

National Association of Home Builders

2018 ICC Group A Online Governmental Consensus Vote Voting Guide



NAHB.org/CodeDevelopment

November 15-30, 2018

NAHB's Voting Recommendations for 2018 Group A OGCV

The National Association of Home Builders urges all Governmental Member Voting Representatives to support the housing industry on the following code change proposals. This voting guide will assist you in supporting only those code change proposals that are necessary and will result in the ability of the construction industry to continue building safe and affordable housing in the future.

This voting guide provides you with NAHB's positions and reasons for proposals that will be on the Online Governmental Consensus Vote ballot. In the colored column of each row is NAHB's recommended action for that specific proposal including a Reason Statement justifying NAHB's position on the proposal. NAHB has also identified critical code changes (shown in bold) that will have a significant impact on the enforcement and adoptability of the Group A codes.

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

International Building Code – Egress

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
E1	Disapprove	This proposal revises IBC 1003 to add grab bars and stanchions to showers and baths that are not required to be accessible affecting R-1 and R-2.	This proposal will require the addition of grab bars to showers and tubs for non-accessible tubs and showers. The quoted cost impact would be \$200 per tub and shower. It cites egress from a shower or tub as a safety issue when showers and baths not part of means of egress.
E31	Disapprove	This proposal adds language to Section 1009, Accessible Means of Egress. It adds a new section, 1009.2.2 Separation of Means of Egress to state that the accessible means of egress shall be separated by a distance not less than 30-feet.	Revising the language of the proposal so that the minimum separation distance between exits is not a minimum of 30-feet, the PC language provides a formula so that buildings with small footprints are not affected by the 30-foot separation requirement.
E32	Disapprove	This proposal eliminates one of the requirements for an elevator to be considered part of an accessible means of egress (1009.4.2 Area of Refuge) and adds a new requirement (1009.4.3 Location).	The new requirement states that where multiple elevators serve as an accessible means of egress, each elevator must be provided with separate operating systems with each elevator in a separate elevator bank.
E81	Disapprove	This proposal revises language removing the 36" minimum sill height of an operable window in R-2 and R-3 stating that this is not high enough to prevent window fall accidents. It also adds an exception	The public comments by the proponent and other individual of the proposal are asking that all windows, regardless of the sill height, to have window fall protection devices (i.e. transoms, clerestories, etc.). The requirement would impede egress from emergency escape windows.
E82	Disapprove	This proposal revises language for window opening requirements less than 36" above finished floor in R-2 and R-3. If window opening is less than 36", it adds requirements; equipped with window screens or barriers withstanding 60 lbs force.	It would require that all windows, regardless of type or height/location, have window fall protection devices. It would impede the egress from windows used for emergency escape.
E90	Disapprove	This proposal revises the minimum corridor width for access to mechanical, plumbing, or electrical systems to coincide with IMC Section 306.2.	The minimum width to access and for the utilization of mechanical equipment is not an egress issue, but one of service. Mechanical spaces are not public spaces and are only for those individuals who have been granted access for the servicing of mechanical equipment

International Fire Code

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
F23	Disapprove	This proposal adds a new section with requirements for furniture affixed outside buildings.	The proposed language has unintended consequences. For example, a built-in bench on a deck would have to be at least 5 feet from the building, be 10 feet from a lot line and be labelled. This was not identified by the proponent as a problem.
F92, Part 1	Disapprove	The public comment requires artificial decorative vegetation over 6 feet tall installed outdoors within 5 feet of a building or on the roof to meet flammability requirements.	It is unclear when the provisions of this public comment apply. Is it only triggered when such vegetation within 5 feet of a building or when it is within 30 feet as the exception suggests?
F92, Part 2	Disapprove	The public comment requires artificial decorative vegetation over 6 feet tall installed outdoors within 5 feet of a building or on the roof to meet flammability requirements.	It is unclear when the provisions of this public comment apply. Is it only triggered when such vegetation within 5 feet of a building or when it is within 30 feet as the exception suggests?

F117	Disapprove	This proposal limits the use of NFPA 13R systems in Group R occupancies from buildings where the floor level of the highest story is max. 60 ft above grade to those where the highest story is max. 30 ft above the lowest level of fire department access.	This proposal would require most four story Group R buildings to have a full NFPA 13 fire sprinkler system where a 13R system is currently allowed. The change is not based on fire loss data and would increase the cost of a four story, 48-unit building by over \$100,000. NFPA 13R systems have an excellent track record, so a cost increase to the sprinkler system of around 78% is unfounded.
F158	Disapprove	This proposal creates a new section with provisions for the replacement of newly installed smoke alarms.	The intent of this proposal is to let existing smoke alarms stay in place beyond the 10-year replacement schedule as required by smoke alarm standards. Smoke alarm technology continues to improve, and occupants of existing buildings should benefit from those improvements the same as those of new buildings.
F267, Part 1	Disapprove	This proposal requires four-story or higher buildings of combustible construction to have gypsum board or other noncombustible materials installed during construction on all but the highest two floors when portions of the building exceed 40 feet.	The proposal would require the gypsum board to be installed before the roof is on, so each floor would have to be waterproofed or the wet gyp board would have to be replaced once the building is weathertight. It's unclear how the other trades would complete their rough-ins with gyp board in place, and it may require plumbing, HVAC and other systems to be inspected two floors at a time.
F267, Part 2	Disapprove	This proposal requires four-story or higher buildings of combustible construction to have gypsum board or other noncombustible materials installed during construction on all but the highest two floors when portions of the building exceed 40 feet.	The proposal would require the gypsum board to be installed before the roof is on, so each floor would have to be waterproofed or the wet gyp board would have to be replaced once the building is weathertight. It's unclear how the other trades would complete their rough-ins with gyp board in place, and it may require plumbing, HVAC and other systems to be inspected two floors at a time.
F270	Disapprove	This proposal requires automatic sprinkler systems to be installed in buildings under construction before they exceed 40 feet in height.	The proposal would impose impractical and costly restrictions on wood construction. Fire sprinkler systems require that the finished ceiling is in place, so a temporary system would have to be installed before the permanent system. In addition, sprinkler standards do not allow the approval of temporary systems, and freeze protection would be required in some regions.

International Fuel Gas Code

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
FG10	Disapprove	This proposal requires fuel gas venting be brought up to current code when making any changes to the exterior of the building.	Minor exterior modifications to a multi-family building could trigger bringing the entire combustion air exhaust systems up to code. A new door on a multi-family building will require access to every unit for inspection. Weatherization programs have procedures to deal with this.

International Building Code – Fire Safety

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
FS21	Disapprove	This proposal aims to treat penetrations through rated exterior walls in the same manner as fire-resistant joints, requiring them to be fire-stopped when protected openings are required.	This proposal aims to treat penetrations through rated exterior walls in the same manner as fire-resistant joints, requiring them to be fire-stopped when protected openings are required. The change would require protection of vented hoods, fireplaces, and dryer vents, among other items.
FS34	Disapprove	This proposal increases the fire-resistance rating of walls and horizontal assemblies between dwelling or sleeping units in residential occupancies to a 2-hour fire barrier and requires walls and floors to meet load-bearing requirements without sheathing.	Public comment asks for increasing fire rating to 1-hour. That does not provide additional safety to occupants during egress. There is no language in the code that requires the materials of a building maintain its structural integrity after a fire. Furthermore, there would be an increase in cost due to additional material assembly.
FS91	Disapprove	This proposal adds a pointer to the air barrier provisions of the IECC in the water resistance section.	The proposal adds language to the wrong section and mixes air control and water control layers. Some states or jurisdictions have their own energy code and do not adopt the IECC, or are still on older editions.
FS93	Disapprove	This proposal adds requirements for enhanced drainage in areas with high wind-driven rain and behind adhered veneer and stucco in Climate Zones 1A, 2A and 3A.	The proposal raises concerns about enforceability due to the scale and line thickness of the map. There is also concern the new drainage requirements may eliminate products that are in current use and performing well.
FS94	Disapprove	This proposal adds a requirement that vertical fenestration shall comply with the IECC.	The proposal is in the wrong section of the code and treats skylights as a wall element when they are generally considered a roof element.
FS95	Disapprove	This proposal adds a new requirement to test exterior walls over 40 feet in Type I-IV buildings to NFPA 285, and test such walls as a complete system.	The change does not clarify the code. If approved there would be two sections mandating NFPA 285 testing based on different criteria, and the section title is misleading since it is not the only set of requirements applying to the exterior wall envelope. This is based on the Grenfell Tower fire which occurred because the cladding was combustible, but this change would affect even noncombustible cladding on a wall that contains any amount of combustible material.
FS96	Disapprove	This proposal adds a new fire testing requirement for walls not required to be tested to NFPA 285. A list of deemed-to-comply walls with noncombustible finishes or insulation is provided.	The code should not specify test criteria and setups outside of an established, consensus test method from NFPA, ASTM or others should be referenced. And the UL fire testing that this proposal is based on is being used outside of the testing's scope, which was to inform fire fighters about the dynamics of such exterior fires. It was not meant to make objective comparisons between wall configurations.
FS99	Disapprove	This proposal revises NFPA 285 test requirements to apply when there are any combustible components in the exterior wall. Adds criteria for testing projections and interior corners, wind effects.	A test which doesn't exist should not be brought into the code. It is also not clear whether the testing criteria is appropriate for the information being sought. No reason is given as to why a 12-inch projection should trigger this requirement. Larger horizontal projections may even have a positive effect on fire behavior.

FS111	Disapprove	This proposal restores the limitation on polypropylene siding to Type VB buildings only.	If the proponent's concern is taller buildings, they should have limited the use of polypropylene siding above 40 feet as is done for other cladding products rather than limiting polypropylene siding to Type VB. Also, the IBC-Structural Committee members are fully capable of evaluating issues of fire performance.
FS149	Disapprove	This proposal adds a requirement that windows in walls with HPL panels or foam plastic insulation be protected as detailed in NFPA 285 tests or using 20 gauge flashing around window openings.	The proposal lacks guidance on who is responsible for specifying the details of the window protection and how it gets integrated with the water-resistive barrier and other flashing at the window.
S7	Disapprove	This proposal requires foam plastic insulation above a deck to be separated with a 30 minute fire-rated assembly as an alternative to testing per NFPA 276 and UL 1256.	There are provisions in Chapter 26 that provide exemptions from the standard requirement for a thermal barrier. This proposal does an end-run around those exceptions. Adding this conflicting language in Chapter 15 would cause confusion.
S21	Disapprove	This proposal expands special inspections of fire-resistant penetrations and joints to Group R buildings with an occupant load greater than 250.	The Group E comparison in the reason statement is invalid, as the 250 person occupant load referred to applies to persons assembled in one room. ASCE 7 rationale behind Risk Category III classification: Risk Category III includes buildings and structures that house a large number of persons in one place, such as theaters, lecture halls. Applying the same requirements to R occupancies as those listed is overly restrictive.

International Building Code – General

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
G21	N/A	This proposal clarifies Group R-1 also applies to buildings with more than two dwelling units.	The proposal is consistent with Group R-2, which also applies to buildings with more than 2 dwelling units, and Group R-3, which applies to buildings with fewer than 2 dwelling units.
G54	Disapprove	This proposal revises provisions for separation walls in Group R and I-1 buildings to require exterior walls separating units meet fire separation distance requirements.	The proposal lacks supporting fire statistics to substantiate the need for the changes. New Group R and I-1 buildings are sprinklered, reducing the risk of a fire in the first place. Potential impacts include 1-hour rated exterior walls where not required previously, a fire door for the exterior door to a unit and fire-rated safety glazing for windows.
G75	As Modified by Public Comment	This proposal adds allowable heights for new Type IV-C, IV-B and IV-A construction. Group R sprinklered buildings can be 85, 180 or 270 feet respectively.	This proposal adds allowable heights for new Type IV-C, IV-B and IV-A construction. Group R sprinklered buildings can be 85, 180 or 270 feet respectively.
G80	As Modified by Public Comment	This proposal adds allowable stories for new Type IV-C, IV-B and IV-A construction. Group R-2 sprinklered buildings can be 8, 12 or 18 stories respectively.	Adds option to construct high-rise Group R buildings using mass timber elements.
G90	As Submitted	This proposal relocates the Section 419 provisions on Live/Work Units to a new subsection under Section 508 Mixed Occupancies.	The proposal recognizes Live/Work Units are a special case of a mixed occupancy, with their own set of area limits, occupant load limits and associated requirements. There is no reason for them to be off in another chapter of the IBC.
G108	As Modified	This proposal adds three new types of construction, IV-A, IV-B and IV-C, for tall mass timber buildings, with associated interior and exterior protection requirements and limits on exposed mass timber.	Adds option to construct high-rise Group R buildings using mass timber elements.

G122	Disapprove	This proposal expands sound transmission requirements to apply to separations between dwelling or sleeping units and all public spaces, not just corridors, stairs or service areas.	The proposal is less clear than the existing language where STC and IIC ratings are required. The term "public areas" could be taken to exclude spaces that can only be accessed by tenants or their guests. The cost to provide STC or IIC ratings for a floor system could be as much as \$8,000 to \$12,000 per dwelling unit.
G125	Disapprove	This proposal requires intersections between walls and floors where sound transmission ratings are needed to be sealed per ASTM C919.	The proposal focuses on sealing particular wall and floor intersections at the expense of other solutions to address flanking paths. Proper orientation of floor framing, avoiding continuous floor framing and sheathing under a wall, and use of floor toppings and coverings or resilient channels can improve ratings even more than sealing.
G130, Part 2	As Submitted	This proposal revises the efficiency dwelling unit provisions, reducing the minimum living room area and additional area for each occupant over 2 and fixing conflicts with A117.1	The proposal coordinates the efficiency unit provisions in the IMPC with the standard room size and clearance requirements of the IBC and A117.1. The IBC has been modified to allow a smaller unit size than currently permitted by the IPMC.
G136	As Submitted	This proposal clarifies an occupied roof does not add to building height or number of stories provided any enclosed roof structures comply with the requirements for penthouses.	The proposal allows an enclosed elevator lobby or stair landing to serve an occupied roof without needing to reclassify the roof as a story. By treating stair towers and elevator lobbies as penthouses, the proposal imposes a reasonable limit of enclosed spaces on an occupied roof.
G139	Disapprove	This proposal replaces performance requirements for the emergency elevator communication system for the hearing- or speech-impaired with references to ASME A17.1, NFPA 72 and the ADA Title III.	Defers to appropriate reference standards for elevator design and to Federal law. This would allow ASME A17.1 to be updated via the administrative process with any design requirements for the system.

International Mechanical Code

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
M13	Disapprove	This proposal requires a balanced ventilation system and increases the scope of the requirement to include low-rise residential dwellings.	This significant change in the ventilation requirements for multi-family dwellings. Balanced ventilation is a best practice, but should not be mandatory. This will not allow even allow a passive damper to introduce outdoor air if an exhaust fan is being used for ventilation.
M20	Disapprove	This proposal would require mechanical ventilation for all dwellings regardless of tightness and ability to naturally ventilate.	This proposal removes the option for natural ventilation in multifamily buildings. Studies show that ventilation fans are prone to failure. Natural ventilation is a viable option and should remain.
M23	Disapprove	This proposal would require timers or sensor controls for all exhaust fans in toilet rooms, bathrooms and shower rooms shall be provided with a delay-shutoff timer, occupant sensor or humidity sensor control.	This proposal is region specific. There is no technical data to show where there is issues. If there are humidity problems in a bathroom, simple retrofit. Concern that 20 minutes is too long and will waste energy. Language does not allow for lower run times.
M67	Disapprove	This proposal states that plastic plumbing and tubing must comply with all requirements of ASTM E84 or UL 723 and prohibits the use of any other standard.	The proposal prohibits the use of any other standard other than ASTM E84 or UL 723.
M73	Disapprove	This proposal requires lab testing of plastic pipe to be conducted without water in piping.	Proponent is trying to put a lab requirement in an installation code. Plastic pipes must pass E84- E84 does not allow water in pipes when testing. The building code should not reiterate testing requirements in a standard.

M78, Part 1	Disapprove	This proposal strikes the section that allows the use of stud cavities for air plenums.	There is no reason that these cavities cannot be used. These cavities are inside the thermal envelope of dwellings that are currently tested for their required air leakage. There is no requirement for duct returns in the code now and pan returns improve the ability to get air back to the air handler.
M78, Part 2	Disapprove	This proposal strikes the section that allows stud wall cavity to be used for air plenums.	There is no reason that these cavities cannot be used. These cavities are inside the thermal envelope of dwellings that are currently tested for their required air leakage. There is no requirement for duct returns in the code now and pan returns improve the ability to get air back to the air handler.

International Plumbing Code

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
P45, Part 1	Disapprove	This proposal modifies and adds criteria and options for meeting the shower control valve restrictions.	The proponent is allowing ASSE 1017 devices this device is not intended for this application. Mixing valves often fail and the proposal may require installing multiple valves.
P53	Disapprove	This proposal adds a new section to the slope to floor or trench drains to a ¼ inch per foot.	This would be 1 inch in 4 feet. This is excessive for a basement floor. A level floor will drain to a floor drain any slight degree from level to a floor drain would work.
P64	Disapprove	This proposal modifies the section for shower linings by requiring a trench drain and requirements for the height above the floor level.	The requirement to line the whole bathroom floor is too restrictive, "If for some reason" cannot be enforced. This is bad code language and contains unenforceable criteria.
P70	Disapprove	This proposal modifies the requirements for combination potable water heating and space heating systems shall have a double wall heat exchanger.	These systems have been in use for decades without data to show there has been a problem with their use. The requirements for their use as currently in the code have not produced data to show a problem.
P79, Part 1	As Submitted	This proposal modification is to clarify the section and table for designers to design a distribution system not for code officials to test in the field.	This proposal adds clarity in the section and table for designers to design a distribution system not for code officials to test in the field. The section and the table were intended to be used to set design capacities for the domestic water systems, not for field testing.
P82, Part 1	Disapprove	This proposal restricts total showerhead flow to 2.5 gpm, regardless of the number of showerheads.	This code change is not necessary. Restricting water use should be addressed on a regional basis.
P82, Part 2	Disapprove	This proposal restricts the total showerhead flow to 2.5 gpm regardless of the number of showerheads.	This code change is not necessary. Restricting water use should be addressed on a regional basis.

International Property Maintenance Code

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
PM8, Part 1	Disapprove	This proposal adds new provisions requiring storm shelters be maintained in accordance with ICC 500 and requiring any damage to components be repaired or the components replaced per ICC 500.	The proposal implies ICC 500 contains maintenance requirements, but the current edition does not. The language would require repair of cosmetic damage or its components even if the structural integrity is not compromised. The requirement needs to be limited to community shelters only.

PM8, Part 2	Disapprove	This proposal adds new provisions requiring storm shelters be maintained in accordance with ICC 500 and requiring any damage to components be repaired or the components replaced per ICC 500.	The proposal implies ICC 500 contains maintenance requirements, but the current edition does not. The language would require repair of cosmetic damage to the shelter or its components even if the structural integrity or performance is not compromised. The requirement needs to be limited to community shelters only.
-------------	------------	--	---

International Residential Code – Mechanical

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
RM7	Disapprove	This proposal requires heating and cooling equipment to be installed in accordance with ACCA 5 QI.	The code already states that heating and cooling equipment are to be installed in accordance with the manufacturer's instructions. The manufacturer's instructions trump all anyways and there is no need to add a QI standard to the code this would make it more confusing and is not needed.
RM9	Disapprove	This proposal requires appliances, equipment and insulation to be installed above the rim of auxiliary drain pans to limit water damage.	The language is too vague. It does not state who is to approve this.
RM12	Disapprove	This proposal restricts the use of recirculating range hoods and eliminates recirculating hoods in new single family homes.	This proposal is discriminatory from one form of housing to another. It is not allowed in a single family home but you can add them in a duplex, triplex, or townhouse
RM19	Disapprove	This proposal requires bathroom and toilet room fans have a delayed-shutoff timer to address humidity.	This is an option for builders and designers and should not be required in the code.
RM22	As Modified by Public Comment	This proposal adds provides a 30% whole house flow rate reduction for balanced and ducted ventilation system that supply recirculated air.	This proposal is a good option to add to the code. It adds flexibility and it gives credit for better performing whole building ventilation systems

International Residential Code – Plumbing

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
RP3	Disapprove	This proposal modifies and adds new sections to require grab bars and stanchions in showers and baths that are not required to be accessible affecting R-1 and R-2.	This is an overreach of the code. It is unnecessary to require all showers and tubs to have stanchions and grab bars. This should be addressed as an "as needed" basis.
RP10	Disapprove	This proposal adds a new section limiting the maximum length of hot water piping to 50 feet.	This should be provided as an option. The proponent is saying there is not cost impact but there will be an increase. If you have more than 100 feet of piping you will need another water heater which adds significant cost implications.
RP13	Disapprove	This proposal adds new sections for soil gas (Radon) vent piping in the plumbing section of IRC.	As written, this is not an option and will increase the cost of construction. Written in language that will require it to be installed contrary to what the proponent stated. Soil gas venting requirements belong in the Radon appendix.
RP16	Disapprove	This proposal adds an appendix to the IRC containing water efficiency requirements for dwellings subject to the code.	This proposal sets standards that are above the minimum code and do not belong in the national model code. Water efficiency is a regional basis and should be addressed accordingly.