## AWC TOP 10 RECOMMENDATIONS FOR cdpACCESS

The ICC Public Comments Hearings concluded on Saturday, September 25, following 5 days of hearings in Pittsburgh, PA. In the next few weeks, ICC Validated Voters will have the opportunity to take further action on several changes. The Online Governmental Consensus Voting (OGCV) process is extremely important in ensuring your voice as a fire or building official is heard. The American Wood Council (AWC) supports the ICC OGCV process. Following is a short list of changes that AWC feels deserves consideration. We would greatly appreciate your time and effort in reviewing these recommendations and thank you for your kind consideration.

### ACTION CONSISTENT WITH THE CODE DEVELOPMENT COMMITTEE AND PUBLIC COMMENT HEARING OUTCOME.

| CHANGE NUMBER | PCH ACTION[1,2] | AWC REC'S[2] | REASON |
|---|---|---|---|
| G147-21 | AS | AS | A proposal by several members of the former ICC-TWB Ad Hoc Committee to increase allowable exposed mass timber area on the ceiling in Type IV-B construction. Justified by conclusive testing performed on CLT that meets current product standards. See the original proposal for detailed test results. **Support the CAH and PCH actions for Approval as Submitted.** ***See Footnote 3, below.*** |
| FS18-21 | AMPC1 | AMPC1 | Permits fire resistance rated exterior walls to terminate at the underside of a floor or roof assembly, when both building elements have the same fire resistance rating. **Support the PCH action for Approval as Modified by Public Comment 1.** |
| FS19-21 | AMPC1 | AMPC1 | Introduces new IBC Section 705.6.1 to clarify commonly misapplied requirements for continuity of 2-hour fire-resistance-rated exterior walls from the wall below, through the floor assembly, to the wall above in Type III platform construction. **Support the PCH action for Approval as Modified by Public Comment 1.** |
| FS108-21 | D | D | Limits the existing heavy timber flame spread exemption when used in any Type of Construction other than Type IV-HT. **Support the PCH action for disapproval.** |
| F72-21 | AMPC3 | AMPC3 | Permits the use of 13R sprinkler systems when the height measured to the eave of a pitched roof structure is less than 45 feet above the lowest level of fire department vehicle access. Allows a building consistent with the scope of NFPA 13R, while assuring fire department access to the roof. **Support the PCH action for Approval as Modified by Public Comment 3** |
| F174-21 | AS | AS | Adds exception to clarify that during construction, IFC 3303.5 does not pertain to the 1"-thick noncombustible material specified in IBC 602.4.3. **Support the CAH and PCH actions for approval as submitted.** |

| CHANGE NUMBER | PCH ACTION[1,2] | AWC REC'S[2] | REASON |
|---|---|---|---|
| E96-21 | AMPC1 | AMPC1 | Permits penetrations into or through enclosure and structural framing needed for construction of the interior stairways and ramps. **Support the PCH action for Approval as Modified by Public Comment 1.** |
| WUIC6-21 | D | D | Proposal would preclude coated products from being considered ignition-resistant materials. Such an absolute prohibition would be a departure from the other performance-based provisions under IWUIC 503.2(1). **Support the CAH and PCH actions for disapproval.** |
| **CHANGES THAT RECEIVED A SPLIT VOTE AT THE COMMITTEE ACTION HEARINGS AND PUBLIC COMMENT HEARINGS.** | | | |
| G15-21 | AS | D | Changes the measurement point from the upper-most interior floor to the occupied roof surface for defining a building as a high-rise. For buildings not permitted to exceed 85' in height, the presence of an occupiable roof will likely result in a high-rise building classification, adding considerable cost. **Recommend Disapproval.** |
| G122-21 Part 1 | D | AS | For consistency with G122-21 Part II, which was *As Submitted* by the FS Committee. Eliminates the 1/2" GWB covering ("thermal barriers") for mass timber elements serving as occupancy and incidental use separations in Type IV-B & IV-C buildings. **Recommend Approval as Submitted.** |
| G142-21 | D | D | Permits cross laminated timber in exterior walls of buildings classified as Type III, consistent with what is permitted in Type IV. CLT has fire resistance ratings up to 3 hours and is equal or better than other materials currently allowed in the exterior walls of Type III construction. **Recommend Approval as Submitted.** |

[1] Outcome of Public Comment Hearings

[2] Definitions of action abbreviations:

AS: Approved as submitted
AMPC1: Approved as modified by Public Comment 1
AMPC3: Approved as modified by Public Comment 3
D: Disapproved

[3] In light of the aggressive campaign by NRMCA to muster votes to disapprove G147-21, AWC is compelled to respond to their spreading of misinformation. The ICC code development process provides for an open debate from all stakeholders on the merits of code change proposals. A concerted effort was made to provide detailed technical information to committee and voting members so they could make an informed decision on G147-21. Both the General Code Development Committee and the voters at the Public Comment Hearing understood the conservative interpretation of the RISE tests that is reflected in G147-21. A link to the test report from the Research Institutes of Sweden (RISE) was published in the reason statement and the report can also be found here. Further, a webinar detailing the test procedures and findings is here.

The NRMCA claim regarding the number of layers of noncombustible protection (i.e., 2 layers versus 3 layers) demonstrates either a failure of NRMCA to study the test report, or a deliberate misrepresentation of how

the tests apply to G147-21. The first test involved a fully exposed ceiling, and all walls protected with two (2) layers of Type X gypsum. This first test, which was carried out for 4 hours, coincides with the limit of exposed areas of CLT allowed under G147-21. Each subsequent test exposed more CLT wall areas, in addition to the fully exposed ceiling. These subsequent tests were performed as a scientific means of determining how much CLT could be exposed in the compartment while still achieving the desired outcome of self-extinguishment under varying conditions of protection thickness and ventilation. The results of these subsequent tests showed that, under certain conditions, self-extinguishment can still be achieved even when substantial wall area is exposed in addition to 100% of the ceiling area. Considered together, the results of all five (5) tests provide conclusive evidence that the proposed limits in G147-21 are not only justified (as demonstrated in Test 1), but also conservative (as demonstrated in subsequent tests) because the proposal involves only exposed ceiling areas.

Contrary to the NRMCA claim that G147-21 "undermines" the work of the ICC TWB Ad Hoc Committee (TWB), it in fact complements their work. G147-21 is based on the same approach used by the TWB for determining the exposed area limits that can safely be justified. The RISE tests used CLT complying with the currently code-referenced material standard, PRG-320-19. This was not the case in the ATF tests, which utilized CLT manufactured with adhesives of lesser fire resistance. The TWB recognized the need for more robust adhesives. With the newer generation of CLT (as required by the 2021 IBC through reference to PRG 320-19), the RISE testing indicated much greater areas of CLT can safely be exposed.

There were several members of the original TWB that served on the advisory board for the RISE tests. Please see the test report for a complete list of the advisory board.

Lastly, the TWB concluded its work in 2019, following completion of the 2019 Group B code development cycle and dissolution of the TWB committee. It was neither practical nor necessary to reconvene the TWB. Please support G147-21 for Approved as Submitted.