

Individual Consideration Agenda

Comment 1:

IRC: BB102.1, SECTION BB107 (New), BB107.1 (New), BB107.2 (New), BB107.2.1 (New), BB107.3 (New), BB107.3.1 (New), BB107.3.2 (New), BB107.4 (New), BB107.5 (New), BB107.6 (New), BB107.7 (New), BB107.8 (New), BB107.9 (New), BB107.10 (New), BB107.11 (New)

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Replace as follows:

2024 International Residential Code

APPENDIX BB TINY HOUSES

SECTION BB102 DEFINITIONS

BB102.1 General. The following words and terms shall, for the purposes of this appendix, have the meanings shown herein. Refer to Chapter 2 of this code for general definitions.

TINY HOUSE. A dwelling that is 400 square feet (37 m²) or less in floor area excluding lofts.

BODY LENGTH. The longest dimension of a movable tiny house, excluding drawbar and coupling mechanism, measured horizontally perpendicular to the axles.

BODY WIDTH. The widest dimension of a movable tiny house, excluding removable appendages, measured horizontally parallel to the axles.

CHASSIS. The entire transportation system comprised of the drawbar and coupling mechanism, running gear assembly, lights, and a chassis frame that is an integral part of the movable tiny house structure.

HEIGHT, MOVABLE TINY HOUSE. The vertical measurement of a movable tiny house from the bottom of the wheels to the highest point of the roof or other permanent appendage.

INSTALLATION (INSTALLED). The construction required for the fixed placement of a movable tiny house, including the anchorage system and connections thereto, and the water, fuel gas, electrical and sewage systems and connections thereto, that are required for occupancy.

MOVABLE TINY HOUSE. A tiny house that is anchored to a chassis that can be installed in a jurisdiction. Also known as a tiny house on wheels.

SECTION BB107 MOVABLE TINY HOUSES

BB107.1 Authority to regulate movable tiny houses. The building official is authorized to regulate movable tiny houses only for the location of installation and as required for occupancy.

BB107.2 General. Movable tiny houses, for their location of installation, shall comply with this code and this appendix except as otherwise stated in this section.

BB107.2.1 Engineered design. Movable tiny houses shall require an approved engineered design for: attachment to the chassis frame per Section BB107.3.1, the chassis per Section BB107.3, the foundation in accordance with this code, and anchorage to the foundation or ground anchorage per Section BB107.3.2.

BB107.3 Chassis. The chassis for the movable tiny house shall meet the performance requirements for motor vehicles and their safety-related components with documentation submitted by the applicant that is deemed acceptable to the building official, and shall require an approved engineered design for all design loads.

BB107.3.1 Attachment to the chassis . The structural system of the movable tiny house shall be attached to the chassis frame in accordance with an engineered design capable of resisting transit loads, and the wind and seismic design loads for the location of installation.

BB107.3.2 Anchorage of the chassis. The chassis shall be anchored to the foundation in accordance with an engineered design and this code, or with ground anchors in accordance with an engineered design meeting the requirements of Appendix BA Sections BA124 and BA125.

BB107.4 Maximum dimensions. Movable tiny houses shall not exceed the following maximum dimensions:

1. The body width shall not exceed 12 feet (3048 mm).
2. The body length shall not exceed 40 feet (12,192 mm).
3. The movable tiny house height shall not exceed 13 feet 6 inches (4115 mm).

BB107.5 Location on lot. Movable tiny houses and their accessory structures shall be located on the property in accordance with applicable codes and ordinances of the jurisdiction.

BB107.6 Relocation of movable tiny houses. Relocated movable tiny houses shall comply with all applicable provisions of this code and this appendix for the new location.

BB107.7 Skirting. Skirting enclosures shall be installed where required by other laws or ordinances. Skirting shall be of material suitable for exterior exposure and ground contact. Skirting shall be adequately secured to ensure stability, minimize susceptibility to wind damage and vibration, and allow for potential frost heave.

BB107.8 Exterior means of egress. Exterior stairways and ramps that provide egress from the movable tiny house to the public way shall comply with the applicable provisions of this code.

BB107.9 Adjacent accessory structures. Accessory structures, such as a stairway, ramp or deck, shall not be structurally supported by or attached to a movable tiny house unless engineering calculations are submitted that substantiate a proposed structural connection. **Exception:** The building official shall have the authority to waive the engineering calculations requirement if deemed unnecessary for the proposed work.

BB107.10 Inspections. In addition to the applicable inspections required in Section R109.1, movable tiny houses shall require, as applicable, the following inspections at the stated times:

1. Pre-pour concrete slab inspection: All under- or in-slab utilities and in-slab reinforcing or structural connectors shall be inspected before concrete is poured.
2. Anchorage: Foundation anchors, ground anchors, and their connections to the movable tiny house shall be inspected after its installation.
3. Utilities: Inspection of utility service equipment, such as water, fuel gas, electrical and sewage systems, shall be made prior to concealment by any permanent portion of the construction, and shall include inspection of approved utility connections between the site and the movable tiny house.

BB107.11 Glazing. Exterior glazing of a movable tiny house shall be fully tempered glass or an approved alternative.

Reason:

- 1. How this Comment relates to the original proposal, and to Appendix BB**

This Comment relates to both the original RB42-25 proposal and to the current Appendix BB. It addresses Appendix BB more directly than the original proposal, introducing a new section covering only Movable Tiny Houses.

RB42-25 as submitted for CAH1 proposed changes to IRC Section R301 Design Criteria as well as to Appendix BB Tiny Houses, and proposed referencing a new standard:

At the time of submittal for CAH1, the draft standard's scope was:

"This standard will provide minimum requirements for the design, construction, inspection, certification and regulatory compliance of tiny houses used for permanent occupancy to assure public safety, sustainability and resilience."

Similarly, the abstract of the draft standard was:

"Tiny houses are growing in popularity as communities look to address affordable housing issues and homebuyers are looking for new housing options. This standard will codify existing requirements for the design, construction, inspection and certification of tiny houses used as permanent dwellings into a single standard and address identified gaps in available requirements for foundations and chassis."

The original Reason statement for RB42-25 focused on introducing a new term, Small Residential Unit (SRU), for structures up to 1200 square feet, and includes many other aspects well beyond the scope of Appendix BB without mentioning tiny houses. Since CAH1, the standard has continued to develop in this direction, including renaming the standard that reflects this SRU priority. As of July 15 the standard is not complete, and our understanding from 1215 Committee members is that it will not be complete before CAH2. It's unclear if it will be complete in time for inclusion in the IRC this code cycle.

With all of this in mind, including that an incomplete standard cannot be referenced, this Comment focuses on realizing Appendix BB's original intention of including movable tiny houses (≤ 400 sq.ft.) by proposing needed provisions directly into the appendix in a new section titled Movable Tiny Houses. This Comment does not intend to address the full scope that the draft standard currently proposes (such as larger size limits, and certain inspection and certification protocols). It instead offers a pragmatic and relatively expedient way to close key regulatory gaps for movable tiny houses built on a chassis. Importantly, this Comment does not oppose the development and possible inclusion of a completed 1215 standard in the IRC. However, the rapidly growing movable tiny house movement and public safety concerns cannot afford to wait another code cycle before progress is made.

2. Why direct inclusion in Appendix BB is best

Movable tiny houses, though constructed on a chassis for transport, are being used (permitted or not) in a way that aligns with the IRC's definition of a dwelling unit: "A single unit providing complete independent living facilities for one or more persons, including permanent provisions for living, sleeping, eating, cooking, and sanitation." No national model code or other regulatory framework exists that fully addresses their unique nature as both habitable and transportable structures.

The U.S. Department of Housing and Urban Development (HUD) does not regulate tiny houses on wheels [HUD's term] under its Manufactured Home Construction and Safety Standards (24 CFR Part 3280) if they meet HUD's RV exemption criteria (built on a chassis, ≤ 400 sq.ft., permanently towable). In its 2018 Federal Register notice (2018-24950 - [attached](#)), HUD clarified it does not distinguish between seasonal or permanent occupancy for RVs and that it does not intend to regulate tiny homes meeting the RV exemption criteria—even when used as year-round housing. Because movable tiny houses as defined in this Comment fit within HUD's RV exemption criteria, they are not regulated by HUD. Appendix BA of the IRC, which applies to manufactured housing, is only applicable to HUD-labeled units. In addition, the Federal Motor Vehicle Safety Standards (FMVSS) and National Highway Traffic Safety Administration (NHTSA) requirements apply solely to transportation safety—not the structural, utility, or life-safety concerns of dwellings.

The IRC stands as the appropriate model code with both the widespread recognition and fully developed framework needed to regulate movable tiny houses, especially with Appendix BB (formerly AQ) already adopted in more than half of the 50 US states. Also, because IRC appendices require explicit adoption by jurisdictions, Appendix BB would offer its movable tiny house provisions without imposing them on communities not yet ready to adopt them, or would give jurisdictions a clear opportunity to modify them for local conditions.

3. Proposed code language overview

This Comment proposes a new section Movable Tiny Houses to Appendix BB that clarifies jurisdictional authority (Sections BB107.1, BB107.5, and BB107.6) and ensures safety for **movable tiny houses** as a distinct subset of tiny houses:

- **Terminology:** Introduces to **Section BB102 Definitions** the term **Movable Tiny House** to define tiny houses built on chassis, and adds the term **Chassis** to distinguish them from other IRC-regulated structures. This aligns with how movable tiny houses are typically built. The Comment also adds the terms **Body Length**, **Body Width**, and **Height**, **Movable Tiny House**, and **Installation (Installed)**.
- **Dimensional Limits:** Proposes width, length, and height limits based on the Federal Motor Vehicle Safety Standards (FMVSS), HUD standards, and current industry norms (primarily 8'6" or 10' wide, and 13'6" height). Though some US jurisdictions allow a 14' vehicle height, the predominant 13'6" limit was chosen for this appendix to ensure acceptance across all jurisdictions. Though industry norms do not typically exceed 10' width, this Comment allows up to 12' width, recognizing existing precedent in HUD's RV exemption criteria.

- **Structural Requirements:** Like tiny houses on a permanent foundation in Appendix BB, the portion of a movable tiny house above the chassis would comply prescriptively with the IRC, or could in part or whole be in accordance with an engineered design. The remaining structural components of a movable tiny house would require an approved engineered design: the chassis and the foundation, as well as the connections of the tiny house to the chassis, and anchorage of chassis to the foundation or ground (drawn from existing Appendix BA ground anchorage methods). Together these would ensure the structural safety of the movable tiny house.

Future prescriptive paths are anticipated for these structural components, either directly incorporated into Appendix BB, or by reference to future standards.

- **Glazing Requirements:** Adds safety glazing requirements based on the unique exposure of these homes to roadway conditions—enhancing public safety during transit.
- **Additional Requirements adapted from Appendix BA:** The following added definition and sections are drawn largely from Appendix BA with adjustments for movable tiny houses:

BB102 Definitions - the term **Installation (Installed)**

BB107.3.2 Anchorage

BB107.5 Location on lot

BB107.6 Relocation of movable tiny houses (drawn from IEBC Ch.14)

BB107.7 Skirting

BB107.8 Exterior means of egress

BB107.9 Adjacent accessory structures

BB107.10 Inspections

BB107.10(3) Utilities

4. Urgency and Context

The tiny house movement has been largely driven by small and independent builders, owner-builders, nonprofits, schools, and even knowledgeable family members of owners. This grassroots nature is a core strength of the movement, but it also places it at odds with federal compliance models like HUD's, which are primarily structured for licensed manufacturers. While some tiny house builders could technically fit under that umbrella, requiring formal manufacturing undermines the affordability and access that define this housing type. Movable tiny houses remain one of the few attainable forms of owner-occupied affordable housing — one reason demand continues to rise.

Movable tiny houses also offer unique affordability advantages, especially in regions with high land costs or limited housing inventory. By enabling ownership of the housing structure without requiring land ownership, they can expand access to homeownership. For example, movable tiny house owners may lease or be granted temporary use of land while maintaining full ownership of the dwelling itself — a model that can benefit both the occupant and the landowner. Movable tiny houses also support increased density within existing infrastructure, and help jurisdictions meet growing needs for workforce and flexible housing and provide intergenerational living options, particularly in areas facing housing shortages or evolving land use needs. Their mobility makes them a resilient housing option in rural, urban, transitional, or post-disaster scenarios, and their scale aligns with sustainable living goals.

Currently thousands of jurisdictions face waves of largely unregulated movable tiny homes being built or moved into their communities. Some of these homes are well-constructed and safe. Many are not. Regardless, people are living in them full-time. Authorities need a tool to view movable tiny houses for what they are: dwellings on a chassis that can be fixed long-term, comply with local building and zoning codes, and/or be readily moved to another location with similar compliance required. This housing type currently falls outside regulatory framework, but is appropriate for inclusion as a valid single family dwelling type in the IRC.

This Comment isn't intended to resolve every issue facing movable tiny house designers, builders, owners or their communities. Instead, it offers a clear, timely, and actionable path forward—addressing the most urgent gaps in safety and regulation. It does so within the widely adopted Appendix BB - Tiny Houses, which was specifically created to help jurisdictions regulate innovative, compact forms of permanent housing.

- **2018-24950 federal register HUD responses.pdf**

<https://www.cdpassess.com/comment/1312/38876/documentation/206316/attachments/download/10962/>

Cost Impact: The change proposal is editorial in nature or a clarification and has no cost impact on the cost of construction

Justification for no cost impact: This Comment does not change the provisions in Appendix BB for tiny houses permanently fixed to a foundation, and therefore does not impact their cost. Rather, it introduces a distinct new category of tiny houses. Although there are similarities between tiny houses and movable tiny houses, the added requirements for movable tiny houses form their own construction cost baseline.

Comment (CAH2)# 1312
