

WABO TCD VOTING RECOMMENDATIONS

Group A Cycle for the 2024 I-CODES

For those who want to begin review of the code changes for the upcoming Online Governmental Consensus Vote (OGCV) for the Group A cycle, here are the WABO Technical Code Development Committee recommendations. The suggestions contained in this voting guide are the opinions of the WABO Technical Code Development Committee members who attended the TCD meetings and ICC hearings, and are being provided to you as recommendations only—“vote your conscience.” These are items TCD identified as being significant, but there are many other items that will be on the OGCV ballot. We strongly encourage readers of this document to read the proposals, public comments, and reason statements, as well as listen to the testimony at the hearings to inform your voting. All this information is (or will be) available via [cdpACCESS](#).

Eligible voters can cast votes at <https://www.cdpassess.com>. The OGCV is expected to start approximately October 11, and will close two weeks after opening. Detailed rules about voting procedures and code development are found in ICC Council Policy #28 ([CP 28](#)).

Items in this voting guide are listed in order of priority (as determined by TCD), then by code change number.

Key abbreviations/acronyms in the voting guide:

Committees/Proponents:

BCAC	=	ICC Building Code Action Committee
FCAC	=	ICC Fire Code Action Committee
NAHB	=	National Association of Homebuilders
WASFM	=	Washington State Fire Marshals

Votes & Comments:

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

Priority:

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

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

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**2021 WABO Group A Voting Guide
IBC Means of Egress - Page 1 of 3**

ITEM #	SUBJECT	TCD RECOMMENDATION	TCD PRIORITY	TCD RATIONALE / ANALYSIS
E28-21	Accessible means of egress. Clarifying occupiable roof trigger for elevator.	AS	H	BCAC proposal. TCD testified in support of BCAC public comment for AS. AS will align the occupied roof trigger for an elevator as an accessible means of egress with the trigger for enclosed space. TCD agrees this is consistent with interpretations and with equivalent trigger for enclosed space. CAH recommendation for D => AS requires 2/3 majority.
E40-21	Accessible shower door openings	AMPC	H	BCAC proposal. TCD public comment. AMPC will point user to plumbing code for shower door dimensional requirements (min. 22"), rather than totally exempting units other than Type A and Accessible units from any minimum clear opening width requirement which would create a conflict between the IBC and the IPC. This proposal also avoids a potential conflict with requirements for Type B units. CAH recommendation for AS => AMPC requires 2/3 majority.
E45-21	Main entry door locks	D	H	Builders Hardware Manufacturers Assoc (BHMA) proposal. BHMA submitted public comment to modify. TCD did not have a position on this item at PCH. AMPC will modify the current allowance for A (< 300 OL), B, F, M, and S, and in places of religious worship to have the main doors locked with key-operated devices on the egress side (double cylinder locks). New text recognizes there may only be one main door, and adds a condition that the main door(s) must be the main exterior doors to the building, or the main doors to the tenant space. Doors are still required to be easily reconized as being locked and have signage. TCD feels the new language is not necessary, and is potentially dangerous (locking entry doors), particularly for large office buildings. CAH recommendation for D => AMPC requires 2/3 majority.
E71-21	Illuminated exit signs	AMPC	H	WASFM proposal. TCD testified in support of WASFM public comment to modify. AMPC will require an illumination source to provide charging for photoluminescent exit signs, per manufacturer instructions. CAH recommendation for D => AMPC requires 2/3 majority.
E73-21	Stair handrail lateral location	AS	H	TCD proposal. TCD submitted public comment for AS. AS will require stair handrails be located within 6 inches of edge of stair walking surface. Lateral distance is currently unregulated (can be located an unsafe distance away). CAH recommendation for D => AS requires 2/3 majority.
E96-21	Interior exit stair penetrations for platform framing	AMPC	H	Colorado Chapter proposal. TCD testified against the original proposal at the CAH, but position was "watch" for PCH. AMPC will allow structural elements "such as beams or joists" to penetrate into or through stair enclosures if they support the interior exit stairway or support the roof of the interior exit stairway. TCD thinks this will more clearly allow platform framing at stairs. CAH recommendation for D => AMPC requires 2/3 majority.
E97-21	Interior exit stair protection	AMPC	H	TCD proposal. TCD public comment to modify. AMPC will require exterior walls of interior exit stairs to be 1-hr rated for 10' above an unprotected roof assembly, or require the roof assembly to be 1-hr rated with protected openings for 10 feet from the stair. The code currently does not restrict location of an unprotected skylight immediately adjacent to an unprotected exterior wall of an interior exit stairway. This will provide the protection, but gives the designer the choice how to protect the stair. CAH recommendation for D => AMPC requires 2/3 majority.
E100-21	Exterior stair height limitation	AMPC	H	TCD proposal. TCD public comment to modify. AMPC will clarify language by stating it as restrictive--exterior stairs are not allowed if building exceeds 6 stories in height, or is a high rise. CAH recommendation for D => AMPC requires 2/3 majority.

2021 WABO Group A Voting Guide
IBC Means of Egress - Page 2 of 3

E104-21	Exit discharge across a roof	D	H	Grove (Jensen Hughes) proposal. Public comment by Grove to modify failed. TCD recommended D at PCH, but did not testify. AS would allow exit discharge onto the roof of the same or a different building when 1) the roof assembly has the same rating as the stair enclosure, and 2) a continuous path of egress travel is provided to a public way. TCD thinks this conflicts with the definition of exit discharge, and that the proposal does not protect the exit path from horizontal exposure--only from fire below. CAH recommendation for D => AMPC requires 2/3 majority.
E105-21	Egress court protection	AMPC	H	City of San Diego proposal. TCD testified in support of public comment by City of San Diego to modify. AMPC would exempt protection for egress courts that are 1) on grade, 2) have two independent egress paths to a public way, and 3) have the required width or capacity along both paths. TCD believes this is consistent with egress principles where if there is a hazard in one direction, occupants can egress in a different direction so don't need rated protection (e.g., exterior exit balconies). Stated intent is "required width or capacity" is based on the full occupant load entering the egress court. CAH recommendation for D => AMPC will require 2/3 majority.
E139-21	Public or common toilet and bathing facilities	AMPC	H	Mazz (United Spinal Assoc) proposal. TCD testified in support of Boecker public comment to modify. AMPC will clarify that toilet/bathing facilities within dwelling or sleeping units are not required to be accessible unless required by Section 1108. The proposal was targeted at requiring public and common facilities in R occupancies to be accessible. CAH recommendation for D => AMPC will require 2/3 majority.
E22-21	Single exit from elevator lobbies	D	H	BCAC proposal. TCD testified in opposition to BCAC public comment and proposal as a whole. AS would require direct access to exit stair from all elevator lobbies, or a corridor leading to an exit. Essentially makes all elevator lobbies comply with requirement for Fire Service Access Elevator lobbies. "Elevator lobby" is undefined. CAH recommendation for D => AS requires 2/3 majority.
G10-21	Definition of net floor area--elevator lobbies	D	H	Grove (Jensen Hughes) proposal. TCD submitted a public comment for D. AS would change the definition of "Floor Area, Net" such that the areas of elevator lobbies would not count. "Elevator lobby" is undefined, and can be of unlimited area. TCD provided examples of buildings where it is unclear what is elevator lobby and what isn't. This could affect occupant load counts for open office plans and pre-function areas in assemblies. CAH recommendation for AS => AS requires simple majority.
E24-21	Reorganization of egress lighting provisions	AMPC	M	BCAC proposal. TCD public comment. AMPC reorganizes, clarifies, and simplifies provisions for emergency lighting power. CAH recommendation for AS => AMPC requires 2/3 majority.
E55-21	Control vestibules (a.k.a, sally ports)	D	M	BCAC proposal. Healthcare CAH/BCAC submitted Public Comments 2 & 3 to modify. TCD did not have a position on this item at PCH AMPC 2 & 3 defines "control vestibule" and allows them for "security, clinical needs, or environmental control" in F & H 5 occs, and in B/I-2/M occs with occupant load <50. The building must be sprinklered, or automatic smoke detection must be installed in space served by control vestibule. Control vestibules must comply with 7 listed items, including a requirement for an override switch to be located near the door. TCD is concerned that there is no guidance for the override switch function, and that the switch defeats the purpose of the control vestibule to begin with. CAH recommendation for D => AMPC 2 & 3 requires 2/3 majority.
E118-21	Power doors at public entrances	D	M	CO Chapter proposal. TCD testified in support of BCAC public comment to modify. Public comment failed. AS will exempt tenant spaces with their own exterior public entrances to be considered "a separate facility and building" for the purposes of determining power door requirements. TCD thinks this is confusing language, and would provide a loophole to providing power doors to buildings--just install a door to the exterior from tenant spaces. Failed PC provided clearer guidance. CAH recommendation for AS => AS requires simple majority.

2021 WABO Group A Voting Guide
IBC Means of Egress - Page 3 of 3

E9-21	Increased occupant load (maximum occupant load)	AS	L	Metropolitan Transportation Authority (MTA) proposal. TCD had no position on this item at PCH. AS allows maximum allowable occupancy to be based on 5 sq ft/person, vs. current code allowance of 7 sq ft/person. TCD agrees with reasoning that 5 sq ft/person is already allowed in Chapter 10, and that as long as adequate exit capacity is provided, safety is achieved. CAH recommendation for D => AS requires 2/3 majority.
E13-21	Sum of ratios for mixed occupancies with single exit	D	L	Perras proposal. TCD testified in support of the public comment to only include sum of ratios. Public comment failed. AS would also change "occupancies" to "function" in multiple sections of 1004 as well as in Table 1006.2.1. TCD does not agree with the change in terminology. CAH recommendation for D => AS requires 2/3 majority.
E90-21	Corridor construction within tenant spaces	D	L	CO Chapter proposal. CO Chapter submitted public comment to modify. TCD did not have a position on this item at PCH. AS exempts corridor construction within a single-tenant office spaces. Replaces current code exemption for B occupancies that are allowed to have a single exit. TCD agrees with the concept of dealing with office spaces differently than the current code, but thinks proponent should have added a separate exception rather than replacing the existing. CAH recommendation for D => AS requires 2/3 majority.

2021 WABO Group A Voting Guide
IBC Fire Safety - Page 1 of 1

ITEM #	SUBJECT	TCD RECOMMENDATION	TCD PRIORITY	TCD RATIONALE / ANALYSIS
FS9-21	Protection of structural members	AMPC	H	TCD proposal. TCD public comment to modify. AMPC reorganizes the section to make it more understandable. No technical changes being made. CAH recommendation for D => AMPC requires 2/3 majority.
FS29-21	Fire wall construction	AMPC 1 & 2	H	AIA proposal. TCD submitted PC 2 to modify. AMPC 1 & 2 will state NFPA 221 is "deemed to comply" for construction of fire walls, except where the IBC is more restrictive (refers to IBC 102.4, which states code governs over standard). Fire resistance ratings are still determined by IBC 706.4. CAH recommendation for AS => AMPC 1 & 2 requires 2/3 majority.
FS83-21	Smoke/draft control doors at elevator hoistways	D	H	BCAC/FCAC proposal. TCD testified in opposition to BCAC public comment to modify. AS will allow hoistways opening into corridors to be unprotected if the elevator connects 3 stories or less, and the building is sprinklered. Per opponent to the proposal, AS will conflict with another code change that was approved (G182-21). CAH recommendation for D => AS requires 2/3 majority.
FS31-21	Fire wall materials	AS	M	Richardson proposal. TCD submitted PC to modify. D was upheld, so PC was never discussed. AS will allow fire walls to be constructed of combustible construction in Types III, IV, and V construction. Current code only allows it in Type V. TCD thinks this is reasonable given legacy code allowances, and that mixing different materials of construction can lead to other issues. CAH recommendation for D => AS requires 2/3 majority.

2021 WABO Group A Voting Guide
IBC General - Page 1 of 2

ITEM #	SUBJECT	TCD RECOMMENDATION	TCD PRIORITY	TCD RATIONALE / ANALYSIS
G104-21	Elevated PV panels	D	H	Multiple proponents incl Sustainable Energy Action Committee (SEAC) and CA Fire Chiefs. TCD testified in opposition to this proposal at both the CAH and PCH. AS would exempt elevated PV panel systems from story and height limitations, with some conditions. TCD believes the exceptions are too broad, and objects to allowing substantial roof-like PV panel systems to evade the story and height limits, which are critical on mid-rise buildings. TCD also believes the proposal would allow the PV panel systems to create openings near the property line, in conflict with the code requirements for enclosed spaces. CAH recommendation for D => AS requires 2/3 majority.
G105-21	Parapets/etc. height limit at occupiable roofs	AMPC 2 & 3	H	BCAC proposal. TCD submitted Public Comment 2 to modify, and supported Public Comment 3 by Siu/Kranz/Seattle. AMPC 2 & 3 will allow "elements or structures enclosing the occupied [occupiable] roof areas" to exceed 48 inches in high rise buildings. The 48-inch limitation was originally put in place to allow firefighters to escape off the roof if necessary. This method of escape is not practical in high rise buildings, so there is no need to limit the height. TCD testified that PC3 is intended to apply to elements extending upward from the roof surface => walls, not roofs or roof-like structures. CAH recommendation for AS => AMPC requires 2/3 majority.
G106-21 Part II	Guards at occupiable roofs	AMPC	H	Kranz proposal. TCD submitted a public comment to modify. AMPC will require a guard or other approved barrier to be located at the edge of the occupiable space of an occupiable roof. An exception allows the guard or barrier to be located at the roof perimeter if the occupiable roof surface is less than 30 inches above the unoccupied roof surface. The intent is to enhance life safety by preventing people (especially children) from wandering off the occupiable area to the roof edge and falling off the building. CAH recommendation for D => AMPC requires 2/3 majority.
G112-21 Part I	Sleeping lofts - main provisions	AMPC 2	H	TCD proposal. TCD submitted Public Comment 1 to modify. PC1 failed, despite support from others including NAHB. Tacoma/Seattle submitted Public Comment 2 to modify as a backup to PC1. TCD testified in support of PC2 at the PCH after PC1 failed. AMPC 2 will place all the requirements unique to sleeping lofts in an appendix chapter, where they will be available for local adoption. The SBCC has already approved provisions for lofts in the 2021 WSBC that are less restrictive than the appendix, but this is a move in the right direction for the model code. CAH recommendation for D => AMPC 2 requires 2/3 majority.
G172-21	Grab bars & stanchions at bathtubs	D	M	Pauls proposal. TCD did not have a position on this item at PCH. AS would require grab bars and a "stanchion" (defined in the proposal) be installed at bathtubs and showers in all Group R occupancies (except in Accessible units). TCD objects to subjective/unenforceable language in proposal ("often vertical," "relatively deep," etc.), as well as requiring these in all residences as being too far-reaching. However, there was some agreement that this is an important safety issue for the future. TCD recommendation for Medium priority is based our concern that a high percentage of voters at the PCH supported overturning the Committee to hear the public comments. CAH recommendation for D => AS requires 2/3 majority.
G191-21	Awning framing	AMPC	M	Hirschler proposal. TCD submitted a public comment to modify. AMPC will delete the unnecessary requirement for "combustible or non-combustible" awning covers (is there any other kind of material?) TCD recommends this as medium priority because either AMPC or D does not result in any technical changes. CAH recommendation for AS => AMPC requires 2/3 majority.

2021 WABO Group A Voting Guide
IBC General - Page 2 of 2

G193-21	PV panel fire ratings and definitions	AS	M	SEAC proposal. TCD submitted a public comment for D. Based on discussions at the PCH and with the vote for disapproval of G104-21, TCD withdrew the public comment and testified in mild support of the proposal. AS will require elevated PV panels on buildings to be tested/listed/labeled for fire classification purposes. TCD objects to the definitions for PV Support Structure, Elevated which allows occupancies below the PV panel system. This opposition is somewhat lessened by the disapproval of G104-21, which would have exempted many elevated PV panel systems from being included in story counts and height measurements. CAH recommendation for AS => AS requires simple majority.
G16-21	Occupied roof trigger for high rise	AS	L	TCD proposal. American Wood Council (AWC) submitted a public comment for AS. TCD focused PCH efforts on the public comment to G15-21, instead of trying to overcome the Committee's disapproval of this item. AS will require buildings with occupiable roofs more than 75 feet above lowest F.D. vehicle access to comply with high rise requirements, if the occupant load on the occupiable roof is 50 or more. TCD supports this proposal since our public comment to modify G15 did not pass. The low priority reflects the recognition that this is highly unlikely to achieve the necessary 2/3 vote. CAH recommendation for D => AS requires 2/3 majority.
G20-21 Part I	Occupiable roof - definition & change in terminology (IBC)	AS	L	BCAC/FCAC proposal. TCD submitted a public comment to modify. Public comment failed. AS will define "occupiable roof" as an "exterior space on a roof designed for human occupancy...and...is equipped with a means of egress system...." The proposal then changes all instances of "occupied roof" in the code to "occupiable roof." TCD believes this definition is flawed, in that "exterior space" is ambiguous, and could include large roof coverings. In addition, a means of egress is always required, so the last part of the definition is unnecessary (if a roof deck doesn't have a means of egress, is it no longer an occupiable roof?) However, TCD thinks having a definition is better than not having one, and BOs can interpret "exterior" as they wish. CAH recommendation for AS => AS requires a simple majority.
G20-21 Part II	Occupiable roof - definition & change in terminology (IFC)	AS	L	See TCD rationale/analysis for Part I. CAH recommendation for AS => AS requires a simple majority.
G106-21 Part I	Guards at occupiable roofs	D	L	Kranz proposal. Nat'l Fireproofing Contractors (NFCA) submitted a public comment for AS. TCD had no position on this item at PCH but instead, focused efforts on Part II. AS would add a pointer in the occupiable roof section in Chapter 5 to the requirement for guards in IBC 1015.2. In choosing not to submit a public comment on this part, TCD decided the pointer was not necessary. CAH recommendation for D => AS requires 2/3 majority.
G112-21 Part II	Sleeping lofts - additional egress provisions	D	L	TCD proposal. TCD submitted a public comment to modify. AS would update Chapter 10 provisions to accommodate sleeping loft provisions in Part I. However, since the PCH vote places the Part I provisions in an appendix chapter and includes the necessary Chapter 10 provisions, approving Part II would create a confusion by introducing undefined terms into the body of the code. CAH recommendation for D => AS requires 2/3 majority.
G112-21 Part III	Sleeping lofts - smoke alarms	D	L	TCD proposal. TCD submitted a public comment to modify. AS would require smoke alarms in sleeping lofts. However, since the PCH vote places the Part I provisions in an appendix chapter and includes the smoke alarm requirement, approving Part III would create a confusion by introducing undefined terms into the body of the IBC and IFC. CAH recommendation for D => AS requires 2/3 majority.
G15-21	Occupied roof trigger for high rise	No Position	N/A	CO Chapter proposal. TCD submitted public comment to modify. Public comment failed. AS will require buildings with occupiable roofs more than 75 feet above lowest F.D. vehicle access to comply with high rise requirements, regardless of occupant load on the occupiable roof. TCD could not achieve a substantial consensus on whether the language in the proposal was an improvement on the existing definition. However, this is an important issue that warrants a vote. CAH recommendation = AS => AS requires simple majority.

**2021 WABO Group A Voting Guide
Fire (IFC) - Page 1 of 1**

ITEM #	SUBJECT	TCD RECOMMENDATION	TCD PRIORITY	TCD RATIONALE / ANALYSIS
F15-21 Part II	Landscape and vegetative roofs	D	H	FCAC/BCAC proposal. Multiple proponents on two public comments to modify. TCD position at PCH = "watch." AMPC 1 & 2 adds definition of landscaped, modifies definition of vegetative roof. Requires landscaped and vegetative roofs to comply with fire classifications for roofing (IBC 1505.1). TCD objects to requiring dog runs, lawns, and planters to be tested for Class A/B/C roofing classification. This may be appropriate for WUI areas, but not everywhere. CAH recommendation for AS => AMPC 1 & 2 requires 2/3 majority.
F72-21	NFPA 13R 30' height limit	AMPC 3	M	Multiple proponents of proposal, including NAHB. Shapiro submitted PC 3. TCD had no position on this item at PCH. AMPC 3 will allow 13-R systems to be used up to 45' above lowest F.D. vehicle access, but establishes several points to measure height. Medium priority is because WA SBCC has already eliminated the height restriction in the IFC/IBC. However, this is a move in the right direction for the model code. CAH recommendation for D => AMPC 3 requires 2/3 majority.

2021 WABO Group A Voting Guide
Property Maintenance (IPMC) - Page 1 of 1

ITEM #	SUBJECT	TCD RECOMMENDATION	TCD PRIORITY	TCD RATIONALE / ANALYSIS
PM14-21	Habitable space floor area	AMPC	H	NY State Dept of State proposal. TCD submitted public comment to modify. AMPC will require habitable rooms to have a min. floor area of 70 sq ft, versus current code requirement for a living room of 120 sq ft. CAH recommendation for AS => AMPC requires 2/3 majority.