

TO: Interested Parties

RE: ICC's recent "2021 International Tiny House Provisions" publication and proposed ASTM standard(s)

On September 15, 2022, a critical meeting is scheduled to decide whether to go forward with a proposed ASTM Tiny House standard(s) review committee, to which the International Code Council (ICC) or a portion thereof has objected.

On September 9, 2022, ICC announced on its website that they have released a new publication called the "2021 International Tiny House Provisions (ITHP)," which ICC says "was created to provide a one-stop source for information on applicable codes and standards pertaining to tiny houses and how and when they may apply."

The timing of the release less than one week before the meeting date is certainly eyebrow-raising. Because of my interest in this topic, I purchased the pdf download for \$224 (\$280 without an ICC member discount) and skimmed through it, wondering what might conceivably fill 2,332 pages and what new insight I could glean. I gleaned little.

Of the 2,000-plus pages, the vast majority (Section III) consists of the entire 2021 International Residential Code (IRC) Code and Commentary, with Appendix AQ and its commentary broken into in pieces and inserted into the applicable portions of the IRC instead of standing on their own between Appendices AP and AR. The only new material appears to be in the introduction (Section I). ICC reprinted their proposed Tiny House model legislation (Section II), their two new offsite construction standards (Section IV), federal HUD standards for manufactured homes (Section V) and made brief reference to RV and Park Model RV standards (Section VI).

In all the pages of the IRC, the only places Appendix Q inserts occur are in Chapters 1, 2, 3 and 11. There are ZERO applicable references in all other IRC Chapters, except for the occasional "does not apply." There is nothing in Chapter 4 Foundations, Chapter 5 Floors, Chapter 6 Walls, Chapter 8 Roofs, etc. By reprinting in their entirety chapters 4-10, 12-43, and all the Appendices

except AQ, ICC reinforces the idea that Tiny Homes must be built per the IRC except for those few alternatives allowed under Appendix AQ if adopted by a local jurisdiction. Since there are NO IRC alternative provisions for Tiny House footings or foundations, they are either required to use a concrete, masonry or all-weather wood footing and foundation system extending below the frost line of the authority having jurisdiction, or gain approval by using an engineered design specific to the home as allowed under the International Building Code (IRC Section R301).

In Section I, ICC states that all housing “units over 8 feet in width or 40 feet in length or 320 square feet in area that are built on a permanent chassis” MUST comply with HUD standards (unless they are built to IRC requirements). Whether all such homes *must* comply with HUD standards, or just the ones built to and seeking approval under those standards, is certainly debatable. By continuing to insist that the round peg of Tiny Houses must be inserted into their existing square I-code boxes, ICC standards or HUD standards, into which they do not fit, ICC is actually making the case that an ASTM committee is urgently needed to develop new standards appropriate to Tiny House construction as it actually exists.

Based on the poor formatting at the bottom of the pages, which makes reading page numbers all but impossible, and errors in the decision flow-chart on page 5 where the first diamond labelled “Under 400 sq. ft. excluding loft?” is repeated twice), it may be that this publication was rushed out to meet an arbitrary deadline and influence debate.

Eric Fried
Chief Building Official

Note: This is my opinion as a local chief building official and not an official position of Larimer County.