INTERNATIONAL CODE COUNCIL
2022 CODE DEVELOPMENT CYCLE

2022 DISCUSSION GUIDE TO THE PUBLIC COMMENT AGENDA

ADMINISTRATIVE PROVISIONS

INTERNATIONAL BUILDING CODE®

-FIRE SAFETY

(Structural portions)

-GENERAL

(Structural portions)

-STRUCTURAL

INTERNATIONAL CODE COUNCIL PEFORMANCE CODE®

(Structural portions)

INTERNATIONAL EXISTING BUILDING CODE®

INTERNATIONAL RESIDENTIAL CODE®

-BUILDING

September 14 – 18, 2022

KENTUCKY INTERNATIONAL CONVENTION CENTER

LOUISVILLE, KY

2021-2022 Code Development Cycle, Group B (2022) Discussion Guide and Updates to the 2021 *International Codes*

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DISCUSSION GUIDE
2022 (GROUP B) ICC CODE DEVELOPMENT CYCLE
PUBLIC COMMENT AGENDA DISCUSSION GUIDE

The purpose of this guide is to assist the efficient discussion of the individual agenda items by providing an overview of the committee actions, assembly actions (if any) and the submitted Public Comments. The agenda items are listed in the same order as the published Tentative Hearing Order on page xlvii of the 2022 Public Comment Agenda document.

See page xxxvi of the 2022 Public Comment Agenda document (Section 7.5 of CP#28-05). Section 7.5.9.5 requires that the Code Development Committee Action be the initial motion.

Whenever a motion under consideration is for Approval as Submitted or Approval as Modified, a subsequent motion and second for a modification published in the Public Comment Agenda may be made (see Section 6.4.4). Each subsequent motion for modification, if any, shall be individually discussed and voted before returning to the main motion. When the initial motion is for Disapproval, that motion must be voted upon before any other motions are entered. This is reflected in the column under "Allowable Subsequent Motions per Section 7.5.9.6 (CP#28).

Excerpts from CP #28:

7.5.9.5 Initial Motion: The code development committee action shall be the initial motion considered.

7.5.9.6 Motions for Modifications: Whenever a motion under consideration is for Approval as Submitted or Approval as Modified, a subsequent motion and second for a modification published in the Public Comment Agenda may be made (see Section 6.4.4). Each subsequent motion for modification, if any, shall be individually discussed and voted before returning to the main motion. A two-thirds majority based on the number of votes cast by eligible voters shall be required for a successful motion on all modifications.

7.5.9.7 Voting: After dispensing with all motions for modifications, if any, and upon completion of discussion on the main motion, the Moderator shall then ask for the vote on the main motion. The vote on the main motion shall be taken electronically with the vote recorded and each vote assigned to the eligible voting member. If the motion fails to receive the majority required in Section 7.6, the Moderator shall ask for a new motion.

7.5.9.8 Subsequent Motion: If the initial motion is unsuccessful, a motion for either Approval as Submitted or Approval as Modified by one or more published modifications is in order. A motion for Disapproval is not in order. The vote on the main motion shall be taken electronically with the vote recorded and each vote assigned to the eligible voting member. If a successful vote is not achieved, Section 7.5.8.9 shall apply.

7.5.9.9 Failure to Achieve Majority Vote at the Public Comment Hearing. In the event that a code change proposal does not receive any of the required majorities in Section 7.6, the results of the Public Comment Hearing for the code change proposal in question shall be Disapproval. The vote count that will be reported as the Public Comment Hearing result will be the vote count on the main motion in accordance with Section 7.5.8.7.

7.5.9.10 Public Comment Hearing Results: The result and vote count on each code change proposal considered at the Public Comment Hearing shall be announced at the hearing. The results shall be posted and included in the Online Governmental Consensus Ballot (see Section 8.2).

7.6 Majorities for Final Action: The required voting majority for code change proposals individually considered shall be based on the number of votes cast of eligible voters at the Public Comment Hearing shall be in accordance with the following table:

Committee Action	**Desired Final Action**		
	AS	**AM/AMPC**	**D**
AS	Simple Majority	2/3 Majority	Simple Majority
AM	2/3 Majority	Simple Majority to sustain the Committee Action or; 2/3 Majority on each additional modification and 2/3 Majority on entire code change proposal for AMPC	Simple Majority
D	2/3 Majority	2/3 Majority	Simple Majority

Note 1: This public comment has been submitted by CP28 Administration. The public comment does not request an action and is intended to identify a procedural issue (CP28 Section 3.6.3.1.1). See the individual public comment for more information.

VOTING AT THE GROUP B PUBLIC COMMENT HEARINGS

The Public Comment Hearings in Louisville, KY are the first step in the process to determine the Final Action on 2022 Group B code changes – Public Comment Hearing (PCH) voting followed by the Online Governmental Consensus Vote (OGCV) utilizing cdpACCESS®. The following is a summary of the voting procedures published on page v of the posted Public Comment Agenda (PCA), specifically noting how the final action will be determined. Be sure to review the PCA for a complete description of the process.

The first step is the voting that will occur at the Public Comment Hearings. This process is regulated by Section 7.5.9 of CP 28 Code Development (see page xxxiv in the PCA). The action at the PCH will be determined by an electronic voting system. In accordance with Section 10.1 of CP 28, the vote counts at the Public Comment Hearings will be combined with the online ballot votes during the OGCV as stipulated in Section 7.5.9.10.

The Consent Agenda will be voted with a motion to ratify the action taken at the Committee Action Hearings. This will be the Final Action on those code changes and they will not be considered in the Online Governmental Consensus Vote (Section 7.5.5).

The second step in the final action process is the Online Governmental Consensus Vote (OGCV). This is a process which is built into cdpACCESS and is regulated by Section 8.0 of CP 28. It is anticipated that the ballot period will start approximately two weeks after the Public Comment Hearings and will be open for two weeks. As noted in Section 8.1, the results of the PCH set the agenda and ballot options for the OGCV.

The following are examples of the application of the table in Section 8.1:

Committee Hearing Action	**PCH Action**	**OGCV Ballot and Voting Majority**	
AS	AS	AS: Simple Majority	D: Simple Majority
AS	AMPC 3, 5	AMPC 3, 5: 2/3 Majority	D: Simple Majority
AS	D	AS: Simple Majority	D: Simple Majority
AM	AS	AS: 2/3 Majority	D: Simple Majority
AM	AM	AM: Simple Majority	D: Simple Majority
AM	AMPC 1	AMPC 1: 2/3 Majority	D: Simple Majority
AM	D	AM: Simple Majority	D: Simple Majority
D	AS	AS: 2/3 Majority	D: Simple Majority
D	AMPC 2,6, 7	AMPC 2, 6, 7: 2/3 Majority	D: Simple Majority
D	D	AS: 2/3 Majority	D: Simple Majority

As in the past, voters will have access to the hearing video from both the Public Comment and Committee Action Hearings. Non-eligible voters will also be able to log-in and view the OGCV ballot, but will not be permitted to vote.

PROPOSED CHANGE	COMMITTEE HEARING ACTION	ALLOWABLE SUBSEQUENT MOTIONS PER SECTION 7.5.9.6 (CP# 28)	PUBLIC COMMENTS		PCH ACTION
			DESIRED ACTION	PUBLIC COMMENT NUMBER	
INTERNATIONAL ADMINISTRATIVE PROVISIONS CODE					
ADM6-22	D	***None***	AMPC	1	
ADM11-22	D	***None***	AMPC	1	
ADM13-22 Part I	AM	***AMPC***	AMPC	1 through 6	
ADM13-22 Part II	AM	***AMPC***	AMPC	1 through 6	
ADM14-22	AM	***AMPC***	AMPC	1 through 6	
ADM17-22 Part I	D	***None***	AS	1	
ADM17-22 Part II	D	***None***	AS	1	
ADM18-22	AM	***AMPC***	AMPC	1	
ADM19-22	D	***None***	AMPC	1	
ADM20-22	D	***None***	AS	1	
ADM21-22	D	***None***	AMPC	1	
ADM25-22	AS	***None***	D	1	
ADM26-22	AS	***None***	D	1	
ADM27-22	AS	***None***	D	1	
ADM28-22	D	***None***	AS	1	
ADM29-22	D	***None***	AS	1	
ADM30-22	D	***None***	AMPC	1	
ADM34-22 Part II	D	***None***	AMPC	1	
ADM35-22	AM	***None***	D	1	
ADM36-22 Part I	AM	***AMPC***	AMPC	1	
ADM36-22 Part II	D	***None***	AMPC	1	
ADM37-22 Part I	D	***None***	AMPC	1	
ADM38-22 Part I	AS	***None***	D	1	
ADM40-22	AS	***AMPC***	AMPC	1	
ADM41-22 Part II	D	***None***	AS	1	
ADM42-22	AS	***AMPC***	AMPC	1, 2	
ADM43-22 Part I	AS	***AMPC***	AMPC	1, 2	
ADM43-22 Part II	D	***None***	AMPC	1, 2	
ADM44-22	AS	***AMPC***	AMPC	1	
ADM48-22 Part I	AS	***AMPC***	AMPC	1, 2	
ADM48-22 Part II	D	***None***	AMPC	1, 2	

PROPOSED CHANGE	COMMITTEE HEARING ACTION	ALLOWABLE SUBSEQUENT MOTIONS PER SECTION 7.5.9.6 (CP# 28)	PUBLIC COMMENTS		PCH ACTION
			DESIRED ACTION	PUBLIC COMMENT NUMBER	
INTERNATIONAL ADMINISTRATIVE PROVISIONS CODE (continued)					
ADM52-22	**AM**				
The overall action on this code change proposal was As Modified, which impacted 75 of the referenced standards updates (see https://www.iccsafe.org/wp-content/uploads/2022-Group-B-Report-of-the-Committee-Action-Hearing-Results-Complete.pdf for the committee modification). We received 22 public comments to ADM-52-22. As noted in the Introduction to this Public Comment Agenda, "Public Comment Consideration of ADM52-22", page vii, ADM52-22 will be dealt with procedurally by dividing the question as a multiple part code change proposal; with each referenced standard receiving a public comment being dealt with as a separate part in conjunction with the submitted public comment. The actual committee action for each standard update as a separate part is noted below. SEE NEXT PAGE FOR FOOTNOTES.					
ANSI/SPRI GT-1	AS[2]	***AMPC***	AMPC	1	
ANSI/SPRI VF-1	AS[2]	***None***	D[4]	2	
ANSI/SPRI/FM 4435-ES-1	AS[2]	***None***	D[4]	3	
ANSI/AMCA 210/ANSI/ASHRAE 51	AM[3]	***None***	D[4]	4	
ANSI/AMCA 230	AS[2]	***AMPC***	AMPC	5	
ANSI/AMCA 540	AS[2]	***None***	D[4]	6	
ASTM E136	AS[2]	***AMPC***	AMPC	7	
ASTM E1354	Note 5	***AMPC***	AMPC	8	
ASTM E1537	Note 5	***AMPC***	AMPC	9	
ASTM E2231	AS[2]	***AMPC***	AMPC	10	
ASTM E2652	AS[2]	***AMPC***	AMPC	11	
ASSE 1018	AS[2]	***AMPC***	AMPC	12	
ASSE 1019	AS[2]	***None***	D[4]	13	
ASSE 1044	AS[2]	***AMPC***	AMPC	14	
ASSE 1056	AS[2]	***AMPC***	AMPC	15	
ASSE 1060	AS[2]	***AMPC***	AMPC	16	
ASSE 1071	AS[2]	***AMPC***	AMPC	17	
ASSE 1079	AS[2]	***AMPC***	AMPC	18	
ASSE 1081	AS[2]	***AMPC***	AMPC	19	
NFPA 1124	AS[2]	***None***	D[4]	20	
BHMA A 156.10	Note 5	***None***	AMPC	21	
UL/CSA 60335-2-40	AM[3]	***AMPC***	AS[1]	22	

PROPOSED CHANGE	COMMITTEE HEARING ACTION	ALLOWABLE SUBSEQUENT MOTIONS PER SECTION 7.5.9.6 (CP# 28)	PUBLIC COMMENTS		PCH ACTION
			DESIRED ACTION	PUBLIC COMMENT NUMBER	

1. Requested action by this PC is to update the standard as proposed in the original proposal. The action, therefore, is Approval of the proposed change As Submitted with respect to this standard update.
2. Committee action is to update the standard as proposed in the original proposal. The committee action, therefore, is Approval of the proposed change As Submitted with respect to this standard update.
3. Committee action is to update the standard as modified by the committee. The committee action, therefore, is Approval of the proposed change As Modified with respect to this standard update.
4. Requested action by PC# 2, 3, 4, 6, 13 and 20 is to leave ANSI/SPRI VF-1, ANSI/SPRI/FM 4435-ES-1, ANSI/AMCA 210/ANSI/ASHRAE 51, ANSI/AMCA 540, ASSE 1019, NFPA 1124 and UL/CSA 60335-2-40, respectively, at the current year edition referenced in the 2021 Codes. The action requested, therefore is Disapproval of the proposed change to the code regarding update of these standards. Therefore, the initial motion is the committee action of AS or AM as indicated and a motion for Disapproval would not be in order. If the initial motion fails, the PCH result will be Disapproval in accordance with Section 7.5.9.9 of CP28.
5. This referenced standard update did not get submitted from the Standard Development Organization (SDO), or from any individual proposing standards update, prior to the Committee Action Hearings. Therefore, there is no Committee Action on this item. The initial motion on this item will be AMPC, which will require a 2/3rd vote to pass. If a 2/3rd vote is not achieved, in accordance with Section 7.5.9.9 of CP28, the PCH result for this item will be Disapproval.

INTERNATIONAL EXISTING BUILDING CODE					
EB5-22	D	***None***	AMPC	1	
EB11-22	D	***None***	AMPC	1	
EB24-22	AM	***AMPC***	AMPC	1, 2	
EB25-22	AS	***AMPC***	AMPC	1	
EB27-22	AS	***AMPC***	AMPC	1	
EB33-22	AS	***None***	D	1	
EB34-22	D	***None***	AMPC	1	
EB36-22	D	***None***	AMPC	1	
EB37-22	D	***None***	AMPC	1	
EB45-22	AM	***AMPC***	AMPC	1	
EB48-22	AS	***None***	D	1	
EB46-22	AS	***AMPC***	AMPC	1	
EB83-22	AM	***AMPC***	AMPC	1	
EB94-22	AM	***None***	AS	1	
			D	2	
EB85-22	AS	***AMPC***	AMPC	1	
EB97-22	AS	***AMPC***	AMPC	1	
			D	2	
EB98-22	AS	***None***	D	1	
EB106-22	D	***None***	AMPC	1, 2	
EB107-22	D	***None***	AMPC	1	
EB116-22	AM	***AMPC***	AMPC	1	
INTERNATIONAL BUILDING CODE – STRUCTURAL					
EB3-22	D	***None***	AMPC	1	
EB17-22	D	***None***	AMPC	1	
EB19-22	D	***None***	AS	1	
EB39-22	AS	***AMPC***	AMPC	1	
EB40-22	D	***None***	AMPC	1	
EB47-22	AM	***AMPC***	AMPC	1	
EB50-22	AM	***AMPC***	AMPC	1	
EB52-22	D	***None***	AMPC	1	
EB64-22	AM	***AMPC***	AMPC	1	
EB67-22	AM	***AMPC***	AMPC	1	

INTERNATIONAL BUILDING CODE – STRUCTURAL (continued)					
EB70-22	AS	***AMPC***	AMPC	1	
			D	2	
EB75-22	AS	***AMPC***	AMPC	1	
EB76-22	D	***None***	AMPC	1	
EB77-22	D	***None***	AMPC	1	
EB103-22 Part II	D	***None***	AMPC	1	
EB114-22	AS	***AMPC***	AMPC	1	
FS2-22	D	***None***	AMPC	1, 2	
FS3-22	AM	***None***	Note 1	1	
FS6-22	D	***None***	AS	1	
FS8-22	D	***None***	AS	1	
FS9-22	D	***None***	AMPC	1	
FS11-22	AM	***None***	AS	1	
PC5-22	D	***None***	AMPC	1	
G2-22	D	***None***	AMPC	1	
G4-22 Part I	D	***None***	AMPC	1	
G13-22	AS	***AMPC***	AMPC	1	
SP2-22	AS	***AMPC***	AMPC	1	
S3-22	D	***None***	AMPC	1	
S10-22	D	***None***	AMPC	1	
S28-22	AS	***AMPC***	AMPC	1, 2	
S30-22	AS	***AMPC***	AMPC	1	
S32-22	AS	***AMPC***	AMPC	1	
S34-22	D	***None***	AMPC	1	
S39-22	D	***None***	AMPC	1	
S42-22	D	***None***	AMPC	1, 2	
S43-22	D	***None***	AMPC	1	
S44-22	AS	***AMPC***	AMPC	1	
			D	2	
S45-22	AM	***AMPC***	AMPC	1	
			D	2	
S48-22 Part I	D	***None***	AMPC	1	
S53-22	D	***None***	AMPC	1	
			D	2	
S59-22 Part I	D	***None***	AMPC	1	

INTERNATIONAL BUILDING CODE – STRUCTURAL (continued)					
S60-22	D	***None***	AMPC	1, 2	
S70-22	D	***None***	AMPC	1	
S74-22	AS	***AMPC***	AMPC	1	
			AS	2	
			D	3	
S75-22	AS	***None***	AS	1	
			D	2	
S76-22	AM	***None***	AM	1, 2	
			D	3 through 15	
S77-22	D	***None***	AMPC	1	
S78-22	D	***None***	AMPC	1	
S79-22	D	***None***	AMPC	1, 2	
			AS	3	
S81-22	AM	***AMPC***	AMPC	1 through 6	
S82-22	D	***None***	AS	1	
S85-22	AS	***AMPC***	AMPC	1	
S99-22	D	***None***	AMPC	1	
S102-22	D	***None***	AMPC	1, 2	
S116-22	AM	***AMPC***	AMPC	1 through 4	
S122-22	AS	***AMPC***	AMPC	1	
S133-22	AM	***None***	D	1	
S134-22	D	***None***	AMPC	1	
S137-22	D	***None***	AMPC	1	
S140-22	D	***None***	AMPC	1	
S143-22	AM	***AMPC***	AMPC	1	
S144-22	AS	***AMPC***	AMPC	1	
			Note 1	2	
S145-22	D	***None***	AMPC	1	
S157-22	AM	***AMPC***	AMPC	1, 2	
S161-22	D	***None***	AS	1	
S164-22	D	***None***	AMPC	1	
S168-22	D	***None***	AMPC	1	
S173-22	D	***None***	AMPC	1	
S174-22	D	***None***	AMPC	1	
S178-22	D	***None***	AMPC	1, 2, 3	

INTERNATIONAL BUILDING CODE – STRUCTURAL (continued)					
S182-22	AS	***None***	Note 1	1	
S183-22	AS	***None***	Note 1	1	
S185-22	D	***None***	AS	1	
S187-22	AM	***None***	Note 1	1	
S192-22	AM	***AMPC***	AMPC	1	
S201-22	AM	***None***	D	1, 2, 3	
S202-22	AS	***None***	D	1	
S204-22	D	***None***	AS	1	
S205-22	AM	***AMPC***	AMPC	1, 2	
			D	3 through 10	
S212-22	D	***None***	AS	1	
S224-22	D	***None***	AMPC	1	
S227-22	AM	***AMPC***	AMPC	1	
INTERNATIONAL RESIDENTIAL CODE – BUILDING					
RB4-22	D	***None***	AMPC	1	
RB5-22	AM	***AMPC***	AMPC	1	
RB6-22	D	***None***	AMPC	1	
RB11-22	D	***None***	AMPC	1	
RB12-22	D	***None***	AS	1	
RB13-22	D	***None***	AMPC	1	
RB19-22	D	***None***	AMPC	1, 2	
RB24-22	D	***None***	AMPC	1	
RB25-22	D	***None***	AMPC	1	
G4-22 Part II	D	***None***	AMPC	1	
RB36-22	D	***None***	AMPC	1	
RB39-22	AM	***AMPC***	AMPC	1	
RB40-22	D	***None***	AMPC	1	
RB41-22	AM	***None***	D	1	
			Note 1	2	
RB44-22	AS	***None***	D	1	
RB45-22	D	***None***	AMPC	1	
RB47-22	D	***None***	AMPC	1	
RB48-22	D	***None***	AMPC	1	
RB49-22	D	***None***	AS	1	

INTERNATIONAL RESIDENTIAL CODE – BUILDING (continued)					
RB53-22	AM	***AMPC***	AMPC	1, 2, 3	
RB55-22	D	***None***	AS	1	
RB56-22	D	***None***	AMPC	1	
RB57-22	D	***None***	AMPC	1	
RB61-22	AM	***AMPC***	AMPC	1	
			D	2, 3	
RB62-22	D	***None***	AMPC	1	
RB63-22	AS	***AMPC***	AMPC	1, 2, 3	
RB64-22	AS	***AMPC***	AMPC	1, 2	
RB66-22	D	***None***	AMPC	1	
			AS	2	
RB69-22	D	***None***	AMPC	1	
RB74-22	AM	***AMPC***	AMPC	1, 2	
RB76-22	AM	***AMPC***	AMPC	1	
RB79-22	D	***None***	AMPC	1	
RB87-22	D	***None***	AMPC	1	
			AS	2	
RB93-22	D	***None***	AMPC	1	
RB100-22	D	***None***	AMPC	1	
RB118-22	D	***None***	AMPC	1	
RB122-22	AM	***AMPC***	AMPC	1	
RB129-22	D	***None***	AMPC	1	
RB130-22	D	***None***	AMPC	1	
RB132-22	D	***None***	AMPC	1, 2	
RB136-22	D	***None***	AS	1	
RB137-22	D	***None***	AS	1	
RB144-22	D	***None***	AMPC	1	
RB148-22	D	***None***	AMPC	1	
RB149-22	D	***None***	AMPC	1	
			AS	2	
RB150-22	AS	***AMPC***	AMPC	1, 2	
RB151-22	D	***None***	AS	1	
RB153-22	AM	***AMPC***	AMPC	1 through 4	
RB155-22	AS	***None***	D	1	
RB157-22	AM	***None***	D	1	

INTERNATIONAL RESIDENTIAL CODE – BUILDING (continued)					
RB158-22	D	***None***	AMPC	1	
RB159-22	D	***None***	AS	1	
RB160-22	D	***None***	AS	1	
RB166-22	D	***None***	AMPC	1	
RB169-22	AM	***AMPC***	AMPC	1	
RB173-22	AS	***AMPC***	AMPC	1, 2	
RB176-22	AM	***AMPC***	AMPC	1	
			D	2	
RB178-22	D	***None***	AMPC	1, 2	
RB188-22	D	***None***	AMPC	1	
RB190-22	AS	***AMPC***	AMPC	1	
RB193-22	D	***None***	AMPC	1	
RB195-22	D	***None***	AMPC	1	
RB205-22	AS	***None***	Note 1	1	
RB216-22	AM	***AMPC***	AMPC	1	
RB231-22	AS	***None***	AS	1	
			D	2, 3	
RB233-22	AS	***AMPC***	AMPC	1	
RB236-22	AM	***AMPC***	AMPC	1	
RB239-22	AM	***AMPC***	AMPC	1	
RB242-22	D	***None***	AMPC	1	
			D	2, 3, 4	
RB251-22	AS	***AMPC***	AMPC	1	
			D	2, 3	
RB252-22	AS	***AMPC***	AMPC	1	
			D	2, 3	
RB253-22	D	***None***	AMPC	1, 2	
RB254-22	AM	***AMPC***	AMPC	1	
			AS	2, 3	
			AM	4	
RB255-22	D	***None***	AMPC	1, 2	
RB257-22	D	***None***	AMPC	1	
S24-22 Part II	D	***None***	AMPC	1	
RB263-22	D	***None***	AMPC	1	
RB269-22	AS	***AMPC***	AMPC	1	

INTERNATIONAL RESIDENTIAL CODE – BUILDING (continued)					
RB271-22	AS	***AMPC***	AMPC	1	
RB275-22	D	***None***	AMPC	1	
			AS	2	
RB276-22	D	***None***	AS	1	
S48-22 Part II	D	***None***	AMPC	1	
S59-22 Part II	D	***None***	AMPC	1	
RB285-22	D	***None***	AMPC	1	
RB290-22	D	***None***	AS	1	
RB291-22	D	***None***	AS	1	
RB292-22	D	***None***	AS	1	
RB294-22	D	***None***	AMPC	1	
RB295-22	AS	***AMPC***	AMPC	1	
RB7-22	D	***None***	AMPC	1, 2	
RB162-22	AM	***AMPC***	AMPC	1	
RB163-22	D	***None***	AMPC	1	
RB206-22	AM	***AMPC***	AMPC	1	
RB297-22	AM	***AMPC***	AMPC	1	
RB310-22	D	***None***	AMPC	1	
RB311-22	D	***None***	AMPC	1	
RB312-22	AS	***None***	D	1	
RB313-22	D	***None***	AMPC	1	
RB315-22	AS	***None***	AS	1	
			D	2	
RB317-22	D	***None***	AMPC	1	

UPDATES TO THE 2022 DISCUSSION GUIDE & PUBLIC COMMENT AGENDA

2022 ICC CODE DEVELOPMENT CYCLE TECHNICAL UPDATES TO THE 2021 PUBLIC COMMENT AGENDA FOR THE PROPOSED CHANGES TO THE:

ADMINSTRATIVE PROVISIONS

INTERNATIONAL BUILDING CODE®
-STRUCTURAL

INTERNATIONAL EXISTING BUILDING CODE®

INTERNATIONAL RESIDENTIAL CODE®
-BUILDING

SUMMARY OF UPDATES:

ADMINISTRATIVE PROVISIONS:

ADM18-22 PC1:	**See highlighted corrections**
ADM52-22:	**Public comments have been split. See below for new arrangement.**

IRC – BUILDING:

RB7-22 PC1:	**New link for file attachment in the reason**
RB7-22 PC2:	**New links for file attachment in the reason**
RB40-22 PC1:	**Revised Standards Analysis. See highlighted corrections**
RB162-22 PC1:	**New link for file attachment in the reason**
RB163-22 PC1:	**New link for file attachment in the reason**
RB206-22 PC1:	**New link for file attachment in the reason**
RB297-22 PC1:	**New link for file attachment in the reason**

ADMINSTRATIVE PROVISIONS

ADM18-22: See highlighted corrections

Public Comment 1:

Proponents: Kota Wharton, representing City of Grove City (kwharton@grovecityohio.gov) requests As Modified by Public Comment

[A] 104.9.2.1 Extensions. The fire code official shall have the authority to reasonably extend policies, rules and procedures issued pursuant to Section 104.9.2. Such extensions shall be made available to the public, shall include the original effective date and new expiration date and shall be recorded and entered into the ~~fires~~ files of the code compliance agency.

[A] ~~104.9.2~~ 104.9.2.2 Notification to the building official. The fire code official, prior to issuing or extending any policies, procedures or rules shall notify the building official in writing.

ADM52-22: Public comments have been split. See below for new arrangement.

Individual Consideration

Public Comment 1:

Proponents: Amanda Hickman, representing Air Movement and Control Association International, Inc. (AMCA) (amanda@thehickmangroup.com) requests As Modified by Public Comment

Further modify as follows:

SPRI	Single-Ply Roofing Institute	
Standard Reference Number	**Title**	**Referenced in Code(s):**
ANSI/SPRI GT-1— 2122	**Test Standard for Gutter Systems**	**IBC**

Commenter's Reason: Since it is possible that some of the standards updates will not be finalized in time for the 2024 code publication, we are recommending only the proposed standard edition be updated at this time.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction Revisions made in proposed updated standards will not result in any cost increase.

Public Comment# 3564

Public Comment 2:

Proponents: Amanda Hickman, representing Air Movement and Control Association International, Inc. (AMCA) (amanda@thehickmangroup.com) requests As Modified by Public Comment

Further modify as follows:

SPRI	Single-Ply Roofing Institute	
Standard Reference Number	**Title**	**Referenced in Code(s):**
ANSI/SPRI VF-1— 21 17	**External Fire Design Standard for Vegetative Roofs**	**IBC**

Commenter's Reason: Since it is possible that some of the standards updates will not be finalized in time for the 2024 code publication, we are recommending only the proposed standard edition be updated at this time.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction Revisions made in proposed updated standards will not result in any cost increase.

Public Comment# 3562

Public Comment 3:

Proponents: Amanda Hickman, representing Air Movement and Control Association International, Inc. (AMCA) (amanda@thehickmangroup.com) requests As Modified by Public Comment

Further modify as follows:

SPRI	Single-Ply Roofing Institute	
Standard Reference Number	**Title**	**Referenced in Code(s):**
ANSI/SPRI/FM 4435-ES-1— 21 17	**Wind Test Design Standard for Edge Systems Used with Low Slope Roofing Systems**	**IBC**

Commenter's Reason: Since it is possible that some of the standards updates will not be finalized in time for the 2024 code publication, we are recommending only the proposed standard edition be updated at this time.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction Revisions made in proposed updated standards will not result in any cost increase.

Public Comment# 3563

Public Comment 4:

Proponents: Amanda Hickman, representing Air Movement and Control Association International, Inc. (AMCA) (amanda@thehickmangroup.com) requests As Modified by Public Comment

Further modify as follows:

AMCA	Air Movement and Control Association International	
Standard Reference Number	**Title**	**Referenced in Code(s):**
ANSI/AMCA 210-23 16 ANSI/ASHRAE 51— 23 16	**Laboratory Methods of Testing Fans for Aerodynamic Performance Rating**	**IRC®**
ANSI/AMCA 210— 23 16/ANSI/ASHRAE 51— 23 16	**Laboratory Methods of Testing Fans for Aerodynamic Performance Rating**	**IMC**

Commenter's Reason: Since it is possible that some of the standards updates will not be finalized in time for the 2024 code publication, we are recommending only the proposed standard edition be updated at this time.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction Revisions made in proposed updated standards will not result in any cost increase.

Public Comment# 3285

Public Comment 5:

Proponents: Amanda Hickman, representing Air Movement and Control Association International, Inc. (AMCA) (amanda@thehickmangroup.com) requests As Modified by Public Comment

Further modify as follows:

AMCA	Air Movement and Control Association International

Standard Reference Number	Title	Referenced in Code(s):	
ANSI/AMCA 230— ~~23~~ 22	**Laboratory Methods of Testing Air Circulating Fans for Rating and Certification**	**IMC**	**IECC®**

Commenter's Reason: Since it is possible that some of the standards updates will not be finalized in time for the 2024 code publication, we are recommending only the proposed standard edition be updated at this time.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction Revisions made in proposed updated standards will not result in any cost increase.

Public Comment# 3561

Public Comment 6:

Proponents: Amanda Hickman, representing Air Movement and Control Association International, Inc. (AMCA) (amanda@thehickmangroup.com) requests As Modified by Public Comment

Further modify as follows:

AMCA	Air Movement and Control Association International	
Standard Reference Number	**Title**	**Referenced in Code(s):**
ANSI/AMCA 540—~~23~~ 13	**Test Method for Louvers Impacted by Wind Borne Debris**	**IBC**

Commenter's Reason: Since it is possible that some of the standards updates will not be finalized in time for the 2024 code publication, we are recommending only the proposed standard edition be updated at this time.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction Revisions made in proposed updated standards will not result in any cost increase.

Public Comment# 3560

Public Comment 7:

Proponents: Marcelo Hirschler, representing GBH International (mmh@gbhint.com) requests As Modified by Public Comment

Further modify as follows:

ASTM	ASTM International						
Standard Reference Number	**Title**	**Referenced in Code(s):**					
E136—~~2019~~ 2022	**Standard Test Method for Assessing Combustibility ~~Behavior~~ of Materials Using ~~in~~ a Vertical Tube Furnace at 750°C**	**IFGC**	**IMC**	**IWUIC**	**IBC**	**IRC**	**IRC®**

Commenter's Reason: Update on dates and titles as follows:
The title of ASTM E136 has changed from Standard Test Method for Behavior of Materials in a Vertical Tube Furnace at 750°C to Standard Test Method for Assessing Combustibility of Materials Using a Vertical Tube Furnace at 750°C – The latest edition is dated 2022.

The title of ASTM E2652 has changed from Standard Test Method for Behavior of Materials in a Tube Furnace with a Cone-shaped Airflow Stabilizer, at 750°C to Standard Test Method for Assessing Combustibility of Materials Using a Tube Furnace with a Cone-shaped Airflow Stabilizer, at 750°C – The latest edition is dated 2018.

The latest edition of ASTM E1354 is dated 2022 – the latest edition of ASTM E1537 is dated 2022 and the latest edition of ASTM E2231 is dated 2021.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction. This simply updates dates and titles

Public Comment# 3103

Public Comment 8:

Proponents: Marcelo Hirschler, representing GBH International (mmh@gbhint.com) requests As Modified by Public Comment

Further modify as follows:

ASTM	ASTM International	
Standard Reference Number	**Title**	**Referenced in Code(s):**
E1354—<u>22</u> ~~17~~	**Standard Test Method for Heat and Visible Smoke Release Rates for Materials and Products Using an Oxygen Consumption Calorimeter**	**IFC**

Commenter's Reason: Update on dates and titles as follows:
The title of ASTM E136 has changed from Standard Test Method for Behavior of Materials in a Vertical Tube Furnace at 750°C to Standard Test Method for Assessing Combustibility of Materials Using a Vertical Tube Furnace at 750°C – The latest edition is dated 2022.

The title of ASTM E2652 has changed from Standard Test Method for Behavior of Materials in a Tube Furnace with a Cone-shaped Airflow Stabilizer, at 750°C to Standard Test Method for Assessing Combustibility of Materials Using a Tube Furnace with a Cone-shaped Airflow Stabilizer, at 750°C – The latest edition is dated 2018.

The latest edition of ASTM E1354 is dated 2022 – the latest edition of ASTM E1537 is dated 2022 and the latest edition of ASTM E2231 is dated 2021.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction This simply updates dates and titles

Public Comment# 3559

Public Comment 9:

Proponents: Marcelo Hirschler, representing GBH International (mmh@gbhint.com) requests As Modified by Public Comment

Further modify as follows:

ASTM	ASTM International	
Standard Reference Number	**Title**	**Referenced in Code(s):**
E1537—16 <u>22</u>	**Test Method for Fire Testing of Upholstered Furniture**	**IFC**

Commenter's Reason: Update on dates and titles as follows:
The title of ASTM E136 has changed from Standard Test Method for Behavior of Materials in a Vertical Tube Furnace at 750°C to Standard Test Method for Assessing Combustibility of Materials Using a Vertical Tube Furnace at 750°C – The latest edition is dated 2022.

The title of ASTM E2652 has changed from Standard Test Method for Behavior of Materials in a Tube Furnace with a Cone-shaped Airflow Stabilizer, at 750°C to Standard Test Method for Assessing Combustibility of Materials Using a Tube Furnace with a Cone-shaped Airflow Stabilizer, at 750°C – The latest edition is dated 2018.

The latest edition of ASTM E1354 is dated 2022 – the latest edition of ASTM E1537 is dated 2022 and the latest edition of ASTM E2231 is

dated 2021.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction This simply updates dates and titles

Public Comment# 3558

Public Comment 10:

Proponents: Marcelo Hirschler, representing GBH International (mmh@gbhint.com) requests As Modified by Public Comment

Further modify as follows:

ASTM	ASTM International		
Standard Reference Number	**Title**	**Referenced in Code(s):**	
E2231— 21 ~~2018~~	**Standard Practice for Specimen Preparation and Mounting of Pipe and Duct Insulation Materials to Assess Surface Burning Characteristics**	**IMC**	**IRC®**

Commenter's Reason: Update on dates and titles as follows:
The title of ASTM E136 has changed from Standard Test Method for Behavior of Materials in a Vertical Tube Furnace at 750°C to Standard Test Method for Assessing Combustibility of Materials Using a Vertical Tube Furnace at 750°C – The latest edition is dated 2022.

The title of ASTM E2652 has changed from Standard Test Method for Behavior of Materials in a Tube Furnace with a Cone-shaped Airflow Stabilizer, at 750°C to Standard Test Method for Assessing Combustibility of Materials Using a Tube Furnace with a Cone-shaped Airflow Stabilizer, at 750°C – The latest edition is dated 2018.

The latest edition of ASTM E1354 is dated 2022 – the latest edition of ASTM E1537 is dated 2022 and the latest edition of ASTM E2231 is dated 2021.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction This simply updates dates and titles

Public Comment# 3557

Public Comment 11:

Proponents: Marcelo Hirschler, representing GBH International (mmh@gbhint.com) requests As Modified by Public Comment

Further modify as follows:

ASTM	ASTM International	
Standard Reference Number	**Title**	**Referenced in Code(s):**
E2652— 16 18	**Standard Test Method for Assessing Combustibility ~~Behavior~~ of Materials Using ~~in~~ a Tube Furnace with a Cone-shaped Airflow Stabilizer at 750°C**	**IBC**

Commenter's Reason: Update on dates and titles as follows:

The title of ASTM E136 has changed from Standard Test Method for Behavior of Materials in a Vertical Tube Furnace at 750°C to Standard Test Method for Assessing Combustibility of Materials Using a Vertical Tube Furnace at 750°C – The latest edition is dated 2022.

The title of ASTM E2652 has changed from Standard Test Method for Behavior of Materials in a Tube Furnace with a Cone-shaped Airflow Stabilizer, at 750°C to Standard Test Method for Assessing Combustibility of Materials Using a Tube Furnace with a Cone-shaped Airflow Stabilizer, at 750°C – The latest edition is dated 2018.

The latest edition of ASTM E1354 is dated 2022 – the latest edition of ASTM E1537 is dated 2022 and the latest edition of ASTM E2231 is dated 2021.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction This simply updates dates and titles

Public Comment# 3556

Public Comment 12:

Proponents: Angela Juarez, representing IAPMO/ASSE requests As Modified by Public Comment

Further modify as follows:

ASSE	ASSE International		
Standard Reference Number	**Title**	**Referenced in Code(s):**	
1018— 2001 (R2021)	**Performance Requirements for Trap Seal Primer Valves; Potable Water Supplied**	**IPC**	**IRC®**

Commenter's Reason: The revisions submitted are editorial corrections.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction

Public Comment# 3305

Public Comment 13:

Proponents: Angela Juarez, representing IAPMO/ASSE (angela.juarez@iapmo.org) requests As Modified by Public Comment

Further modify as follows:

ASSE	ASSE International		
Standard Reference Number	**Title**	**Referenced in Code(s):**	
1019— 2011 (R2016)	**Performance Requirements for Freeze-resistant, Wall Hydrants, Vacuum Breaker, Draining Types**	**IPC**	**IRC®**

Commenter's Reason: The revisions submitted are editorial corrections.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction

Public Comment# 3555

Public Comment 14:

Proponents: Angela Juarez, representing IAPMO/ASSE (angela.juarez@iapmo.org) requests As Modified by Public Comment

Further modify as follows:

ASSE	ASSE International		
Standard Reference Number	**Title**	**Referenced in Code(s):**	
1044— 2015 (R2020)	**Performance Requirements for Trap Seal Primer Devices—Drainage Types and Electronic Design Types**	**IPC**	**IRC®**

Commenter's Reason: The revisions submitted are editorial corrections.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction

Public Comment# 3554

Public Comment 15:

Proponents: Angela Juarez, representing IAPMO/ASSE (angela.juarez@iapmo.org) requests As Modified by Public Comment

Further modify as follows:

ASSE	ASSE International		
Standard Reference Number	**Title**	**Referenced in Code(s):**	
1056— 2013 (R2021)	**Performance Requirements for Spill-Resistant Vacuum Breaker**	**IPC**	**IRC®**

Commenter's Reason: The revisions submitted are editorial corrections.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction

Public Comment# 3553

Public Comment 16:

Proponents: Angela Juarez, representing IAPMO/ASSE (angela.juarez@iapmo.org) requests As Modified by Public Comment

Further modify as follows:

ASSE	ASSE International	
Standard Reference Number	**Title**	**Referenced in Code(s):**
1060— ~~2020~~ 2017 (R2021)	**Performance Requirements for Outdoor Enclosures for Fluid-conveying Components**	**IRC®**

1060— ~~2020~~ 2017 (R2021)	Performance Requirements for Outdoor Enclosures for Fluid Conveying Components	IPC

Commenter's Reason: The revisions submitted are editorial corrections.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction

Public Comment# 3552

Public Comment 17:

Proponents: Angela Juarez, representing IAPMO/ASSE (angela.juarez@iapmo.org) requests As Modified by Public Comment

Further modify as follows:

ASSE	ASSE International	
Standard Reference Number	Title	Referenced in Code(s):
1071— 2021 (R2021)	Temperature Actuated Mixing Valves for Plumbed Emergency Equipment	IPC

Commenter's Reason: The revisions submitted are editorial corrections.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction

Public Comment# 3551

Public Comment 18:

Proponents: Angela Juarez, representing IAPMO/ASSE (angela.juarez@iapmo.org) requests As Modified by Public Comment

Further modify as follows:

ASSE	ASSE International	
Standard Reference Number	Title	Referenced in Code(s):
1079— 2012 (R2021)	Performance Requirements for Dielectric Pipe Unions	IMC IPC

Commenter's Reason: The revisions submitted are editorial corrections.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction

Public Comment# 3550

Public Comment 19:

Proponents: Angela Juarez, representing IAPMO/ASSE (angela.juarez@iapmo.org) requests As Modified by Public Comment

Further modify as follows:

ASSE	ASSE International		
Standard Reference Number	**Title**	**Referenced in Code(s):**	
1081— 2014 (R2020)	**Performance Requirements for Backflow Preventers with Integral Pressure Reducing Boiler Feed Valve and Intermediate Atmospheric Vent Style for Domestic and Light Commercial Water Distribution Systems**	**IPC**	**IRC®**

Commenter's Reason: The revisions submitted are editorial corrections.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction

Public Comment# 3549

Public Comment 20:

Proponents: William Koffel, representing American Pyrotechnics Association (wkoffel@koffel.com) requests As Modified by Public Comment

Further modify as follows:

NFPA	National Fire Protection Association	
Standard Reference Number	**Title**	**Referenced in Code(s):**
1124—~~22~~ 06	**Code for the Manufacture, Transportation, Storage and Retail Sales of Fireworks and Pyrotechnic Articles**	**IFC**

Commenter's Reason: Exception No 4 to Section 5601.1.3 specifically references the 2006 Edition of NFPA 1124. Subsequent editions of NFPA 1124 do not address the retail sales and associated storage of consumer fireworks. The reference to the 2006 Edition was specifically added starting with the 2021 Edition of the IFC to address this issue. As such, the reference to the 2006 Edition of NFPA 1124 should remain for this section only. Other references to NFPA 1124 should be updated as already included in ADM52-22.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction
The Public Comment does not increase or decrease the cost of construction. The change is an editorial change to be consistent with the IFC requirements.

Staff Analysis: The 2006 edition of NFPA 1124 is being proposed to apply to IFC Section 5601.1.3 only.

Public Comment# 3061

Public Comment 21:

Proponents: John Woestman, representing Builders Hardware Manufacturers Association (BHMA) (jwoestman@kellencompany.com) requests As Modified by Public Comment

Further modify as follows:

BHMA	Builders Hardware Manufacturers' Association	
Standard Reference Number	**Title**	**Referenced in Code(s):**
A 156.10—2017 2022	**Power Operated Pedestrian Doors**	**IBC**
A156.10—2017 2022	**Power-operated Pedestrian Doors**	**IFC**

Commenter's Reason: The 2022 edition of BHMA A156.10 is expected to be approved and published by the end of 2022.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction The revisions being finalized in A156.10 for Power Operated Pedestrian Doors are not expected to change the cost of construction.

Public Comment# 3175

Public Comment 22:

Proponents: Jay Peters, representing Honeywell (peters.jay@me.com) requests As Modified by Public Comment

Further modify as follows:

UL	UL LLC	
Standard Reference Number	**Title**	**Referenced in Code(s):**
UL/CSA 60335-2-40— ~~2022~~ 2019	**Household and Similar Electrical Appliances—Safety—Part 2: Particular Requirements for Motor-Compressors**	**IMC**

Commenter's Reason: The proponent's reasoning statement provided to the committee for this modification was completely inaccurate. The original proposal for the inclusion of edition of UL 60335-2-40 should be upheld. The 2022 edition of the standard was not complete when the proponent incorrectly testified that it was complete. There is no debate as to the technical aspects or merits of the standard. ICC Procedures do not allow for a standard to be approved unless completed by the deadline. UL 60335-2-40 2022 Edition was not, and is still not complete today. This proposal should be disapproved for procedural and policy issues and not updated until the next cycle. If this standard edition is approved as modified, there will be technical and safety conflicts between this standard and the ASHRAE 15 as the code adopts the 2019 edition of ASHRAE 15 and there are conflicting provisions between the new 2-40 and the adopted 15 standard. It makes no practical sense to adopt a more recent listing standard for flammable refrigerant containing equipment than the installation standard that correlates with it. Other codes have, thus far, also voted to NOT include the 2022 edition of UL 60335-2-40 in the 2024 codes. Moreover the CANENA WG14 agreed unanimously to require an external discharge safety valve as part of the installation standard. This also is not complete yet and one further example this is not ready to be adopted yet.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction No change to code.

Public Comment# 3548

RB7-22: New link for file attachment in the reason

Public Comment 1:

Proponents: Julie Furr, representing FEMA ATC Seismic Code Support Committee (jfurr@rimkus.com); Michael Mahoney, representing FEMA (mike.mahoney@fema.dhs.gov); Kelly Cobeen, representing Federal Emergency Management Agency/Applied Technology Council - Seismic Code Support Committee (kcobeen@wje.com) requests As Modified by Public Comment

Commenter's Reason: New language addressing new and existing materials has been included clarifying when new materials have to be used and when materials matching the existing materials are allowed to be used instead. Structural definitions have been deleted where already defined in Chapter 2 of the IRC or revised to match definitions already defined in Chapter 2 of the IEBC.

In developing this public comment, we have collaborated with WABO and other interested parties. This public comment will work in conjunction with WABO's code change proposals and public comments. The link below is to a document showing how Appendix AJ is intended to look, if all of the related Appendix AJ proposals and public comments are approved. Where proposals and public comments operate on the same section, this combined document identifies which text is intended to control.

https://www.cdpaccess.com/p/public-comment/3547/27869/files/download/3691/RB7-22%20attachment.pdf

This shows what Appendix AJ would look like if these proposals were approved with floor modifications and public comments: RB7, RB162, RB163, RB206, and RB297

RB7-22: New link for file attachment in the reason

Public Comment 2:

Proponents: Ardel Jala, representing Washington Association of Building Officials Technical Code Dev Committee (ardel.jala@seattle.gov); Micah Chappell, representing Washington Association of Building Officials Technical Code Development Committee (micah.chappell@seattle.gov) requests As Modified by Public Comment

Commenters Reason: This public comment is being submitted in response to the direction given by the IRC-Building Committee to improve Appendix AJ before trying to move its provisions into the body of the code. To that end, we have taken many of the provisions from our originally-proposed Chapter 44 and incorporated them into Appendix AJ. Along the way, we have cleaned up the appendix by deleting unfamiliar terms in the appendix in favor of more familiar terms, clarifying the scope, and updating provisions that have not been updated since the appendix was created. This comprehensive public comment results in an appendix that is a clearer, updated, reasonable, and more usable and enforceable—and therefore, more adoptable. A clean version of the final result of RB7-22 incorporating this public comment, without strike-throughs and underlines, can be viewed via this link:

https://www.cdpaccess.com/p/public-comment/3211/27823/files/download/3692/RB7-WABO-clean%20final%20V2%201.pdf

In developing this public comment, we have collaborated with the FEMA/ATC Seismic Code Support Committee, and this public comment will work in conjunction with their code change proposals and public comments. Attached is a document showing how Appendix AJ is intended to look, if this public comment and all the SCSC proposals and public comments are approved

https://www.cdpaccess.com/p/public-comment/3211/27823/files/download/3693/WABO-FEMA%20Combined%20Proposals-V2%201.pdf

OVERVIEW

Relation of Appendix to Code:

The underlying philosophy for this public comment is that the appendix, when adopted, is to be added to the code. It is not a standalone existing buildings code. This is true of the existing appendix, despite its “deemed to comply” provision in the existing AJ101.1. Given that philosophy, the “deemed to comply” language has been deleted, since it could imply that none of the rest of the code applies—which is clearly erroneous, as we would expect items not in the appendix to be regulated by the rest of the IRC. In its place, the appendix now clearly says to comply with the IRC for new construction, except where Appendix AJ modifies those provisions. Carrying this philosophy through results in the deletion of many redundant provisions and definitions (further explanations below).

Reorganization:

This public comment deletes several unnecessary and outdated sections, as follows. Deletion of these sections results in the editorial renumbering of the subsequent sections, as shown in this public comment.

Section AJ103 (Preliminary Meeting). This section required the building official to meet with a permit applicant, at the applicant's request. The stated purpose of the meeting is for the building official to understand the applicant's intention for the work, and for the building official and the applicant to collaborate on what's required. This requirement is unnecessary, as this is a service that a reasonable building department will provide on request. In addition, many the issues can be handled in other ways other than a meeting.
AJ104 (Evaluation of an Existing Building). This provision that allows the building official to require an evaluation of the existing building by a registered design professional is tied to "reconstruction." Aside from the fact that provisions relating to "reconstruction" are being deleted (see below), Section R106.1 already gives the building official this authority.
Sections AJ108 (Renovations) and AJ110 (Reconstruction). See "Terminology and Definitions" below.
New Sections AJ106 (Additions) and AJ107 (Relocations) have been added to regulate those classifications of work.

SPECIFIC CHANGES

Purpose and Intent (AJ101):

The scope now refers to repairs, alterations, additions and relocations, consistent with the changes described in "Terminology and Definitions" below.
The scope also clearly states that the rest of the code applies, where it's not modified by Appendix AJ.
Sections AJ101.2 (classification of work) and AJ101.3 (multiple categories of work) have been deleted since they are unnecessary. The text in AJ101.2 doesn't do anything. Most of AJ101.3 is clear with the new classifications of work and their definitions. Regarding the 12-month period in AJ101.3, this is something that should be covered by building department procedures and policies for each jurisdiction, and reflect how flexible they want to be. Having a set period of time unnecessarily ties the building official's hands, and encourages gaming of the system
Compliance (AJ102):

Carbon monoxide alarms are required to be installed, consistent with Section R315.2.2 (AJ102.3).
The sections relating to replacement EERO windows has been reorganized and modified for clarity and flexibility (AJ102.4.3). The current provisions provide a break on full compliance for replacement windows for emergency escape and rescue openings. This public comment provides flexibility for the vertical height of the window opening control devices and fall protection devices in existing openings. It also clarifies that window opening control devices and fall protection are not required when window replacement is of the glazing only. These changes are consistent with the concept approved by the Committee in RB99-22.
Sections AJ102.7 (Other Alternatives) and AJ102.9 (Features exceeding code requirements) are deleted because they are unnecessary. AJ102.7 is covered in Chapter 1, and there are never restrictions on exceeding code requirements (AJ102.9).
This public comment also makes editorial changes to this section, deleting unnecessary verbiage ("regardless of the category of work being performed") and updating the terminology (smoke alarms vs detectors)
Terminology and Definitions (AJ103):

The end result of the changes to the definitions is that only the additional definitions that are needed to apply the provisions of the appendix remain in Section AJ103.

- This public comment deletes the unfamiliar terms "reconstruction," "rehabilitation," and "renovation" from the definitions, along with the sections regulating them. Instead, the appendix now exclusively uses "repair," "alteration," "addition," and "relocation" to refer to the work being done on an existing building. These terms are familiar to users of the I-codes, and more closely correspond with the terms used in Section 107.2.1 of the IRC.
- Unnecessary definitions for "equipment or fixture" and "materials and methods requirements," and "rehabilitation" have been deleted. "Equipment" and "fixtures" are well understood to users of the code. Alternate materials and methods are covered in Chapter 1. "Rehabilitation" was defined, but the term is not used in either the existing appendix or the appendix as modified by this public comment.
- The definition for "dangerous" is being added since it is not defined in Chapter 2. The language is taken from the IEBC.

Repairs (AJ104):

The modifications this public comment makes to the section on repairs are editorial. The change in Section AJ104.1 from "work" to "repair" clarifies the scope of the section is about repair work, not work in general. The modification Section AJ104.3 consolidates the exceptions which required compliance with IRC Chapters 34 through 43 anyway.

Alterations (AJ105):

New Section AJ105.1 scopes the alterations section, as well as clearly states newly-installed elements need to comply with the code for new construction. The "do no harm" provision is included as well, consistent with Section R102.7.1.
The existing section on extensive alterations is being deleted because it referred to the deleted section on reconstruction. For further discussion of the technical changes, see the discussion on Reconstruction below.
AJ105.4 provides a pointer to the sections regulating structural alterations. Note that other code change proposals and public comments would add further structural provisions to the appendix.
Section AJ105.4.1 on unreinforced masonry walls has been relocated from the deleted section on renovations.
Substantive changes to Section AJ105.5 on electrical equipment and wiring add a requirement that lighting outlets must be controlled by

a wall-mounted switch, located near an entrance to the room, consistent with IRC Section E3903.2 (AJ105.5.3.4). The other changes are editorial, including the clarification that the circuit is a "branch" circuit, consistent with the definitions in IRC Section E3501.1 (AJ105.5.3.2). The exception to AJ105.5.1 isn't really an exception and still refers to the same chapters, so it has been integrated into the main charging language.

The existing appendix permits a ceiling height of not less than 6 feet 8 inches. This public comment further extends the relief on ceiling height in existing buildings to include existing attics (AJ105.7). Bathrooms, toilet rooms and laundry rooms are allowed to have a ceiling height not less than 6 feet 4 inches, similar to a break these occupiable spaces receive in new construction (R305.1, Exception 3). The first exception maintains the sloped ceiling height provisions per R305.1 for new construction but lowers the minimum ceiling height requirement for 50% of the room from 7 feet to 6 feet 8 inches, consistent with the general requirement. The second exception maintains the allowance for beams, girders, and other obstructions that is permitted in new construction. This concept was supported by the Committee in their approval of RB82-22.

Section AJ105.8 is expanded to include requirements for stairway illumination (AJ105.8.5) and handrails and guards at stairs (AJ105.8.6). The provision for stairway illumination is relocated from the deleted section on reconstruction. In a substantive change to the current appendix provisions, if the stair is altered, compliant handrails and guards must be installed (AJ105.8.6). This remedies an unsafe condition. The new section on stair treads and risers (AJ105.8.4) gives a break for stair treads and risers that is consistent with a more general break for existing stairs in IEBC Section 506.3. The concept of the break was supported by the Committee in their approval of RB114-22.

Additions (AJ106):

This is a new section in this appendix. The requirement for additions to comply with new construction is consistent with the principles in Section R102.7.1 and the IEBC.

Relocations (AJ107):

This is a new section in this appendix. The provisions are consistent with how the IEBC treats moved buildings (see IEBC Section 1401.2).

Referenced Standards (AJ108):

ASTM F2090 is stricken from Table AJ108.1. Section AJ102.4.3 is revised to refer to Section R312.2 which contains the reference to this standard within the body of the code.

Reference to the International Existing Building Code is updated to the 2024 edition.

Reference to the International Fire Code and to the International Property and Maintenance Code is added as reference to these codes is added in Section AJ107 Relocated Buildings.

PROVISIONS IN DELETED SECTIONS ON RENOVATIONS AND RECONSTRUCTION

Renovations:

All of the sections in the section on renovations have been deleted without relocating them. The sections on materials and methods and on interior finish are unnecessary because this appendix is only about modifications to the code. The section on door and window dimensions is deleted because "minor reductions" is ambiguous, and unnecessary.

Reconstruction:

Sections on stairway illumination, handrails, and guards have either been moved to new Section AJ105.8, or are already covered by that section. The ceiling height allowance is now located in the Alterations section (AJ105.7).

The sections on wall and ceiling finish and separation walls have been deleted without substitution because they were incomplete, and it is unreasonable to trigger these retroactive requirements for the following reasons:

The current provisions are incomplete because they only deal with common wall separations as you would find in townhouse-style units (vertical), and not with duplexes with horizontal separations.

As far as it being unreasonable, the section on wall and ceiling finishes would require additional costs to comply, both to provide the materials, and to comply with permit requirements. It requires an accounting of every wall and ceiling finish in the work area in terms of the actual materials, and then whether they comply with the flame spread and smoke development requirements. In older construction, this could be difficult to determine, and from a plan review standpoint, would likely result in at least two rounds of corrections—the first to request the information, the second to tell them to fix it.

RB40-22: Revised Standards Analysis. See highlighted corrections

Public Comment 1:

Proponents: Kelly Cobeen, representing Federal Emergency Management Agency/Applied Technology Council - Seismic Code Support Committee (kcobeen@wje.com); J Daniel Dolan, representing Seismic Code Support Committee (jddolan@wsu.edu); Michael Mahoney, representing FEMA (mike.mahoney@fema.dhs.gov)

Staff Analysis: In accordance with Section 3.6.3.1.1 of ICC Council Policy 28, the new referenced standard ICC 1300-22 ~~ACI Code 440-~~

~~22~~, must be completed and readily available prior to the Public Comment Hearing in order for this public comment to be considered.

RB162-22: New link for file attachment in the reason

Public Comment 1:

Proponents: Julie Furr, representing FEMA ATC Seismic Code Support Committee (jfurr@rimkus.com); Kelly Cobeen, representing Federal Emergency Management Agency/Applied Technology Council - Seismic Code Support Committee (kcobeen@wje.com); Michael Mahoney, representing FEMA (mike.mahoney@fema.dhs.gov) requests As Modified by Public Comment

Commenter's Reason: This public comment clarifies specific points of concern that were raised in testimony during the code action hearings.

In developing this public comment, we have collaborated with WABO and other interested parties. This public comment will work in conjunction with WABO's code change proposals and public comments. The link below is to a document showing how Appendix AJ is intended to look, if all of the related Appendix AJ proposals and public comments are approved. Where proposals and public comments operate on the same section, this combined document identifies which text is intended to control.

https://www.cdpaccess.com/p/public-comment/3135/27714/files/download/3680/FEMA_IRC%20APP%20J%20compiled%2007-21-22.docx

This shows what Appendix AJ would look like if these proposals were approved with floor modifications and public comments: RB162, RB163, RB206, and RB297.

RB163-22: New link for file attachment in the reason

Public Comment 1:

Proponents: Julie Furr, representing FEMA ATC Seismic Code Support Committee (jfurr@rimkus.com); Kelly Cobeen, representing Federal Emergency Management Agency/Applied Technology Council - Seismic Code Support Committee (kcobeen@wje.com); Michael Mahoney, representing FEMA (mike.mahoney@fema.dhs.gov) requests As Modified by Public Comment

Commenter's Reason: Multiple questions were raised by the committee and opposition testimony, that highlighted differing interpretations of the originally proposed language. This public comment simplifies and clarifies the proposed language to address those points. The 2 primary changes are:

1- The horizontal addition provisions have been condensed into one section that uses prescriptive language in-line with the IRC practice. The language used in this public comment was developed in collaboration by all interested parties, including input from the Home Builders Association.

2 - Both the horizontal and vertical addition sections have been clearly limited in scope to structural requirements only. The original proposed language was more broad and encompassed all disciplines, which exceeded the intended purpose of this section.In developing this public comment, we have collaborated with WABO and other interested parties. This public comment will work in conjunction with WABO's code change proposals and public comments. The link below is to a document showing how Appendix AJ is intended to look, if all of the related Appendix AJ proposals and public comments are approved. Where proposals and public comments operate on the same section, this combined document identifies which text is intended to control.

https://www.cdpaccess.com/p/public-comment/3134/27715/files/download/3698/FEMA-IRC%20APP%20J%20compiled%2007-21-22.pdf

This shows what Appendix AJ would look like if these proposals were approved with floor modifications and public comments: RB7, RB162, RB163, RB206, and RB297.

RB206-22: New link for file attachment in the reason

Public Comment 1:

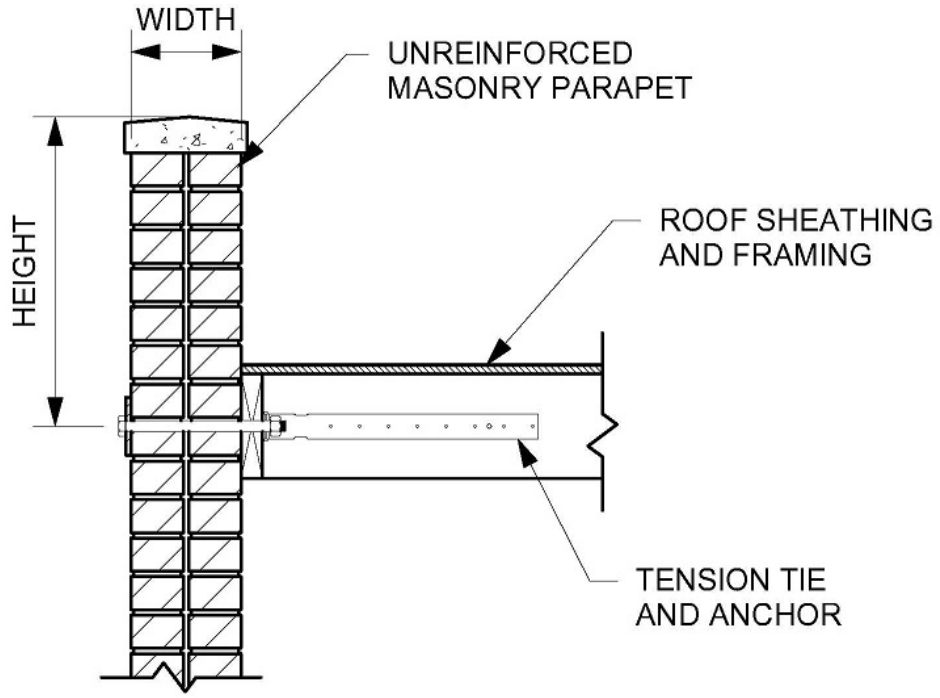
Proponents: Julie Furr, representing FEMA ATC Seismic Code Support Committee (jfurr@rimkus.com); Kelly Cobeen, representing Federal Emergency Management Agency/Applied Technology Council - Seismic Code Support Committee (kcobeen@wje.com); Michael Mahoney, representing FEMA (mike.mahoney@fema.dhs.gov) requests As Modified by Public Comment

Commenter's Reason: This public comment addresses points of concern that were raised in testimony during the public action hearings. A new figure has been added to clarify how the height-to-width ratio should be determined.In developing this public comment, we have collaborated with WABO and other interested parties. This public comment will work in conjunction with WABO's code change proposals and public comments. The link below is to a document showing how Appendix AJ is intended to look, if all of the related Appendix AJ

proposals and public comments are approved. Where proposals and public comments operate on the same section, this combined document identifies which text is intended to control.

https://www.cdpaccess.com/p/public-comment/3133/27718/files/download/3699/FEMA-IRC%20APP%20J%20compiled%2007-21-22.pdf

This shows what Appendix AJ would look like if these proposals were approved with floor modifications and public comments: RB7, RB162, RB163, RB206, and RB297



RB297-22: New link for file attachment in the reason

Public Comment 1:

Proponents: Julie Furr, representing FEMA ATC Seismic Code Support Committee (jfurr@rimkus.com); Michael Mahoney, representing FEMA (mike.mahoney@fema.dhs.gov); Kelly Cobeen, representing Federal Emergency Management Agency/Applied Technology Council - Seismic Code Support Committee (kcobeen@wje.com) requests As Modified by Public Comment

Commenter's Reason: This public comment restores the references to "structure" that were removed from Appendix AJ with the original proposal and overlooked with the approved floor modifications.
AJ102.4 was added by the floor modification, however, the original intent was for this section to be a subset of AJ102.2. There should not be two sections with the same title.

AJ108.4 is deleted as a correlation with RB206-22 that was approved as modified and deals more unreinforced masonry parapets – with is currently the only structural item dealt with in this section on Renovations.

AJ109.4 is deleted as a correlation with RB162-22 that was approved as modified and deals more extensively with requirements for structural alterations to existing buildings.

In developing this public comment, we have collaborated with WABO and other interested parties. This public comment will work in conjunction with WABO's code change proposals and public comments. The link below is to a document showing how Appendix AJ is intended to look, if all of the related Appendix AJ proposals and public comments are approved. Where proposals and public comments operate on the same section, this combined document identifies which text is intended to control.

https://www.cdpaccess.com/p/public-comment/3132/27763/files/download/3694/FEMA-IRC%20APP%20J%20compiled%2007-21-22%20%282%29.pdf

This shows what Appendix AJ would look like if these proposals were approved with floor modifications and public comments: RB7, RB162, RB163, RB206, and RB297