



Working toward the future

NRCA advocates for the roofing industry during the 2021 I-Codes hearings

by Mark S. Graham

From Oct. 23 to 30, NRCA participated in the International Code Council®'s 2019 Group B Public Comment Hearings in Clark County, Nev., to develop the 2021 I-Codes. Following is a brief explanation of ICC's code development process and some of the roofing-related code changes being considered.

The process

ICC develops and publishes its 15 model codes on a three-year cycle. The 2018 editions of the I-Codes were published in 2017. The next editions, which are being developed, will be published as the 2021 I-Codes.

ICC divides the process for updating its model codes into two groups: Group A and Group B. Group A code changes were considered in 2018, and Group B changes are being considered this year. Development of some I-Codes falls within a specific group while development of others—such as the International Building Code®—occurs in both groups.

The roofing-related requirements in the IBC, those specifically in Chapter 15-Roof Assemblies and Rooftop Structures, are assigned



to Groups A and B. IBC's Structural Code Development Committee, which is part of Group B, primarily is responsible for Chapter 15's content. However, IBC's fire safety, general and plumbing committees are responsible for specific portions of Chapter 15, which are in Group A.

Similarly, portions of the International Residential Code® for One- and Two-family Dwellings also are assigned to both groups. IRC's Chapter 9-Roof Assemblies is assigned to Group B.

The International Energy Conservation Code® is assigned to Group B.

Code change proposals for consideration in Group B were

due Jan. 7. Initial ICC committee recommendations regarding 1,325 of Group B's code proposals took place during ICC's 2019 Group B Committee Action Hearings held April 28-May 8 in Albuquerque, N.M.

Public comments

Items brought forth at the Group B Public Comment Hearings were open to public comments. Public comments were received for 415 of the Group B code change proposals. The remaining 910 proposals not receiving public comments were placed on a consent agenda and voted on by ICC's governmental voting members (code officials) en masse.

NRCA submitted one Group B public

comment, which attempted to overturn the committee's recommendation for disapproval on Code Change CE256-19. NRCA had submitted this code change proposal to add clarifying

“ICC intends to publish the 2021 I-Codes in mid-to late-2020 with an intention that initial adoptions will begin in 2021”

language to the IECC addressing situations in roof system replacement projects where adding additional above-deck roof insulation may not be feasible because of rooftop conditions (flashing heights, rooftop equipment, door openings, wall conditions, etc.). NRCA had submitted a similar code change proposal, Code Change RE217-19 to IRC, which the committee had recommended for approval as modified. NRCA's public comment on Code Change CE256-19 attempted to correlate with RE217-19 for consistency between IECC and IRC.

ICC's governmental voting members disapproved NRCA's public comment on Code Change CE256-19, sustaining the committee's recommendation for disapproval.

During the public comment hearings,

NRCA also provided testimony on a number of roofing-related public comments submitted by others. For example, the

Polyisocyanurate Insulation Manufacturers Association requested the committee's recommendation on NRCA's Code Change RE217-19

be overturned. PIMA's public comment was successful despite NRCA's opposition; ICC's governmental voting members disapproved RE217-19.

Also, SPRI submitted a public comment requesting the committee's recommendation to disapprove Code Change S17-19 be overturned. This code change proposal originally was submitted by SPRI to add ANSI/SPRI GT-1, "Test Standard for Gutter Systems," to the IBC. Despite NRCA's opposition, SPRI's public comment was successful; ICC's governmental voting members overturned the committee's action and approved S17-19.

What's next

Final action on Group B code change proposals takes place through ICC's online governmental consensus vote, which was held Nov. 18-Dec. 5. Code change proposals approved during this final action vote—along with those approved during 2018's Group A—will be published in the 2021 I-Codes.

ICC intends to publish the 2021 I-Codes in mid- to late-2020 with an intention that initial adoptions will begin in 2021.

Once the 2021 I-Codes are published, NRCA will provide a complete overview of all the roofing-related changes. 🌱🌱🌱

MARK S. GRAHAM is NRCA's vice president of technical services.

 @MarkGrahamNRCA

For more about this topic, see "Planning ahead," July 2019 issue, page 20.