

Individual Consideration Agenda

Public Comment 1:

IRC: APPENDIX BB, SECTION BB102, BB102.1, SECTION 202, SECTION 202 (New), SECTION BB107 (New), BB107.1 (New), BB107.2 (New), BB107.2.1 (New), BB107.3 (New), BB107.3.1 (New), BB107.3.1.1 (New), BB107.3.2 (New), BB107.3.3 (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), BB107.12 (New), BB107.13 (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 *relocatable tiny house*, excluding drawbar and coupling mechanism, measured horizontally perpendicular to the axles.

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

CHASSIS. The entire transportation system consisting of a drawbar and coupling mechanism, running gear assembly, lights, and *chassis frame*.

CHASSIS FRAME. The structural frame of the *chassis* that supports and is integrally connected to the *relocatable tiny house* structure above, and is connected to the foundation or ground anchor below. Also known as *integral frame*.

HEIGHT, RELOCATABLE TINY HOUSE. The vertical dimension of a *relocatable 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 *relocatable tiny house*, including its anchorage system and connections and its water, fuel gas, electrical and sewage systems and connections, that are required for occupancy.

RELOCATABLE TINY HOUSE. *A tiny house with an integral chassis frame designed and constructed to be relocated, and installed as a dwelling unit. Also known as a movable tiny house or a tiny house on wheels.*

SECTION BB107 **RELOCATABLE TINY HOUSES**

BB107.1 Regulation. The building official shall regulate relocatable tiny houses under this appendix as dwellings as required for occupancy at the location of installation.

BB107.2 General. *Relocatable tiny houses shall comply with this code and this appendix for the location of installation. An existing relocatable tiny house that undergoes alteration, an addition, or relocation shall comply with the applicable sections of Chapter 14 of the IEBC.*

BB107.2.1 Engineered design. *Relocatable 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 relocatable tiny house shall meet the performance requirements for vehicles and their safety-related components, with documentation approved by the building official, and shall require an approved engineered design for all design loads.*

BB107.3.1 Attachment to the chassis. *The structure above the chassis shall be attached to the chassis frame in accordance with an engineered design capable of resisting transit loads, wind and seismic design loads for the location of installation.*

BB107.3.1.1 Transit design load for attachment to chassis. *Side wall connections to the chassis frame shall use the design load in accordance with Equation BB-1.*

$$H=(D+F)1.25$$

(Equation BB-1)

where:

H = Horizontal allowable stress design load (lb) for design of dwelling connection to the chassis frame.

D = Dead load (lb), self-weight of the dwelling above the chassis frame. Not less than 350 lb/ft times one side wall length.

F = Floor load (lb), allowance for built-in items and contents in place at time of transport = 20 lb/sq ft times gross floor area.

BB107.3.2 Anchorage of the chassis. *The chassis frame shall be anchored to the ground or foundation in accordance with an engineered design complying with the foundation and anchorage sections of Appendix BA.*

BB107.3.3 Chassis and floor framing. *Floor framing shall be part of the engineered chassis frame or shall be in accordance with this code and with an engineered connection to the chassis frame.*

BB107.4 Maximum dimensions. *Relocatable tiny houses shall not exceed the maximum dimensions as follows:*

- 1. Body width shall not exceed 12 feet (3048 mm).*
- 2. Body length shall not exceed 40 feet (12,192 mm).*
- 3. Height shall not exceed 13 feet 6 inches (4115 mm).*

BB107.5 Location on lot. *Relocatable 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. Relocated *relocatable 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.

BB107.8 Exterior means of egress. Exterior stairways and ramps that provide egress from the *relocatable 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 *relocatable 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, *relocatable tiny houses* shall require an inspection of the foundation anchors and ground anchors and their connections after their *installation*.

BB107.11 Inspection agencies. The *building official* is authorized to accept inspection reports by *approved* inspection agencies for off-site construction of the *relocatable tiny house*.

BB107.12 Glazing. Exterior glazing of a *relocatable tiny house* shall be fully tempered glass or an *approved* alternative.

BB107.13 Utility connections. Approved connections shall be provided for electrical, fuel gas, water and sewer utilities.

Reason: This Public Comment proposes provisions in Appendix BB for tiny houses constructed on a chassis and used for permanent occupancy. It addresses jurisdictional authority and safety by requiring engineered design for the chassis and related load-transfer components, while relying on existing IRC provisions for the dwelling structure. This Comment stands alone as a complete and enforceable proposal.

A second, related Public Comment proposes optional prescriptive structural provisions for specific elements, offering an additional complementary compliance pathway. Together, these comments respond to current regulatory concerns facing building officials, code enforcement, design professionals, builders, and owners with respect to relocatable tiny houses.

Relationship to the Original RB42 Proposal and IRC Appendix BB

This Public Comment is directly related to the original RB42-25 proposal and to Appendix BB – Tiny Houses. It represents a refinement and narrowing of the original RB42 scope, not something new or unrelated.

RB42 proposed changes to IRC Section R301 (Design Criteria) and Appendix BB and proposed referencing a developing standard, **ICC/THIA 1215-202x, Design, Construction and Regulation of Tiny Houses for Permanent Occupancy**. At the time of CAH1 submittal, the draft standard scope stated:

“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.”

The abstract emphasized the intent to codify requirements for tiny houses designed to be permanent dwellings, that address regulatory gaps related to both tiny houses on a foundation and on a chassis.

However, the original RB42 reason statement focused primarily on introducing the new term *Small Residential Unit (SRU)* for structures up to 1200 square feet and addressed a range of topics beyond the scope of Appendix BB, without specific focus on tiny houses. Since CAH1, the draft 1215 Standard has continued to evolve in this broader SRU direction, including renaming the standard to reflect that emphasis. The standard remains incomplete, and according to the 1215 Committee vice-chair and lead proponent of RB42, it will not be complete in time to be considered for inclusion or reference in Appendix BB during the current code cycle.

Because the issues surrounding tiny houses on a chassis are immediate and unresolved, this Public Comment refocuses the original RB42 intent by proposing **direct inclusion of provisions for tiny houses 400 square feet or less built on a chassis into Appendix BB**. This approach realizes Appendix BB’s original purpose while avoiding delay associated with the completion of a broader and more complex standard.

This comment does not represent oppositions to, or hinder the continued development or future reference to a completed 1215 standard. Rather, it provides a pragmatic, timely solution to address urgent public safety and regulatory gaps for tiny houses on a chassis during the current code cycle.

Direct Inclusion in Appendix BB Is Appropriate

Tiny houses constructed on a chassis and used for permanent occupancy are functioning as **dwelling units** according to the IRC definition:

“A single unit providing complete independent living facilities for one or more persons, including permanent provisions for living, sleeping, eating, cooking, and sanitation.”

Despite this, no national model code or standard currently regulates them as dwellings for permanent occupancy.

- The U.S. Department of Housing and Urban Development (HUD) does not regulate relocatable tiny houses on wheels 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 further 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.
- Appendix BA of the IRC, which applies to manufactured housing, is only applicable to HUD-labeled units.
- 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 related to dwellings.
- Recreational Vehicle Industry Association (RVIA) standards, including ANSI A119.5 for Park Model RVs, do not address the full range of structural, fire, life-safety, and durability requirements applicable to tiny houses used as dwelling units.
- This comment provides a path to IRC compliance for owner-builders, small builders, and nonprofits what are typically unable to afford to follow a modular regulatory path because IRC modular programs rely on factory-based manufacturing and certification programs.

The IRC is therefore the appropriate model code to regulate this housing type. Appendix BB is particularly well suited, as it has already been adopted in more than half of U.S. states and requires explicit adoption by jurisdictions. This allows communities to adopt, modify, or decline these provisions based on local needs, without imposing requirements on jurisdictions not yet ready to regulate relocatable tiny houses.

Response to CAH1 and CAH2 Committee Concerns

This Public Comment directly addresses feedback raised during CAH1 and CAH2.

Concerns raised at CAH1 regarding scope are addressed by limiting applicability to **tiny houses of 400 square feet or less**, consistent with Appendix BB.

During CAH2 Committee discussion, it was suggested that the submission represented an entirely new proposal unrelated to RB42. That characterization is not accurate and did not reflect the intent or substance of the CAH2 Comment or this Public Comment. The 1215 Standard included tiny houses on a chassis. This submission narrows the original RB42 scope, aligns it with Appendix BB, and places provisions for tiny houses on a chassis directly where jurisdictions are already regulating tiny houses.

RB42’s lead proponent and the vice-chair of the 1215 Standard effort supported this approach in our CAH2 Comment and continues to do so, now as a co-proponent of this Public Comment.

A significant revision responding to CAH2 feedback is the shift in terminology from *movable tiny house* to **relocatable tiny house**. This change aligns with established IBC and IEBC language and avoids confusion with manufactured housing, modular construction, and vehicle-based products. In ICC usage, *relocatable* describes buildings that may be transported but are not necessarily part of an industrialized or federally regulated manufacturing program. The term refers solely to a building’s capacity for relocation and does not prescribe a factory-built, modular, or industrialized construction pathway.

Another concern raised at CAH2 was the need for a clear and enforceable inspection process, particularly given the prevalence of owner-builders, small builders, and nonprofit organizations that build relocatable tiny homes. Three common inspection pathways include:

1. **Full Field Inspection**, identical to the standard IRC inspection process, applied as the building is constructed and conducted either in person or remotely, as permitted by the receiving AHJ.
2. **Comprehensive Pre-Move Inspection**, consistent with the IEBC provisions for moved buildings, allowing inspection of concealed work prior to relocation and a final inspection at the receiving site.
3. **Combination Inspection**, allowing the AHJ to accept inspections from ICC-certified third-party electrical, plumbing, or mechanical inspectors where appropriate, followed by a final inspection by the AHJ—a practice already common for remote or owner-built construction.

These pathways do not create special privileges or exemptions. They simply clarify existing practices and provide building officials with flexible, enforceable options so jurisdictions can safely and consistently regulate small, relocatable dwellings.

Urgency, Context, and Need

Relocatable tiny houses are being built, moved, and occupied in thousands of jurisdictions today — permitted or not. Some are well-constructed and safe; many are not. Regardless, people are living in them full-time.

This housing type has been driven largely by small builders, owner-builders, and nonprofits — a strength that conflicts with federal compliance models designed for larger licensed manufacturers. Requiring HUD-style manufacturing would undermine affordability and access and is inconsistent with how these dwellings are actually produced.

Relocatable tiny houses offer unique affordability, density, and resilience benefits. They enable dwelling ownership without necessarily requiring land ownership, support intergenerational and workforce housing, and provide flexibility in rural, urban, and post-disaster contexts. Their use has outpaced existing regulatory frameworks.

Overview of the Proposed Code Provisions

The Public Comment proposes a new section in Appendix BB addressed relocatable tiny houses as a distinct subset of tiny houses. It clarifies jurisdictional authority and addresses the unique safety considerations associated with structures built on a chassis. The Public Comment makes no technical changes to the existing provisions of Appendix BB.

Key elements include:

Terminology

Adds definitions to Section BB102, including Relocatable Tiny House, Chassis, Chassis Frame, Body Length, Body Width, Height, and Installation (Installed), aligning terminology with existing IRC usage and construction practices as well as developing terminology in the draft 1215 Standard.

Dimensional Limits

Establishes width, length, and height limits informed by FMVSS, HUD RV exemption criteria, and prevailing industry norms (primarily 8'6" to 10' wide and 13'6" high). Although some jurisdictions permit 14' vehicle height, the 13'6" limit was selected to ensure nationwide compatibility. A maximum width of 12' is permitted to recognize existing precedent in HUD's RV exemption criteria.

Structural Requirements

The portion of the tiny house above the chassis is required to comply with the IRC prescriptively or by engineered design, consistent with the current Appendix BB. The chassis, foundation, connections to the chassis, and anchorage to the ground require approved engineered design, referencing existing Appendix BA anchorage methods. This combination ensures structural safety while allowing future development of prescriptive paths. Section BB107.3.1.1 Gives guidance for engineering the chassis frame accounting for transit loads.

Glazing Requirements

Adds safety glazing provisions reflecting the exposure of these structures to roadway conditions during relocation.

Adapted Provisions from Appendix BA and IEBC

Includes provisions addressing anchorage, lot location, relocation, skirting, exterior means of egress, adjacent accessory structures, and inspections, from IRC Appendix BA and the IEBC — adapted to the specific characteristics of relocatable tiny houses.

Conclusion

This Public Comment refines and advances a primary intent of the original RB42, and builds on the CAH2 Comment in Cleveland. It provides jurisdictions with a safe, flexible, and enforceable path to regulate relocatable tiny houses within Appendix BB during the current code cycle, while allowing the broader ICC/THIA 1215 Standard to continue development without delaying urgently needed regulatory tools.

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 relocatable tiny houses, the added requirements for relocatable tiny houses form their own construction cost baseline.

Attached Files

- **2018 Federal Register notice (2018-24950).pdf**

<https://www.cdpassess.com/public-comment/4051/40047/files/download/11872/>

Public Comment# 4051
