

National Association of Home Builders

2026 Hartford ICC Public Comment Hearings Voting Resource

NAHB.org/CodeDevelopment

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National Association
of Home Builders



NAHB's Voting Recommendations for the 2026 PCH Code Change Proposals

This voting resource identifies code change proposals that have significant impact on the housing industry. The National Association of Home Builders encourages Governmental Member Voting Representatives to review the recommended positions and associated reasons before casting votes. The recommended positions are intended to result in new codes that support safe and affordable housing.

This voting resource provides you with key information you need to follow the Public Comment Hearings. Code change proposals are listed in numerical order and include all public comments submitted for each proposal. NAHB's recommended action for each possible motion is color-coded and a supporting reason statement is included. NAHB has also identified critical code changes (shown in **bold**) that will have a serious impact on the enforcement and adoptability of the codes.

How to use this resource: When the moderator calls for the Proposal, look to the center column titled "Recommended Action & Vote" to see the NAHB recommendation for each Proposal and position on the Public Comment(s). For example, NAHB would like the Standing Motion of Disapprove to be overturned for F110 and then be "Approved as Modified by Public Comment 1" as indicated.

International Fire Code

Prop #	Proposal/Comment Description	Recommended Action & Vote	Reason Statement
F110	Proposal would strike limited combustible and add reference to Section 703.3.1 for noncombustible materials and provide a 15-minute thermal barrier rating.	Oppose Standing Motion (D) Support (AMPC 1)	Unnecessarily adds reference to Section 703.3.1 of the IBC. Maintains the terms thermal barrier rating.
PC 1	This proposal attempts to clarify construction provisions for bathrooms that do not exceed 55 square feet.	Support	Removes the terms limited combustible and thermal barrier rating, because they are not otherwise referenced in the IBC. Lists bathrooms with the current exceptions.
PC 2	This proposal rewords the IBC and IFC sections to reference covering walls with ½ gypsum or equivalent in bathrooms that do not exceed 55 square feet.	Neutral	

Note: NAHB has a "neutral" position on those proposals not listed in this document.

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International Wildland-Urban Interface Code

Prop #	Proposal/Comment Description	Recommended Action & Vote	Reason Statement
WUIC11	This proposal replaces Section G101.3.1 on exterior sprinkler systems with new language detailing the purpose, components, operation and potential benefits of such systems.	Support (AMPC 1) or (AMC 2) or Support (D)	The approved language describes these systems as an additional level of protection, not as a replacement for the IWUIC's construction requirements. It acknowledges the lack of a consensus standard for these systems.
PC 1	Replaces the approved language with a new paragraph that removes the sentence stating there have been numerous installations which have proven their effectiveness in protecting against flying embers.	Neutral	
PC 2	Requests Disapproval.	Neutral	
WUIC12	This proposal moves the section on Fire Protection Plans from Chapter 4 to Chapter 6 and expands the details on the project information required to be provided. The plan must be prepared by a registered design professional, qualified landscape architect, qualified fire safety specialist, or similar qualified professional.	Support Standing Motion (D)	Much of the required information would be on a typical site plan, but the proposal requires a separate and duplicative plan. There are also concerns requiring legally binding statements on other parties the design professional or specialist have no control over. No estimate of the cost for a specialized professional to prepare preliminary and final plans is provided.
PC 1	Modifies the option to retain a qualified landscape architect or fire safety specialist and just says they need to be approved. Removes language stating that the owner's authorized agent can provide the fire protection plan.	Oppose	Clearly stating an owner's authorized agent (e.g., an architect, engineer or other professional) can act on the owner's behalf to provide a required document is common throughout the I-codes. The public comment does not address the other issues with the proposal.
WUIC22	Proposal removes "water supply" as a criterion for determining the ignition rating of exterior building products from table 503.1. The proposal attempts to eliminate the confusion between the table and chapter 4, as chapter 4 requires a water supply for all structures constructed in the WUIC.	Support Standing Motion (AMC 2)	The proposal resolves a conflict that Table 501.3 allows for a nonconforming water supply if the construction class is increased to the next higher class but the IWUIC itself applies to new construction and requires an adequate water supply per Chapter 4.
PC 1	Requests Disapproval.	Oppose	
WUIC26	This proposal modifies Section 503.2.4 on ignition-resistant building materials to specify paints, coatings and stains are not approved methods of protection.	Support (D) or Support (AMPC 1)	There are products tested to ASTM E84 or UL 723 with evaluation reports that could comply with 503.2.4, some of which could be used on materials other than wood. This code change would not only prohibit those products from being approved under the base code but would also remove their ability to demonstrate equivalency through the standard alternate means and methods process.
PC 1	Removes the prohibition on fire-retardant paints, coating, stains, or other surface treatments but requires they be tested for weathering per ASTM D2898.	Support	The comment addresses concerns that exterior fire-retardant treatments need to meet weathering requirements and allows for alternative means of demonstrating compliance.

* Significant proposals are in bold

WUIC36	The proposal reorganizes Section 504.5 on exterior walls to create a section on exterior wall assemblies requiring 1-hour fire ratings and protection of exposed bottom edges of sheathing and a section on exterior wall coverings allowing noncombustible materials, fire-retardant-treated wood or ignition-resistant building materials. Buildings with non-conforming defensible space have to meet both criteria.	Support Standing Motion (D)	The proposal requires the exterior surfaces of log walls be covered with noncombustible cladding if the site lacks defensible space. This wrecks the aesthetics of a log home and significantly increases the cost. The requirement for protecting the bottom of exposed sheathing with Z- or U-flashing may conflict with building code requirements for drainage.
PC 1	Deletes the definitions for Exterior Surfaces and Exterior Wall and requirements to protect the exposed bottom edge of combustible sheathing and modifies the proposal to require exterior wall coverings be ignition-resistant materials.	Oppose	The IBC and IRC define exterior wall coverings as everything outboard of the structural wall sheathing or structural framing. This change would therefore require water-resistive barriers and continuous insulation be ignition-resistant as well as the outermost veneer or cladding.
WUIC37	The proposal modifies the exception from underfloor enclosures per Section 504.6 to create separate provisions for conforming and non-conforming defensible space. Where defensible space is nonconforming, the exception applies only if the underside of exposed floors and framing members are protected with 1-hour rated construction and the exterior surfaces are noncombustible, fire-retardant-treated wood or ignition-resistant building materials.	Support Standing Motion (D)	Both exceptions are very awkward. Literally the language specifies what the "underside" of an exposed floor should be protected with, but if fire-rated construction is used you're talking about the entire floor assembly. The cost impact statement is insufficient as it lacks any sort of quantification of the potential costs.
PC 1	Modifies the proposal to break out the option to protect exposed floors or exposed structural columns, beams and supporting walls by constructing them with heavy timber or log wall construction to a separate item.	Oppose	The public comment conflicts with WUIC40 (on the consent agenda) that changed "protected with" to "constructed with". By deleting and replacing the entire exception it's also possible the requirement for 6" of flashing or noncombustible material up from grade added by WUIC39 (also on the consent agenda) gets lost.
WUIC42	The proposal modifies Sections 504.7 and 504.8 on appendages and projections to move 1-hour rated and heavy timber construction to the numbered list of options and add a new option for protecting the exterior walls to which the structures are attached with 1-hour rated construction and ignition-resistant materials.	Oppose Standing Motion (D) Support (AS)	The proposal may better address construction of attached decks from a moisture protection perspective than other proposals. Builders are used to constructing 1-hour rated walls for sites with limited fire separation distance.
PC 1	Revises the proposal to apply the enhanced requirements to exterior walls within 5 feet of the accessory structure or projection. Glazing and doors need to have 45-min fire protection ratings.	Oppose	Steel doors and aluminum windows may be needed to meet the 45-min rating, and that will present energy code issues. Just pointing to the performance requirements for vents may create issues for kitchen and dryer exhaust vents and other ventilation openings that aren't soffit or foundation vents.
WUIC44	This proposal modifies Sections 504.7.1 and 505.7.1 to require all underfloor areas of unenclosed accessory structures and projections from habitable buildings be enclosed or protected with noncombustible or ignition-resistant materials or fire-retardant-treated wood and adds similar new similar requirements to Section 506.	Support (AMPC 1) or Support (AMC 2)	The proposal enhances protection requirements for underfloor areas of unenclosed accessory structures and projections. The approved committee comments clarify the space does not have to be enclosed with an entire exterior wall assembly as well as clarifying where and how the requirement for 6" of noncombustible material up from grade is provided.
PC 1	Revises the proposal to editorially correlate the exceptions to 504.7.1 and 505.7.1, change the title of 506.6 to Attachments, and add an option to 506.6.1 for enclosing underfloor areas with any material permitted for exterior wall construction.	Support	The comment provides consistency, alignment with approved language in WUIC39 and WUIC41, both of which are on the consent agenda, and improves clarity in underfloor area requirements

* Significant proposals are in bold

WUIC48	This proposal modifies Sections 504.10 and 505.10 on vents to delete the detailed lists of ventilation openings.	Support Standing Motion (AMC 2)	The proposal as approved with committee modifications focuses the requirement to protect ventilation openings on attic and underfloor ventilation openings versus other vents and openings such as intake and exhaust openings for HVAC that are connected to metal ducts or dryer and kitchen exhaust vents which are required to have dampers.
PC 1	Modifies the proposal to clarify the prescriptive and performance requirements for ventilation openings can be followed where applicable.	Oppose	Together with the public comment on WUIC51 this would require gable and dormer end vents and foundation vents be listed products tested to ASTM E2886 instead of being able to use the prescriptive option for 1/8" noncombustible mesh.
WUIC51	This proposal modifies Sections 504.10, 505.10 and 506.5 to delete language limiting ventilation openings to horizontal or vertical surfaces and limiting the size of such openings to 144 square inches.	Support Standing Motion (AMC 2)	Testing from IBHS that showed vents on top of a sloped roof could be adequately protected even with just 1/8" noncombustible mesh. Removing the area limitation reduces the total number of individual vents required in wildfire areas and would help allow more use of traditional vented attics rather than forcing builders towards unvented attics.
PC 1	Modifies the proposal to limit the prescriptive option to protect ventilation openings with 1/8" noncombustible mesh to openings on a sloped roof or roof ridge.	Oppose	This would require gable and dormer end vents and foundation vents be listed products tested to ASTM E2886 instead of being able to use the prescriptive option for 1/8" noncombustible mesh.
WUIC53	This proposal renames Section 503 to Wildland Construction and Material, deletes Table 503.1 defining the classes of construction, and states ignition-resistant building materials shall be designed for exterior use. Compliance with Section 504 for Class 1 construction is required for all structures.	Support Standing Motion (D)	The code should not impose a one-size-fits-all standard for wildfire-resistant construction. Some buildings may only be exposed to embers, not direct flame contact. The costs are way understated; the actual cost impact could be tens of thousands of dollars.
PC 1	Requests Approval as Submitted.	Oppose	
PC 2	Requests Disapproval.	Support	
WUIC54	This proposal retitles Section 504 as Construction Methods for Exterior Wildfire Exposure and makes numerous changes including adding new provisions for roof covering gaps, protection of open eaves, and exterior wall coverings. Acceptance criteria for tests to ASTM E2957, E2632, E2726 and E2707 are added.	Oppose Standing Motion (AMC2) Support (D)	The code should not impose a one-size-fits-all standard for wildfire-resistant construction. Some buildings may only be exposed to embers, not direct flame contact. The costs are way understated; the actual cost impact could be tens of thousands of dollars. Numerous provisions are poorly written and use colloquial terms such as "bird stops", "mudded", and "boxed-in" that are not used elsewhere in the model I-Codes. Approval of WUIC54 would over-write technically justified, appropriately targeted improvements the IFC committee passed and which are on the consent agenda.
PC 1	Modifies Section 504.2.1 on roof covering gaps to delete the requirement the ASTM D3909-compliant cap sheet be "72-pound" material.	Support	The language being deleted contains an outdated designation for the cap sheet. Proposal WUIC31 removed the outdated language, was approved unanimously by the IFC committee, and is on the consent agenda.

* Significant proposals are in bold

PC 2	Modifies Section 504.5 on exterior walls to separate the option to use log wall construction for exterior walls from the option to use a wall assembly tested to ASTM E2707.	Support	The comment fixes an error that was made by CALFire/CAL FPO while entering WUIC54 into cdpACCESS California Building Code Section 7A wildfire requirements list log wall construction and wall assemblies tested to ASTM E2707 as separate options for exterior walls.
PC 3	Modifies Section 504.5 on exterior walls to separate the option to use log wall construction for exterior walls from the option to use a wall assembly tested to ASTM E2707.	Support	The comment fixes an error that was made by CALFire/CAL FPO while entering WUIC54 into cdpACCESS California Building Code Section 7A wildfire requirements list log wall construction and wall assemblies tested to ASTM E2707 as separate options for exterior walls.
PC 4	Adds an option to Section 504.7.3.2 on decking surfaces to allow the use of decking materials tested to ASTM E2632 if the exterior wall coverings where the deck is attached are noncombustible or ignition-resistant materials.	Support	The comment adds an option that is included in the California Building Code Chapter 7A requirements and that CALFire/CAL FPO had intended to include in WUIC54.
PC 5	Clarifies the charging language of Section 504.2 related to roof assembly fire testing per ASTM E108 or UL 790 and adds ASTM D4869 Type IV underlayment as an option under slate roofs on combustible decks.	Neutral	The comment correlates the requirements of WUIC54 related to roof assemblies with proposal WUIC31 that was approved unanimously by the IFC committee and is on the consent agenda.
PC 6	Replaces Section 504.2.1 on roof covering gaps with a new section on flame and ember protection at eaves that removes the specification the cap sheet be 72-pound material and specifies fireblocking the space between the roof covering and roof deck.	Support	The comment correlates the requirements of WUIC54 related to spaces between a roof covering and roof deck with proposals WUIC30 and WUIC32 which were approved unanimously by the IFC committee and are on the consent agenda.
PC 7	Modifies Section 504.2.2 on roof valley flashing to delete the requirement the ASTM D3909-compliant cap sheet be "72-pound mineral-surfaced nonperforated" material.	Support	The comment correlates the requirements of WUIC54 related to roof valley flashing with proposals WUIC29 and WUIC32 which were approved unanimously by the IFC committee and are on the consent agenda.
PC 8	Modifies Section 504.10 on ventilation openings to focus on enclosed attic and rafter spaces or underfloor vents, require gaps around listed and tested vents be sealed and remove the prohibition on vents in soffits and eave overhangs.	Support	The comment correlates the requirements of WUIC54 related to ventilation openings with several proposals approved by the IFC committee. Allowing properly protected eave and soffit vents helps permit the use of traditional ventilated roofs that can be more cost-effective than unvented roofs.
PC 9	Modifies Section 504.10.2 on off-ridge and ridge vents to require they be constructed entirely of noncombustible material	Oppose	The comment would require every single component of a vent including fasteners, spacers, insulation, sealing material, etc. be noncombustible even if they are enclosed or protected by noncombustible other components.

* Significant proposals are in bold

PC 10	Modifies Section 504.10 to create separate requirements for ventilation openings in vertical and horizontal surfaces, along a roof ridge, and in a sloped surface.	Oppose	Where the prescriptive option is allowed, every single component of a vent including fasteners, spacers, insulation, sealing material, etc. be noncombustible even if they are enclosed or protected by noncombustible other components. The prohibition on eave and soffit is maintained, which could force builders to use unvented roofs.
PC 11	Modifies Section 504.5 to require exterior walls be 1-hour rated construction, noncombustible materials, heavy timber or log wall construction, or assemblies tested to E2707. Revises Section 504.5.1 to point to Section 503.2.	Neutral	
PC 12	Modifies Section 504.3 to point to the sections for noncombustible and ignition-resistant materials and fire-retardant-treated wood and remove the section on protection of open eaves.	Support	The comment removes duplicative requirements as most of the options for enclosed eaves also apply to open eaves. The comment removes a reference to the Gypsum Association Fire Resistance Design Manual which is not developed through a consensus standards process.
PC 13	Modifies Sections 504.7, 504.7.1 and 504.7.3.2 to point to the sections for noncombustible and ignition-resistant materials and fire-retardant-treated wood. Deletes the requirement for testing decking to ASTM E84 or UL 723 if tested to ASTM E2632.	Support	The comment removes a reference to the Gypsum Association Fire Resistance Design Manual which is not developed through a consensus standards process.
PC 14	Modifies Section 504.9 on exterior doors to remove an option to test the exterior surface to ASTM E2707.	Support	ASTM E2707 is used to test wall assemblies rather than fenestration. The option is not necessary as exterior doors that can meet the remaining options are commonly available.
PC 15	Modifies sections related to roof assemblies, exterior walls, attachments and projections, exterior glazing, garage doors and ventilation openings to coordinate with other approved proposals.	Oppose	The comment retains the 72-pound cap sheet language that was removed by other proposals, does not remove colloquial language, and incorrectly points to roof assembly fire classification requirements for fire-retardant wood shakes and shingles used as wall coverings.
PC 16	Requests Approval as Submitted.	Oppose	Approving the proposal as originally submitted would undo even the modest attempt by the proponents to resolve some of the myriad issues that was approved at CAH #2.
PC 17	Requests Disapproval.	Support	
WUIC55	This proposal deletes Sections 505 and 506 on Class 2 and Class 3 Ignition-Resistant Construction with no replacement.	Support Standing Motion (D)	The code should not impose a one-size-fits-all standard for wildfire-resistant construction. Some buildings may only be exposed to embers, not direct flame contact. The costs are way understated; the actual cost impact could be tens of thousands of dollars.
PC 1	Requests Approval as Submitted.	Oppose	
PC 2	Requests Disapproval.	Support	

* Significant proposals are in bold

WUIC60	This proposal retitles Section 603 to Vegetation Plan and replaces the existing fuel modification provisions with new provisions covering landscape plans, fire-smart vegetation, planting of shrubs, and planting and management of trees, within a 30-foot perimeter of the house.	Support (AMPC) or Support (D)	The proposal contains inappropriate commentary language in new Section 603.3 relating to fire hazard reduction benefits and in the Exception to 603.4.2.1 relating to transmitting fire and interrupting the advance of embers. The proposal would require site plans under the IBC for IRC-scope projects, and it is noted the IBC and IRC just refer to a "site plan", not a "construction site plan."
PC 1	Deletes language requiring the landscape plan provide significant fire hazard reduction benefits for public and firefighting safety, clarifies site plan requirements, and clarifies vegetation requirements.	Support	The deleted language on fire hazard reduction benefits is commentary and not enforceable. The change from "construction site plan" to "site plan" and associated changes correlates site plan requirements with the IBC and IRC.
PC 2	Requests As Modified by Committee	Oppose	The comment does not fix the issues with the language addressed by the NAHB comment.
WUIC71	This proposal modifies Appendix C to replace the Fire Hazard Severity Form with new provisions for a Community WUI Hazard Evaluation Framework.	Support Standing Motion (D)	The new provisions are commentary and guidance more suited for a resource document than a code. While it has flaws, the existing form has been successfully used (in some cases with modifications) by communities to evaluate fire hazard severity.
PC 1	Restores the existing Fire Hazard Severity Form and moves the proposed Community WUI Hazard Evaluation Framework to a new Appendix J.	Oppose	The comment does not address the issue that the proposed framework is more appropriate for a guide rather than a code.

International Fire Code

Prop #	Proposal/Comment Description	Recommended Action & Vote	Reason Statement
F45	This proposal attempts to delete the current requirements for posts and other barriers and replace with all of chapter 12 requirements for ESS protection in garages.	Oppose Standing Motion (AMC) Support (D)	Addressing ESS safety requirements along with "features, appliances, or equipment" captures a number of building elements that do not carry the same risk as an ESS. What the committee approved in CAH2 brings in IRC-scoped buildings which violates IFC Section 102.5.
PC 1	Replaces the requirements from the original proposal and adds requirements for ESS installed in the path of turning vehicles.	Oppose	Claims without evidence that addressing vehicle's "normal driving path" is not sufficient and removes wheel barriers as a code-recognized option. Conflicts with the IRC.
F74	Proposal adds an exception to allow the use of NFPA 1142 or WUIC where adopted.	Support Standing Motion (D)	If a locality has adopted NFPA 1142 or the IWUIC as required by this proposal, they wouldn't need the exception to use them. 507.1 currently allows consideration of alternatives.
PC 1	This proposal allows the use of NFPA 1142 or where adopted, the IWUIC for alternate water supplies.	Oppose	Already allowed in Appendix B. Removes the options for other alternatives. Allows the use of NFPA 1142 or requires the adoption of the IWUIC only, as alternatives.
F108	Proposal would require an automatic suppression system where the fire area exceeds 500 Sf, when a lithium-ion or lithium metal powered vehicle is present	Oppose Stranding Motion (AMC) Support (D)	Requires sprinklers to be installed in parking garages where lithium-ion or lithium metal powered vehicles are parked or stored, greater than 500 sq feet.
PC 1	Expands the requirement for fire sprinklers to all Group S-2 parking garages.	Oppose	This goes far beyond the scope of the original proposal. The I-Codes do not have to correlate with NFPA 88A.
PC 2	Limits where the new requirements apply, only to new construction.	Neutral	
PC 3	Requests Disapproval.	Support	
F110	Proposal would strike limited combustible and add reference to Section 703.3.1 for noncombustible materials and provide a 15-minute thermal barrier rating.	Oppose Standing Motion (D) Support (AMPC1)	Unnecessarily adds reference to Section 703.3.1 of the IBC. Maintains the term "thermal barrier rating."
PC 1	This proposal attempts to clarify construction provisions for bathrooms that do not exceed 55 square feet.	Support	Removes the terms limited combustible and thermal barrier rating, because they are not otherwise referenced in the IBC. Lists bathrooms with the current exceptions.
PC 2	This proposal rewords the IBC and IFC sections to reference covering walls with ½ gypsum or equivalent in bathrooms that do not exceed 55 square feet.	Neutral	
F162	Proposal introduces post-fire repair and reconstruction requirements. Focuses mostly on fire sprinkler installation in post fire events.	Oppose Standing Motion (AS) and Support (D)	Introduces a beat-the-clock scenario. This concept encourages construction to occur at a rapid rate to avoid the requirement to install a sprinkler system. 25% and 60 days are arbitrary numbers with no technical justification.

* Significant proposals are in bold

PC 1	Changes the proposed damage of greater than 25% to 50% and unoccupancy from 60 days to 180.	Oppose	The PC still supports the concept of beat the clock. While the timeframe is increased it still relies on many things out of the owner's control such as plan reviews and permitting.
PC 2	Changes the proposed damage of greater than 25% to 30% and unoccupancy from 60 days to 180.	Oppose	The PC still supports the concept of beat the clock. While the timeframe is increased it still relies on many things out of the owner's control such as plan reviews and permitting.
PC 3	Requests Disapproval	Support	
F225	Proposal introduces new requirements for temporary detection and notification for all construction greater than 10,000 square feet and three stories in height.	Support Standing Motion (D)	Not enough information provided on how these systems work, function, or how they are maintained and used. No nationally recognized Standards or Listings are included for systems or the products.
PC 1	Adds a new Appendix for Temporary Detection and Notification.	Oppose	Does not reference any nationally recognized listings or standards for equipment, components or systems. Does not prescribe what type of detection devices are required. Requires these systems for buildings being demolished. Requires backup power source.

International Building Code – Fire Safety

Prop #	Proposal/Comment Description	Recommended Action & Vote	Reason Statement
FS10	This proposal limits the fire protection of additional members attached to primary or secondary steel members needing fire protection based on the cumulative footprint of such attachments but extends the protection from 12 to 18 inches.	Support Standing Motion (D)	The added trigger is confusing. Does cumulative mean the designer needs to total up the area of all the attachments? No justification has been provided for extending the protection to 18 inches.
PC 1	Requests Approval as Submitted.	Oppose	
FS35	This proposal requires penetrations, joints and voids in occupiable roofs that are horizontal assemblies be protected with firestops or fire-resistant joint systems, or if unrated be protected with materials or systems to prevent fire spread.	Support Standing Motion (D)	As written, if the occupied roof is constructed with an elevated paver system every joint between pavers would need to have a firestop. If the roof is unrated, you would still need to provide firestopping. Further, an occupiable roof is a use, not a structure or an assembly of building components.
PC 1	Requests Approval as Submitted.	Oppose	
FS55	This proposal modifies Section 715.3 to delete the exception from fire-resistant joint systems for joints at the intersection of curtain walls and roofs and modifies Section 715.4 to add roof and roof/ceiling assembly intersections with curtain walls to voids needing perimeter fire containment systems.	Oppose Committee Action (AMC1) Support (D)	The supposed gap is likely enclosed by the roof or parapet assembly. A fire-resistant joint system might be needed but not a perimeter fire containment system.
PC 1	Requests Disapproval.	Support	

* Significant proposals are in bold

International Building Code – General

Prop #	Proposal/Comment Description	Recommended Action & Vote	Reason Statement
G24, Part 1	This proposal revises the IBC and IEBC definitions of “roof repair”.	Support Standing Motion (D)	Concern is around the change from “repair” vs. “reinstallation” and the impact that may have on renovations and building maintenance.
PC 1	Proposes a revised definition of roof repair to establish objective criteria based on damaged, deteriorated or failed components, attempting to clarify distinctions between repair, maintenance and replacement.	Oppose	The existing terms "reconstruction or renewal" appropriately maintain the fully understood concept of a roof repair. The proposed definition is far more limiting than the current provisions.
G24, Part 2	This proposal revises the IBC and IEBC and ISPSC definitions of “repair”.	Support Standing Motion (D)	Concern is around the change from “repair” vs. “reinstallation” and the impact that may have on renovations and building maintenance.
PC 1	Attempts to clarify repair versus maintenance by defining both terms and establishing criteria based on component condition.	Oppose	Asserts the preventive replacement of a component is maintenance, but if the same component is replaced after it fails, it now becomes a repair.
G24, Part 3	This proposal revises the IRC definitions of “repair” and “roof repair”	Support Standing Motion (D)	Concern is around the change from “repair” vs. “reinstallation” and the impact that may have on renovations and building maintenance.
PC 1	Requests revised definitions for repair, maintenance and roof repair to remove circular language, and set criteria based on component condition. Maintains existing Chapter 11 references.	Oppose	Asserts the preventive replacement of a component is maintenance, but if the same component is replaced after it fails, it now becomes a repair.
G34	This proposal changes 303.1.2 to clarify the intent of the provision is that the assembly space is a support space for the main occupancy, such as conference rooms in office buildings and fitness rooms in residential buildings.	Support Standing Motion (AS)	Proposal removes reference to the occupancy needing to be accessory to another occupancy, because some were interpreting that for a small Group A to be reclassified as a Group B, it also needed to comply with the accessory occupancy criteria of Section 508.2, which was never the code's intent.
PC 1	Seeks to require small assembly spaces to be "associated with" another occupancy to avoid misclassification as Group B, prevent unintended multi-assembly uses, and retains existing "part of that occupancy" language.	Oppose	This comment repeats language used in some parts of the IBC (e.g., Section 303.1.3) but it remains vague. “Associated with” is ambiguous. Is it best practice to continue repeating unclear language? For example, if a space includes a Group B space, a Group S-2 space, and a small conference room between them, the phrase provides no clear basis for assigning the conference room to either occupancy. These small conference rooms are low risk, and introducing additional ambiguity offers little benefit.

<p>PC 2 States the term "main occupancy" is unclear and could allow buildings of small assembly spaces to avoid Group A classification.</p>	<p>Oppose</p>	<p>The phrase "accessory to another occupancy" has been misinterpreted to require compliance with Section 508.2 for reclassification, even though reclassification is not dependent on Section 508.2. Referencing the "main occupancy" is consistent with existing Section 508.2 language which has not posed enforcement issues. The example of multiple small assembly spaces is not realistic, as Section 302.1 first classifies the building as Group A. And section 303.1.1 already mandates classification of small buildings and tenant assembly spaces as Group B. The phrase "shall be classified" is mandatory.</p>
<p>G45, Part 2 This proposal revises IFC section 102.5 to state that certain IFC sections apply to residential occupancies. When applying these sections, one-and-two-family dwellings and/or townhouses, built in compliance with IRC, shall be regulated as group R occupancies.</p>	<p>Oppose Standing Motion (AS) Support (D)</p>	<p>The scope of the IFC should not be expanded to include issues already addressed in the IRC. The IRC is designed to be a stand-alone code. No correlation with the IRC.</p>
<p>PC 1 Requests Approve as Submitted.</p>	<p>Oppose</p>	<p>The ICC Board of Directors has previously stated that the IRC is intended to be a stand-alone code, covering all requirements necessary for one- and two-family dwellings and townhouses.</p>
<p>PC 2 Requests Disapproval.</p>	<p>Support</p>	<p>The proposal is counter to ICC Committee Interpretations on this subject, which say that these IFC sections are not applicable in the manner in which they are being applied.</p>
<p>G66 This proposal increases the fire-resistance rating for every open and enclosed parking garage from 2- to 3-hours.</p>	<p>Support Standing Motion (D)</p>	<p>None of the reasons provided in support of the proposal have shown that a catastrophic loss of a parking facility was the result of current fire resistance ratings. An increase in fire resistance ratings from 2- to 3-hours will not eliminate damage requiring repair as the result of a vehicle fire.</p>
<p>PC 1 Increases parking garage fire-resistance ratings from 2- to 3-hours.</p>	<p>Oppose</p>	<p>No technical substantiation was provided showing that the current 2-hour fire resistance ratings have resulted in the catastrophic loss of a parking facility due to vehicle fires.</p>
<p>G116 This proposal increases the fire-resistance rating for parking garages adjacent to group R occupancies from 2- to 3-hours.</p>	<p>Support Standing Motion (D)</p>	<p>None of the reasons provided in support of the proposal have shown that a catastrophic loss of a parking facility was the result of current fire resistance ratings. An increase in fire resistance ratings from 2- to 3-hours will not eliminate damage requiring repair as the result of a vehicle fire.</p>
<p>PC 1 Raises fire-resistance rating of parking garages under Group R to 3-hours.</p>	<p>Oppose</p>	<p>No technical substantiation was provided showing that the current 2-hour fire resistance ratings have resulted in the catastrophic loss of a parking facility due to vehicle fires.</p>

G195, Part 1	This proposal adds the 1200, 1205 and 1210 ICC standards for off-site construction into the code and creates a new section in chapter 31 for modules and modular components.	Support (AMPC 1) or Support Standing Motion (AS)	One obstacle to modular construction is the patchwork of state and local regulation for modular manufacturing and compliance with the building code. This proposal provides a pathway to standardize modular construction by bringing the ICC 1200, 1205 and 1210 off site modular standards into the IBC by reference.
PC 1	Clarifies that off-site construction under ICC/MBI 1205 must include IBC chapter 17 tests and special inspections by making QA manuals mandatory and aligning procedures.	Support	It additionally clarifies that separate inspection processes are not required where the special inspections and tests are incorporated into the in-plant inspection processes. This comment is consistent and compatible with public comment 1 on S107-25.
PC 2	Opposes referencing ICC/MBI 1200, 1205 and 1210 arguing they mandate proprietary ICC/ISO material, violate ANSI and CP#28 rules, limit competition, raise compliance costs and increase housing costs.	Oppose	The points made in the PC reason statement are invalid. There are numerous well-known agencies providing third-party oversight of modular construction, and state-run modular programs that provide regulatory oversight and in-plant inspections.

International Building Code – Egress

Prop #	Proposal/Comment Description	Recommended Action & Vote	Reason Statement
E22	This proposal makes a revision to Footnote a in tables 1006.3.4(1) and 1006.3.4(2) pointing to 903.3.1.3 which has the effect of allowing single exit R-2 occupancies with a 13-D sprinkler system installed provided they have EERO.	Support Standing Motion (AS)	Clarifies that townhouses built under occupancy Group R-2 can have one exit with a 13D sprinkler system installed.
PC 1	Amends previous actions to say only townhouses classified as R-2 can use a 13D system and be built with a single exit.	Oppose	There is a technical error in the public comment. Because section 903.3.1.3 is shown struck out, this PC would prohibit the use of NFPA 13D systems for IBC built townhouses.
E24	Permits a building of up to 4-stories with single exit stairways, and 4 dwellings per story.	Support (AMC)	Housing affordability is at an all-time low, permitting more safe, affordable “Missing Middle” will help fill the housing gap. Buildings permitted with this proposal are limited in number of stories and units per story and are of primarily non-combustible construction.
PC 1	Prohibits doors of dwelling units or elevators from opening directly into the stair shaft enclosure.	Oppose	This additional restriction isn’t necessary for buildings of 4-stories. It is permitted at 3-stories and will add increased cost without any significant improvement in overall building safety.
PC 2	Provides an editorial fix.	Neutral	Is an editorial correction, if this PC is disapproved it can be fixed by CCC committee after the hearings.

* Significant proposals are in bold

	PC 3 Requests disapproval	Oppose	Numerous states are legislatively permitting similar buildings, creating a patchwork of regulation state to state. This proposal was discussed in length during the committee process and was well grounded, limited in height and number of dwelling units and provides other enhancements to maintain safety.
E35	Revises section 1008.3 by removing the square footage requirement for restrooms in other rooms and spaces, to require all public restrooms regardless of size to have emergency means of egress lighting.	Support (AMPC) or Support (D)	The original proposal created unintended consequences in its interpretation as it would apply to gender neutral spaces, or spaces intended for a single occupant, but with two fixtures, such as a men's restroom with a water closet and urinal.
PC 1	Amends previous action to change multi-user to multi-compartment as it relates to requiring emergency lighting in public restrooms. Additionally, it revises bathing and restrooms to say toilet rooms.	Support	Multi-compartment is a better interpretation of the type or restroom this is targeted at. Multi-user could be interpreted to mean any restroom where two people could enter at the same time. The revisions to only using the phrase toilet room also clarifies the intent.
E41	This proposal splits Exception 1 of 1009.2.1 into three separate numbered parts. It adds to the list allowing an occupied roof to be excepted from using an elevator as an accessible means of egress when it is served by interior exit stairways or ramps.	Support (AMC)	Clarifies current exceptions for elevator standby power and what is required when the elevator serves an occupied roof.
PC 1	Includes edits and revisions addressing committee and other comments to the proposal addressing when an elevator requires backup power for an occupied roof above a 4th story.	Support	Narrows and clarifies the scoping for the group of exceptions, clarifying it is for when elevator standby power isn't required. Whereas the original proposal said the exception applied to its use as part of an accessible means of egress.
E71	This proposal adds a new Exception 2 to 1011.7.1 addressing the open ends of treads where open risers are permitted.	Support (AMC)	Provides parameters for when it's desired that stair treads do not extend entirely to an abutting wall.
PC 1	Requests Approval as Submitted.	Oppose	The language as offered isn't clear, it may be difficult to enforce. The proposal refers to "open ends of treads" when what is meant is that the tread doesn't fully extend to the wall or guard, leaving a gap between the tread's end and the wall.
E73	This proposal adds two new sections requiring egress path markings and contrasting stripes on the leading edges of egress stairways, with exception for those fully inside dwelling units.	Oppose Standing Motion (AMC) Support (D)	Following CAH 2 it was realized that the text as written will be difficult to enforce.
PC 1	Provides clarifying language on the placement and position of stairway marking treads.	Oppose	Support PC 3 for disapproval.
PC 2	Provides clarifying language on the placement and position of stairway marking treads.	Oppose	Support PC 3 for disapproval.
PC 3	Requests Disapproval.	Support	The language regarding the size and specific placement is not clear and will be difficult to enforce. They will be difficult to implement on all stairway types and costly to maintain.

E117	This proposal adds a third exception clarifying that Groups R-2, R-3 or R-4 occupancies containing Accessible, Type A or Type B Units, including accessory occupancies in accordance with Section 508.2 shall be provided with no fewer than one accessible public entrance.	Support Standing Motion (AS)	Proposal aligns the number of required accessible entrances for Groups R-2, R-3 or R-4 occupancies containing Accessible, Type A or Type B Units with the minimum federal requirement.
PC 1	Further modifies the original proposal by adding text "that is a primary entrance" to Exception 3 in 1105.1.	Oppose	The proposal introduces the term "primary entrance" which is not a defined code term. The phrase is subjective and will lead to inconsistent interpretation and misapplication in the field.
PC 2	Replaces Accessory Occupancy language with Common Use, arguing the latter is a more applicable term.	Oppose	Narrows the scope by replacing "accessory occupancies" with "common use areas", excluding spaces intended for public use. As defined, common use areas are limited to service rooms, spaces or elements not for public use, whereas accessory occupancies included shared spaces that may be accessed by the public. This creates ambiguity, for example, whether apartment hallways are "not for public use" despite regular visitor access.
E119	This proposal adds a new section 1106.3.1 clarifying that parking spaces provided for persons other than residents serving R-2, R-3 and R-4 are not intended to be included in the parking calculations for residential parking on section 1106.3.	Support (AMPC) or Support Standing Motion (AS)	With the revisions made at CAH 2 this proposal clarifies that parking serving other facilities that are part of R-2, R-3 or R-4 developments are calculated in accordance with Section 1106.2.
PC 1	Revises language approved at CAH 2 to use defined terms common use and public use for parking in R-2, R-3 and R-4.	Neutral	Comment takes a slightly different approach to clarifying the same intent, that parking serving other portions of a residential development, such as parking serving the business offices is calculated according to Section 1106.2.
E120	This proposal adds and edits multiple sections of 1107 to regulate EV charging stations.	Support Standing Motion (AMC2) or Support (AMPC 3) or (AMPC 4)	Regulates EV charging spaces by providing scope when accessibility is required and points to A117 for technical requirements.
PC 1	Revises Section 1107.2.2.1 which controls accessible routes between EV charging and building entrances.	Neutral	
PC 2	Intends to simplify the language of 1107.2.1 addressing the minimum number of EV charging spaces required on a site.	Neutral	
PC 3	Deletes the language in 1112.1 requiring signage that says "use last" language for signage required at accessible EV charging stations.	Support	The proposed "use last" signs attempt to regulate common courtesy rather than enforceable behavior. Use last instructions are subjective and invite inconsistent interpretation creating confusion for both users and enforcement bodies. Such ambiguity will likely result in unintended consequences when enforcement is attempted.
PC 4	Deletes the language in 1112.1 requiring signage that says "use last" language for signage required at accessible EV charging stations.	Support	The proposed "use last" signs attempt to regulate common courtesy rather than enforceable behavior. Use last instructions are subjective and invite inconsistent interpretation creating confusion for both users and enforcement bodies. Such ambiguity will likely result in unintended consequences when enforcement is attempted.

PC 5	Changes Electrical to Electric when describing EV charging statements. Also, revises the language used to count EV charging spaces for purposes of determining the minimum number required to be accessible.	Neutral
PC 6	Moves the language "Accessible electric vehicle charging station signs shall include "Accessible EV Charging - Use Last"." to 1112.4 Other signs.	Neutral

International Building Code – Structural

Prop #	Proposal/Comment Description	Recommended Action & Vote	Reason Statement
S2	This proposal adds reference to new ASTM practice for on-site inspection of spray-applied fire-resistive materials and removes language duplicated in ASTM E605 and E736.	Support Standing Motion (D)	The concerns raised by NAHB have not been addressed in the completed standard.
PC 1	Replaces the ASTM work item number with reference to the completed ASTM E3430-25.	Oppose	The concerns raised by NAHB have not been addressed in the completed standard.
S4	This proposal adds new requirements for special inspection of board and wrap fire-resistive materials based on a new ASTM standard.	Support Standing Motion (D)	The draft standard conflicted with IBC 1704.2.1 on who can act as a fireproofing inspector and only covered listed designs and judgments. The IBC 721 prescriptive designs and IBC 722 calculated methods were not included. This could lead to disputes in the field over what requires special inspection. No justification was provided for requiring a special inspection for standard Type X gypsum board.
PC 1	Replaces the ASTM work item number with reference to the completed ASTM E3430-25.	Oppose	The concerns raised by NAHB have not been addressed in the completed standard.
S5	This proposal replaces the reference to AWCI 12-B for special inspections and tests for intumescent fire-resistive materials with a reference to a new ASTM practice.	Support Standing Motion (D)	The draft standard conflicted with IBC 1704.2.1 on who can act as a fireproofing inspector and only covered listed designs and judgments. The IBC 721 prescriptive designs and IBC 722 calculated methods were not included. This could lead to disputes in the field over what requires special inspection.
PC 1	Replaces the ASTM work item number with reference to the completed ASTM E3432-25.	Oppose	The concerns raised by NAHB have not been addressed in the completed standard.

* Significant proposals are in bold

S55	The proposal revises Table 1604.5 to assign battery energy storage systems providing services to a to Risk Category IV power-generating facility with a 20 MW or greater capacity or any such systems capable of storing more than 80 MWh of total energy to Risk Category IV. Such systems can be assigned to Risk Category II if a plan is submitted to provide an alternative energy source to consumers within one hour if a failure occurs due to wind, earthquake, snow, flood or tornado.	Support (D) or Support (AMPC 1)	The proposed new exception is not directly connected to the added requirements for battery energy storage systems in Risk Category IV, which leaves an opening for a misinterpretation that they otherwise should be classified as Risk Category III even if not explicitly listed.
PC 1	Modifies the exception to clarify it applies to battery energy storage system facilities listed under Risk Category IV in Table 1604.5.	Support	The comment clarifies the exception applies only to battery energy storage facilities required to be classified as Risk Category IV. Such facilities can otherwise be classified as Risk Category I, II or III if they meet or are associated with the occupancies and uses listed in those categories.
S63	The proposal creates a new Section 1604.5.3 for energy storage systems (ESS) that assigns systems associated with Group R-3 buildings and more than 10 feet from a property line to Risk Category I, systems that serve a bulk-power grid and not associated with other buildings to Risk Category II, and other systems serving buildings to the Risk Category for the building they are associated with.	Oppose Standing Motion (D) Support (AS) or Support (AMPC 1)	Potential cost savings for residential buildings constructed to the IRC if they meet the property line limitation; this would result in such systems being classified as Risk Category I rather than Risk Category II. Systems serving multifamily buildings would be classified as Risk Category II, which most multifamily buildings already are.
PC 1	Modifies the proposal to clarify the risk category assignments only apply to photovoltaic or energy storage systems support structures not assigned to Risk Category III or Risk Category IV by Section 1604.5.	Support	The public comment maintains the language allowing energy storage systems associated with a dwelling to be assigned to Risk Category I.
S85	The proposal modifies Section 1607.14.3 on roof live loads for photovoltaic panel systems and adds a new Section 1607.14.4 specifying a 10 pound per square foot live load for uncovered open frame roof structures.	Support (AMPC 1) or (AMC 2) or Support (D)	The proposal addresses the lack of clarity about what was meant by "the horizontal clear space between the panel supports". The approved committee modification explicitly deletes an unjustified live load requirement for uncovered open-frame roof structures for which no substantiation was provided.
PC 1	Modifies the proposal to specify where the clear height under all portions of PV panels is 24 inches or less and the horizontal distance between rows of PV panels is 18 inches or less, roof live loads also need not be applied between the rows.	Support	The comment provides an additional clarification intended to prevent overly conservative design of roofs with photovoltaic systems.
S95	The proposal adds a new Section 1611.2 on design of roof drains specifying such design shall comply with the requirements of the International Plumbing Code. Section 1101.7 of the IPC is modified to specify roofs themselves shall be designed for the rain load in accordance with the International Building Code.	Support (AMPC 1) or Support Standing Motion (AS)	The proposal appropriately differentiates between the ponding check and the design of the roof drainage system, and deletes a confusing, run-on sentence. The rainfall intensities from NOAA Atlas 14 are incorporated into the ASCE Hazard Tool.
PC 1	Modifies the proposal to state rainfall intensities shall be as specified by the jurisdiction or an approved source rather than referring to the ASCE Hazard Tool.	Neutral	

S97, Part 2	The proposal modifies numerous IBC sections to state "flood hazard areas" include special flood hazard areas and 500-year floodplains. A new Section 1612.3.1 states the elevation of the design flood determined in accordance with ASCE 24 is the design flood elevation that determines elevation requirements as a function of Flood Design Class.	Oppose Standing Motion (AS) Support (AMPC 1)	The change extends flood resistant design requirements for multifamily buildings and dwellings constructed to the IBC to the 500-year floodplain and requires residential buildings be raised to a 500-year flood elevation. Unlike other environmental hazards where changes in requirements mainly impact the size of structural members, length of shear walls, or perhaps changes in cladding or roofing material, this change fundamentally affects how space in a multifamily building can be used.
PC 1	Requires Group R-2 and R-3 buildings only need be elevated to the 100-year base flood elevation plus 1 foot.	Support	The comment would limit flood resistant construction requirements for single-family dwellings constructed to the IBC and multifamily buildings to the special flood hazard areas (100-year floodplain) mandated under the NFIP. It is noted these buildings cannot use dry floodproofing methods and must have their lowest floor elevated.
S97, Part 3	The proposal modifies numerous IBC Appendix G sections to state "flood hazard areas" include special flood hazard areas and 500-year floodplains.	Oppose Standing Motion (AS) Support (D)	Appendix G is intended as a floodplain management ordinance that communities who want to join the NFIP but don't want to write their own ordinance can adopt. The changes increase the number of permit records a jurisdiction needs to maintain permanently, and burdens owners in the 500-year floodplain with an additional application process to the floodplain administrator.
PC 1	Requests Disapproval	Support	
S97, Part 4	The proposal modifies numerous IEBC sections to state "flood hazard areas" include special flood hazard areas and 500-year floodplains.	Oppose Standing Motion (AS) Support (AMPC 1)	Extending flood resistance requirements out to the 500-year floodplain and elevation affects the ability of building owners to remodel and upgrade their building for reasons other than flood, including making improvements to resist wind, snow, rain and seismic hazards or improve fire safety.
PC 1	Exempts Group R-2 and R-3 buildings in 500-year floodplains from substantial damage and substantial improvement requirements.	Support	This would allow more residential properties in lower income communities to be renovated and to be retrofitted for increased resilience to wind, seismic or snow loads without triggering flood elevation requirements.

* Significant proposals are in bold

S97, Part 6	The proposal adds definitions for 500-Year Floodplain, Base Flood, Base Flood Elevation, Design Flood, Design Flood Elevation, Flood Hazard Area, and Special Flood Hazard Area to the IRC.	Support Standing Motion (AM) or Support (D)	NAHB is opposed to extending the NFIP minimum construction standards (or more) out to the 500-year floodplain and elevation. The cost estimate is several times higher than stated by the proponents. In lower-income communities, extending substantial damage/improvement requirements to the 500-year floodplain could discourage upgrading an existing house including discouraging retrofits to increase its resistance to wind, snow, wildfire or other hazards.
PC 1	Adds a definition for 500-Year Floodplain and adds the 500-year floodplain into the definition for Flood Hazard Area.	Oppose	Together with the proponents' comment on S97 Part VI this would restore the requirement to elevate new homes to a 500-year elevation and extend flood resistance requirements to the 500-year floodplain, with significant cost and design impacts.
PC 2	Supports As Modified by Committee (AMC1)	Support	
S97, Part 7	The proposal modifies numerous IRC sections to state "flood hazard areas" include special flood hazard areas and 500-year floodplains. A new Table R306.1.4 is added for determination of the 500-year elevation. Section R306.2.2 is revised to require an exterior door at the top of stairs providing access to the building.	Support Standing Motion (D)	NAHB is opposed to extending the NFIP minimum construction standards (or more) out to the 500-year floodplain and elevation. The cost estimate is several times higher than stated by the proponents. In lower-income communities, extending substantial damage/improvement requirements to the 500-year floodplain could discourage upgrading an existing house including discouraging retrofits to increase its resistance to wind, snow, wildfire or other hazards.
PC 1	Restores 500-year flood provisions. A list of methods for determining the elevation replaces a table. Limits substantial damage and substantial improvement requirements to the 100-year floodplain. Removes the exterior door required at the top of stairs.	Oppose	The comment removes an egregious requirement for an exterior door at the top of a stair within a permanent flood-resistant enclosure and reduces the burden on existing houses outside the regulatory 100-year floodplain. However, NAHB remains generally opposed to 500-year floodplain and flood elevation requirements due to the cost and design impacts.
PC 2	Requests Disapproval.	Support	
S102	The proposal modifies Section 1613.2 to specify where Site Class DE, E or F soils are present and the site is located in the conterminous United States east of -105 degrees longitude, the Seismic Design Category shall be determined in accordance with ASCE 7-16.	Support Standing Motion (D)	Other than perhaps limiting plain concrete shear walls it is not clear what the big benefit is forcing areas back to SDC B or C, especially in a part of the country where wind may govern the design. The change is not editorial, it is a technical change and will increase cost if an affected state or jurisdiction has adopted and is enforcing the 2024 IBC (and thus ASCE 7-22).
PC 1	Replaces the proposal with one modifying ASCE 7-22 to specify the spectral response accelerations for Seismic Design Categories DE, E and F sites in the Central and Eastern US be taken as not less than those identified for Site Class D sites.	Oppose	The modifications should have been limited to those locations where the seismic design category (SDC) decreased two steps (e.g., SDC D to SDC B) or where the increase in seismic design forces exceeded 20%. The standard 6-year updates to the USGS Seismic Hazard Model typically increase spectral response accelerations by 10%-20% in many locations yet those increases are not pushed ahead of ASCE 7 adopting the updated model.

* Significant proposals are in bold

S107	The proposal adds a new Section 1704.2.5.2 exempting modular construction done in a plant complying with the QA/QC provisions ICC 1200 and 1205 from special inspections during fabrication.	Oppose Standing Motion (D) Support (AMPC 1) or (AMPC 2) or Support (AS)	The 3rd-party inspection program and enforcing agency oversight defined in ICC 1205 plays the same role as a special inspection program would. As modular components could come from a factory in a different state or region than the project being constructed, a modular manufacturing plant should be able to obtain a similar exemption from needing a parallel set of 3rd-party special inspections as exists for fabricated items.
PC 1	Replaces the proposal with one stating the Chapter 17 special inspection and test requirements can incorporated into the inspection processes specified in ICC 1205 for modular construction. The inspectors must provide a certificate of compliance.	Support	Allows special inspections and tests to be incorporated into the existing 3 -party oversight process established by ICC 1205 instead of requiring a separate, parallel set of 3rd-party special inspections, provided they are equivalent to those required by Chapter 17. The primary difference from Comment #2 is the explicit requirement for the inspectors to provide a certificate of compliance.
PC 2	Replaces the proposal with one stating for modular construction per Section 3115 special inspections and tests required by Section 1705 are permitted to be conducted as part of the inspection and approval processes specified in ICC 1205.	Support	Allows special inspections and tests to be incorporated into the existing 3 -party oversight process established by ICC 1205 instead of requiring a separate, parallel set of 3rd-party special inspections, provided they are equivalent to those required by Chapter 17.
S138	The proposal modifies Section 1901.3 on anchoring to concrete to permit using the 2022 edition of ACI 355.2 and the 2021 edition of ACI 355.4 for seismic qualification of post-installed anchors.	Oppose Standing Motion (D) Support (AMPC) or Support (AS)	Previous experience with ACI 318 anchorage requirements and seismic qualification of post-installed anchors suggested the resulting requirements were overly conservative for a continuous line of anchors such as those along the sill or sole plates of a light-frame wood or cold-formed steel building at the foundation.
PC 1	Replaces proposal with a new exception for anchorage of structures in SDC C, nonstructural anchorage, foundation anchorage not part of the seismic force-resisting system and anchorage of light-frame construction.	Support	Similar to the exceptions for light-frame construction in existing Section 1905.7.2 this will protect post-installed anchorage of sill and sole plates in light-frame construction from being subject to onerous and unnecessary reductions in design capacity.
PC 2	Requests Disapproval.	Oppose	

S153	The proposal adds a definition for Salvage Lumber and a new Section 2303.1.1.3 for the use of salvage lumber. Such lumber can be used in structural applications if tested to ASTM D4761 or if 90 percent of the design values assigned per the AWC National Design Specification are used.	Support (AMPC 1) or (AMPC 2) or (AMPC 3) or Support Standing Motion (AMC 2)	This would expand the supply of lumber in the marketplace for residential construction by providing a path for the re-use of lumber salvaged from existing buildings.
PC 1	Consolidates the requirements for salvage lumber with and without an existing grade mark and allows a grading or inspection agency, structural engineer or wood scientist to approve its use.	Support	This would allow an experienced wood scientist or a registered design professional with experience in wood construction to evaluate and establish a grade for the salvaged lumber.
PC 2	Consolidates the requirements for salvage lumber with and without an existing grade mark and allows a grading or inspection agency, structural engineer or wood scientist to approve its use. Adds guidance on the conditions that affect design values.	Support	This comment provides the most guidance as to what conditions could significantly impact the strength characteristics of the lumber and what condition (e.g., nail holes) do not. This comment would also allow an experienced wood scientist or a registered design professional with experience in wood construction to evaluate and establish a grade for the salvaged lumber.
PC 3	Consolidates allowances for using salvage lumber with and without an existing grade mark and permits approval by a grading or inspection agency, engineer or wood scientist. The grade mark or certificate of inspection must be from an ALSC certified agency.	Support	This limits the individuals who could evaluate and provide a grade for the salvaged lumber to ALSC-certified graders.
S159	The proposal adds new Sections 1402.11, 2304.3.3.1 and 2510.8 requiring exterior cladding be designed and constructed to accommodate vertical framing shrinkage.	Support Standing Motion (D)	This change could result in building officials requesting explicit documentation for the design to accommodate shrinkage. While it is important the architect and cladding manufacturer make sure the cladding system and structural system are compatible, no substantiation was provided this is a life safety concern or impacts the performance of the primary structure.
PC 1	Removes proposed requirements from Sections 2304 and 2510 and adds a new Section 1404.1.1 requiring exterior wall coverings be designed and installed to accommodate vertical shrinkage and compression.	Oppose	The definition of exterior wall covering includes a lot more elements than just a veneer or siding. The original rationale focused on exterior veneer or stucco finish. No evidence is provided that water-resistive barriers, housewrap, flashing, trim, cornices, gutters, downspouts and other elements considered to be exterior wall coverings need special consideration.

International Existing Building Code

Prop #	Proposal/Comment Description	Recommended Action & Vote	Reason Statement
EB17	The proposal would require seismic structural observations for any seismic retrofit projects.	Support (AMPC) or Support (D)	The proposal reason statement lacks justification to apply these structural observations a requirement to ALL retrofits, particularly when stating this language would go beyond what is currently required for new buildings not currently required to comply with the structural observation requirements of 1704.6 of the IBC.
PC 1	Modifies the proposal to apply only to buildings assigned to Seismic Design Categories D, E, or F and only to seismic retrofit work.	Support	The comment appropriately limits the structural observation requirement to the areas of highest seismic risk and only to seismic retrofits triggered by the IEBC.
EB40	The proposal adds provisions for existing decks where the structural load bearing components are damaged to undergo a structural evaluation for all associated loads and repaired meeting the load requirements of the IBC.	Support Standing Motion (AMC2) or Support (AMPC 1)	The proposal addresses important safety considerations with existing decks and balconies. The committee modifications provide appropriate reference to the IRC for repairing decks and balconies that are attached to a building constructed under the IRC and allow any qualified professional to evaluate such decks and balconies.
PC 1	Modifies the exception for replacement of deck boards to clarify it applies specifically to damaged deck boards.	Support	The comment provides a useful clarification to the proposal.
PC 2	Requests Disapproval.	Oppose	The proposal addresses important issues related to deck safety. NAHB worked with the proponents to provide appropriate references to the IRC.
EB52, Part 1	The proposal would prohibit the raising of slab-on-grade foundations, without first assessing the existing slab, per ASCI 562 or ASCI 318.	Support (AMC2) or Support (AMPC1)	The proposal is necessary to ensure buildings in flood zones with existing slab-on-grade foundations that are being elevated consider the safety aspects of doing so and not risk failure due to improper or missing reinforcement or lack of structural integrity.
PC 1	Relocates the requirement to evaluate raised slab-on-grade foundations added to the flood hazard area provisions for additions in Chapters 5 and 11 to a new Section 304.5.2.1 applicable to all methods.	Support	The comment correlates with other proposals to create one section in the IEBC for flood-resistant construction requirements.

International Residential Code – Building

Prop #	Proposal/Comment Description	Recommended Action & Vote	Reason Statement
RB7	This proposal modifies the Purpose of the IRC by changing "safety" to "life safety" and removing "property."	Support (AMPC1) or Support (AS)	Removing the word "property" clarifies that property protection is outside the purpose of the code.
PC 1	Adds the term "fire protection" and removes the phrase "safety to life and protection from fire and other hazards."	Support	The revision more closely reflects the needs of one- and two-family dwelling and townhouse construction.
PC 2	Adds property protection to the purpose of the code and moves "a reasonable level of life safety" to later in the sentence.	Oppose	Addressing property protection indicates the IRC is intended to protect the occupant's personal property which is a major departure in the use of the code.
RB9	This proposal adds to the information required on the construction documents for braced wall design.	Support Standing Motion (D)	This goes beyond the prescriptive nature of the IRC and adds requirements for engineering calculations for braced wall lines and may lead to a registered architect or engineer needing to be hired to develop the drawings. No data was given that homes built to current requirements are failing.
PC 1	Replaces the language with many of the same requirements as the proposal.	Oppose	This language does not change the impact of the original proposal, and the original concerns remain.
RB10	This proposal adds construction document requirements from the IBC.	Support Standing Motion (D)	The IRC stands apart from the commercial codes and, therefore, does not need to be correlated with the IBC by adding a lot of unnecessary detail that would be time-consuming to provide.
PC 1	Requires the determination of design flood elevations and construction documents to show exterior wall and roof assembly details.	Oppose	Similar to the proposal, it adds unnecessary detail that would be time-consuming to provide.
RB12	This proposal adds a water-resistive barrier inspection to the administrative chapter.	Support Standing Motion (D)	Since WRBs are installed at different times, this is not practical and would delay making the building weathertight.
PC 1	Requires inspection of the WRB prior to concealment when determined by the AHJ.	Oppose	The impracticality of the original proposal still exists in this comment.
RB33	This proposal changes the definition of "manufacturer's installation instructions" to include instructions which are provided in forms other than in printed form.	Support Standing Motion (D)	Not every contractor has easy access to a computer or printer, especially at the jobsite, and cell service is not always available. Generally, installation instructions are expected to be in the box or attached to the product.
PC 1	Requests Approve as Submitted.	Oppose	
RB35	This proposal adds provisions for occupiable roofs.	Support (AMPC) or Support Standing Motion (AMC2)	This proposal defines what constitutes an occupiable roof, how large the penthouse can be, and when it is not considered a story.
PC 1	Modifies Exception 2 for enclosures.	Support	Makes a small modification to address clearances around mechanical equipment for any reason, not just for servicing.

* Significant proposals are in bold

RB40	The proposal adds a definition of Wildfire Hazard Areas and a new requirement for buildings in structures in such areas be constructed, altered, inspected and maintained in accordance with the new ICC 605 Standard for Residential Construction in Regions with Wildfire Hazard.	Support Standing Motion (D)	Requires any state or jurisdiction adopting the 2027 IRC undertake the effort to evaluate if they have wildfire hazard areas regardless of their perceived risk or history of wildfires. The IWUIC is too reflective of California's wildfire resistance requirements and overly conservative and costly for other areas of the country.
PC 1	Modifies Appendix BB to allow and create requirements for relocatable tiny houses	Oppose	Would still require any state or jurisdiction adopting the 2027 IRC undertake the effort to evaluate if they have wildfire hazard areas. Does not address concerns the IWUIC is overly conservative and costly for many areas of the country.
PC 2	Intends to provide prescriptive design options for some structural elements on relocatable tiny houses.	Oppose	Does not address concerns the IWUIC is overly conservative and costly for many areas of the country.
RB42	This proposal allows dwellings that are 1,200 sq ft or smaller to comply with ICC/THIA 1215 or the IRC where applicable.	Support Standing Motion (D)	The scope of the proposal would allow homes currently built under the IRC to be built in compliance with the referenced tiny home standard currently under development allowing reduced structural bracing and homes built on chassis.
PC 1	Modifies Appendix BB to allow and create requirements for relocatable tiny houses	Oppose	An appendix with code requirements for transportable tiny homes which are not regulated by HUD should not be included in the IRC.
PC 2	Intends to provide prescriptive design options for some structural elements on relocatable tiny houses.	Oppose	This is an entirely new proposal; therefore, it is out of scope. It is also reliant on PC1.
RB51	The proposal replaces Section R306.1 with general requirements for flood-resistant construction with new text splitting the requirements into a numbered list and adds a new Section R306.4 for repairs, alterations, additions and foundations of existing buildings and structures.	Support Standing Motion (AMC2) or Support (AMPC)	The comments approved at CAH #2 remove a requirement that exterior equipment or appliances replaced due to flood be elevated.
PC 2	Modifies sections related to work on existing buildings to apply only in special flood hazard areas.	Support	The comment would exempt existing buildings outside the 100-year floodplain from needing to be elevated or otherwise comply with flood resistant construction requirements if substantially improved or substantially damaged.
RB63	This proposal reformats Section R302.2 on fire-resistant construction for townhouses and adds a table with prescriptive assemblies and their fire-resistance ratings.	Support (AMPC1) or Support Standing Motion (AMC)	Providing prescriptive assemblies makes the code easier to use.
PC 1	Adds concrete and masonry materials to the table with fire ratings for assemblies.	Support	Including some of the more common concrete and masonry materials to the table will simplify compliance with this section.
PC 2	Requests As Modified by Committee.	Support	Includes a title change in Section R302.3.2.1 for clarity.

* Significant proposals are in bold

RB89	This proposal adds a new section on corrosion resistance for saltwater environments.	Oppose Standing Motion (AMC) Support (D)	Corrosion resistance is already required at coastlines, and no data was provided to show the extent new homes have this problem. According to the proposal's reason statement, the provisions are based on an above-code program.
PC 1	Changes "shoreline" to "coastline."	Neutral	The modification is editorial and does not fix the problem with the proposal.
RB113	This proposal allows the required egress door to be swinging, pivoted or balanced and adds max. force limits to move the door.	Support Standing Motion (AMC)	The requirement is based on the need to regulate egress doors in commercial buildings located in a smoke barrier where the means of mechanically controlling smoke is by a pressure difference. It is not necessary in the IRC.
PC 1	Adds force limitations for opening the required egress door.	Oppose	This is being applied very broadly to address a very small number of potential cases where the opening force may come close to this limitation.
RB115	This proposal adds requirements for locking entrance doors for dwelling and sleeping units.	Support Standing Motion (D)	Locking requirements (protection from unwanted entry) should not be in the IRC. The text also includes subjective and commentary language.
PC 1	Limits the scope of the change to the dwelling unit egress door, allows other options beyond deadbolt locks, and removes the reference to sliding bolts.	Oppose	No enforceable language is provided for locks other than deadbolts, and it excludes the language about not needing keys, special knowledge or effort for all locks other than deadbolts.
RB118	This proposal requires frost protection for exterior landings, decks, balconies, stairs and similar facilities at the required egress door.	Oppose Standing Motion (AMC) Support (D)	This is more restrictive than the IBC and does not align with exceptions for footings elsewhere in the code (for example, R507.3). It would apply in all regions despite no data showing it is a problem everywhere.
PC 1	Requests Disapproval.	Support	
RB121	This proposal restores the stair geometry requirements allowed by prior editions of model building codes.	Support Standing Motion (AS)	The safety benefits of the current stair geometry are technically unsubstantiated and are not practical in homes with smaller footprints. Studies used to support current stair dimensions do not show injury data based on which stair geometry the injury occurred, and floors were responsible for only 1.2% fewer total injuries than stairs.
PC 1	Changes the tread depth to 10 inches.	Oppose	Less restrictive stair geometry than this is already allowed elsewhere in the IRC and for federally regulated homes.
PC 2	Requests Approve as Submitted.	Support	
PC 3	Requests Disapproval.	Oppose	
RB145	This proposal adds provisions for the grouping of ESS units.	Oppose Standing Motion (D) Support (AMPC1) or Support (AS)	This allows the installation of ESS units that are listed for closer spacing than the code currently allows, simplifying placement and installation.

* Significant proposals are in bold

PC 1	Allows one or more battery modules installed as a BESS unit to be considered an "individual unit" where the aggregate energy of the connected modules does not exceed 20kWh.	Support	Addresses the reality of multiple modules can be designed to be combined into one BESS unit. Such units should not be penalized simply for their design.
RB151	The proposal deletes the option to provide frost protections for footings by constructing them to the ASCE 32 standard.	Support Standing Motion (D)	ASCE 32 was just reaffirmed in 2025 and was included in the ADM61 reference standard update. Removing the standard could increase the cost of construction if a dwelling or its foundation system falls outside the structural provisions of the IRC and needs to be engineered
PC 1	Requests Approval as Submitted.	Oppose	
RB153	The proposal modifies Section R403.3 and Table R403.3(1) to remove references to EPS and XPS including R-values and require the insulation manufacturer provide minimum R-values and compressive strengths.	Support (AMPC) or Support Standing Motion (D)	The proposal could result in a builder needing to hire an engineer to determine the required compressive strength for insulation used in an FPSF as well as the risk reduction factor. No guidance is provided for calculating either criterion. Prescriptive requirements for other insulation materials need to be provided.
PC 1	Adds references to ASTM C1289 and ASTM C1029 and removes the requirement insulation be EPS or XPS. Clarifies the R-values provided for use in determining insulation thickness are for EPS or XPS	Support	The comment would allow the use of insulation materials other than EPS and XPS if they can demonstrate they maintain the tabulated R-values under long-term exposure to moist, below-ground conditions in freezing climates. Builders would be able to continue using EPS and XPS with the existing prescriptive requirements.
PC 2	Requests Approval as Submitted.	Oppose	
RB174	This proposal requires the vapor retarder to be at least 10 mils thick and comply with ASTM E1745.	Support Standing Motion (D)	This would eliminate the long-standing prescriptive requirement and unnecessarily increase cost.
PC 1	Requires the vapor retarder to conform to ASTM E 1745 requirements.	Oppose	This change is based on a local performance issue, and no information was provided that humidity is higher in homes built recently. There is also a significant cost impact.
RB242	This proposal adds an exception for attic access in attic spaces without plumbing, mechanical, or electrical components needing periodic maintenance.	Oppose Standing Motion (D) Support (AMPC1) or Support (AS)	This lowers the number of attic access points needed on homes, reducing the likelihood of occupants storing things in the attic.
PC 1	Clarifies that the exception does not apply for attic openings required for inspection.	Support	This addresses concerns brought up in the Committee Action Hearings.
RB304	This proposal adds an appendix with requirements for physical security.	Support Standing Motion (D)	Many forced entries are attacks on windows or glass (not addressed by this change), and it does not recognize technology as a deterrent.
PC 1	Modifies the change by removing additions and alterations and doors leading from the garage from the scope. It also reduces some of the reinforcement and entry vision requirements.	Oppose	Providing security requirements is still outside the scope of what the IRC covers and does not address the fact that hardening all potential entry points (i.e. glazing) is impractical.

* Significant proposals are in bold

International Residential Code – Mechanical

Prop #	Proposal/Comment Description	Recommended Action & Vote	Reason Statement
RM7	This proposal prohibits the use of stud cavity and joist space plenums for return air.	Support Standing Motion (D)	Plenums allow the ability to avoid a central return providing cost savings and flexibility. They may also be used in a joist space where ducts cannot occupy that same space due to space constraints.
PC 1	Does not appear to modify the language of the original proposal.	Oppose	This removes an acceptable and viable option which has been used for many years. Not everyone will be adopting the 2021 or later energy provisions, and no harm is done by leaving it in as the more restrictive provision will apply.

International Residential Code – Plumbing

Prop #	Proposal/Comment Description	Recommended Action & Vote	Reason Statement
RP8	This proposal reduces the developed length of hot water runs from 100 ft to 50 ft	Support Standing Motion (D)	This may require two water heaters in larger homes. Current requirement is based on an industry-wide consensus.
PC 1	Adds the definition of principal shower and reduces the maximum length of hot water piping to 60 feet.	Oppose	Definition is confusing, contains commentary (along with the term "may") and could be misapplied. 60 feet is overly restrictive.

International Property Maintenance Code

Prop #	Proposal/Comment Description	Recommended Action & Vote	Reason Statement
PM8	This proposal adds provisions for grading and drainage.	Support Standing Motion (D)	The new language is vague and subjective. It references "other regulations." Speaks to water flowing over property lines but allows "approved" systems.
PC 1	Intends to prevent roof/condensate drainage from flowing over public walkways.	Oppose	I-Codes do not define a public walkway (just "public way"). Many awnings and canopies do not come equipped with downspouts.

* Significant proposals are in bold

IADMIN

Prop #	Proposal/Comment Description	Recommended Action & Vote	Reason Statement
ADM22, Part 2	This proposal emulates the proposed requirements for alternate materials and applies them to modifications.	Support Standing Motion (D)	Unnecessarily raises the bar for modification compliance. Existing text is more appropriate to address residential applications.
PC 1	Changes the modification section to more elaborate process.	Oppose	This is overly restrictive, and the existing language is more appropriate for addressing the issue for residential applications.
ADM48, Part 2	This proposal adds an optional requirement for special inspections for water resistant barriers.	Support Standing Motion (D)	This is unnecessary and could result in several additional inspections at various stages of construction. Code officials already have the authority to require inspection of these areas.
PC 1	Introduces another special inspection to inspect the water-resistive barrier with flashings and membranes installed at the roof to wall intersection.	Oppose	This does not correct the original reasons for our opposition.

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