

WABO TCD VOTING RECOMMENDATIONS

Group A Cycle for the 2021 I-CODES

For those who want to begin review of the code changes we will be voting on, here are the WABO Technical Code Development Committee recommendations. The suggestions contained in the WABO Recommendations are the opinions of the WABO Technical Code Development Committee (TCD) members who attended the TCD meetings and ICC hearings and are being provided to you as recommendations only.

Cast your votes at <https://cdpaccess.com>

Note:

1. When on your cdpACCESS dashboard, a help link to the voting process is on lower right.
2. If you search the OGCV Listing by Agenda Number, you must enter the entire agenda number, i.e. enter E1-18 not just E1.

Key to abbreviations:

E = IBC Means of Egress
F = IFC (Fire Code)
FG = IBC Fuel Gas
FS = IBC Fire Safety
G = IBC General
M = IMC (Mechanical)
P = IPC (Plumbing)
S = IBC Structural

Votes & Comments abbreviations:

PC = Public Comment
AS = Approve as submitted
AM = Approve as modified (by the code development committee)
AMPC = Approve as modified by the public comment(s)
D = Disapprove

Priority:

H = High priority
M = Medium priority
L = Low priority

Detailed rules about voting procedures and code development are found in Council Policy 28 (CP 28) <http://www.iccsafe.org/abouticc/Pages/policies.aspx>

If you have questions on the voting process, contact any of the following:

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2018 WABO Group A Voting Guide
Tall Wood

ITEM #	SUBJECT	TCD RECOMMENDATION	TCD PRIORITY	TCD RATIONALE
G108	Mass timber (tall wood). Defines "mass timber." Creates new Types IV-A, IV-B, & IV-C Construction and sets construction parameters (e.g., fire resistance ratings). Renames old Type IV to Type IV-HT and makes HT a subset of mass timber, but makes no other changes to it.	AM	H	Studied by ICC Ad Hoc Committee on Tall Wood Buildings (TWB). Extensive testing and analysis validates the package of proposals is appropriately conservative. See TWB web page on ICC website for documentation, presentations, and responses to all concerns raised at Committee Action Hearings and through Public Comments. Other related proposals: G89, FS81, FS5, FS6, FS73, G28, F266, G80, G75, G84. Note: major correlation issue if G108 does not pass, and others do. Prefer passing all, but proposal can stand on its own without FS5, FS73, and F266.
G89	Mass timber (tall wood). Requires 1/2" GWB thermal barrier on surface of mass timber elements serving as fire barriers or horizontal assemblies for separated occupancies or incidental uses. Alternates to GWB to be tested per NFPA 285.	AM	H	See rationale for G108.
FS81	Mass timber (tall wood). Sets prescriptive parameters for "non-combustible protection" (how many layers of GWB) required in Types IV-A and IV-B.	AM	H	See rationale for G108. Closely related to FS5.
FS5	Mass timber (tall wood). Sets performance parameters and test method for "non-combustible protection" required in Types IV-A and IV-B. Applies to materials other than GWB.	AS	H	See rationale for G108. Closely related to FS81.
FS6	Mass timber (tall wood). Requires sealing of intersections of mass timber elements, unless tested w/o sealants. Special inspection required for sealant installation.	AMPC	H	See rationale for G108.
FS73	Mass timber (tall wood). Allows mass timber to serve as fireblocking.	AS	H	See rationale for G108.
G28	Mass timber (tall wood). Triggers dual water supply to fire pumps for Type IV-A & IV-B buildings > 120 feet in height (triggered at 420 ft for other types of construction).	AS	H	See rationale for G108.
F266	Mass timber (tall wood). Protection of mass timber during construction (Fire Code).	AMPC	H	See rationale for G108.
G80	Mass timber (tall wood). Allowable number of stories.	AS	H	See rationale for G108.
G75	Mass timber (tall wood). Allowable building height (feet).	AM	H	See rationale for G108.
G84	Mass timber (tall wood). Allowable area.	AS	H	See rationale for G108.

ITEM #	SUBJECT	TCD RECOMMENDATION	TCD PRIORITY	TCD RATIONALE
G1	Atrium. Redefines atrium as connecting 3 or more stories in all occupancies except I-2 & I-3.	AMPC	H	Current code is confusing (2-story atrium versus 2-story vertical opening). This makes it clear that nothing in atrium provisions (404) is triggered until 3 stories.
G21	R-1 Occupancies. Classifies dwelling units used as transient lodging as R-1 occupancy (e.g., AirB&B).	D	H	This proposal was not a comprehensive approach to how dwelling units that are rented out through organizations like AirB&B are classified. Concerns with how this would apply to something like a condo building having a hundred units, where three of them are rented out and considered transient, would the entire building be classified as an R-1? While a simple notion on the surface, enforcement issues would be created by trying to determine when or if something is more than a "transient" use. Trying to shift an R-2 into R-1 because an Air B&B is happening at a location a few times a year while the owner is out of town would be hard to catch and to prove.
G32	Atrium. Allows lowest 2 floors to be open to atrium, with "top hat" above constructed per shaft requirements.	AM	H	Matches what many jurisdictions already allow. Is a reasonable design alternative.
G34	Enclosure of Atrium. Allows sprinklered fabric curtain ("fire protective curtain assembly") to be used instead of sprinklered glass in atrium wall separations.	AM	H	Puts in Code a method of passive fire protection that is regularly approved through code alternates.
G86	Allowable building area. Frontage increase calculation is put into Table format.	D	H	Concern was the equations were difficult to understand and the table will reduce the number of mistakes. Still allows interpolation. So it seems to get rid of math, but still needs math and appears to simplify yet still has similar steps. Table will go from using published equations to using non-published equations.
G88	Occupancy separations. Fills in balance of Table 508.4	AMPC	H	This completes the portions of the Table that have been blank allowing user to obtain correct information no matter how you read the table. The blanks in the table were confusing for some code users.
G91	Incidental uses. Add pointer from IBC to IFC for additional construction requirements.	D	H	Pointer to Chapter 6 of the IFC that has very little relation to Table 509 in the IBC and it is not needed.
G94	Wood stairs in podium building. Eliminates transition in interior exit stairways of materials from combustible to non-combustible at horizontal building separation under certain criteria.	D	H	G95 (WABO proposal) is preferred.
G95	Wood stairs in podium buildings. Allows interior exit stairs in Sec. 510 podium buildings extending from Type III, IV & V buildings above the 3-hour horizontal assembly down into Type IA building to be of combustible construction.	AS	H	WABO TCD code change. Fires do not typically start inside the stair enclosure so combustible stairs inside the enclosure should be permitted to extend from the Type III, IV & V into the Type 1-A building below. Proposal includes a 3-hour stair enclosure (rather than 2-hour as currently required) below the 3-hour horizontal assembly. Eliminates the need for AM&M requests.

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G108	Mass timber (tall wood). Defines "mass timber." Creates new Types IV-A, IV-B, & IV-C Construction and sets construction parameters (e.g., fire resistance ratings). Renames old Type IV to Type IV-HT and makes HT a subset of mass timber, but makes no other changes to it.	AM	H	Studied by ICC Ad Hoc Committee on Tall Wood Buildings (TWB). Extensive testing and analysis validates the package of proposals is appropriately conservative. See TWB web page on ICC website for documentation, presentations, and responses to all concerns raised at Committee Action Hearings and through Public Comments. Other related proposals: G89, FS81, FS5, FS6, FS73, G28, F266, G80, G75, G84. Note: major correlation issue if G108 does not pass, and others do. Prefer passing all, but proposal can stand on its own without FS5, FS73, and F266.
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F266	Mass timber (tall wood). Protection of mass timber during construction (Fire Code).	AMPC	H	See rationale for G108.
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G84	Mass timber (tall wood). Allowable area.	AS	H	See rationale for G108.
G122	Sound transmission. Deletes list of public areas where sound transmission requirements from units applies.	AS	M	We support this because the current list of uses where sound abatement is required is too restrictive and would not require sound abatement for mixed uses such as R2 or R1 next to arcades, casinos, bowling alleys, parking garages, etc. Deleting the list but leaving "adjacent public areas." Gives building officials more flexibility by expanding those uses where sound abatement is needed.

2018 WABO Group A Voting Guide
Fire Safety

ITEM #	SUBJECT	TCD RECOMMENDATION	TCD PRIORITY	TCD RATIONALE
FS8	Fire protection for Secondary non-structural attachments to structural members.	AMPC	H	The proposal to require a 12-inch extension of fireproofing on all non-structural attachments is based on a general industry practice as described in ANSI/UL 263 BXUV. Seattle worked with proponent to clarify the language through public comment.
FS20	Platform Framing and Fire Resistive Barriers. Defines platform framing, adds text to regulate intersections of horizontal and vertical assemblies (i.e., floors/roofs to exterior walls/fire barriers).	D	H	This is so specific to wood construction that there will be unintended consequences for other materials. Language is confusing and would be difficult to enforce. Introducing wood into a non-combustible wall changes the nature of that wall.
FS24	Fire walls in buildings with stepped roofs. Editorial clean up for fire walls that also serve as exterior walls located in buildings with stepped roofs (multiple roof elevations).	AMPC	H	We support this because the current code language is very hard to follow, especially for new users. The code change converts a long sentence into bullets making it much easier to read & understand. The public comment addresses a FS Committee recommendation to further improve the language.
FS48	Membrane Penetration. Provides an exception to allow walls as a membrane penetration.	D	H	This proposal is trying to say that a wall intersection is a penetration. This is a bad precedent to set. They are trying to compare this to the case where a wall intersects a floor- or roof-ceiling assembly. That change was based on language in the UL Directory regarding non-rated walls intersecting rated horizontal assemblies. There is no similar language in the UL Directory regarding walls intersecting other walls.
FS99	Exterior wall covering. Would set up new testing criteria (including wind) for exterior walls > 40' tall and containing combustible materials.	D	H	Proposed mostly because of mass timber. No evidence provided to show current testing is inadequate. Can't test all possible combinations of materials and configurations. Wind testing is arbitrary (not required for any other material), and may result in less-conservative results.
S21	Special Inspection of fire-resistive penetrations and joints. Adds new trigger for special inspections: fire area containing a Group R with occupant load > 250.	D	H	1. WABO has the only registration/certification process for fire resistive penetration/joint special inspectors in the country (ICC does not have a program). For the rest of the country, who does these? How does the BO know they're qualified? 2. There is no rationale for picking 250 occupants as the trigger. The reason statement only says they used the same number as the Risk Category III trigger for E occupancies, but they are not related topics.
FS49	Penetrations using dissimilar materials. Requires not less than 36" distance past the firestop before combustible pipe can be connected to non-combustible pipe	AMPC	L	This is consistent with NFPA 101, Sections 8.3.5.5.1 and 8.3.5.5.2.
FS56	Doors in fire partitions. Allows dual 20-minute doors to substitute for single 45-minute rated door in a fire partition	AMPC	L	Distantly related to G54. Approval bolsters argument for protection of facing windows, but this proposal is only about what door rating is required.

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ITEM #	SUBJECT	TCD RECOMMENDATION	TCD PRIORITY	TCD RATIONALE
E18	Exit access stairway for occupied roof. Clarifies number of exits is based on occupant load of individual story or occupied roof. Exempts multi-level roof decks from requirement to get to enclosed exit within 1 story.	AS	H	Actual change is benign, but priority is based on the need to get 2/3 majority, to correct MOE Committee mistake.
E20	Open exit access stairways. Deletes restriction that must transition to enclosed exit within 1 story.	D	H	Would allow 2nd required exit stair to be open for entire height of building in a B or M occupancy. See figures and rationale in PC3 for E18. Same issue as E21.
E21	Open exit access stairways. Modifies restriction that must transition to enclosed exit within 1 story.	D	H	Would allow 2nd required exit stair to be open for entire height of building in a B or M occupancy. See figures and rationale in PC3 for E18. Same issue as E20.
E22	Single exit from occupied roof. Modifies single exit tables to allow occupied roof to not be treated as a story for exiting.	D	H	Would allow single exit from an occupied roof at higher level than would be allowed for a story.
E30	Accessible Means of Egress. Occupied roof acts like a story for triggering AMOE elevators.	AS	H	Occupied roofs at four or more stories above the level of exit discharge should be treated like occupied floors at the same level in the building. A similar approach has been taken in other sections of the building code (see IBC Chapter 10 1006.3, 1006.3.2, and 1006.3.3). The vertical travel distance encountered by a fire fighter performing an assisted rescue is the same whether the occupants are on an occupied roof on the 4 floor above the level of exit discharge or whether they are on the floor of the 4 story above the level of exit discharge within the building.
E31	Accessible Means of Egress Separation. Requires 30' separation between AMOEs.	D	H	The 30 feet separation, where an elevator is required as one of the accessible means of egress, may be too tough for small-footprint buildings. Section 403.5.1 was referenced for justification, but it is different – it allows for ¼ as well as 30 feet and it measures to the shafts instead of the entrances (and this would still not work in small-footprint buildings). In addition, this could be read as requiring elevators to be at least 30 feet apart. Two accessible means of egress next to each other would not meet the current criteria for independent means of egress, so this is already adequately addressed. Structurally, this could require stairways to be moved outside the main structural core of the building in high-rise buildings.
E33	Accessible area of refuge. Allows interior area of refuge with direct access to an exterior exit door to be provided at exit discharge, instead of requiring exterior area for assisted rescue.	AS	H	This is a reasonable design alternative. A "regular" area of refuge is protected, and this would require there be a door from the area of refuge directly to outside. Especially needed in areas where weather might impair the use of an exterior area for assisted rescue. The major accessibility advocate agreed with this, and contradicted the MOE Committee's assertion that the exterior area for assisted rescue is preferred.
G35	Atrium exits. Allows 1/2 of required exits to be open to atrium, with restrictions on travel distance and separation.	AMPC	H	We support this proposal as modified by public comment since it allows for design flexibility, in a well-protected environment, it provides clarity on travel distance in atriums and clarifies number of exits stairways in the atrium. Provides additional criteria for complying with Chapter 10 in atriums and consistent language.

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E53	Locks on doors from decks. Adds an exception in the code to allow locks to be placed on exterior egress doors serving an exterior areas like decks and occupied roofs, if the specified conditions are met.	AMPC	H	We support this code change because it allows locks to be placed on exterior egress doors serving outdoor areas where occupants must re-enter the building for egress. Owners and tenants often wait until after the C of O is issued to have locks installed because the code does not currently allow it. Then alternate to allow the locks is submitted for review. This proposal provides a reasonable approach to allow these doors to be locked to ensure occupant safety while maintaining building security that owners/tenants require.
E115	Power-Operated doors. Requires at least one power-operated door at each accessible public entry to buildings. Different occupant load triggers for different occupancies.	AMPC	H	WABO worked with Seattle to submit public comments to the approved as submitted proposal. The proponent spoke in favor of the public comments we made. This a reasonable requirement, since door-opening forces are difficult to meet and maintain for exterior doors.
E76	Handrail location. Proposed code change would allow handrail to be located 12" beyond the outer edge of the stairway.	D	M	The current code does not limit the distance that a handrail can be located outside the plane of the stairway. TCD's original proposal specified 12" beyond the plane of the stair but was disapproved due to lack of substantive data. 12" was thought to be an appropriate distance to accommodate safe travel on the stair + it would allow for bicycle runnels.

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Fire Code - Page 1 of 3

ITEM #	SUBJECT	TCD RECOMMENDATION	TCD PRIORITY	TCD RATIONALE
F17	Combustible storage in corridors. Prohibits in fire-resistance rated corridors: 1) storage of combustible materials including construction materials; 2) any use that interferes with egress.	D	H	The main premise was protecting Fire-resistance Rated corridors from combustible storage as a way to maintain egress. Concern on proposal is what is classified as storage?
F18	Lithium-ion battery storage. Provisions for storage of batteries waiting for recycling.	D	H	Original proposal was flawed (see Committee reason) as were the public comments to fix it. Proposal is too onerous. Provisions would apply no matter how few batteries are being stored. For example, would significantly impact recycling collection area in offices.
F21	Artificial vegetation. Requires fire testing of any artificial vegetation within 30 feet of a building, or on an occupied roof.	D	H	Requirement for fire testing would apply no matter how big or small the artificial vegetation is.
F85	Storage within elevator lobbies. Prohibits storage in elevator lobbies, if hoistway protection per IBC 3006.2 is required.	D	H	Does not indicate what is considered storage that would be prohibited. Is furniture considered storage if it is for someone waiting for access. What about art or sculptures? Doesn't consider if the lobby is not providing the protection for the hoistway.
F91	Spray-applied fireproofing and intumescent coating maintenance. Visual observation is required to verify fireproofing is undamaged.	D	H	Maybe not a bad idea, but proposal is flawed. Testimony said owner is responsible, but this is a new section and is not charged in IFC 701.6, which assigns responsibility to the owner. So the question is, who is responsible? Also, how does this visual inspection occur if the fireproofing is concealed? There is no exception in the proposed text.
F92, Pt I	Artificial combustible vegetation. Fake vegetation within 5' of the building, or on the roof, must comply with flammability requirements of NFPA 701. Triggered when vegetation is 6' tall. Exception for vegetation 30' from exterior walls of the building.	D	H	Proposal is flawed. Testimony asserted this only applies to large structures, similar to the fake palm trees on the Las Vegas Strip (foam plastic over heavy steel frames). However, this applies to <u>anything</u> over 6' tall. Also, the exception is confusing--how does the 30' apply versus the 5' in the charging language? Testimony indicated this was added so vegetation in center of large roof area would not be regulated, but text isn't clear. Most proponents actually preferred F21, but that was narrowly disapproved.
F92, Pt II	Artificial combustible vegetation. Fake vegetation within 5' of the building, or on the roof, must comply with flammability requirements of NFPA 701. Triggered when vegetation is 6' tall. Exception for vegetation 30' from exterior walls of the building.	D	H	Building code version of Part I.

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F117	NFPA 13-R system. Limits application of 13-R systems to buildings with highest occupied floor 30 feet above lowest fire department vehicle access.	D	H	This is a major change of scope that should be handled by the NFPA 13 committee. It unfairly penalizes buildings built on downward-sloping corner lots, versus mid-block lots. See figures and rationale in PC3. Putting in NFPA 13 in these setting could lose you sprinklers on balconies in lieu of protection on the roofs, but would include combustible spaces. Would trigger NFPA 13 at 4th floor. Will increase cost. 2018 triggers attic protection at 55 feet which contradicts this line of reasoning. Was very narrowly approved (47-45) after PC to modify failed.
F152	Future capability for visible alarm notification appliances. Requires 5% excess capacity plus wiring to every floor to accommodate future installation of visible alarms.	D	H	This puts an additional capacity requirements for fire alarm power supply and circuits in a code that does not get used by the designers for electrical capacity. Should be in the NEC.
F182	Valet trash. Allows combustible trash (rubbish), placed in exits, corridors, etc. under certain conditions and require an operational permit from the fire official for the service.	D	H	While the service needs to be reasonably regulated, the proposal is flawed. The operational permit would be issued to the owner of the valet trash business, which doesn't tie it to a building. Requires minimum corridor width to be maintained, which would say corridors would have to be designed to be wider (existing buildings wouldn't be able to use valet trash service). Some opponents feel nothing should ever be allowed in corridors, since many code provisions assume corridors are a "pristine" environment.
F245	Inflatable Devices (Bounce House). Allows the fire official to require a permit to operate. Limits operation to 14 days. Must anchor and operate per manufacturer's instructions (including number of operators, abide by weather criteria, etc.)	D	H	We agree with the committee that stated they had issues with the proposal regarding indoor vs. outdoor uses, time period, fire extinguishers, and the location of portable generators.
F263	Construction safeguards. Requires daily fire safety inspections for 10 listed items until CofO issued.	D	H	Stop work can be triggered because of no paperwork. Does not coordinate with requirements of Ch. 33. Could cause project to shut down over paperwork? Also, a contractor could be cited for violations on items that happen during the normal course of construction, depending on timing of fire inspector visit (e.g., exposed conductors while installing temporary wiring).
F267, Pt 1	Construction safeguard. Requires gyp board to protect uncompleted levels during construction of Type III and V buildings. No more than 2 levels of wood allowed to be exposed.	D	H	Untested method, unwarranted bias against wood construction, Auto sprinkler while building is being built. Requires weather protection (rain/snow) or else may have to discard gyp protection.
F267, Pt 2	Construction safeguard. Building code version of Part 1.	D	H	See rationale for Part 1.
F270	Construction safeguard. Requires sprinklers to be installed during construction. Can't start construction above 40' until sprinklers installed below.	D	H	Would require an operational sprinkler system for certain types of construction 4 stories or more, above 40 ft in height before proceeding. Would require sprinkler contractor to construct up to 40', stop, then come back after upper construction completed.
F277	Animal Housing Fire Protection. Requires fire protection for animal housing facilities and creates a new chapter in the fire code to address it.	D	H	Over-regulation. Would prohibit smoking in barns. Would put fire official in position of regulating manure storage/disposal. Adopts NFPA 101 and 150 to regulate.

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F303	Retail sales and storage of consumer fireworks. Extensive new regulations.	D	H	Places overly-extensive new regulations on retail sales and storage of consumer fireworks. Puts occupancy classification in Fire Code (calls it "Use Group M"). Committee disapproved in favor of F300.
F328	Fire Code Official qualifications. Adds an appendix for minimum qualifications for fire code officials, fire inspector, fire plans examiners, and employment termination requirements in the Fire Code	D	H	WABO does not believe that these minimum qualification standards should be located in the Code. Agree with committee that this is an HR issue.
F276	Distilling or brewing of beverages, and storage of beer, distilled spirits and wines in barrels and casks. Adds Beverages over 16-percent alcohol content to moderate-hazard storage to Group S-1. Adds new chapter 40 Storage of Distilled Spirits and Wines. Requires an automatic sprinkler system through out Group F-1 fire area used to manufacture distilled spirits. Requires an automatic sprinkler system through out S-1 fire area for bulk storage of distilled spirits or wine. Add exception to 307.1 Uses other than Group H	D	H	The code change requires sprinklers for all distilleries with no consideration of size, haz mat quantity, etc. Small distilleries have been located without incident in unsprinklered buildings depending on the MAQ analysis; there is no need to change. There is no bulk storage definition which creates interpretation issues for sprinklering storage of liquor and wine. The new Chapter 40 covers spill control, but lacks details such as how many casks can be stored and what spill scenario is being covered.

2018 WABO Group A Voting Guide
Fuel Gas

ITEM #	SUBJECT	TCD RECOMMEN DATION	TCD PRIORITY	TCD RATIONALE
FG15	Gas line penetration. Allows through foundation wall below grade gas line penetration.	AS	H	We believe that below grade penetrations that were previously permitted were proven to be a safe installation method. This proposal restores those penetration allowances that were prohibited by an unwarranted 2015 code change.

2018 WABO Group A Voting Guide
Mechanical

ITEM #	SUBJECT	TCD RECOMMENDATION	TCD PRIORITY	TCD RATIONALE
M3	R-value calculation. Puts calculation in the definition of Thermal Resistance.	D	H	We do not support this proposal because it would place a required calculation to be provided and verified by the code official in the definition. Committee disapproved as this is redundant with standards in the IECC and is not necessary.

**2018 WABO Group A Voting Guide
Plumbing**

ITEM #	SUBJECT	TCD RECOMMENDATION	TCD PRIORITY	TCD RATIONALE
P14	All gender restrooms. Fixture calculation specifics for multi-user facilities serving all genders.	D	H	Although this proposal tries to allow for all gender facilities, it does not actually address all separate facility issues. We do not support this proposal since it is not a comprehensive approach to providing all gender facilities.
P15	All gender restrooms. Adds an exception not requiring separate facilities.	D	H	This proposal also tries to allow for all gender facilities, but falls short of being inclusive or addressing the issues of separate facilities or fixture calculations, for these reasons we do not support this proposal.
P53	Floor slope to drains. Would require any floor surface served by trench or floor drains to be sloped.	D	H	We do not support this proposal since it would unnecessarily require the floor surface of any room served by a floor or trench drain to be sloped to that drain with no substantiated benefit.
P131 Pt 1	Rainwater systems. Non-potable system alternative.	AMPC	H	We support this proposal to change the IPC because it puts in the Code a standardized alternative non-potable rainwater system in compliance with CSA B805/ICC 805.
P131 Pt 2	Rainwater systems. Non-potable system alternative.	AMPC	H	We support this proposal to change the IRC because it puts in the code a standardized alternative non-potable rainwater system in compliance with CSA B805/ICC 805.
P132 Pt 1	Rainwater systems. Potable system alternative.	D	H	We do not support this since it is not the right chapter for this change since it allows a complying rainwater system for potable water in the IPC .
P132 Pt 2	Rainwater systems	AMPC	H	We support this proposal because it puts in the Code a standardized alternative rainwater system to be used under certain conditions and puts the change in the correct location of the IRC .