National Association of Home Builders

2019 ICC Group B Online Governmental Consensus Vote Voting Guide

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November 18-December 5, 2019

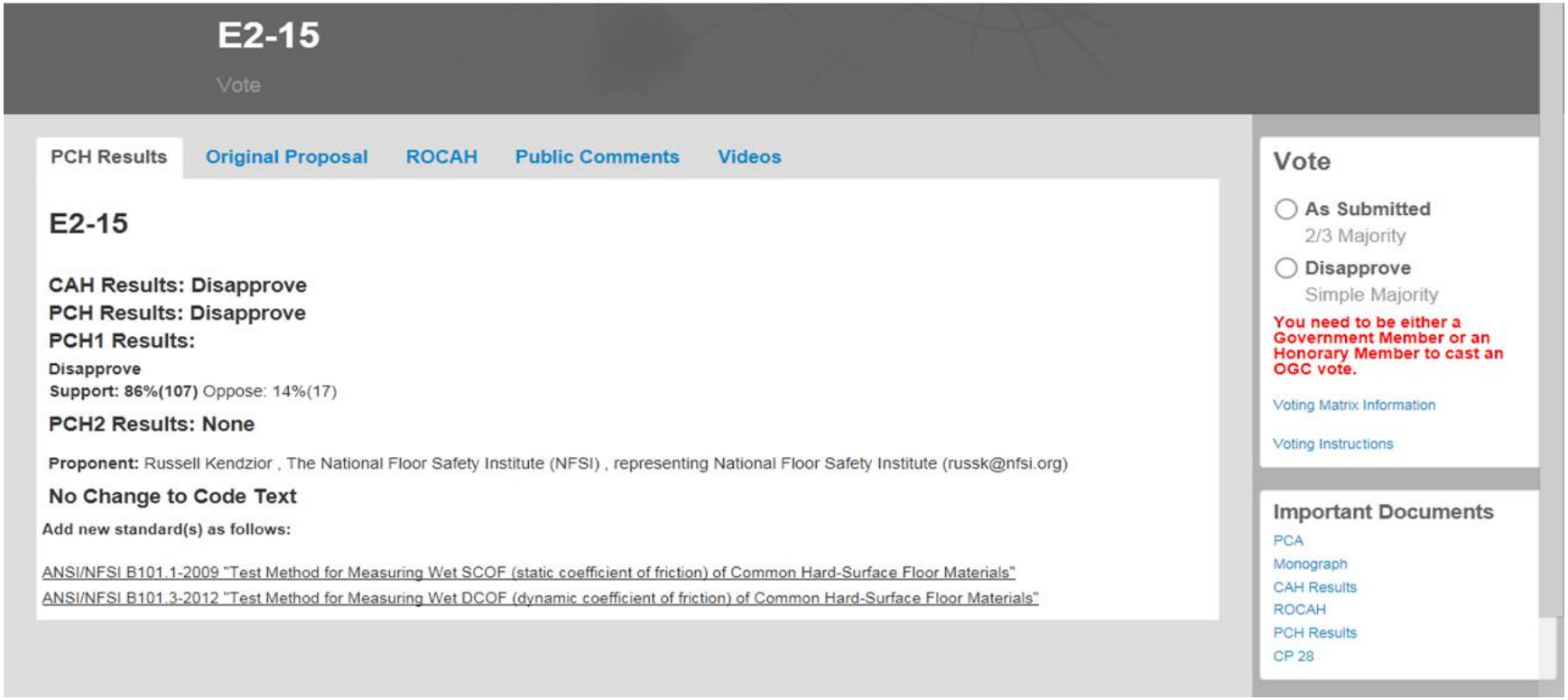
National Association of Home Builders

NAHB's Voting Recommendations for 2019 Group B OGCV

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

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

How to use this guide- Once you have logged into cdpACCESS, you will see a list of proposals on the left hand of the screen. When you select the proposal, a screen similar to the one below will open and you will be able to cast your vote on the proposal. With this guide, you can see that our recommended vote on ADM7-19 is "Disapprove", as indicated by "Disapprove" in the recommended vote column.



Note: This Voting Guide includes a comprehensive list of positions NAHB feels are important to the housing industry and homebuyers. Those highlighted in blue are most critical to the housing industry!

IADMIN

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
ADM5, Part 2	Disapprove	This proposal changes the definition of townhouse to include all connected townhouse units and creates a definition for "townhouse unit."	Defining "townhouse" as the entire structure is confusing, because the term is commonly used by contractors, code officials, realtors and the public for the individual dwelling.
ADM7	Disapprove	This proposal requires the code official to approve the use of the IRC for the repair, alteration, change of occupancy, addition to and relocation of existing buildings within the scope of the IRC.	It should remain the choice of the designer as to which code a project is built under. If you can build a new house to the IRC, work done under the IRC is also acceptable for an existing home. That's how it's been from day one.
ADM12	Disapprove	This proposal adds a standard in the IMC for the inspection of HVAC systems in buildings scoped to the IRC.	The scope of the IMC does not include dwellings scoped to the IRC, but the standard's scope overlaps the scope of both codes. The proposed language is confusing, because it appears to apply to buildings scoped to the IRC. And much of the standard is written in permissive language.
ADM22	Disapprove	This proposal requires test samples for materials or methods that do not conform to the requirements of the IBC to be randomly selected by an approved agency.	The proposed language assumes that only materials would be tested, but this section also applies to methods. You can't randomly select methods, and you can't randomly select alternative materials when used in only one location.
ADM23, Part 1	Disapprove	This proposal requires agencies conducting product certification or product evaluation to be accredited by an accreditation body and that a third-party certification agency certifies products and materials.	(1) Not all products need to be approved by a third-party agency. (2) Using the term "approved source" in the section heading of 104.11.1.1 creates a conflict with the definition of "approved source." (3) An approved source may be a person, but this language only allows agencies to perform the certification or evaluation.
ADM33, Part 2	Disapprove	The proposal revises sections on fees and adds a new section on permit valuations.	Already covered in the IBC. The "Permit Valuation" section is not needed in the energy code.
ADM33, Part 3	Disapprove	This proposal updates language in R104 "fees" which includes a requirement for permit valuation which requires an estimated valuation of the work that will be performed for the permit	Already covered in the IBC. The "Permit Valuation" section is not needed in the energy code.

IECC – Commercial

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
CE3, Part 1	As Submitted	The proposal expands the scope to allow consideration of integrated energy efficiency measures, renewable energy systems and energy storage.	This is a good proposal that supports installing on-site integration of energy efficiency measures, renewable energy systems, and energy storage.
CE3, Part 2	As Submitted	This proposal intends to update the intent of the IECC to include renewable energy systems and energy storage systems.	This proposal includes renewable energy and storage systems in the intent. Renewable energy can be part of a dwelling and how it uses energy and should be included in the intent.

CE5, Part 1	Disapprove	The proposal makes health and life safety a part of the energy code intent.	Health and life safety are not the primary drivers of the energy code. The proposal introduces a conflict with the last sentence in this section that already states that the code is not intended to abridge safety, health, environmental requirements. This will expand future code proposals to include changes with the primary benefit of health instead of energy efficiency.
CE5, Part 2	Disapprove	This proposal introduces life safety into the intent of the IECC	The IECC already addresses health and safety issues. Life safety is addressed in the IBC and IFC and the IECC is not to conflict with that.
CE6, Part 1	Disapprove	The proposal adds provisions that the intent also includes provisions for human comfort.	Comfort is not an energy issue, too subjective. The added language on comfort is too specific for the scope.
CE12, Part 2	Disapprove	This proposal requires any above code program to have a building thermal envelope that is equal or greater than the SHGC levels of the 2009 IECC.	The code official determines if an above code program is acceptable and meets the requirements of the local adopted code. There is no need to add additional backstops.
CE15, Part 1	Disapprove	Require that the IECC requirements be included on the construction documents.	Would create issuing with pulling permits, duplicative with standard construction documentation, unnecessary and onerous to comply with.
CE15, Part 2	Disapprove	This proposal would require a "energy reference construction document" which would require documentation that the code is being met.	This proposal requires additional time and labor and the information is already included on the drawings.
CE16, Part 1	Disapprove	The proposal established the requirements for a third-party inspection agency.	Gives the third-party inspection agency complete control over the approval or disapproval as an "extension" of the code official. The code official should have the final say. This level of detail does not need to be in the code.
CE16, Part 2	Disapprove	This proposal would require new requirements for third party inspection and create criteria about whether the code official or third party is verifying what aspect of the dwelling.	The code official should have the final say when determining compliance. This proposal gives too much authority to the third-party inspector.
CE49	Disapprove	The proposal lowers the requirement for performance-based design from 85% to 80%.	No basis provided for the proposed increase in stringency. The proposal does not recognize the recent increases in stringency of the standard reference design. Cost impacts of these incremental changes tend to be exponential as 85% of reference design is already high performance.
CE53	**Disapprove**	**The proposal adds a new section to the IECC that will REQUIRE On-Site renewable energy for EVERY building and includes provisions for the capacity of the equipment with some exceptions.**	**Should remain as an option, not a requirement in the minimum energy code. Decisions to specify solar should be made on a project basis at the local level, not by the national model code.**
CE54, Part 2	As Submitted	This proposal introduces a tropical zone for dwellings without air-conditioning.	This new option for homes without air conditioning is more in tune with how homes are constructed- and lived in- in the tropical climate.
CE61	Disapprove	The proposal increases R-Value and decreases U-Value by mixing the values from various codes and taking the most stringent.	The proposal cherry-picks insulation values between ASHRAE and IECC. The IECC numbers either need to remain as is (no change to code) or be fully aligned between the two codes to maintain a consistent basis for the values across the board.
CE63	Disapprove	The proposal increases R-Value and decreases U-Value by mixing the values from various codes and taking the most stringent.	The proposal cherry-picks insulation values between ASHRAE and IECC. The IECC numbers either need to remain as is (no change to code) or be fully aligned between the two codes. The envelope works as a system.

CE65	Disapprove	The proposal increases the joist/framing R-values in Climate Zone 1	The proposal increases the joist/framing R-values in Climate Zone 1 where delta T is minimal to levels more stringent than ASHRAE 90.1. No justification or cost analysis is provided.
CE66	Disapprove	The proposal increases R-Value and decreases U-Value by mixing the values from various codes and taking the most stringent.	Proposed CZ-1 joists/framing insulation requirements for R-13 are more stringent than ASHRAE 90.1-16, which does not require floor insulation in this application. No justification/cost analysis provided for this increase.
CE68	Disapprove	The proposal increases R-Value and decreases U-Value by mixing the values from various codes and taking the most stringent.	No cost justification is provided for the increase in slab insulation levels. Cherry-picks the most stringent requirements between IECC and ASHRAE.
CE75	Disapprove	The proposal selectively and inequitably lowers U-Values for wood-framed and metal-framed walls.	The current IECC U-factor values are material neutral and do not contain errors as suggested by the proponent. The proposal cherry-picks numbers in a random manner setting target that vary with the material type (wood vs steel). Consistent performance objectives should be maintained regardless of the material type.
CE79	As Modified	The proposal modifies provisions for perimeter slab insulation in an attempt to separate prescriptive and mandatory language.	Agree with committee's decision to replace Mandatory with Prescriptive to maintain tradable options for performance compliance.
CE96	**Disapprove**	**The proposal requires air-barrier testing of dwelling and sleeping units in ALL buildings 4 or more stories in height.**	**Onerous to implement for multifamily buildings. No effective recourse. For minimum code compliance, air barriers should have an option to be implemented with help of an envelope consultant based on use of tested assemblies and visual inspections. The leakage through interior walls and ceilings does not relate to energy efficiency. The proposal reason states that envelope consultants were able to help with solutions that achieved good performance.**
CE97	Disapprove	The proposal separates air-barrier testing for Group R and I occupancies from the testing requirements for all other occupancies. New requirements for non-residential are proposed.	The option for prescriptive compliance and visual inspection should be maintained. The proposal reason states that envelope consultants were able to help with solutions that achieved good performance. Testing can be onerous and expensive.
CE111	As Modified	The proposal is similar to CE110 requiring a software platform to analyze and detect problems with the HVAC system. It does add the requirement that it would apply to buildings with 100,000 or more feet.	The committee modification provides an exception for residential occupancies where such systems would be onerous and not cost-effective.
CE133	**Disapprove**	**This proposal requires non-transient dwelling units to have outdoor energy recovery ventilation based on an enthalpy recovery ratio of not less than 50%.**	**Standard ventilation systems should remain an option for dwelling units in the code. Recovery ventilator systems are expensive and often installed incorrectly leading to performance issues. They can be noisy, and occupants turn them off. Effective integration with the rest of the HVAC systems require complex controls.**
CE150, Part 1	Disapprove	The proposal adds requirements for piping insulation protective barrier to also include protection from wind and physical damage and be removable.	The requirement for the protective layer to be removable is unnecessary in most cases and would eliminate existing materials/solutions and reduce the system's durability. Physical damage is not defined, and the level of required protection is not clear. In residential applications where access is not restricted, the protective layer can be removed inadvertently by residents. Many residential refrigerant pipes do not have joints that require maintenance.

CE217, Part 1	**Disapprove**	**The proposal requires parking spaces in all new construction to have parking spaces capable of future electric vehicle charging or have then ready for electric vehicle charging. Number of spaces is based on total number of parking spaces.**	**These provisions are outside of the scope of the IECC which is building energy use. These decisions should be made between the designer and the developer based on local market and jurisdiction's development plans. The proposed number of EV spaces is not supported by the current market or the projected market share growth. Given the associated costs, these requirements would have a major impact on affordability, particularly for entry level rentals.**
CE217, Part 2	**Disapprove**	**This proposal introduces a requirement for electric vehicle spaces and electric vehicle capable space. It requires one- and two-family dwellings to construct at least one "EV ready" space**	**This is not a building code issue this is a jurisdictional issue. Adding these parking spaces into a residential dwelling is not practical in every application and would add significant cost.**
CE218	**Disapprove**	**Proposal substantially expands the requirements of Section C406 Additional Efficiency Package Options by introducing a new 10 threshold and a system of credits.**	**To achieve the new proposed 10 credit threshold, multiple additional efficiency package options (up to 5) will need to be implemented. The current code requires compliance with one additional package. No justification or cost analysis provided for this major change. The proposal reason statement is incorrect stating no cost impact.**
CE226	**Disapprove**	**Proposal substantially expands the requirements of Section C406 Additional Efficiency Package Options by introducing a new 10 threshold and a system of credits.**	**To achieve the new proposed 10 credit threshold, multiple additional efficiency package options (up to 5) will need to be implemented. The current code requires compliance with one additional package. No justification or cost analysis provided for this major change. The proposal reason statement is incorrect stating no cost impact.**
CE229	**Disapprove**	**Proposal substantially expands the requirements of Section C406 Additional Efficiency Package Options by introducing a new 10 threshold and a system of credits.**	**To achieve the new proposed 10 credit threshold, multiple additional efficiency package options (up to 5) will need to be implemented. The current code requires compliance with one additional package. No justification or cost analysis provided for this major change. The proposal reason statement is incorrect stating no cost impact.**
CE240	**Disapprove**	**Proposal substantially expands the requirements of Section C406 Additional Efficiency Package Options by introducing a new 10 threshold and a system of credits.**	**To achieve the new proposed 10 credit threshold, multiple additional efficiency package options (up to 5) will need to be implemented. The current code requires compliance with one additional package. No justification or cost analysis provided for this major change. The proposal reason statement is incorrect stating no cost impact.**
CE247	Disapprove	The proposal revises the requirements for the standard reference design for above-grade walls to "same as proposed".	The proposal removes a long-standing and stable baseline used in the standard reference design for above-grade walls. It creates an inconsistency with how other enclosure systems are modeled (ceilings, floors, foundation, doors). It takes away an incentive to use more energy efficient materials.
CE263, Part 1	Disapprove	The proposal creates a new appendix for requiring Solar PV in all newly constructed commercial buildings larger than 5,000 square feet.	The solar PV provisions in the model code should be on "how to" instead of requirements to install a PV system. The appendix is written as a mandatory section creating a perception that the IECC is getting ready to require PV installations on all new buildings.

International Existing Building Code

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
EB41	Disapprove	This proposal adds new sections/language to differentiate between partial and complete reconstruction when damage occurs from a fire, earthquake, wind storm or other hazard event, and when requirements for new construction apply.	As written, the provision would require a building within the scope of the IRC but opting to use the IEBC would have to be reconstructed using the IBC rather than the IRC.
EB133	Disapprove	This proposal adds new requirements that existing buildings relocated or moved into a wildland-urban interface area be required to comply with the IWUIC as applicable.	The proposal could require fundamentally changing the aesthetics of a moved or relocated building by triggering a change of cladding materials or prohibit the move or relocation entirely if clear space cannot be provided. No exceptions are provided where only minor portions of the building do not comply with the IWUIC.
EB145	Disapprove	This proposal requires structural observation and special inspection for all wall anchorage retrofits performed using Appendix A2.	The proponent has not provided any specific reasons why more extensive structural observation and special inspection requirements should apply for this retrofit option versus what would be required for new construction.
EB147	As Modified	This proposal adds a special inspection for continuity connectors and crossties and adds a stiffness requirement for the wall anchorage system.	The original proposal contained vague and unenforceable language. However, the committee modification clarified the special inspections can be periodic and removed the subjective and unenforceable language.

IBC – General

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
G12, Part 1	**Disapprove**	**This proposal modifies the definition of "wind-borne debris region" to include sites within one mile of the mean high-water line of an Exposure D condition instead of just one mile from a coastal mean high-water line.**	**An Exposure D condition is defined by 5000 feet or more of open water upwind of the site. In high-wind regions, this revision could require buildings adjacent to wide rivers or large inland lakes but not directly fronting on the Atlantic Ocean or Gulf of Mexico to provide wind-borne debris protection where not already required by code.**
G12, Part 2	**Disapprove**	**This proposal modifies the definition of "windborne debris region" to include sites within one mile of the mean high water line of an Exposure D condition instead of just one mile from a coastal mean high water line.**	**An Exposure D condition is defined by 5000 feet or more of open water upwind of the site. In high-wind regions, this revision could require buildings adjacent to wide rivers or large inland lakes but not directly fronting on the Atlantic Ocean or Gulf of Mexico to provide wind-borne debris protection where not already required by code.**

IRC – Building

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
RB1	Disapprove	This proposal requires supporting data for the approval of alternative materials, design and methods to consist of valid research reports from approved sources and adds provisions for approved sources and third-party certification.	(1) The change is unnecessary, since a code official is already allowed to choose the credentials that the source should have. (2) Not all products need to be approved by a third-party agency. (3) The new section on approved sources conflicts with the definition of "approved source." (4) In contrast to the proposed definition of "accreditation body", an approved source may be a person and not an agency.
RB2	As Submitted	This proposal expands the exemption from permit requirements for fences to include all fences.	The body of IRC doesn't include any requirements for fences, so it doesn't make sense to require permits for them. Plus, this provision seems to generally allow fences up to 7 feet in height which conflicts with zoning height restrictions and causes confusion.
RB14	As Modified by Public Comment 1	This proposal changes the term "grade floor opening" to "grade floor emergency escape and rescue opening" and modifies the definition of "grade floor opening" by measuring to the bottom of the clear opening instead of the sill height.	This is one step in providing consistency among the different provisions such as fall protection and window area wells as to how the measurements are taken.
RB20	Disapprove	This proposal adds a definition for "porch."	(1) It doesn't make sense to limit the definition to heated spaces, since some porches are unheated. (2) Current requirements for porches wouldn't apply in cases where a porch doesn't meet the exact language of the proposed definition. (3) Some entry porches have two-story columns, but this limits the definition to one story.
RB22	Disapprove	This proposal limits the definition of "townhouse" to dwelling units where the yard or public way extends at least 50% of the length of the open sides.	(1) Egress doesn't require more space for a larger home like in commercial buildings. (2) Why can a narrower townhouse have less exposure even when it might have the same occupancy load? (3) A standard door or window width is all that is required, so there should be a set dimension for egress.
RB33	Disapprove	This proposal removes the requirement to provide the outdoor design dry bulb temperature from Appendix D of the IPC and revises the required ACCA Manual J design criteria.	The deleted Winter Design Temperature is the one used to trigger the requirement to provide indoor heating per R303.10, protect solar thermal systems from freezing per M2301.2.6, and protect pipes from freezing per Sections P2603.5 and P3001.2.
RB40	As Modified by Public Comment	This proposal adds hillside homes as an irregular building type to be addressed by engineered design. The public comment focuses the design requirement on the transfer of lateral forces from the house to the foundation.	The modifications improved the original proposal by excluding hillside homes with finished basements from being considered irregular and clarifying the foundation need only be designed for the transfer of lateral forces from the shear or braced walls of the house through the foundation, not for out-of-plane soil forces.
RB43	**As Modified by Public Comment**	**This proposal restores the ability to construct a story of a dwelling using 12-foot-high bearing walls if the wall studs are engineered for gravity loads, wall bracing amounts are increased, and a roof or ceiling diaphragm provides support to the studs.**	**The proposal fixes a long-standing internal conflict in the story height provisions related to the ability to construct 12-foot-high bearing walls. The public comment highlighted the need to provide lateral support to the top of the studs, especially in the case of a vaulted or cathedral ceiling.**
RB46	**As Modified by Public Comment**	**This proposal separates the live load requirements for guards and handrails and only requires guards resist a 200-pound load in the outward and downward directions.**	**The proposal reflects the definition of a guard as a system intended to protect against a fall from a higher elevation to a lower elevation, not to protect against a fall backwards onto the deck. The public comment further clarified how and where the load is applied.**

RB59	Disapprove PC-1	This proposal adds new section stating any occupied roof in a townhouse, the separating common wall must extend to 8-feet above the roof walking surface and be fire-rated.	The proposal would have an unintended consequence of limiting building heights due to zoning. The quoted NFPA statistics do not state how many of the reported fires were caused by grills, hibachis, or barbecues on a roof deck.
RB78	Disapprove	This proposal revises the section for ventilation in bathrooms to require mechanical ventilation even if a window is present.	The proposal essentially states a homeowner should not be allowed to open a window or door for ventilation purposes.
RB81	Disapprove	This proposal adds new language/sections requiring grab bars for new bathtubs and showers.	The option for any homeowner to install grab bars, when they feel they need them, is always an option. This is more of an issue of needing slip-resistant surfaces underfoot.
RB88	As Submitted	This proposal adds an exception for emergency escape and rescue openings stating that the yard of an infill property adjoining existing neighboring properties.is not required to open to a public way.	The exception allows for building or rebuilding a dwelling in the infill lot to match the existing architectural character of the neighborhood, and to allow having sleeping rooms in a basement to maintain a property value equal to existing neighboring properties that do not have similar emergency escape and rescue openings to the yard.
RB90	Disapprove	This proposal adds a maximum reach height of 70 inches above finished floor for the window opening control devices for emergency escape and rescue opening windows.	The proposal is based on a single-hung window but has the potential to eliminate certain types and styles of windows such as sliders that are currently acceptable as an emergency escape and rescue opening.
RB102	Disapprove	This proposal states that not only do sleeping rooms in altered existing basements require an emergency escape and rescue opening, all habitable spaces do, too.	The proposal would limit how basements are laid out and is not enforceable if a permit is not required for modifications to the basement. This would open the doors to requiring all habitable spaces in upper floors of a home to have an emergency escape and rescue opening based on the potential for those spaces to be turned into sleeping rooms,
RB107	As Modified by Public Comment 1, 2	This proposal exempts stairways and ramps attached to a building, porch, or deck from having to meet code requirements. The public comments also exempt stairways serving non-habitable attics and crawlspaces.	The proposed language adds some clarity between the requirements for stairs inside of a dwelling versus those serving outside elements such as decks.
RB112	**Disapprove**	**This proposal revises current max. riser height from 7-3/4" to 7" and tread depth from 10" to 11" because of IBC requirements and injury statistics.**	**This proposal does not provide evidence as to whether falls are due to stair geometry or other reasons such as human error.**
RB114	As Submitted	This proposal adds exception for handrail continuity stating that offsets of six inches or less shall be considered continuous.	This proposal provides some options for how a handrail is attached since the examples provided are somewhat common in residential construction.
RB116	Disapprove	This proposal includes an overall substitution of language for stairway and deletes spiral and bulkhead stairways entirely. Provides pointer to NFPA 101 standards for residential stairs.	The proposal limits stairway types and styles which have otherwise been deemed safe in previous code cycles.
RB119	Disapprove	This proposal revises requirements for guards to state that guards installed in areas where they are not required should meet the same safety requirements of guards in required locations.	The current language is adequate and considers it safe to not require a guard where the walking surface is 30" or lower above the adjacent grade. The proposal would severely limit what guards or objects (i.e. planters) homeowners can use to create a border around an elevated deck or terrace that does not require guards per code.

RB125	Disapprove	This proposal requires heat detectors and alarms to comply with NFPA 72 and requires a heat detector or alarm to be installed in an attached garage.	Heat alarms are not listed for use in unconditioned spaces such as garages, and the backup batteries are only listed to operate up to a temp of 130F, so no batteries would meet the requirements for an unconditioned space. Passive fire protection is also in place which has proven effective in protecting occupants in the house.
RB141	As Modified by Public Comment	This proposal replaces several references to "design flood elevation" with "required lowest floor elevation". The comment relocates and clarifies requirements for garage and carport floors in flood zones.	The proposal clarifies the relationship between the lowest floor elevation of a dwelling and the base or design flood elevation. The public comment aligns the IRC's provisions for garage and carport floors with the minimum construction requirements of the NFIP.
RB152	**Disapprove**	**This proposal requires a habitable attic to be considered a story unless it meets the same area restrictions as mezzanines.**	**Infill sites and flood zone requirements demand higher buildings, and this change limits the size of buildings built on those sites. Jurisdictions restrict building height through zoning, addressing the proponent's concerns.**
RB156	Disapprove	This proposal specifies where a stationary battery storage system can be located, including in a garage, accessory structure or on the exterior of a house.	The proposal would prohibit the installation of a battery in places within the conditioned area of the dwelling, like a closet. Since the batteries cannot be exposed to extreme temperatures, this would effectively prohibit the installation of batteries for many homeowners in hot states.
RB161	**Disapprove**	**This proposal adds a new section on "physical security" with requirements for door materials, door frames and hardware.**	**(1) According to the Bureau of Justice Statistics, the rate of household burglary decreased 56% from 1994 to 2011. (2) Proposed R328.5.5 on sidelight entry doors does not allow for such doors that come as one unit. (3) The product Door Guard holds 3 patents which could limit products available to meet the requirements. (4) This provision would make it difficult for emergency responders to enter a dwelling.**
RB162	Disapprove	This proposal moves the requirements for a vehicular gate from the appendix to the body of the code.	This should stay in the appendix. The Consumer Product Safety Commission (CPSC) states that deaths and injuries have gone down dramatically since UL 325 took effect in 2000. The largest number of serious problems reported to CPSC generally occurred with public access gates around communities, condominiums, and apartment buildings, which this proposal will not address.
RB163	Disapprove	This proposal adds a pointer to the IEBC where the use or occupancy is changed to one outside the scope of the IRC.	Some jurisdictions do not adopt the IEBC, so it doesn't make sense to point to it.
RB164	**As Modified**	**This proposal revises the minimum footing width tables to remove overly conservative assumptions or correct underlying calculations to match common engineering practice.**	**The proposal revises the footing tables, so they produce reasonable footing sizes while still matching engineering practice. The revised tables are designed to focus on starter homes with basic floor and roof assemblies rather than high-end homes with ceramic tile floors and other high-end finishes.**
RB166	As Modified by Public Comment	This proposal adds requirements for wet-setting of anchor bolts in foundations, including the need for proper consolidation of concrete around wet-set bolts.	The original proposal unintentionally mandated wet-setting of anchor bolts. The public comments clarified the practice is a permitted option and addressed concerns with proper consolidation of concrete around wet-set bolts.
RB174	Disapprove	This proposal adds a 4" drainage layer of free-draining granular material or equivalent material as options for foundation wall waterproofing.	There are concerns as to whether a free-draining gravel layer by itself as the only waterproofing method works for all climate zones and groundwater conditions.

RB182	Disapprove	This proposal requires post-tensioned slabs-on-grade on either expansive or stable soils be designed per the PTI DC-10.5 standard.	By excluding post-tensioned slabs in the first sentence of R506.1, users are sent to DC-10.5 for site preparation, base course, and vapor retarder requirements, but the standard doesn't cover those areas.
RB183	Disapprove	This proposal increases the size of vapor retarders under slabs-on-grade from 6 mil to 10 mil and requires they meet ASTM D1743, Class A.	The proposal limits product choice and increases cost by requiring the use of a proprietary product rather than generic polyethylene sheet. No technical justification was provided that this change is necessary for all houses constructed under the IRC.
RB185	As Modified by Public Comment	This proposal adds generic minimum requirements for the construction of deck guards and their connections to deck framing. No details are proposed.	The proposal adds minimum performance requirements for guards intended to address problems with notching of posts and use of nails in withdrawal. The public comments removed language requiring the building official approve the guard manufacturer's installation instructions and restored existing language on plastic composite guards.
RB193	As Modified by Public Comment	This proposal revises the fastener schedule to add 14 gage staples as an option and clarifies the size, number and spacing of fasteners is based on carbon steel.	The proposal clarifies nail requirements for blocking and corrects nail sizes and lengths for sheathing and subflooring. The public comment clarifies the table is based on carbon steel fasteners but allows the use of stainless steel fasteners under alternate means-and-methods or engineered design.
RB212, Part 1	As Submitted	This proposal adds a new provision and details for Extended Plate Wall construction allowing for sandwiching continuous insulation between wood structural panel sheathing and wood framing.	The proposal provides a needed option in cold climates where continuous insulation is required. The new method can help in avoiding warranty issues related to fastening cladding through foam sheathing.
RB219	Disapprove	This proposal replaces the list of materials qualifying as vented cladding with a requirement for vented claddings to provide a minimum 3/16-inch air space.	The proposal does not make it clear brick veneer qualifies as a vented cladding and could require a builder provide furring strips behind vinyl siding in order to create the air space. The language conflicts with a comprehensive reorganization and technical improvements to the vapor retarder section approved during this cycle.
RB221	Disapprove	This proposal adds a section on installation of vapor retarders requiring they be installed per manufacturer's instruction and be installed as an air barrier or in combination with one,	The proposed language does not instruct how an air barrier is to be installed which is an issue for states and jurisdictions that have not adopted an edition of IRC Chapter 11 that addresses air barriers.
RB231	Disapprove	This proposal restores an exception from providing water-resistive barriers for detached accessory buildings that are not heated or cooled.	Many exterior wall covering manufacturers require a water resistive barrier under their products. Adding this exception puts cladding installers at risk of litigation for moisture issues.
RB238	Disapprove	This proposal requires an insulation stop be installed around window and door openings to allow for drainage of water. The insulation stop is to be located 1 to 2 inches from the face of exterior sheathing.	The drainage stop will be covered by the nailing flange and not visible for inspection. A stop would also be unnecessary where a space can be maintained during the placement of insulation. The language references the face of the sheathing, but some wall configurations do not include sheathing.
RB242	As Modified	This proposal divides the water-resistive barrier requirements behind stucco into sections for dry and moist climate zones. A 3/16-inch air space or material with high drainage efficiency is required in moist climate zones.	This proposal improves and enhances water-resistive barrier requirements behind stucco to address issues in the field that are causing liability for builders. The modifications retain prescriptive options and improve flexibility in what materials comply with the code, thus minimizing potential cost impacts.
RB261	As Modified by Public Comment 1	This proposal clarifies the requirements for ceiling joist, rafter and rafter tie connections. The comment further clarifies the requirements for lapped ceiling joists and blocking.	This proposal provides editorial clarifications to the requirements for ceiling joist, rafter and rafter tie connections. The public comment addressed concerns about lumber materials and lapped ceiling joists.

RB277	As Modified by Public Comment 1	This proposal eliminates spaced sheathing as an option for roof decking under concrete and clay tile in high-seismic regions. Only continuous structural sheathing is acceptable.	The limitation is based on observations of roofs pulling away from wood framing in the 1994 Northridge earthquake. The comment allows spaced sheathing in low-seismic areas (Seismic Design Categories A, B, and C).
RB286	Disapprove	This proposal allows radon vent systems in Appendix F to be routed out the side of the building and terminate at the sidewall, provided a fan is installed and the system has been tested.	This change provides a reasonable option for avoiding routing radon vent piping up through a house and terminating at the roof. It also addresses the problem of water vapor freezing at the rooftop termination in cold climates.
RB289	As Modified by Public Comment 1	This proposal adds radon testing requirements to Appendix F.	The proposal clarifies that testing can be performed by the contractor and includes thorough and simple-to-follow instructions.
RB292	Disapprove	This proposal adds energy conservations requirements in Appendix Q for tiny houses.	Air leakage is not a real concern on a tiny house, since opening a door or window has a large effect due to the small volume. Tiny homes simply use less energy anyway, even if you don't test the air leakage.
RB300	**Disapprove**	**This proposal adds an appendix on physical security.**	**(1) According to the Bureau of Justice Statistics, the rate of household burglary decreased 56% from 1994 to 2011. (2) Proposed R328.5.5 on sidelight entry doors does not allow for such doors that come as one unit. (3) The product Door Guard holds 3 patents which could limit products available to meet the requirements. (4) This provision would make it difficult for emergency responders to enter a dwelling.**
RB301	Disapprove	This proposal adds an appendix with prescriptive deck guard details.	The details are overly complex and require an excessive amount of labor. Placing these details, based on high safety factors, in the code would require alternative details to meet the same level of complexity.

IECC – Residential

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
RE2	Disapprove	This proposal requires that a vapor management strategy be documented on all construction documents.	The code does not need to list all information that may be included on plans. This is in the purview of the architect. The term "declaration" is an overreach and does not belong in an energy code.
RE7	As Modified by Public Comment	This proposal updates what is considered "high-efficacy". Exempts kitchen appliance light fixtures.	This would help identify what a high-efficacy light is. This is an outdated provision and we recognize the update that is needed.
RE21	Disapprove	This proposal mandates that each value for a component of the building thermal envelope be on the certificate. It also states that the ERI score with and without renewable energy be on the certificate.	This is confusing language. There is no need to provide two ERI scores. The certificate is for the homeowner for home improvements rather than compliance.
RE32	Disapprove	This proposal adds insulation requirements for slab edges in climate zone 3 and increases the insulation values for climate zones 4 and 5.	There is an issue with this requirement in climate zone 3 the insulation is below the slab depth which would require extra excavating, and this is not accounted for in the cost impact.
RE33	Disapprove	This proposal increased the ceiling R-value to 49 in climate zones 2 and 3.	There is no technical justification for this change other than to align the values with climate zone 4 and higher. There are different climate zones because each area has very different needs when it comes to heating/cooling and insulating.

RE36	Disapprove	This proposal increased the ceiling R-value to 60 in climate zones 4-8.	This proposal will add significant cost to construction. The proponent states that these are small gains in construction however these small gains have big cost implications with extremely low energy savings.
RE37	Disapprove	This proposal adds a requirement to climate zone 5 for 0.40 SHGC.	Flawed reason statement. Zone 5 is a heating dominated climate. Sometimes higher SHGC can save energy in a heating climate, so the proposed SHGC could increase energy use in homes.
RE40	As Submitted	This proposal adds a footnote to table 402.1.2 that allows for R-18 to be a cavity only insulation option with advance framing techniques.	This proposal adds an energy neutral trade-off to the code. R-18 with 24 inches on center framing has the same u-value as standard methods.
RE54	Disapprove	This proposal adds new requirements for insulating basement walls.	Introduces unnecessary new code language that makes compliance less clear. Removes the requirement for insulating the floor above unconditioned basement. Removes the 10-foot limit without justification.
RE57	Disapprove	This proposal requires Grade 1 insulation installation in accordance with RESNET 301 standard.	Introduces conflicts between manufacturer's instructions and the expanded RESNET 301 insulation rating criteria. The RESNET 301 language is overly prescriptive and will limit viable product choices. Internet-based resources are listed in RESNET 301 as code compliance criteria.
RE59	As Modified	This proposal separates the prescriptive and mandatory requirements of the basement walls.	The committee correctly removed the mandatory designation from R402.2.9.1.
RE60	Disapprove	This proposal designates slab-on-grade floor insulation provisions as Mandatory.	The "Mandatory" designation is not appropriate for this section. It should remain "Prescriptive" and tradable through modeling to maintain consistency with the format approved in CE42 Part II.
RE66	Disapprove	This proposal adds new requirements to ceilings/attic section of the air barrier table. It states that walls greater than a foot be insulated like a knee wall and less than a foot be buried.	This code change calls reference to knee-wall provisions but there are no knee-wall provisions and it is not a defined term. It also calls reference to other code sections and adds confusion.
RE67	Disapprove	This proposal is an attempt to clean up language where air barriers are required.	This is redundant language and is not a necessary code change.
RE68	Disapprove	This proposal aims to add clarification to how to install insulation around wiring and plumbing in walls.	This proposal is not necessary it is trying to clarify language but is making it more confusing.
RE71	Disapprove	This proposal requires garage separation assembly be installed in accordance with section R303 and R402.2.8	The proponent is referencing the wrong section of the codes for garage walls. R402.2.8 refers to floors.
RE73	Disapprove	This proposal intends to clarify where air sealing should occur around penetrations in the thermal envelope.	The proponent is trying to add clarification but potentially causing enforcement issues with language of damaged or compressed insulation.
RE74	Disapprove	This proposal intends to add clarification on how vapor retarders are to be installed along with how to insulate crawlspaces and basement floors	This proposal adds clutter and unnecessary language to the code the proposal is calling out things that are already in the code and are redundant.
RE75	Disapprove	This proposal requires air barrier assemblies be sealed at any exposed edge.	Air sealing is required around the building thermal envelope, we do not need to add language the specifies where and how. This is a guidance tool not a code requirement.
RE79	Disapprove	This proposal broadens the scope of sealing and includes sealing around penetration of the HVAC boots whether they are inside or outside of the thermal envelope.	This language is hard to follow and adds confusion. It is taking away sealing when the HVAC boot penetrates the thermal envelope and now requires sealing whenever it penetrates any subfloor. This is an overreach.

RE80	Disapprove	This proposal intends to clarify sealing around electrical, phone, and utility boxes or use an air sealed utility box.	These boxes are already required to be sealed. This is redundant language.
RE81	Disapprove	This proposal includes fireplaces in the air barrier table and treats them the same was the showers are treated.	The requirement to seal penetrations through subfloor is an overreach. If the subfloor is part of the thermal envelope, then it will be addressed.
RE84	Disapprove	This proposal is adding air sealing requirements to the air barrier table. This is adding in areas that are to be required to air seal.	This proposal is adding air sealing requirements to the air barrier table. It is adding kneewall requirements where kneewall is not a defined term in the IRC.
RE85	Disapprove	This proposal is adding air sealing requirements and stating that they are mandatory.	It states that the table is here to offer guidance but then states that the provisions are mandatory, this is contradicting and confusing code language.
RE94	Disapprove	This proposal intends to introduce testing of the wall assembly that separates the building and the garage. The wall assembly must pass a two-part test.	There are already provisions in the code that address air leakage requirements and testing this is not an energy code issue and does not address anything to do with energy efficiency.
RE95	As Submitted	This proposal introduces a sampling protocol for air leakage testing for multi-family into the IECC.	This proposal defines a protocol for sampling and gives reasonable backstops when there is failure to comply.
RE102	As Submitted	This proposal adds clarification to the code by reference ASTM E779 standard, this is already referenced in the code however has caused some confusion.	This helps to add clarification to the testing procedures and acceptable standards that can be used.
RE106	Disapprove	This proposal modifies required capabilities for programmable thermostats.	The level of added specificity to the control requirement schedule is not needed and too restrictive for minimum code. The proposed language is unclear with regard to day vs week schedules. The 2018 code language addresses these provisions adequately.
RE109	Disapprove	This proposal adds requirements for ducts inside conditioned space.	The proposal imposes an arbitrary floor insulation requirement of R19 without any justification. Because in Climate Zones 1 and 2 R13 is the minimum requirement for floors and walls, the new R19 requirement creates a glaring conflict in the code.
RE112	**Disapprove**	**This proposal strikes the exception for duct leakage testing for ducts/air handlers located entirely inside conditioned space. It adds duct testing to the prescriptive section and allows for an 8.0 CFM per 100 sq. ft of conditioned floor space.**	**This code change is not necessary. There is no need to test a system that is located entirely inside of conditioned space, if there is any leakage it is leaking to conditioned space and our dwellings already have to comply with the air leakage requirements.**
RE117	Disapprove	This proposal would make the duct leakage requirements mandatory.	This proposal is not needed. It is mandating duct leakage requirements regardless of location of air handler or duct work.
RE119	As Submitted	This proposal allows for duct leakage test to the outside be an acceptable leakage test method.	This proposal allows for a duct leakage test to outside conditioned space as this is the only duct test that shows actual energy loss.
RE121	As Submitted	This proposal adds a protocol for sampling R2 multifamily dwelling units.	This proposal gives flexibility to the code and sets boundaries and methods to a sampling procedure. Some jurisdictions allow sampling, and this gives a protocol to follow.
RE126	**Disapprove**	**This proposal restricts the types of hot water heater that can be used.**	**Limits currently allowed equipment choices. Indirectly limits fuel choices. Federal equipment minimums should not be further restricted by the code. Limited choice will lead to higher cost of construction.**

RE130	Disapprove	This proposal would require ALL mechanical ventilation systems to be tested and verified to provide the adequate amount of ventilation.	This is a mechanical code issue, not an energy code issue. The basic ventilation systems such as a bathroom exhaust fan do not need to be tested in each house. Standard installation instructions and visual inspections are effective at ensuring performance. This requirement will add significant cost without a corresponding energy benefit.
RE132, Part 1	Disapprove	This proposal requires mechanical ventilation in all dwellings.	The proposal expands mechanical ventilation requirements to all residential occupancies in all cases and circumstances. This is a significant expansion of the scope of this requirement. Ventilation requirements should remain in the IMC. Energy code should continue providing pointers to IMC and IRC, not establish new requirements.
RE132, Part 2	Disapprove	The proposal removes long-standing triggers for mechanical ventilation requirements.	The proposal expands mechanical ventilation requirements to all residential occupancies in all cases and circumstances. This is a significant expansion of the scope of this requirement. Existing thresholds for triggering mechanical ventilation should be maintained in the IRC.
RE145	Disapprove	This proposal requires all lighting to be high efficacy, re-defines high efficacy as 70 lumens per watt, and requires all permanently installed lighting to have occupant sensor control.	An occupant sensor control is not practical in residential applications. Occupant sensors work by turning lights on as well as off when it senses movement. There are circumstances when lights don't need to be on during the day in a well light laundry room or garage and bathrooms. This is not a practical code change.
RE147	Disapprove	To future proof the house for electrification, this proposal would require a 125-volt 20-amp electrical receptacle to be installed in all areas regardless if the house has gas appliances installed.	This proposal does not save any energy and should not be part of the energy code. This is a market issue and not a code/mandate issue.
RE148	Disapprove	This proposal requires exterior lighting in the IRC to comply with C405.4 of the commercial code (with exceptions for one- and two-family dwellings.)	Commercial code provisions should be customized for the types of buildings addressed by the residential provisions. Many of the commercial provisions are not applicable and will be onerous to interpret. The standalone format of the residential provisions should be maintained.
RE151	Disapprove	This proposal creates a backstop in the performance path of the 2009 IECC	This is a performance path which allows flexibility to get to the same results. The backstop of the performance path is the reference design which it has to be proven to be performing equal or better than. There is no reason to add backstops into a performance path.
RE156	As Submitted	This proposal states that on-site renewable energy shall be considered a reduction in energy use of the building.	This proposal would give credit when on-site energy is installed which gives renewable energy to the dwelling which reduces the dwellings draw from the grid and reduces energy use.
RE165	As Modified	This proposal gives a slight penalty in duct systems that are located entirely inside the air barrier and thermal envelope in the simulated performance path if air leakage to the outside is not tested.	This proposal updates the default distribution system efficiencies tables and give more clarity than the previous language.
RE171	As Submitted	This proposal intends to help fix the way that distribution systems are modeled in the standard reference design	This proposal creates a consistent baseline for duct systems. It provides proper incentive for builders and designers to install efficient distribution systems.
RE182	Disapprove	This proposal uses the 2018 IECC as a backstop when using on-site renewable energy for the ERI path	This proposal would penalize builders when installing on-site renewables.
RE184	Disapprove	This proposal limits the amount of total energy use reduction from on-site renewable to 5%.	This proposal is discouraging the use of renewables.

RE190	Disapprove	This proposal adds language that suggest renewable energy systems must be included in any houses that are pursuing the ERI pathway.	This proposal as written would require the use of renewable energy on houses using the ERI path. Renewables should be an optional design metric not a mandate.
RE192	Disapprove	This proposal reduces the ERI numbers.	This proposal brings the ERI scores down to the 2015 levels it was compromised during the 2018 cycle to level out the scores among industry stakeholders. The ERI scores should not be constantly changed, it is already 15% more stringent than the prescriptive path.
RE194	Disapprove	This proposal adds the requirement that if a region has a renewable energy portfolio of 50% or greater than on-site renewables can take credit only if its installed with an on-site energy storage system.	This is a utility issue and not an energy code issue, it does not belong in the code.
RE195	Disapprove	This proposal says that where on-site renewable energy is mandatory then you are only allowed to take credit in the ERI for anything that is beyond the mandated requirements.	Currently the IECC does not have an on-site renewable energy mandate. This provision is not necessary.
RE196	As Submitted	This proposal allows for a 15% tradeoff backstop in the ERI path.	This proposal gives more flexibility with a reasonable backstop.
RE204	Disapprove	This proposal would require a renewable energy certification be given to the code official when on-site renewables are used in the ERI path. The certificate must demonstrate the homeowner owns the solar or that a certain quantity belongs to the homeowner.	This is not an energy code issues, this is a utility issue and does not belong in the building code.
RE206	**Disapprove**	**This proposal introduces flex points into the IECC and 5 additional points must be achieved for all compliance paths.**	**This proposal is proprietary. The proponents do not give enough information as to how to calculate the amount of points different metrics get. If someone wants to add points in how do they do it? Do they have to go to this group to do the closed-door analysis?**
RE207	**Disapprove**	**This proposal introduces flex points into the IECC and 10 additional points must be achieved for all compliance paths.**	**This is a proprietary points system. The proponents do not give enough information about how the analysis was done.**
RE208	**Disapprove**	**This proposal introduces an additional points framework into the prescriptive and performance path with requiring either 3 additional points or a 3% performance improvement for compliance. Equipment efficiency can be used for compliance.**	**The 3 points can be achieved cost effectively when using equipment efficiency**
RE209	**Disapprove**	**This proposal introduces additional mandatory compliance packages that are added to all compliance paths.**	**The additional options are limited and prescriptive. Problematic to combine with performance or ERI paths. Renewables are not included. ERI levels recently have been adjusted and already set at aggressive levels. No need to further tweak ERIs levels every code cycle when the market is still figuring out the process for using it. No cost justification provided.**
RE210	Disapprove	This proposal gives a zero-energy pathway for jurisdictions	This language is very confusing and hard to follow.
RE223	**Disapprove**	**This proposal introduces a zero-energy residential building appendix.**	**This belongs in above-code energy and green programs. The ERI values differ substantially from the ERI thresholds in the main code provisions creating a perceived conflict in the energy code.**

IBC – Structural

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
S2	Disapprove	This proposal revises the exception for reroofing to require primary drainage be modified if emergency overflow drainage is not provided on existing roofs with less than a 1/4" per foot slope.	The proposal would require secondary drains be installed for the entire building even if only a small portion the roof is recovered or replaced. Cost impacts are not provided for a building reroofed under the 2015 or 2018 language that would need scuppers added at a later date.
S9	Disapprove	This proposal deletes the exception from providing emergency overflow drainage if existing roofs have less than a 1/4" per foot slope but provide positive drainage.	The proposal would require secondary drains be installed for the entire building even if only a small portion the roof is recovered or replaced. Cost impacts are not provided for a building reroofed under the 2015 or 2018 language that would need scuppers added at a later date.
S44	As Modified by Public Comment	This proposal assigns a building to Risk Category III if it contains one or more public assembly spaces with an occupant load exceeding 300 people and cumulative public assembly occupant loads of more than 2500 people.	The proposal addresses an issue with having multiple spaces with large occupant loads in a building while still allowing a reasonable level of flexibility for the commercial spaces in a typical mixed-use residential building.
S83	Disapprove	This proposal adds references to ACI and ICC Concrete Special Inspector credentials for demonstrating experience of personnel.	While the proposal does not impose a blanket requirement, the reference to an ACI or ICC certification for special inspectors inappropriately promotes certifications offered by private trade associations.
S86	As Submitted	This proposal exempts detached one- and two-family dwellings and Group U accessory structures from special inspection.	Some building officials are requiring special inspection of engineered portions of a house otherwise permitted and inspected under the IRC. Some homes constructed under the IBC are currently subject to onerous and unjustified special inspection requirements for limited extents of non-conventional construction.
S87	Disapprove	This proposal requires field and lab technicians for concrete tests to comply with ACI 311.6.	The ACI 311.6 specification effectively requires ACI-certified field and laboratory technicians. The code should not require a proprietary certification from an industry trade association.
S98	As Submitted	This proposal exempts masonry fences less than 8 feet high, retaining walls less than 6 feet high, and certain other masonry fences and retaining walls.	The IBC does not require a permit for fences less than 7 feet in height or retaining walls less than 4 feet in height. It makes no sense for the IBC to require special inspections for fences and retaining walls of those heights.
S100	As Submitted	This proposal adds special inspection requirements for Type IV-A, IV-B and IV-C mass timber buildings.	The proposed table of special inspections has been vetted by multiple stakeholders (architects, engineers, building officials, fire service) and material groups, both on the Tall Wood Building committee itself and among the interested parties who participated in committee meetings and conference calls.
S113	Disapprove	This proposal adds a 4" drainage layer of free-draining granular material or equivalent material as options for foundation wall waterproofing.	There are concerns as to whether a free-draining gravel layer by itself as the only waterproofing method works for all climate zones and groundwater conditions.
S123	Disapprove	This proposal deletes high-seismic concrete reinforcing requirements for deep foundation elements of concrete (e.g. cast-in-place or prestressed piles), deferring to ACI 318.	The proposal removes key information on minimum reinforcing patterns and locations from the code. This forces code officials and other users to purchase ACI 318 for use in reviewing plans and verifying construction in the field.

S153	Disapprove	This proposal increases the size of vapor retarders under slabs-on-grade from 6 mil to 10 mil and requires they meet ASTM D1743, Class A.	The proposal limits product choice and increases cost by requiring the use of a proprietary product rather than generic polyethylene sheet. No technical justification was provided that this change is necessary for multifamily buildings or dwellings constructed under the IBC.
S174	As Modified	This proposal revises the fastener schedule to add 14 gage staples as an option and clarifies the size, number and spacing of fasteners is based on carbon steel.	The proposal clarifies nail requirements for blocking and corrects nail sizes and lengths for sheathing and subflooring. The public comment clarifies the table is based on carbon steel fasteners but allows the use of stainless steel fasteners under alternate means-and-methods or engineered design.
S194	Disapprove	This proposal requires a 3/16-inch drainage space behind stucco where the annual mean rainfall exceeds 20 inches. In dry climates, a Type I water-resistive barrier is permitted with the air space.	The drainage space requirement would apply to the entire Eastern half of the US. Depending on what products can provide the required gap, the added costs could be significant. No technical justification was provided that a Type I (equivalent to 10-minute Grade D paper) water-resistive barrier is sufficient to prevent moisture issues.
S196	As Modified	This proposal divides the water-resistive barrier requirements behind stucco into sections for dry and moist climate zones. A 3/16-inch air space or material with high drainage efficiency is required in moist climate zones.	The proposal improves and enhances water-resistive barrier requirements behind stucco to address issues in the field that are causing liability for builders. The modifications retained prescriptive options and improved flexibility in what materials comply with the code, thus minimizing potential cost impacts.