

# AIA voter card of recommendations 2019 ICC group B code change proposals

The American Institute of Architects (AIA) and its members actively participate in the International Code Council (ICC) code development process to create our nation's model construction codes—the I-Codes.

Every three years, AIA, other organizations, and individuals propose code changes, support their approval through written and oral testimony, and advocate for their inclusion in the next edition of the I-Codes. Ultimately, the members of the ICC will approve or disapprove hundreds of proposals during the 2019 Online Governmental Consensus Vote (OGCV) beginning Monday, November 18 and ending Thursday, December 5, 11:59pm Pacific Standard Time.

AIA has determined the following code change proposals to be the highest priority items and asks all ICC voting

members to support these positions during the OGCV. Each item includes AIA's recommended position, a brief description of the proposal, and an explanation for that position.

You can view each proposal by clicking the link on each proposal number below or by visiting [cdpaccess.com/proposals](https://cdpaccess.com/proposals) and entering the proposal number in the "Agenda number" search field at top left (note: You must register with ICC's platform cdpACCESS to view the proposals). If you have questions, please email Paul Karrer at [codes@aia.org](mailto:codes@aia.org).

## Top AIA priority: Zero Code Renewable Energy Appendix

### ■ **CE264-19 | Vote for As Submitted (AS)**

Zero Code Renewable Energy Appendix - Adds a voluntary appendix that jurisdictions may choose to adopt a multi-pathway net zero energy standard as their minimum energy code.

AIA strongly supports CE264-19 because it provides for an optional appendix for communities to adopt a zero energy/zero carbon code if they believe it is appropriate. It requires, as a minimum, that the design must comply with one of the compliance options within Chapter 4 of the International Energy Conservation Code (IECC). The proposal establishes a methodology for designing the photovoltaics (PV)

needed to meet the building's needs. The source can be on-site or off-site PV—although off-site PV is penalized 70%, making use of higher energy efficient buildings even more likely the choice of those using that option.

Zero Code Renewable Energy Appendix (ZCREA) resources:

- [AIA public comment supporting the ZCREA proposal](#)
- [2-page ZCREA fact sheet](#)
- [Guidance document on ZCREA for code officials](#)



## Sustainability and energy efficiency

### ■ **GG1-19 | Vote for As Modified (AM)**

Updates the provisions in Chapter 1 of the International Green Construction Code (IgCC) to correlate with the ASHRAE Standard 189.1 provisions of the IECC. This proposal will aid those using the green code to clearly integrate with the energy design provisions of the IECC or the ASHRAE Standard 90.1 provisions for energy design.

### ■ **GG3-19 | Vote for As Modified by Public Comment 1 (AMPCI)**

AIA supports this allowance for jurisdictions to customize the green code because it will make the code more acceptable. This proposal, along with this public comment, simplifies the green code for owners, designers, manufacturers, code officials, and elected officials.

### ■ **CE5-19 Part I | Vote for As Modified**

CE5-19 changes the intent of the energy code to include life safety within “health, safety, and welfare of the public.” AIA supports it because it ties directly into its policy to increase the performance of buildings to achieve higher levels of health, safety, and welfare.

### ■ **CE15-19 Part I | Vote for Disapproval (D)**

AIA opposes this change because it adds requirements for documentation by trades that can lead to conflicts within the drawings during plan review.

### ■ **CE80-19 | Vote for As Submitted (AS)**

This proposal modifies the requirements for airspace and clarifies how the R-value is to be included. AIA supports it to increase the flexibility of developing appropriate R-values and U-values during building design and the approval process.

### ■ **CE96-19 | Vote for As Modified**

AIA supports the requirement to make residential and institutional air leakage testing mandatory. The modification clarified how follow-up testing was to be done.

### ■ **CE97-19 | Vote for As Modified**

AIA supports the modifications to the provisions for air barriers and added provisions for non-residential thermal envelope testing to achieve a higher level of building energy efficiency.

### ■ **CE106-19 | Vote for As Modified by Public Comment 1**

AIA supports the use of interlocked controls that would stop the operation of HVAC for spaces with operable exterior openings over 40 sf. consistent with its policy of higher levels of building energy efficiency.

### ■ **CE215-19 | Vote for As Modified**

This change adds value through an energy monitoring requirement of all new construction over 25,000 sf. and R-2 occupancies over 5,000 sf. AIA supports the use of greater transparency for building users to understand the impact of their user decisions.

### ■ **CE217-19 Part I | Vote for As Modified**

### ■ **CE217-19 Part II | Vote for Disapproval**

AIA support Part I and opposes Part II because the level of support within communities throughout the U.S. varies greatly. These two items move the provisions for electric vehicle charging stations to an appendix that is optional for communities to adopt where appropriate.

### ■ **RE106-19 | Vote for As Modified by Public Comment 1**

AIA policy supports the use of programmable thermostats to allow the most efficient control of comfort and energy efficiency. This change adds greater flexibility with no increase in cost.

### ■ **RE115-19 | Vote for As Submitted**

Because air leakage in ductwork reduces the efficiency in HVAC operations, AIA supports this change to make residential duct testing mandatory.

### ■ **RE206-19 | Vote for Disapproval**

### ■ **RE207-19 | Vote for Disapproval**

### ■ **RE208-19 | Vote for Disapproval**

### ■ **RE209-19 | Vote for Disapproval**

All four items (RE206, 207, 208, and 209) add stepped requirements for additional energy savings, each using a different threshold and different parameters that are unknown to establish the means of obtaining increased energy efficiency. AIA supports the concept of stepped requirements, but because AIA could not reach a compromise among the four proponents, additional work is necessary to develop a path forward for this concept of additional energy savings to work.



## ■ **RE223-19 | Vote for As Modified by Public Comment 2 (AMPC2)**

AIA supports achieving a zero net carbon code approach for design of buildings. This change adds a simple net zero energy code voluntary appendix to the residential energy code that designers can use and building officials can easily apply.

## Residential building code

### ■ **RB5-19 | Vote for Disapproval**

AIA supports local laws regulating who can prepare plans for review and approval through the building permit system. This change defines “building designer” in a way that is contrary to many state licensing laws, creating unnecessary conflicts.

### ■ **RB40-19 | Vote for As Modified by Public Comment 1**

AIA supports adding seismic provisions for cripple wall clear height and an exception for fireplaces, chimneys, and masonry veneer for hillside light-frame construction.

### ■ **RB59-19 | Vote for Disapproval**

AIA opposed the addition of limitations for occupied roofs by requiring a rated common wall between dwelling units to extend up above the roof. The need for separation of unenclosed spaces above the roof is not justified.

### ■ **RB66-19 | Vote for As Submitted**

This change requires fire separation between dwelling units. AIA supports it because the spread of fire from dwelling unit to dwelling unit is a significant life safety hazard.

### ■ **RB112-19 | Vote for Disapproval**

AIA opposes this change because it adds a requirement for a vertical grab bar at the edge of a tub in all dwelling units. This is appropriate for ANSI Standard A117.1 consideration and coordination, but should not be directly inserted into the code.

### ■ **RB116-19 | Vote for Disapproval**

AIA opposes RB116-19 because it adds a reference to the NFPA 101-2018 Life Safety Code for the design of residential stairs. The purpose of the International Residential Code (IRC) is to include all requirements for residential design in the code. Adding a reference to NFPA 101 will only cause confusion.

## ■ **RB131-19 | Vote for As Submitted**

AIA supports the use of untreated foam insulation when appropriately identified and installed under a 3½” concrete slab when properly marked. Concerns regarding the exposure to the treatments leaching into the soil and potential exposures warrant this change.

### ■ **RB141-19 | Vote for As Modified by Public Comment 1**

AIA supports designing for resilience. This change modifies the limits on flood hazard to reference the lowest floor elevation.

### ■ **RB163-19 | Vote for As Modified by Public Comment 2**

AIA policy calls for comprehensive, coordinated, and contemporary construction codes. This change modifies the provisions in the IRC for additions, alterations, or repairs to coordinate with the International Existing Building Code (IEBC).

## Existing building code

### ■ **EB2-19 | Vote for Disapproval**

AIA opposed this proposal that attempts to define substantial structural change. The National Council of Structural Engineers Associations has had continuing problems with differing interpretations of this definition, adding to inconsistent applications of the code.

### ■ **S2-19 | Vote for Disapproval**

AIA supported the removal of secondary drainage for existing roof replacement for low slope roofs in earlier versions of the International Building Code (IBC) based on changes that were made to the plumbing code requirements for drainage sizing. This change would put it back into the code, adding significant cost to simple reroofing projects.

### ■ **S9-19 | Vote for Disapproval**

S9-19 deletes the exception for replacement materials and methods when recovering or replacing existing roofs. AIA opposes this change for reasons similar to S2-19 above. This would cause significant issues for simple reroofing projects due to the lack of sufficient scope limitations and would result in work performed without a permit.



### ■ **S44-19 | Vote for Disapproval**

AIA opposes this proposal because it could change the risk category for some assembly spaces because of other occupancies in an existing building.

### ■ **S100-19 | Vote for As Submitted**

In 2018, AIA supported the inclusion of a comprehensive package of tall wood building provisions into the IBC. This proposal is part of that package for special inspections to assure the correct installation of the materials and their protection.

### ■ **S156-19 | Vote for As Modified by Public Comment I**

This change clarifies exterior plaster requirements for adobe walls. It adds flexibility for design and is a sustainable building material supported by AIA.

### ■ **S190-19 | Vote for As Modified by Public Comment I**

AIA supports the clarification of the relationship of glazing materials and screens below skylights which is commonly misinterpreted.

## Administrative

### ■ **ADM44-19 | Vote for As Modified by Public Comment I**

ADM44-19 creates an appendix to the IBC using the administrative provisions of the International Performance Code—following AIA policies supporting performance-based design.

