

NAHB High Priority Proposal List

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
CE53	Disapprove	The proposal will REQUIRE On-Site renewable energy for EVERY building and includes provisions for the capacity of the equipment with some exceptions.	Should remain as an option, not a requirement in the minimum energy code. Decisions to specify solar should be made on a project basis at the local level, not by the national model code.
CE96	Disapprove	The proposal requires air-barrier testing of dwelling and sleeping units in ALL buildings 4 or more stories in height.	Onerous to implement for multifamily buildings. No effective recourse. For minimum code compliance, air barriers should have an option to be implemented with help of an envelope consultant and visual inspections. The leakage through interior walls and ceilings does not relate to energy efficiency. The proposal reason states that envelope consultants were able to help with solutions that achieved good performance.
CE133	Disapprove	This proposal requires energy recovery ventilation for all dwelling units. Requires an enthalpy recovery ratio of not less than 50%.	Standard ventilation systems should remain an option for dwelling units in the code. Recovery ventilator systems are expensive and often installed incorrectly leading to performance issues. Effective integration with the rest of the HVAC systems require complex controls.
CE217, Part 1	Disapprove	The proposal requires electric vehicle charging receptacle for parking spaces in all new construction for future electric vehicle charging. Number of spaces is based on total number of parking spaces.	These provisions are outside of the scope of the IECC which is conservation of building energy use. The proposed number of EV spaces is not supported by the current market or the projected market share growth. Given the associated costs, these requirements would have a major impact on affordability, particularly for entry level rentals.
CE217, Part 2	Disapprove	This proposal requires electric vehicle charging receptacle for all homes with a parking space or garage.	This is not a building code issue this is a jurisdictional issue. Adding these parking spaces into a residential dwelling is not practical in every application and would add significant cost.
CE218 CE226 CE229 CE240	Disapprove	Series of proposals that substantially modify Section C406 Additional Efficiency Package Options by introducing a new 10 threshold and a system of credits.	Adds significant cost of compliance. No cost analysis is provided. The current code language requires compliance with a single category from the additional package options. The proposal will in many cases require multiple options to be implemented to reach the new 10-point threshold.
G12, Part 1 G12, Part 2	Disapprove	This proposal modifies the definition of "wind-borne debris region" to include sites within one mile of the mean high-water line of an Exposure D condition instead of just one mile from a coastal mean high-water line.	An Exposure D condition is generally as having 5000 feet or more of open water upwind of the site. In high-wind regions, this revision could require buildings adjacent to wide rivers or large inland lakes but not directly fronting on the Atlantic Ocean or Gulf of Mexico to provide wind-borne debris protection where not already required by code.
RB43	As Modified by Public Comment	This proposal restores the ability to construct a story of a dwelling using 12-foot-high bearing walls if the wall studs are engineered for gravity loads, wall bracing amounts are increased, and a roof or ceiling diaphragm provides support to the studs.	The proposal fixes a long-standing internal conflict in the story height provisions related to the ability to construct 12-foot-high bearing walls. The public comment highlighted the need to provide lateral support to the top of the studs, especially in the case of a vaulted or cathedral ceiling.

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RB46	As Modified by Public Comment	This proposal separates the live load requirements for guards and handrails and only requires guards resist a 200-pound load in the outward and downward directions.	The proposal defines a guard as a system intended to protect against a fall from a higher elevation to a lower elevation, not to protect against a fall backwards onto the deck.
RB112	Disapprove	This proposal revises current max. riser height from 7-3/4" to 7" and tread depth from 10" to 11" because of IBC requirements and injury statistics.	This proposal does not provide evidence as to whether falls are due to stair geometry or other reasons such as human error.
RB152	Disapprove	This proposal requires a habitable attic to be considered a story unless it meets the same area restrictions as mezzanines.	Infill sites and flood zone requirements demand higher buildings, and this change limits the size of buildings built on those sites. Jurisdictions restrict building height through zoning, addressing the proponent's concerns.
RB161 RB300 Appendix	Disapprove	Two proposals which add a new section on "physical security" with increased requirements for door materials, door frames and hardware. RB161 in body of code, RB300 in new Appendix	(1) According to the Bureau of Justice Statistics, the rate of household burglary decreased 56% from 1994 to 2011. (2) Proposed R328.5.5 on sidelight entry doors does not allow for such doors that come as one unit. (3) The product Door Guard holds 3 patents which could limit products available to meet the requirements. (4) This provision would make it difficult for emergency responders to enter a dwelling.
RB164	As Modified	This proposal revises the minimum footing width tables to remove overly conservative assumptions or correct underlying calculations to match common engineering practice.	The proposal revises the footing tables, so they produce reasonable footing sizes while still matching engineering practice. The revised tables are designed to focus on starter homes with basic floor and roof assemblies rather than high-end homes with ceramic tile floors and other high-end finishes.
RE112	Disapprove	This proposal strikes the exception for duct leakage testing for ducts/air handlers located entirely inside conditioned space. It adds duct tightness testing and allows for an 8.0 CFM per 100 sq. ft of conditioned floor space.	There is no need to test a system that is located entirely inside of conditioned space, if there is any leakage it is leaking to conditioned space and dwellings already have to comply with duct sealing requirements.
RE126	Disapprove	This proposal restricts the types of hot water heater that can be used.	Limits currently allowed equipment choices. Indirectly limits fuel choices. Federal equipment minimums should not be further restricted by the code. Limited choice will lead to higher cost of construction.
RE206 RE207	Disapprove	Two proposals that introduce flex points into the IECC and which require additional efficiency points to be achieved for all compliance paths.	This is a proprietary points system. The proponents do not give enough information about how the analysis was done.
RE209	Disapprove	This proposal introduces additional mandatory compliance packages that are added to all residential compliance paths.	The additional options are limited and prescriptive. Problematic to combine with performance or ERI paths. Renewables are not included. No cost justification provided.
RE223	Disapprove	This proposal introduces a zero energy residential building appendix.	This belongs in above-code energy and green programs. The ERI values differ substantially from the ERI thresholds in the main code provisions creating a perceived conflict in the energy code.