

National Association of Home Builders

2022 ICC Online Governmental Consensus Vote Voting Guide *Group B Code Development Cycle*

NAHB.org/CodeDevelopment

October 10 - 24, 2022



National Association
of Home Builders



NAHB's Voting Recommendations for the 2022 Group B Online Governmental Consensus Vote

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.

Each proposal includes a brief description, a recommended vote and supporting reasons for that position. They are listed in numerical order and the recommended vote is formatted to match the manner in which it is presented in the cdpACCESS™ ballot.

Please note that NAHB has also identified critical code changes that will have a serious impact on the enforcement and adoptability of the Group B codes. These high-priority proposals are listed on this page and the next and are also shown in **bold** as they appear in the rest of this voting guide.

For further information on NAHB's voting recommendations please go to www.NAHB.org/CodeDevelopment or contact Neil Burning at 202-266-8565.

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

NAHB High Priority Proposed Changes			
Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
ADM36, Parts 1 & 2	Disapprove	This proposal adds requirements for determining fire safety equivalency and for fire testing.	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.
ADM43, Parts 1 & 2	Disapprove	This proposal modifies the section on permit valuations.	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.
RB44	As Submitted	This proposal modifies the live load table to exclude guards and handrails from the deflection for all other structural members.	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. R302.1 and R302.2 would address walls separating townhouse units, but in conflicting ways.
RB48	Disapprove	This proposal requires the fire separation distance to be determined by assuming an imaginary line where lot lines do not exist between townhouse units.	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.
RB53	Disapprove	This proposal sets minimum lengths for townhouse yards or open ways.	The proposal, as modified, is too restrictive. Common townhouse designs will be prohibited if this change is approved. In addition, the language does not address attached garages in the perimeter measurements which will add confusion.

NAHB High Priority Proposed Changes – Continued

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
RB136	Disapprove	This proposal modifies the section on protection of mechanical, plumbing and electrical systems to require elevation of replacement equipment damaged by flood.	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.
RB144	Disapprove	This proposal adds a new provision requiring all dwellings in areas of high tornado hazards be provided with a residential or community storm shelter.	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.
RB178	Disapprove	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.	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. This issue should be studied prior to making changes in the code.
RB231	As Submitted	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.	Vinyl Siding Institute (VSI) has completed additional testing demonstrating that polypropylene siding poses no additional risks beyond what the current code text requires for other combustible exterior wall coverings. The properties of Polypropylene siding are such that even when tested at a fire separation distance of 4-feet, the siding on the facing test wall failed to ignite after 20-minutes.
S157	Disapprove	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.	This proposal does not provide clear exceptions for other barrier types at retaining walls such as shrubbery or landscaping, and does not adjust the minimum 4" spacing of infill components in locations where children are not likely to be.
S178	Disapprove	The proposal adds new compliance requirements for CO2 associated with construction materials	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.
S205	Disapprove	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.	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.

Administrative Provisions

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
ADM6	Disapprove	This proposal requires buildings destroyed by a fire that has spread outside a WUI area to meet the IWUIC when rebuilt.	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.
ADM13, Parts 1 & 2 ADM14	As Modified	These proposals correlate Section 104 on duties and powers of the building official across the I-Codes.	The proposal as modified by the Committee clarifies Section 104, especially regarding the alternative materials and methods provisions.
ADM36, Parts 1 & 2	Disapprove	This proposal adds requirements for determining fire safety equivalency and for fire testing.	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.
ADM43, Parts 1 & 2	Disapprove	This proposal modifies the section on permit valuations.	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.

International Existing Building Code

EB34	As Submitted	This proposal adds a new section with requirements for accessory dwelling units.	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.
EB39	As Modified by Public Comment 1	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.	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.
EB45	As Modified by Public Comment 1	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.	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.
EB64	As Modified	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.	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.

International Building Code – General

G2	As Modified by Public Comment 1	This proposal adds a definition for Life Safety Components applicable to the determination of Risk Category per Section 1604.5.	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.
----	------------------------------------	---	--

International Residential Code – Building

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
RB7	As Modified by Public Comment 1,2	This proposal, as modified, reorganizes and updates Appendix J on existing buildings and structures.	This change updates the terminology and layout in the appendix to align with what code users are used to. It also deletes provisions and pointers to requirements that are already found in the body of the code.
RB44	As Submitted	This proposal modifies the live load table to exclude guards and handrails from the deflection for all other structural members.	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.
RB45	As Modified by Public Comment 1	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.	The proposal provides guidance on addressing splices in structural members between bearing points.
RB48	Disapprove	This proposal requires the fire separation distance to be determined by assuming an imaginary line where lot lines do not exist between townhouse units.	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. R302.1 and R302.2 would address walls separating townhouse units, but in conflicting ways.
RB53	Disapprove	This proposal sets minimum lengths for townhouse yards or open ways.	The proposal, as modified, is too restrictive. Common townhouse designs will be prohibited if this change is approved. In addition, the language does not address attached garages in the perimeter measurements which will add confusion.
RB61	Disapprove	This proposal reorganizes the separation and continuity requirements for two-family dwellings.	Proposals RB61, RB62, and RB63 all modify Section R302.3. Only RB63 should be approved. It is important for correlation purposes that RB61 and RB62 are disapproved. This is what was agreed upon by those testifying at the Public Comment Hearings.
RB62	Disapprove	This proposal requires fire-resistance-rated floor/ceiling and wall assemblies to extend through attached enclosed accessory structures, separating them.	See the reason statement for RB61.
RB63	As Modified by Public Comment 3	This proposal reorganizes Section R302.3 on two-family dwelling separation, explicitly allows a combination of vertical and horizontal assemblies and adds requirements for vertically stacked dwelling units.	See the reason statement for RB61.
RB74	Disapprove	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 or another approved means.	The proposal provides the only method of direct code compliance for factory-applied coatings through the ASTM standard which may provide a competitive advantage over other systems.
RB79	Disapprove	This proposal adds an exception for exterior stairway illumination for exterior stairways less than 30 inches in total rise.	The 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.
RB93	Disapprove	This proposal coordinates the requirements regarding the use of a key, tool or effort for various components of emergency escape and rescue openings.	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.

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
RB136	Disapprove	This proposal modifies the section on protection of mechanical, plumbing and electrical systems to require elevation of replacement equipment damaged by flood.	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.
RB144	Disapprove	This proposal adds a new provision requiring all dwellings in areas of high tornado hazards be provided with a residential or community storm shelter.	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.
RB162	As Modified by Public Comment 1	This proposal adds a new section in Appendix J with structural requirements for alterations.	The proposal provides a framework to address alterations in the appendix.
RB163	As Modified by Public Comment 1	This proposal, as modified, creates an initial section in Appendix J to address additions.	This change helps create a framework to further develop the appendix in future code cycles.
RB173	As Modified by Public Comment 1	The proposal adds requirements for framing at an open floor edge to support a guard assembly and resist rotation.	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.
RB178	Disapprove	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.	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. This issue should be studied prior to making changes in the code.
RB190	As Modified by Public Comment 1	This proposal adds prescriptive requirements for deck ledger flashing and requires the water-resistive barrier to run behind the ledger.	The proposal, as modified, provides guidance on installing flashing and the water-resistive barrier at deck ledgers. Current code provisions are unclear on how to deal with this detail, especially on existing walls.
RB193	As Modified by Public Comment 1	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.	The public comment revised the earlier footnotes removing unnecessary references to the NDS, which are adequately covered in chapter 3 while retaining prescriptive options, so users won't need an engineered design in most cases. With specific gravity being the primary driver of fastener withdrawal strength, this is an important addition. American Wood Council worked with NAHB to develop a simple table of specific gravities that they will make readily available on their website so users unfamiliar with the NDS Supplement won't have to dig into it looking for the information.
RB195	As Modified by Public Comment 1	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.	See the reason statement for RB193.

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
RB231	As Submitted	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.	Vinyl Siding Institute (VSI) has completed additional testing demonstrating that polypropylene siding poses no additional risks beyond what the current code text requires for other combustible exterior wall coverings. The properties of Polypropylene siding are such that even when tested at a fire separation distance of 4-feet, the siding on the facing test wall failed to ignite after 20-minutes.
RB253	As Submitted	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.	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.
RB257	Disapprove	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.	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.
RB290	Disapprove	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.	Vapor barriers are required below the slab and will keep the tee fitting from filling with concrete when properly installed. Many jurisdictions inspect the vapor barrier and verify that it is sealed to the radon riser pipe which greatly increases the likelihood of a correct installation.
RB291	Disapprove	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.	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.
RB297	As Modified by Public Comment 1	This proposal adds provisions for structural elements and systems in Appendix J.	The proposal, as modified, fleshes out Appendix J with structural requirements that will be helpful as the appendix is further developed in future code cycles.
RB317	Disapprove	This proposal adds an appendix with requirements for physical security.	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.

International Building Code – Structural

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
S3	Disapprove	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.	The new code section on decks and balconies is misplaced in the IBC as Chapter 15 applies to Roof Assemblies and Rooftop Structures. 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.
S24, Part 2	As Modified by Public Comment 1	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.	Public comment 1 has clarified that the additional layer of underlayment is a third option, and is not an additional requirement. The modifications made by the public comment has corrected the concerns that NAHB ad with the original proposal.
S43	As Modified by Public Comment 1	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.	The public comment has addressed NAHB's concerns by adding language allowing a registered design professional to direct the installation of lightening protection systems when the manufacturers of roofing components is unknown or components are of a mixed manufacture.
S48, Part 1	Disapprove	This proposal adds new provision requiring installation of roof insulation materials to comply with Section C503.2.1 of the IECC.	The proposal is pointing to the Commercial Provisions of the energy code, even for roof replacements on a residential building less than 4 stories.
S53	Disapprove	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.	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.
S60	Disapprove	This proposal adds new provisions allowing reinstallation of existing rooftop-mounted photovoltaic panel systems including permit requirements for reinstalled equipment.	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.
S70	Disapprove	This proposal modifies the risk category table to add storm shelters in accordance with Section 423.1 as Risk Category IV structures.	Adding the proposed reference to Section 423 in Table 1604.5 could lead users to believe any ICC 500-compliant storm shelter must be classified as Risk Category IV, which is not true. Section 423 makes it clear the only storm shelters that need to be classified as Risk Category IV are those specifically designated for use by the general community and used for recovery purposes after an event. Otherwise, a storm shelter picks up the same risk category as the building it is associated with.
S102	Disapprove	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.	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.

S133	As Modified	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.	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,
S140	As Submitted	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.	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.
S145	As Submitted	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.	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.
S157	Disapprove	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.	While some questions about this proposal in its final state remain, it is providing a protection against falls from retaining walls that didn't exist previously. This proposal does not provide clear exceptions for other barrier types at retaining walls such as shrubbery or landscaping, and does not adjust the minimum 4" spacing of infill components in locations where children are not likely to be.
S161	Disapprove	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.	The added language states that the soil bearing values determined by a geo-technical evaluation cannot be exceeded in the design is unnecessary. 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.
S178	Disapprove	The proposal adds new compliance requirements for CO2 associated with construction materials	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.
S205	Disapprove	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.	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.
S227	Disapprove	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.	This proposal revised and expanded the tables for roof member uplift using a conservative 10# dead load.