

National Association of Home Builders

# 2022 Louisville ICC Public Comment Hearings Voting Guide

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**September 14 - 18, 2022**



**National Association  
of Home Builders**



# NAHB’s Voting Recommendations for the 2022 Group B Code Change Proposals

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 all the information you need to follow during the Public Comment Hearings. Code change proposals are listed in numerical order and include each public comment submitted for each proposal and a brief description for each. In the center column of each row is NAHB’s recommended action for that specific proposal and a position for each public comment should they be brought forward for a vote. NAHB has also identified critical code changes (shown in bold) that will have a serious impact on the enforcement and adoptability of the Group B codes.

How to use this guide: 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 EB34 and then be “Approved as Modified by Public Comment 1”, as indicated by the “Support (AMPC 1)” in the middle column.

## International Existing Building Code

Prop #	Proposal/Comment Description	Recommended Action & Vote	Reason Statement
EB34	This proposal adds a new section with requirements for accessory dwelling units.	Oppose Standing Motion (D) Support (AMPC 1)	The proposal recognizes the common practice of jurisdictions allowing an additional dwelling unit to be added to an existing single-family dwelling and increases their level of life safety.
	PC 1 Modifies the proposal by clarifying the roles of the fire official and the owner.	Support	The public comment gives jurisdictions the guidance they need to safely provide ADUs. The appendix can be adopted by those jurisdictions which want to provide such dwelling units, and all others will not need to comply.

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

## Administrative Provisions

Prop #	Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
ADM6	This proposal requires buildings destroyed by a fire that has spread outside a WUI area to meet the IWUIC when rebuilt.	Support Standing Motion (D)	The proposal is illogical; it scopes this code to buildings that are outside the scope of this code. Local jurisdictions should define where the WUI line is located. It is unclear whether insurance companies would cover the added cost of this provision.
PC 1	Expands use and application of the IWUI Code.	Oppose	The public comment does not address the issues with the original proposal.
ADM13, Prt. 1&2 ADM14	This proposal correlates Section 104 on duties and powers of the building official across the I-Codes.	Support (AMPC 2) and (AMPC 6); Oppose (AMPC 3), (AMPC 4) and (AMPC 5)	The proposal as modified by the Committee clarifies Section 104, especially regarding the alternative materials and methods provisions.
PC 1	Modifies the proposal with the intent to allow more flexibility with alternate approvals.	Neutral	
PC 2	Modifies the proposal to require the testing to simulate the application, not predict it.	Support	The public comment helps clarify that full-scale testing is not necessary for the approval of alternate materials or methods.
PC 3	Modifies the proposal by removing the requirement that records be in writing.	Oppose	The public comment does a disservice to the contractor or designer by removing the requirement that the code official respond in writing as to why an alternative is not approved. Without the reasons behind the decision, no appeal is possible.
PC 4	Modifies the proposal by adding "fire resistance" to the list of equivalency criteria.	Oppose	The public comment fails to recognize that "fire resistance" is included in the term "fire safety" and is not necessary as a stand-alone list item.
PC 5	Modifies the proposal by changing the code official's responsibility from determining to evaluating.	Oppose	The public comment uses the word "evaluate" which is too weak to describe the role of the code official providing the necessary code oversight. A decision needs to be made, and that only can come through a determination.
PC 6	Modifies the proposal by removing the requirement to provide the listing standard.	Support	The public comment recognizes that providing the listing and the manufacturer's instructions is adequate for determining compliance.

\* Significant proposals are in bold

## Administrative Provisions

Prop #	Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
ADM21	This proposal adds requirements in the IBC for listings and items required to be listed and requires documents to be provided to the building official upon request.	Support Standing Motion (D)	The proposal requires the owner to pay for any and all standards that might be referenced in the code regarding the project if the code official wishes. If abused, this would cause a substantial cost burden.
PC 1	Replaces the proposal to correlate this section with what the committee approved in ADM13 Part I.	Oppose	The public comment requires the listing standard to be made available to the code official, but the listing and the manufacturer's instructions are adequate for determining compliance. ADM13 Part I Public Comment 6 improves this section by striking the term "standard," removing this unnecessary documentation requirement.
ADM36, Part 1	This proposal adds requirements for determining fire safety equivalency and for fire testing.	Oppose Standing Motion (AM) Support (D)	The proposal includes problematic language that requires the test to be of a scale that is sufficient to predict fire safety performance of the end use configuration.
PC 1	Modifies the proposal by applying the testing section to more than fire safety.	Oppose	The public comment allows the code official to require additional testing for an alternative material or method even if the builder or design professional has submitted evaluation reports or an engineering analysis to demonstrate compliance with the intent of the code. A report or analysis should be sufficient.
ADM36, Part 2	This proposal adds requirements for determining fire safety equivalency and for fire testing.	Support Standing Motion (D)	The proposal includes problematic language that requires the test to be of a scale that is sufficient to predict fire safety performance of the end use configuration.
PC 1	Modifies the proposal by replacing "fire resistance" to "fire safety" in the list of equivalencies.	Oppose	The public comment does not address the issues with the original proposal and would conflict with ADM13 Part II as approved by the committee.
ADM42	<b>This proposal adds a new section on permit valuations in the IPC with the intent to correlate with the other I-Codes.</b>	<b>Oppose Standing Motion (AS) and Support (AMPC 1)</b>	<b>The proposal allows the permit to be denied if, in the opinion of the code official, the valuation is underestimated. This language is overly subjective.</b>
PC 1	<b>Modifies the proposal by removing subjective language when assessing the valuation and requiring written notification on why the valuation was altered.</b>	<b>Support</b>	<b>The public comment provides an improvement over the original proposal by removing subjective language, and the requirement for written notification provides necessary feedback in case the code official alters the valuation.</b>
PC 2	<b>Modifies the proposal by removing the requirement to deny a permit based on an underestimation of the valuation and giving the code official authority to deny.</b>	<b>Oppose</b>	<b>The public comment still includes subjective language and does not require a written notification with reasons for altering the valuation. Public Comment 1 is preferred.</b>

\* Significant proposals are in bold

## Administrative Provisions

Prop #	Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
<b>ADM43, Part 1</b>	This proposal modifies the section on permit valuations and removes the requirement that the building official set the final building permit valuation.	<b>Oppose Standing Motion (AS) and Support (AMPC 1)</b>	The proposal allows the permit to be denied if, in the opinion of the code official, the valuation is underestimated. This language is overly subjective.
PC 1	Modifies the proposal by removing subjective language when assessing the valuation and requiring written notification on why the valuation was altered.	<b>Support</b>	The public comment provides an improvement over the original proposal by removing subjective language, and the requirement for written notification provides necessary feedback in case the code official alters the valuation.
PC 2	Modifies the proposal by removing the requirement to deny a permit based on an underestimation of the valuation and giving the code official authority to deny.	<b>Oppose</b>	The public comment still includes subjective language and does not require a written notification with reasons for altering the valuation. Public Comment 1 is preferred.
<b>ADM43, Part 2</b>	This proposal modifies the section on permit valuations in the IRC to correlate it with the other I-Codes.	<b>Support (AMPC 1) or Support Standing Motion (D)</b>	The proposal allows the permit to be denied if, in the opinion of the code official, the valuation is underestimated. This language is overly subjective.
PC 1	Modifies the proposal by removing subjective language when assessing the valuation and requiring written notification on why the valuation was altered.	<b>Support</b>	The public comment provides an improvement over the original proposal by removing subjective language, and the requirement for written notification provides necessary feedback in case the code official alters the valuation.
PC 2	Modifies the proposal by removing the requirement to deny a permit based on an underestimation of the valuation and giving the code official authority to deny.	<b>Oppose</b>	The public comment still includes subjective language and does not require a written notification with reasons for altering the valuation. Public Comment 1 is preferred.

## International Existing Building Code

EB34	This proposal adds a new section with requirements for accessory dwelling units.	<b>Oppose Standing Motion (D) Support (AMPC 1)</b>	The proposal recognizes the common practice of jurisdictions allowing an additional dwelling unit to be added to an existing single-family dwelling and increases their level of life safety.
PC 1	Replaces the proposal by creating a new appendix on accessory dwelling units.	<b>Support</b>	The public comment gives jurisdictions the guidance they need to safely provide ADUs. The appendix can be adopted by those jurisdictions which want to provide such dwelling units, and all others will not need to comply.
EB45	This proposal adds exceptions intending to clarify that an addition of an exit, exit access stairway, or an accessible route is not to be considered an area increase.	<b>Support Standing Motion (AM) or Support (AMPC 1)</b>	The proposal adds to the means of egress which increases life safety and should not be considered an increase in occupancy. This is consistent with EB24 which was approved as modified.
PC 1	Further modifies the proposal by removing the in-filling of floor openings from the exemption for fire protection systems.	<b>Support</b>	The public comment removes an unintended exemption which could create a substantial increase in fire area and occupant loading without bringing fire protection systems into compliance.

\* Significant proposals are in bold

## International Building Code – Structural

– Includes related EB and G proposals –

Prop #	Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
EB17	This proposal modifies the provisions for compliance with reduced seismic forces to reference a new ICC 1300 standard for assessing and retrofitting seismic vulnerabilities in wood light-frame dwellings.	Support (AMPC 1) or Support (AS)	The proposal references ICC 1300 using excess words and jargon, such as the reference to seismic vulnerabilities. The public comment is preferred. However, approving this proposal in some form is necessary to reference the new standard.
PC 1	Replaces the proposal with a simple pointer to ICC 1300 for one- or two-family dwellings or townhouses assigned to Risk Category I or II.	Support	The public comment simplifies the language and removes unnecessary jargon.
EB39	This proposal adds new provision allowing repair of structural concrete to be in accordance with ACI 562 except where the IEBC requires structural retrofits due to disproportionate earthquake damage or substantial structural damage.	Support (AMPC 1) or Support (AS)	The proposal makes the use of ACI 562 optional, unlike previous attempts to reference the standard, and excludes its use for seismic retrofits. Uniform, consensus guidance on concrete repairs is needed to promote cost-effective repairs to concrete buildings and help prevent another Champlain Towers.
PC 1	Modifies the proposal to specify repair of structural concrete shall be permitted to comply with ACI 562 Section 1.7 instead of specifying it is deemed to comply with IEBC Section 405.1.	Neutral	
EB40	This proposal adds new provision clarifying removal and replacement of water-damaged finishes as part of a repair is not considered damage that reduces the lateral load-carrying capacity of a structure.	Oppose Standing Motion (D) Support (AS)	The proposal could reduce the cost of repairs by allowing to water-damaged finishes such as gypsum board that are being used to provide lateral resistance to a building to be replaced in kind without triggering an upgrade of the building's lateral force resisting system.
PC 1	Modifies the proposal so the exclusion only counts for wall and floor finishes damaged by smoke or fire suppression.	Oppose	The public comment could result in water damage due to a plumbing leak not caused by an earthquake or due to a flood triggering a structural upgrade, which could result in triggering the substantial damage clause and requiring a property be elevated or (if non-residential) dry floodproofed.
EB64	The proposal adds new exceptions from needing to consider increased lateral loads due to an added photovoltaic panel system weighing 5 pounds per square foot or less or added mechanical units weighing less than 400 pounds.	Support (AMPC 1) or Support (AM)	The proposal could reduce the cost of complying with energy code or state and local mandates to retrofit existing buildings with photovoltaic systems or more efficient mechanical systems if the added systems are light enough to meet the new exceptions and thus not trigger a structural upgrade.
PC 1	Modifies the proposal to remove the 5 pound per square foot limit for excluding added rooftop photovoltaic panel systems from counting towards triggering a seismic upgrade.	Neutral	

\* Significant proposals are in bold

## International Building Code – Structural

– Includes related EB and G proposals –

Prop #	Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
G2	This proposal adds a definition for Life Safety Components applicable to the determination of Risk Category per Section 1604.5.	Support (AMPC) or Support (D)	The proposal raises the question whether a definition is needed for a word used once in the code. While users hate laundry lists, this might be one case where listing the five types of components directly in 1604.5.1 could have been done.
PC 1	Modifies the proposal to delete the proposed "life safety components" definition and replace the term in 1604.5 with "life safety systems, designated seismic systems, emergency power systems, or emergency and egress lighting systems".	Support	The public comment removes the concern with the proposed definition of "life safety components" and it removes the phrase from section 1604.5, thereby nullifying the need for the definition.
G4, Part 1	This proposal modifies the definition of Roof Replacement to specify it is an alteration that includes removing all existing layers of the roof assembly down to the deck and installing replacement materials.	Support Standing Motion (D)	The proposal uses code requirements in the definition and overrides the ability to reinstall previously undamaged materials in accordance with Section 1512.4. Further, it should be possible to replace a storm-damaged roof without having to upgrade the roof system as long as the building is not made less compliant than it was before the damage. The current definition is sufficient and clear.
PC 1	Modifies the proposal to require installation of "new roof assembly materials".	Oppose	The public comment does not address the concerns with the original proposal. Further, using the term "new roof assembly" in the definition creates a conflict since the roof deck is by definition part of the roof assembly.
S3	This proposal adds new section requiring balconies, decks, exterior stairways, and similar surfaces exposed to the weather and sealed underneath be waterproofed and sloped a minimum of 1/4 unit vertical in 12 units horizontal (2% slope) for drainage.	Support (D) or Support (AMPC 1)	The new code section is not properly placed in the IBC as Chapter 15 applies to Roof Assemblies and Rooftop Structures, the proposal is applicable to decks and balconies. The language used in this proposal is vague and confusing. The Accessibility Code technical criteria allows walking surfaces to have a cross slope of a maximum of 2% and with this proposal requiring a minimum of 2%, the only acceptable slope would be exactly 2% for all affected walking surfaces. The phrase sealed underneath could be interpreted different ways, requiring all decks and balconies to be waterproofed.
PC	This public comment will require exterior surfaces of balconies, decks, landings, porches, stairways, and similar surfaces that are exposed to weather to be sloped to provide drainage, if not already self draining via gaps or perforations.	Neutral	This public comment has fixed the issues addressed in the original proposal. It will not affect the construction of most balconies, decks, landings, porches, stairways because they are already self draining via gaps in decking or perforations in other surfacing materials. And where of solid construction, such as concrete, common construction practices already slope these surfaces to drain water away from the structure.

\* Significant proposals are in bold



## International Building Code – Structural

Prop #	Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
S42	This proposal creates a new Section 1511 on Air Barriers and copies the air barrier provisions including construction, material and assembly requirements from the Commercial Provisions of the International Energy Conservation Code.	Support Standing Motion (D)	This proposal had brought prescriptive material and construction requirements for air barriers into the building code as a reprinting of those requirements from the energy code. It provided no justification for copying the requirements when it could have just supplied a pointer. Conflicts may result if the companion provisions are updated.
PC 1	The public comment brings specific air barrier requirements from the IECC reprinted into the building code.	Oppose	The public comment provides a list of acceptable materials permitted to be used as an air barrier, which are copied from the International Energy Conservation Code (IECC). Sealing methods for air barriers are also addressed and copied from the IECC. There is no justification for copying the requirements when they could have just supplied a pointer. Conflicts may result if the companion provisions are updated.
PC 2	The public comment has removed the reprinted lists taken from the IECC and provided a reference to the IECC in its place. It also has provided prescriptive sealing requirements for roof assemblies.	Oppose	The public comment has removed the reprinted lists taken from the IECC and provided a reference to the IECC in its place. It also has provided prescriptive sealing requirements limited to roof assemblies.
S43	This proposal adds new sections on installation of lightning protection systems limiting attachment to metal edge systems or gutters requiring wind testing and referencing roof covering and roof assembly manufacturer's installation instructions.	Support (AMPC) or Support (D)	Exception did not state what requirement the metal edge system or gutter manufacturer's installation instructions can permit the user to avoid. The language implies there is one single roof assembly manufacturer, but such assemblies can have multiple components from different manufacturers; there was no path to compliance in this instance or if the manufacturer was unknown.
PC 1	The public comment adds language allowing a registered design professional to direct the installation of Lightning Protection System (LPS) components.	Support	The public comment adds additional language to the original proposal addressing circumstances when the manufacturer of flashing or roofing materials is unknown by allowing a registered design professional to prescribe the installation details.
S48, Part 1	This proposal adds new provision requiring installation of roof insulation materials to comply with Section C503.2.1 of the IECC.	Support Standing Motion (D)	The proposal is pointing to the Commercial Provisions of the energy code, even for roof replacements on a residential building less than 4 stories.
PC 1	Modifies the proposal to supply pointers to the IECC provisions for both commercial and residential occupancies.	Oppose	The public comment does not address the issues with the original proposal. In addition, the referenced IECC chapters are too broad and do not specifically relate to roof replacement. The committee was clear any code change related to energy efficiency should be directed to the IECC committees.

\* Significant proposals are in bold



## International Building Code – Structural

Prop #	Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
S53	This proposal modifies the provisions on roof replacement to add a new exception for low-slope roofs requiring compliance with roof insulation requirements for new construction unless the addition of insulation above the roof deck is infeasible.	Support Standing Motion (D)	The proposed language does not belong in IBC Chapter 15. It should be part of IEBC Section 708 on minimum energy conservation requirements for Level 1 alterations or part of the IECC itself. The exception contains a requirement that applies to all roofs and appears to assume insulation can only be added above the roof deck.
PC 1	Modifies the proposal to remove language stating roof replacements must with the roof insulation requirements for new construction and charges the building official with determining where adding new insulation is infeasible.	Oppose	The public comment does not address the issues with the original proposal. Also, with the additional modifications in the PC, the exception now doesn't tell you what it is exempting you from.
PC 2	Requests Disapprove.	Support	
S60	This proposal adds new provisions allowing reinstallation of existing rooftop-mounted photovoltaic panel systems including permit requirements for reinstalled equipment.	Support Standing Motion (D)	The proposal has language problems as it uses the word "permitted" to refer both to "something allowed to be done" and "something that was issued a building permit". Roof repairs often do not require a permit, and existing solar panel installations may not have received one.
PC 1	Modifies the proposal to clean up the language allowing for the reuse of existing PV systems when a roof replacement or roof recovering takes place.	Oppose	The public comment still doesn't address the problem with the original proposal placing permit requirements in Section 1512.5 of the IBC and Section 705.5.1 of the IEBC.
PC 2	Modifies the proposal to clean up the language allowing for the reuse of existing PV systems when a roof replacement or roof recovering takes place.	Oppose	The public comment still doesn't address the problem with the original proposal placing permit requirements in Section 1512.5 of the IBC and Section 705.5.1 of the IEBC.
S102	This proposal adds new provision for barrier cable systems requiring the wires or cables be tightened or stressed to prevent a 4-inch sphere with a 50-pound load applied from passing through the barrier.	Support Standing Motion (D)	The idea a 50-pound force must be applied to the 4-inch sphere to test a guard of any material has been a point of contention in the industry. Deck builders and guard manufacturers have pushed back against building officials who want to apply such a test.
PC 1	Modifies the proposal to list all guard infill components, allow for dividing the 50-pound load between components, and require the components have adequate stiffness to prevent the load from passing through the guard.	Oppose	The list of components is overly prescriptive and unnecessary. The comment does not address the issue of improperly using the 50-pound infill load as a design or test load for checking opening limitations and makes matters worse by expanding the requirement to all guard infill components, not just barrier cable systems.
PC 2	Modifies the proposal to replace the barrier cable requirement with a requirement that all openings in guard infill resist passing of a cone with a horizontally applied concentrated load of 16.5 pounds.	Oppose	The comment does not address the fundamental issue that load testing for checking opening limitations in traditional guard systems should not be required.

\* Significant proposals are in bold

## International Building Code – Structural

Prop #	Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
S133	This proposal adds new provision requiring NFPA 13 sprinkler systems including attachments and bracing comply with ASCE 7 Section 13.3.1 seismic forces for nonstructural components.	Support Standing Motion (AM)	The proposal as submitted was flawed as it made users go to ASCE 7 just to figure out their building is not subject to any seismic bracing requirements. The committee modification clarified bracing and anchorage need only be designed for seismic loads where required by ASCE 7 and NFPA 13,
PC 1	Requests Disapprove.	Neutral	
S140	This proposal adds a new section exempting ground-mounted photovoltaic panel systems serving Group R-3 buildings from special inspections and permits the building official to exempt deep foundations supporting these systems.	Oppose Standing Motion (D) Support (AS) or Support (AMPC 1)	The proposal supplies a needed exception for Group R-3 to minimize the cost of providing on-site energy generation where required by increasingly stringent energy codes and green standards or by local mandates. Some building departments require special inspections for any element of a house or related accessory structure otherwise covered by the IRC that involves an engineer and are reluctant to grant exceptions for work of a minor nature.
PC 1	Modifies the proposal to remove the explicit exemption for ground-mounted photovoltaic (PV) panel systems serving Group R-3 buildings.	Support	The public comment provides cover for a building official to exempt residential installations of ground-mounted photovoltaic systems from special inspection, though an explicit exception for Group R-3 is preferred.
S145	This proposal adds a new section exempting ground-mounted photovoltaic panel systems serving Group R-3 buildings from special inspections and permits the building official to exempt deep foundations supporting these systems.	Oppose Standing Motion (D) Support (AS) or Support (AMPC 1)	The proposal supplies a needed exception for Group R-3 to minimize the cost of providing on-site energy generation where required by increasingly stringent energy codes and green standards or by local mandates. Some building departments require special inspections for any element of a house or related accessory structure otherwise covered by the IRC that involves an engineer and are reluctant to grant exceptions for work of a minor nature.
PC 1	Modifies the proposal to remove the explicit exemptions for ground-mounted photovoltaic (PV) panel systems serving Group R-3 buildings.	Support	The public comment provides cover for a building official to exempt residential installations of ground-mounted photovoltaic systems from special inspection, though an explicit exception for Group R-3 is preferred.
S157	This proposal adds new provision requiring guards along retaining walls adjacent an open walking surface more than 30 inches above the grade below the wall unless an approved barrier is provided or the public cannot access the wall.	Oppose Standing Motion (AM) Support (AMPC 1) and (AMPC 2) or Support (D)	The barrier requirements in place are overly restrictive for every circumstance, and language can be read to require a guard even if the wall extends above the walking surface to the minimum height, forming a barrier.
PC 1	The public comment adds excepting language for when the retaining wall creates an area well, such as at an egress window.	Support	The public comment addressed a concern that guards could be required at all area wells over 30" in depth.
PC 2	The public comment clarifies the required guard height measurement for guards on top of retaining walls.	Support	The language added in this public comment clarifies that when the required guard is installed on top of the protected retaining wall, the two heights are to be added together to obtain the required minimum height of the guard.

\* Significant proposals are in bold

## International Building Code – Structural

Prop #	Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
S161	This proposal modifies the section on design for capacity and settlement to state both the vertical and lateral bearing capacity of the soil and sliding resistance not be exceeded and shall not exceed the values in a geotechnical report, if provided.	Support Standing Motion (D)	The added language states that the soil bearing values determined by a geo-technical evaluation cannot be exceeded in the design. It also implies the lateral bearing capacity and sliding resistance of soils need to be evaluated for all foundations even if they are not of a potential concern.
PC 1	Requests As Submitted	Oppose	
S178	<b>The proposal adds new compliance requirements for CO2 associated with construction materials</b>	Support Standing Motion (D)	<b>The proposal is outside the scope of the IBC. Emissions tracking should not be accomplished through the code compliance process or through building code departments. Third-party reporting systems should be developed and used by product manufacturers for demonstrating their adherence to emission reduction goals.</b>
PC 1	<b>The public comment applies new CO2 emissions standards to concrete products being used during construction.</b>	Oppose	<b>The public comment does not address the issue that the IBC is not the place to regulate emissions.</b>
PC 2	<b>The public comment applies new CO2 emissions standards to steel products being used during construction.</b>	Oppose	<b>The public comment does not address the issue that the IBC is not the place to regulate emissions.</b>
PC 3	<b>The public comment requires Environmental Product Declarations be submitted with permit applications.</b>	Oppose	<b>The public comment will require that Environmental Product Declarations (EPD) be submitted with permit applications to be reviewed for 75% of the steel, concrete and glass products used during construction, without applying any product emission standards which must be met.</b>

\* Significant proposals are in bold

## International Building Code – Structural

Prop #	Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
S205	The proposal adds a new section on fire-retardant-coated wood prohibiting site-applied coatings, paints or solutions. Factory-laminated products and facings or wood veneers applied on site are permitted.	Oppose Standing Motion (AM) Support (D)	The proposal prohibits fire-retardant-coated wood, site-applied coatings, paints or solutions, preventing their widespread and successful use in the field. By creating a new section on fire-retardant-coated wood, site-applied coatings, paints or solutions will be prescriptively prohibited, preventing their use under an alternate materials application. Factory-laminated products and facings or wood veneers applied on site are permitted. Eliminating an entire class of tested products is not the stated purpose or intent of the model building codes.
PC 1	The public comment modifies slightly the language permitting the use of fire-retardant coated wood.	Oppose	The public comment removed the sentence prescriptively prohibiting the application on site of fire-retardant coatings, paints or solutions to surfaces but only permits the use of factory-manufactured laminated products produced with a wood substrate, complying with Section 803.11 , or the application of facings or veneers over a wood substrate as methods to comply with new coated wood requirements.
PC 2	The public comment removes the prohibition on all coated wood, but only allows factory coated products to be used.	Oppose	The public comment removes the sentence prescriptively prohibiting fire-retardant coated wood, but only permits the use of factory applied coated wood products or the application of facings or veneers complying as acceptable methods of improving the flame spread index or smoke-developed index of surfaces.
PC 3-10	Requests Disapprove.	Support	
S227	This proposal adds an exception allowing uplift forces to be determined from the truss design drawings or construction documents and revises the table providing required rating of uplift connectors to correlate with ASCE 7-16.	Support (AMPC 1) or Support (D)	This proposal revised and expanded the tables for roof member uplift using a conservative 10# dead load.
PC 1	The public comment revises the tables for roof member uplift to use 15# dead load.	Support	The public comment has revised the table for roof member uplift to be based on a realistic 15# roof/ceiling dead load.

\* Significant proposals are in bold

**International Residential Code – Building**  
– Includes related G and S proposals –

<b>Prop #</b>	<b>Proposal/Comment Description</b>	<b>Public Comment Recommended Action &amp; Vote</b>	<b>Reason Statement</b>
G4, Part 2	This proposal modifies the definition of Roof Replacement to specify it is an alteration that includes removing all existing layers of the roof assembly down to the deck and installing replacement materials.	Support Standing Motion (D)	The proposal uses code requirements in the definition and overrides the ability to reinstall previously undamaged materials in accordance with Section R908.5. Further, it should be possible to replace a storm-damaged roof without having to upgrade the roof system as long as the building is not made less compliant than it was before the damage. The current definition is sufficient and clear.
PC 1	Modifies the proposal to require installation of "new roof assembly materials".	Oppose	The public comment does not address the concerns with the original proposal. Further, using the term "new roof assembly" in the definition creates a conflict since the roof deck is by definition part of the roof assembly.
S24, Part 2	The proposal modifies the section on underlayment to move the exceptions for one layer of D1970 self-adhered underlayment or two layers of 30# asphalt felt into the tables of underlayment types, underlayment application and underlayment fastening.	Support Standing Motion (D) or Support (AMPC 1)	The wording in portions of the table changed by this proposal were confusing and could be misinterpreted to require additional layers of underlayment.
PC 1	The public comment revises the tables for required roofing underlayment.	Support	The public comment clarifies that an additional layer of underlayment is not required but is a third option of underlayment installation. The comment fixes the concerns with the original proposal.
S48, Part 2	This proposal adds new provision requiring alteration of an existing roof assembly to comply with Section R503.1.1 of the IECC.	Support Standing Motion (D)	The proposal improperly points to the IECC rather than IRC Chapter 11.
PC 1	Modifies the proposal to point to the applicable section in Chapter 11 of the IRC.	Oppose	The public comment does not address the issues with the original proposal. In addition, the referenced chapter is too broad and do not specifically relate to roof replacement. Further, the change would require the roofing contractor to assess the energy use of the building when conducting a roof replacement. The committee was clear any code change related to energy efficiency should be directed to the IECC committee.
<b>RB7</b>	<b>This proposal adds a chapter with provisions for existing buildings and structures.</b>	<b>Oppose Standing Motion (D) Support (AMPC 2)</b>	<b>The proposal would bring in commercial construction requirements from the IEBC directly into the body of the code. NAHB supports developing Appendix J to address work done on existing buildings scoped to the IRC, but not in this manner.</b>
PC 1	<b>Replaces the proposal to address new and existing materials when making repairs and modifying structural definitions.</b>	<b>Oppose</b>	<b>The public comment includes changes that conflict with the preferred Public Comment 2.</b>
PC 2	<b>Replaces the proposal with a comprehensive modification and reorganization of Appendix AJ.</b>	<b>Support</b>	<b>The public comment deletes unnecessary pointers to provisions that are already in the code and uses terminology that code users are familiar with.</b>

\* Significant proposals are in bold

## International Residential Code – Building

Prop #	Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
RB11	This proposal requires listing test standards or evaluations to be relevant to the provision requiring the listing, that listed items be installed per the listing, and that a copy of the listing be provided to the building official if requested.	Support Standing Motion (D)	The proposal requires the owner to pay for any and all standards that might be referenced in the code regarding the project if the code official wishes. If abused, this would cause a substantial cost burden.
PC 1	Replaces the proposal to correlate this section with what the committee approved in ADM13 Part II.	Neutral	The public comment is redundant if ADM13 Part II passes.
RB13	This proposal requires supporting data for the approval of materials or assemblies to be based on research reports from an approved, accredited agency.	Support Standing Motion (D)	The proposal does not correlate with what the Committee approved in ADM13 Part II.
PC 1	Replaces the proposal with the intent to correlate these sections with what the committee approved in ADM13.	Oppose	The public comment includes extra text that is confusing and does not correlate with ADM13, and the reference in R104.11.2.2 points to the wrong Section.
RB40	This proposal adds a new section permitting voluntary lateral force-resisting system alterations using the new ICC 1300 standard, Appendix A3 or A4 of the IEBC, or the voluntary seismic retrofit sections of the IEBC.	Support Standing Motion (D)	The proposal adopts IEBC appendices in the IRC. This has generally been frowned upon outside the IEBC and is unnecessary as a user can always opt to use the IEBC even for a dwelling within the scope of the IRC. RB41 is the preferred vehicle for referencing ICC 1300 as it's clear and concise, plus includes chimneys which are missing from this proposal.
PC 1	Modifies the proposal to specify voluntary retrofits do not trigger compliance with other structural requirements of the IRC.	Neutral	
RB41	This proposal adds new provision allowing voluntary seismic retrofit of one- and two-family dwellings and townhouses using a new ICC 1300 standard.	Support Standing Motion (AM)	The proposal is the appropriate vehicle for referencing the new ICC-1300 standard. It is simpler than RB40-22 and does not attempt to adopt IEBC appendices in the IRC.
PC 1	Requests Disapprove.	Oppose	
RB44	This proposal modifies the live load table to exclude guards and handrails from the deflection for all other structural members.	Support Standing Motion (AS)	The proposal saves the builder needing hire an engineer to calculate the deflection of wood guards. Failure of a guard or handrail will not lead to the collapse of a building, so a stringent L/240 limit is not needed.
PC 1	Requests Disapprove.	Oppose	
RB45	This proposal requires splices in floor, ceiling, or roof framing members not occurring over a bearing point to be designed by a registered design professional.	Oppose Standing Motion (D) Support (AMPC 1)	The proposal is not necessary, because splices are adequately addressed in the code, and it does not address non-structural splices.
PC 1	Modifies the proposal by deleting Section R301.9 on framing member splices and adding requirements for splices to occur over vertical supports or be engineered in the applicable joist and rafter Sections.	Support	The public comment addresses the concerns caused of creating a new section on splices by placing guidance in the relevant sections for joists and rafters.

\* Significant proposals are in bold

## International Residential Code – Building

Prop #	Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
RB48	This proposal requires the fire separation distance to be determined by assuming an imaginary line where lot lines do not exist between townhouse units.	Support Standing Motion (D)	The proposal is meant to address interior corners where there is no existing or possible future structure measured perpendicular to the wall--a large departure from how fire separation distance has been used.
PC 1	Modifies the proposal by further addressing measurement of lot lines between townhouse units and attempts to clarify that this section does not apply to walls covered in R302.2.	Oppose	The public comment adds confusion, because both R302.1 and R302.2 would address walls separating townhouse units, but in conflicting ways. It is also unclear if "exterior wall" applies to the unit or overall building because there is no definition of the term outside of Chapter 11.
RB53	This proposal sets minimum lengths for townhouse yards or open ways.	Support (AMPC 1) and (AMPC 3)	The proposal was modified so as not to prohibit common townhouse designs, but the approved version is still too restrictive. If Public Comment 1 passes, Public Comment 2 is not needed.
PC 1	Modifies the proposal by adding a set length in addition to the percentage calculation for each wall of unsprinklered townhouses and applying whichever dimension is less.	Support	The public comment would avoid prohibiting most common townhouse designs being built today and provides a simpler correction of the issue addressed in Public Comment 2.
PC 2	Modifies the proposal by changing the minimum wall length for unsprinklered townhouses from 15 percent to 12 percent.	Support	The public comment provides an alternate, more restrictive solution to Public Comment 1.
PC 3	Modifies the proposal by adding an exception allowing the walls of an attached garage to count toward the open length for sprinklered townhouses.	Support	The public comment fixes the unintended consequence of prohibiting popular townhouse designs with an attached garage.
RB62	This proposal requires fire-resistance-rated floor/ceiling and wall assemblies to extend through attached enclosed accessory structures, separating them.	Support Standing Motion (D)	The proposal reorganizes the section in a way that conflicts with RB61, which was approved as modified.
PC 1	Modifies the proposal by moving Exception 2 from R302.3 to the section on Continuity and adds an exception for common accessory rooms.	Oppose	The public comment is likely to cause problems with correlation, since there were a lot of changes approved for this section in RB61 and RB63. For example, Section R302.3.2 on continuity was approved in RB61 with conflicting text.

\* Significant proposals are in bold



## International Residential Code – Building

Prop #	Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
RB74	This proposal requires a floor assembly examined for equivalent fire performance to 2x10s under Exception 4 for fire protection of floors to demonstrate such equivalency per new standard ASTM D8391.	Support Standing Motion (AM)	The proposal as modified references the new ASTM standard D8391 as an option for demonstrating equivalent fire performance under Section R302.13 and maintains the current allowance of code officials to approve other floor assemblies. It is important that the code should provide the option of both compliance methods.
PC 1	Modifies the proposal by prohibiting the use of field-applied fire-resistant paints, coatings, and chemical treatments.	Oppose	The public comment does not provide convincing reasoning for prohibiting the use of field-applied coatings which comply with an ASTM standard that provides the parameters for acceptance. In addition, an all-out prohibition denies the possibility of using alternate means and methods for approval.
PC 2	Modifies the proposal by requiring field-applied protection to be inspected in accordance with IBC Section 1705.15.	Oppose	The public comment unnecessarily points to one part of the referenced standard and referencing the section on special inspections in the IBC is much too restrictive for an IRC building.
RB76	<b>This proposal reorganizes Section 303 by addressing natural light and ventilation requirements in separate sections.</b>	Support Standing Motion (AM)	<b>The proposal logically separates the section into provisions for lighting and ventilation for easier compliance and enforcement.</b>
PC 1	<b>Modifies the proposal by requiring all habitable rooms to be provided with natural ventilation openings.</b>	Oppose	<b>The public comment would make many affordable residential dwelling designs, such as townhouses, impossible to build. It would also prohibit using many basement areas as living space. Mechanical and natural ventilation are both viable strategies to fight airborne pathogens, so responding to Covid is not a valid reason for this change.</b>
RB79	This proposal adds an exception for exterior stairway illumination for exterior stairways less than 30 inches in total rise.	Oppose Standing Motion (D) Support (AMPC 1)	This proposal can cause confusion where a light at an exterior door is required by the electrical code but also serves a stairway less than 30 inches in total rise.
PC 1	Modifies the proposal so that the exception does not apply to a light source serving a grade-level egress door.	Support	The public comment removes the possible conflict with the National Electrical Code.
RB93	This proposal coordinates the requirements regarding the use of a key, tool or effort for various components of emergency escape and rescue openings.	Support Standing Motion (D)	The proposal requires EEROs and any bars, grilles, covers and screens placed over them to open without effort. This is unreasonable and will add unnecessary costs.
PC 1	Modifies the proposal by removing the requirement for special knowledge or effort for egress components.	Oppose	The public comment does not provide convincing evidence that every aspect of these sections needs to be correlated. Windows, screens and covers are different than doors in how much effort they need for operation, and the requirements are stated correctly in the current code.

\* Significant proposals are in bold

## International Residential Code – Building

Prop #	Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
RB132	This proposal adds prescriptive requirements for preservatives used in the field treatment of treated wood.	Support Standing Motion (D)	The proposal has the problem that one would have to know what was used for the initial treatment in order to comply, and that may be difficult to find out. The requirement should stay as it is.
PC 1	Modifies the proposal by requiring field treatment per the treated wood manufacturer's recommendations and deletes the requirement that field treatment is the same as the factory treatment.	Oppose	The public comment should not add another requirement to follow manufacturers "recommendations" in the code. It is unclear how this affects contractor liability.
PC 2	Modifies the proposal by requiring field treatment per the treated wood manufacturer's recommendations.	Oppose	The public comment has the same issues as Public Comment 1.
RB136	This proposal modifies the section on protection of mechanical, plumbing and electrical systems to require elevation of replacement equipment damaged by flood.	Support Standing Motion (D)	The proposal adds a requirement to the IRC without prescriptive guidance on how to elevate such equipment. As written this requirement could apply even in a very minor flood that doesn't result in a claim being filed for the home or the community declaring a disaster.
PC 1	Requests As Submitted.	Oppose	
RB144	<b>This proposal adds a new provision requiring all dwellings in areas of high tornado hazards be provided with a residential or community storm shelter.</b>	Support Standing Motion (D)	<b>The proposal represents a significant cost increase. Storm shelters cost \$3,000 for an in-ground prefab unit, \$5,000 for an above-ground unit that can be bolted to a garage or storage room slab, and \$8,000-\$14,000 for a site-built room. The proposal would do nothing to address the overwhelming majority of tornadoes that are EF0-EF2 and cause damage to homes but do not represent an extreme threat to life safety.</b>
PC 1	Modifies the proposal to place the requirement for providing a storm shelter in an Appendix.	Oppose	The public comment includes language in Section AY101.1 that does not match the parallel language in existing IRC Section R323.1 as modified for the 2024 IRC by proposal RB143-22. Also, the travel distance requirement in Section AY103.1 is more stringent than parallel language in the 2024 IBC that was modified in Group A to allow the building official to approve a longer distance.

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## International Residential Code – Building

Prop #	Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
RB149	This proposal requires reflective markings beneath eaves where installed BIPV systems create hidden electrical hazards and provides an exception for systems listed to UL 3741 which do not present a hazard.	Support (AMPC 1) or Support Standing Motion (D)	The proposal intends to correlate with the IFC. But this is not practical since fire officials in some areas are not involved in IRC-scoped buildings. There is also an aesthetic concern without a standardized marking system since neighbors could see the bright markings.
PC 1	Modifies the proposal by deleting the section on reflective markings and requires all BIPV systems to be listed and labeled per UL 3741.	Support	The public comment provides better language since most BIPV products likely comply with the standard and would not need to be provided with markings as required in the proposal.
PC 2	Requests As Submitted.	Oppose	
RB160	This proposal requires sleeping units in which an ESS is installed to be protected by smoke alarms and changed the requirement for a heat detector to a heat alarm.	Support Standing Motion (D)	The proposal requires heat alarms that are not on the market. Installing alarms that are not designed for unconditioned spaces. could lead to many false alarms.
PC 1	Requests As Submitted.	Oppose	
RB162	This proposal adds a new section in Appendix J with structural requirements for alterations.	Support Standing Motion (AM) or Support (AMPC 1)	The proposal provides a framework to address alterations. NAHB supports developing Appendix J to address work done on existing buildings scoped to the IRC.
PC 1	Further modifies the proposal by changing two section titles and prohibiting the exceptions under Dead Load Increase from being used simultaneously.	Support	The public comment makes minor improvements to clarify the intent of this section.
RB163	This proposal adds a new section with structural requirements for additions.	Support (AMPC 1) or Support Standing Motion (D)	The proposal would add the provisions in the body of the code. NAHB supports developing Appendix J to address work done on existing buildings scoped to the IRC in a comprehensive manner. The change also includes language and concepts that are unfamiliar in the context of the IRC.
PC 1	Modifies the proposal by moving the section to Appendix J, deleting language referring to "attached" and "detached" additions, and requiring engineering where structural components do not meet the requirements of the code.	Support	The public comment creates an initial section in the Appendix for additions and improves on the original proposal by simplifying the provisions.

\* Significant proposals are in bold

## International Residential Code – Building

Prop #	Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
RB173	The proposal adds requirements for framing at an open floor edge to support a guard assembly and resist rotation.	Support AMPC 1 or Support Standing Motion (AS)	The proposal added requirements for framing at an open floor edge to support a guard assembly and resist rotation when guardrails are required at the stairway edge. It did not include any prescriptive details for open web trusses or I-joists.
PC 1	The public comment adds additional prescriptive requirements and limitations for framing at a floor opening to a stairway which will support a guardrail post.	Support	The public comment clarifies the use of lumber, structural glued laminated timber, structural composite lumber, I-joist and open web trusses when used as floor framing supporting guards are all permitted.
PC 2	The public comment adds additional prescriptive requirements for when metal gusseted floor trusses are used at the floor opening to a stairway which will support a guardrail post.	Oppose	The public comment adds prescriptive details for open web floor trusses when used as floor edge framing supporting guards that are better served to be located in manufacturer's installation instructions.
RB178	This proposal deletes the requirements for drilling of bolt holes from the Table R507.2.3 footnotes and adds such requirements based on the 2018 NDS in R507.9.1.3 Ledger to Band Joist Details.	Support Standing Motion (D) or Support (AMPC 1)	Regardless of what the existing footnotes say, drilling two hole sizes for lag screws is impractical during construction of a residential deck. Enforcing any hole size requirements is impossible without conducting two separate inspections.
PC 1	The public comment removes the prescriptive hole size requirement for bolts attaching ledgers.	Support	The public comment removes a requirement that is difficult to inspect and not required for other bolts.
PC 2	The public comment replaces a reference to the NDS with a prescriptive hole size requirement for deck ledger bolting.	Oppose	The public comment makes explicit a requirement that cannot be enforced in the field without two inspections,
RB188	This proposal reorganizes the ledger and lateral connection provisions for decks and adds additional deck lateral bracing requirements.	Support Standing Motion (D)	The proposal could result in needing to hire an engineer to design the lateral bracing for a deck. Depending on the criteria used this could result in overly conservative construction details. Current prescriptive deck requirements have been adequately tested and proven effective in protecting against lateral loads produced by live load, wind and seismic conditions.
PC 1	The public comment further reorganizes the section on lateral connections and removes the list of lateral bracing methods	Oppose	The public comment does remove the list of bracing options that included some impractical solutions for a residential deck but could still result in engineering being required. Referring to lateral movement instead of lateral loads includes designing decks to resist dancing college students or even someone running into the deck with a lawn mower.

\* Significant proposals are in bold

## International Residential Code – Building

Prop #	Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
RB190	This proposal adds prescriptive requirements for deck ledger flashing and requires the water-resistive barrier to run behind the ledger.	Oppose Standing Motion (AS) Support (AMPC 1) or Support (D)	The proposal includes overly-restrictive requirements for existing walls and requires a lot of siding to be removed. It requires flashing details that are not possible with less than 2" under a patio door above the deck.
PC 1	The public comment modifies the flashing required at patio doors above decks and allows ledgers to be spaced off of the building wall without flashing.	Support	The public comment addressed concerns about flashing required at patio doors above decks as well as allowing ledgers to be spaced off of the building wall without requiring flashing.
RB193	This proposal requires nail head dimensions for roof sheathing fasteners and requires RSRS-03 ring shank nails for wood species with a specific gravity from 0.35 to 0.42.	Oppose Standing Motion (D) Support (AMPC 1)	The proposal does not address which species of wood it applies to. It also applies high-wind area requirements to all areas and requires the use of nails with large heads.
PC 1	The public comment clarifies the prescriptive option when lumber used for roof framing is a specific gravity greater than 0.34 and less than 0.42 and removes a requirement to design to the NDS for low specific gravity lumber.	Support	The public comment retains a prescriptive fastening option for roof framing lumber with specific gravities of less than 0.42 but greater than 0.34. AWC is developing a readily accessible table of specific gravities to be available on their website.
RB195	This proposal modifies Table R602.3(3) to require smaller nail spacing in the field for wood species with a specific gravity less than 0.42.	Oppose Standing Motion (D) Support (AMPC 1)	This proposal did not provide a prescriptive requirement if the lumber used for wall framing had a specific gravity of less than 0.42. An engineered design would be required.
PC	The public comment provides a revised footnote to the table that provides a prescriptive nailing requirement when specific gravity is less than 0.42 but greater than 0.34.	Support	The public comment provides a revised footnote to Table R602.3(3) with a prescriptive nailing requirement of 8" in the field for nailing wall sheathing to framing when the lumber used for framing has a specific gravity of less than 0.42 but greater than 0.34.
RB231	This proposal deletes limitations on polypropylene siding on walls with a fire separation distance of less than 5 feet and walls closer than 10 feet of a building on another lot.	Support Standing Motion (AS)	This proposal removes an unjustified testing requirement that singles out a particular product. The fire separation distance requirements in Section R302 provide appropriate limits on wall construction when necessary.
PC 1	Requests As Submitted	Support	
PC 2	Requests Disapprove	Oppose	
PC 3	Requests Disapprove	Oppose	
RB239	This proposal provides fastening requirements for attaching soffit to wood species with specific gravity greater or equal to 0.35 and less than 0.42.	Support (AMPC) or Support Standing Motion (AS)	This proposal provides fastening options for soffit attachment to wood species with wood species of lower specific gravity.
PC 1	Modifies the first sentence of the footnote so that it describes the specific gravity basis of the prescribed nailing for soffit framing.	Support	The proposed public comment revises the first sentence of the footnote so that it describes the specific gravity basis of the prescribed nailing for soffit framing. This is editorial in nature.

\* Significant proposals are in bold

## International Residential Code – Building

Prop #	Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
RB253	This proposal modifies the provisions for fire classification to make the requirements for photovoltaic products and panel systems consistent with the general requirements for roof coverings and assemblies and define Class A, B and C assemblies.	Oppose Standing Motion (D) Support (AMPC 1) and (AMPC 2) or Support (AS)	The proposal provides a logical reorganization of the provisions for fire classification and weather protection of roofs and eliminates duplicative requirements for setback distances for roofing products.
PC 1	Modifies the proposal to delete references to fire classification of roof coverings.	Support	The public comment clarifies the fire classification applies to the entire roof assembly including the substrate the roof coverings are tested over.
PC 2	Modifies the proposal to retitle Section R902.1 as Roof Assemblies, and specify such assemblies only need to be listed where required by a jurisdiction.	Support	The public comment would allow for easier substitution of structural components (e.g., roof sheathing, roof trusses) or underlayments if needed due to supply chain issues.
RB257	This proposal adds new section requiring balconies, decks, exterior stairways, and similar surfaces exposed to the weather and sealed underneath be waterproofed and sloped a minimum of 1/4 unit vertical in 12 units horizontal (2% slope) for drainage.	Support Standing Motion (D)	The proposal is in the wrong chapter as it's not just about roof assemblies and would require all exterior balconies, decks, stairs, etc. be waterproofed if enclosed below, but provisions recently added to the IBC (Section 2304.12.2.4) only requires an impervious moisture barrier between moisture-permeable toppings and wood framing below.
PC 1	Modifies the proposal to relocate the provision to Section R507 and remove the requirements for waterproofing and for the slope for drainage be a minimum of 2%.	Oppose	R507 is specific to exterior decks, but the provision applies to exterior balconies, stairs and other elements that are not otherwise subject to R507.
RB263	<b>This proposal expands the requirements for improved roof covering underlayment from the Wind Design Required Region to the Hurricane-prone Region.</b>	Support Standing Motion (D)	<b>The proposal imposes an excessive requirement for the mid-Atlantic and Northeast regions where the risk of intense hurricanes is much less than FL and the Gulf Coast, and the risk of severe tornadoes much less than the SE. Home Innovation Research Labs estimated the cost impact as \$700-\$900 for a typical home, much higher than quoted by the proponent.</b>
PC 1	<b>Modifies the proposal to change the trigger from hurricane-prone regions to areas where the ultimate design wind speed is 120 miles per hour or greater.</b>	Oppose	<b>The public comment would make the IRC more stringent than the IBC where the corresponding provisions kick in at 130 miles per hour. The change would also impact areas outside the hurricane-prone region such as Alaska.</b>
RB290	This proposal requires a minimum 4-ft long perforated pipe or geotextile matting to be connected to each side of the tee fitting and requires above-ground materials to meet the requirements for DWV piping.	Support Standing Motion (D)	Vapor barriers are required below the slab and will keep the tee fitting from filling with concrete when properly installed.
PC 1	Requests As Submitted.	Oppose	

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## International Residential Code – Building

Prop #	Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
RB291	This proposal requires the radon vent pipe to be centered in an unobstructed cylindrical space 36 inches tall and 18 inches in diameter for the possible future installation of a fan.	Support Standing Motion (D)	The proposal would require several elbow fittings in many installations which negatively affects a non-activated system. Many installers will run a new vent when they install an active system, so it is not necessary to provide the space for a future fan.
PC 1	Requests As Submitted.	Oppose	
RB297	This proposal requires structural elements and systems in existing buildings to comply with Section R102.7.1.	Support Standing Motion (AM) or Support (AMPC 1)	The proposal, as modified, fleshes out Appendix J with structural requirements that will help as we move towards development of comprehensive existing building provisions in the IRC. The committee modification removes the problematic reference to Chapters 3 through 10.
PC 1	Further modifies the proposal by placing the word "structure" back into Section AJ102.1 and deleting pointers to R102.7.1 in the structural provisions.	Support	The public comment recognizes that structures are within the scope of the IRC and should be addressed in this Appendix. Additional changes correlate with other changes approved during the CAH.
RB317	This proposal adds an appendix with requirements for physical security.	Support Standing Motion (D)	The public comment requires sidelight entry doors to have double stud framing or equivalent which eliminates many such doors that come as one unit. A single unit is preferred, because it has a continuous threshold which protects the structure of the house. Forced entries are just as likely to occur through windows, and this does not address those cases.
PC 1	Modifies the proposal by simplifying the requirements for door and door frame construction and deleting the section on entry vision and glazing.	Oppose	The public comment addresses the problems of complying with providing a 180-degree view, but it does not fix the other issues with the proposal.

\* Significant proposals are in bold



