



Comments to Rule and Regulations #196
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R303.7 Interior Stairway Illumination: Revise section R303.7 as follows:

Proposed Code Language: R303.7 Interior Stairway Illumination. Interior stairways shall be provided with an artificial light source to illuminate the landing and treads. ~~The light source shall be capable of illuminating treads and landing to levels of not less than 1 foot-candle (11 lux) as measured at the center of treads and landings.~~ There shall be a wall switch at each floor level to control the light source where the stairway has six or more risers.

Support: Designing and inspecting to ensure 1 foot-candle at all stair treads is over burdensome for residential dwelling units.

R302.6 Dwellings-garage fire separation: Delete the following sentence “Attachment of gypsum board shall comply with Table R702.3.5” as follows:

Proposed Code Language: R302.6 Dwellings-garage fire separation: The garage shall be separated as required by Table R302.6. Opening in garage walls shall comply with Section R302.5. ~~Attachment of gypsum board shall comply with Table R702.3.5.~~ The wall separation provision of Table R302.6 shall not apply to garage walls that are perpendicular to the adjacent dwelling unit wall.

Support: The strikeout sentence above has been added to the 2015 IRC and eliminates acceptable alternative methods of attaching gypsum per other sections and would prevent the use of new materials and practices as deemed acceptable through engineered designs or testing and ESR reports.

R303.4 Mechanical ventilation: Delete section R303.4 without substitution. .

Support: There is no evidence that mechanical whole house ventilation systems are necessary within dwelling units.

Proposed Code Language:

TABLE M1601.1.1:

GAGES OF METAL DUCTS AND PLENUMS USED FOR HEATING OR COOLING

DUCT SIZE	GALVANIZED		ALUMINUM
	MINIMUM THICKNESS inches and (mm)	EQUIVALENT GALVANIZED SHEET NO.	MINIMUM THICKNESS (in.)
Exposed rectangular ducts 14 inches or less Over 14 ³ inches	0.0157 (0.3950 mm)	28	0.0175
	0.0187 (0.4712 mm)	26	0.018
	0.0236 (0.6040 mm)	24	0.023
Exposed rectangular ducts 14 inches or less Over 14 ³ inches	0.0157 (0.3950 mm)	28	0.0175
	0.0187 (0.4712 mm)	26	0.018

Support: Delete Table M1601.1.1 and substitute with 2009 IRC Table M1601.1.1(2) Metal duct thickness requirements have been dramatically increased. Typically duct forming equipment is not able to accommodate new thicker material requirements, furthermore there is little or no value in increasing the metal duct thickness. The larger cost of adopting this change can has not been justified by any value or safety.

N1102.4.1: Building thermal envelope. The building thermal envelope shall comply with Sections N1102.4.1.1 and one of the following options given by Sections N1102.4.1.2 or N1102.4.1.3. The sealing methods between dissimilar materials shall allow for differential expansion and contraction.

Add the following new section copied from the 2009 IRC section N1102.4.2.2:
(N1102.4.1.3) Visual inspection option. The items listed in Table N1102.4.1.1, applicable to the method of construction, are field verified. Where required by the code official, an approved party independent from the installer of the insulation, shall inspect the air barrier and insulation.

Support: Years of experience has verified the effectiveness of the visual inspection option for ensuring home air tightness as provided within the 2009 IRC section N1102.4.2.2. Therefore, the cost burden of requiring a whole house air test on all homes is not justified and the visual inspection options from 2009 IRC should be maintain within the proposed adoption.