



BACKGROUND | OCTOBER 2021

2024 ICC National Model Codes: Group A - Online Voting Guide

The National Multifamily Housing Council (NMHC) and National Apartment Association (NAA) support the development of the International Code Council's family of building codes and actively participate in the process. We are committed to improving the national model codes, while ensuring that proposals are technologically feasible, practical and cost-effective for multifamily construction.

The Group A issues of greatest interest to the apartment industry include fire safety and protection systems, egress, accessibility and mechanical provisions. This document provides our recommendations for voting on apartment industry priorities during the ICC Online Governmental Consensus Voting Period scheduled for October 15 to November 1, 2021.

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About NMHC

Based in Washington, DC, the National Multifamily Housing Council (NMHC) is a national association representing the interests of the larger and most prominent apartment firms in the U.S. NMHC's members are the principal officers of firms engaged in all aspects of the apartment industry, including ownership, development, management and financing. NMHC advocates on behalf of rental housing, conducts apartment-related research, encourages the exchange of strategic business information and promotes the desirability of apartment living. Nearly one-third of Americans rent their housing, and almost 15 percent live in an apartment (buildings with five or more units). For more information, contact NMHC at 202/974-2300, email the Council at info@nmhc.org or visit NMHC's website at www.nmhc.org.

About NAA

The National Apartment Association (NAA) serves as the leading voice and preeminent resource through advocacy, education and collaboration on behalf of the rental housing industry. As a federation of 151 state and local affiliates, NAA encompasses over 93,000 members representing more than 10 million apartment homes globally. NAA believes that rental housing is a valuable partner in every community that emphasizes integrity, accountability, collaboration, community responsibility, inclusivity and innovation. To learn more, visit www.naahq.org.

This document includes technical analysis and commentary provided by Newport Partners/Ventures, LLC.

Overview

The National Multifamily Housing Council (NMHC) and National Apartment Association (NAA) support the development of the International Code Council's (ICC) family of building codes and actively participate in the code-making process. We are committed to improving the national model codes, while ensuring that proposals are technologically feasible, practical and cost-effective for multifamily construction.

The Group A issues of greatest interest to the apartment industry include fire safety and protection systems, egress, accessibility and mechanical provisions. The following outlines the apartment industry's priorities following the ICC Public Comment Hearings in September 2021 and provides our recommendations for voting on these issues during the ICC Online Governmental Consensus Voting (OGCV) Period.¹ This guide references only those proposals with meaningful impacts to multifamily construction and does not reflect all items open for voting during the online voting period or items where NMHC and NAA have a neutral position. Additionally, this guide does not include the industry's analysis of proposals that are not included in the OGCV.

We urge all ICC voters to support the multifamily industry and ensure the continued availability and affordability of apartment housing nationwide.

FOOTNOTES

¹ Importantly, these provisions will continue to evolve throughout the code cycle and should not be considered final until the new code editions are published. Also, this document does not capture all the changes impacting apartment construction. Building professionals and property owners should consult the final codes directly for a full explanation of relevant code requirements.

2024 ICC Codes

Multifamily Priority Proposals

Favorable	Item of Benefit for Apartment Construction
Moderate	Unfavorable Item for Apartment Construction
Significant	Item with Significant Cost or Design Impacts for Apartment Construction
AS	As Submitted
AM	As Modified
AMPC	As Modified by Public Comment
D	Disapproved

International Building Code - General

PROPOSAL #	TYPE OF CHANGE	CAH RESULT	PUBLIC COMMENT HEARING RESULT	ONLINE VOTE RECOMMENDATION	CODE SECTION & ANALYSIS
G12	Revision	D	D	AS	202 Definitions – High-Rise Buildings: Submitted by the ICC Building Code Action Committee. Part of a series of proposals (see also G14, G15, G16) that address occupied roofs. Clarifies that building with occupied roofs at 75' would not trigger fire safety requirements for high-rise buildings. Instead, “high-rise” classification is triggered by floor level of story below at 75'.
G15	Revision	AS	AS	D	202 Definitions – High-Rise Buildings: Part of a series of proposals (see also G12, G14, G16) addressing occupied roofs. Imposes additional fire safety requirements for buildings with occupied roofs of $\geq 75'$ by classifying them as “high-rise” – which subjects those buildings to greater fire protection requirements attached to high-rise structures. Proposal fails to consider more appropriate triggering criteria like floor level below roof or occupant load and conflicts with recommendations of the ICC Building Code Action Committee (G12).
G16	Revision	D	D	D	202 Definitions – High-Rise Buildings: Part of a series of proposals (see G12, G14, G15) that address occupied roofs. Classifies buildings as “high-rise” if occupant load

					of occupied roof is greater than 50 people or occupied roof => 75'.
G44	Revision	AS	AS	D	310.2 Residential Group R-1 and Additional Sections: Changes definition of R-1 occupancies to include sleeping units or dwelling units – forcing the recategorization of some multifamily properties as R-1. Proposal triggers R-1 definition when a potentially small number of dwelling units – more than two - are used for primarily transient occupancy, limiting flexibility in apartment lease options.
G66	New Requirement	D	D	D	406.2.7 Electric Vehicles: Requires electric vehicle (EV) charging infrastructure for new parking facilities with more than 10 spaces without regard for actual EV usage rates or market penetration of EV equipment. For R-2 occupancies, requires 2% of parking spaces to have EV Supply Equipment installed and 18% to be EV-Ready (e.g., have space in electric panel for 40 amp circuits and conduit run within 3' of parking space and terminated at a receptacle).
G106	Revision	D	AMPC	D	1015.2 Occupied Roofs: Requires guards between occupied and unoccupied portions of roofs.
G163	New Requirement	D	D	D	1202.7 Soil Gas Control Systems (Radon): Requires soil gas control system in accordance with ANSI-AARST CC-1000 in multifamily buildings. Could substantially and unnecessarily increase costs, as proposal would require radon control systems regardless of radon zone.
G164	New Requirement	D	D	D	1202.7 Soil Gas Control Systems (Radon): Where radon testing is done, requires radon control system to comply with ANSI-AARST CC1000.
G172	New Requirement	D	D	D	1210.3 Grab Bars - Toilet and Bathroom Requirements: Requires an onerous number of grab bars or stanchions in all apartment bathtubs, tub/showers and showers – including grab bars at the access side of tub, end wall and back wall. Requires grab bars on the interior and exterior of each shower.
G174	New Requirement	D	D	D	1211 Germicidal Irradiation: Requires ultraviolet germicidal irradiation systems in employee and public toilet facilities of all occupancies. Requires systems in all public areas of R-2 occupancies with an occupant load greater than 50 people.
G203	New Appendix	D	D	D	Appendix S Soil Gas Control (Radon): Creates appendix requiring that soil gas systems (radon) comply with ANSI-AARST CC-1000.

International Fire Code

PROPOSAL	TYPE OF	CAH	PUBLIC	ONLINE VOTE	CODE SECTION & ANALYSIS
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#	CHANGE	RESULT	COMMENT HEARING RESULT	RECOMMENDATION	
F8	New Requirement	AM	AMPC	D	304.1 Valet Waste: Part of a series of valet trash proposals (see also F236 and F237). Imposes additional approval requirements for valet trash that could unnecessarily interrupt the use of these services.
F23	New Requirement	D	D	D	321 Combustibles on Roofs and Near Buildings: Imposes requirements for use of combustible furniture on roofs.
F72	Revision	D	AMPC	AMPC	IFC 903.2.1.2 / IBC 903.3.1.2 NFPA 13R Sprinkler Systems: Addresses height limitations for use of NFPA 13R sprinklers imposed in the last code cycle. Clarifies when NFPA 13 sprinkler protection is required, measured from fire vehicle access road level.
F94	New Requirement	D	AMPC	AMPC	907.10.1 / 1103.8.3 Replacement Smoke Alarms: Clarifies when replacement smoke alarms must include a 520hz signal.
F107	New Requirement	D	D	D	1032.4.1 Exit Signs: Requires monthly inspection of exit signs and imposes 3-year record keeping requirement.
F111	New Requirement	D	D	AS	1101 Construction Requirements for Existing Buildings: Establishes a process to develop a plan of correction for existing buildings not in compliance with Chapter 11.
F116	Revision	D	AMPC	D	1103.9 Carbon Monoxide (CO) Detection: Changes requirements for CO sensors providing that CO detection be retroactively installed in accordance with Chapter 9.
F230	Revision	D	D	AS	Appendix D / D102.1 Fire Apparatus Access Roads: Allows flexibility by broadening definition of additional fire department access road. Permits a sidewalk, driveway, pathway, court or other surface meeting certain criteria to be considered a fire department apparatus road.
F231	Revision	D	D	AS	Appendix D / D107.1 Fire Apparatus Access Roads: Allows flexibility for residential developments with not more than 50 dwelling units. Access roads from two directions are not required where a qualifying development is not in a wildland-urban interface area and the single access road is at least 26'.
F236	New Requirement	AM	AM	AM	Appendix O (New) Valet Waste: Provides an optional appendix providing recommended criteria for valet trash and recycling collection controls including container characteristics (must have peak heat release not exceeding 300 kW/m ²), container size (no larger than 2 cu. ft.) and operational requirements (maximum time allowable in corridors and operational plans).

International Building Code – Fire Safety, Egress

PROPOSAL #	TYPE OF CHANGE	CAH RESULT	PUBLIC COMMENT HEARING RESULT	ONLINE VOTE RECOMMENDATION	CODE SECTION & ANALYSIS
FS19	Revision	D	AMPC	AMPC	705.6.1 Floor Assemblies in Type III Construction: Clarifies the construction and fire-resistive requirements of the intersection of exterior walls and floor construction.
FS23	New Requirement	D	D	D	705.11 Wall Penetrations: Requires penetrations through fire-rated exterior walls to be protected with firestopping without justification. Would impact HVAC and other penetrations without providing scoping detail on size of penetrations, proximity to adjacent buildings, etc.
FS83	Revision	D	D	AS	716.2.2.1, 1020.2.1 Fire Door Assemblies: Removes requirement for smoke/draft control elevator doors for three interconnected stories in Group R buildings that open into corridors with fire-rated corridor walls.
E60	Revision	D	AS	D	1011.5.2 Stairs - Riser Height and Tread Depth: Reduces maximum stair tread riser height to 7" and minimum stair tread depth to 10" (from 7 3/4" and 11" respectively).
E102	Revision	D	D	D	1027.5 Exterior Exit Stairways: Adds requirement that exit stairs/ramps be located 10 feet from centerline of street, alley, public access.
E104	Revision	D	D	AS	1028.2 Exit Discharge: Increases egress options - Allows exit onto roof of same or adjacent building if fire safety provisions are met.
E112	Revision	D	D	AS	1031.2 Emergency Escape and Rescue Openings: Increases egress options - Adds language allowing egress into an area that "has access to" a public way.
E121	Revision	AS	AMPC	D	1106.3 Accessible Parking Spaces: Part of a package of proposals (see also E122 and E123) on accessible parking. Original proposals took differing approaches to accessible parking requirements and changes to this section would benefit from additional consideration of the preferred direction.
E124	Revision	D	AS	D	1107.2 Electrical Vehicle Charging Stations: Removes R2 exception for accessible, electric vehicle (EV) charging station requirements. Requires 5% of spaces, but not less than 1 space, to be accessible in R2 occupancies.
E132	Revision	D	D	D	1108.6.2.2.1 Type A Units: Increases requirements for number of Type A units in R2 occupancies (2 percent to 5 percent).

International Mechanical Code

PROPOSAL #	TYPE OF CHANGE	CAH RESULT	PUBLIC COMMENT HEARING RESULT	ONLINE VOTE RECOMMENDATION	CODE SECTION & ANALYSIS
M18	Revision	D	D	D	403.1 / 403.3.2.1 Supply Air System and Ventilation: Requires balanced ventilation, e.g., supply and exhaust air for Group R occupancies – designed to prohibit exhaust-only ventilation systems where the only entrance to a dwelling unit is from an interior corridor.
M50	Revision	D	D	D	512.1 – 5 / AARST Radon: Where a radon system is installed, requires compliance with ANSI/AARST CC-1000-2018 Soil Gas Control Systems in New Construction of Buildings for subslab soil exhaust systems.