



**ICC 1215-202X edition
Second Public Input Agenda
based on Nov 24, 2025 input received
on First Draft of the
ICC 1215 Standard**

**For December 10, 2025
and subsequent Meetings –
Teleconference**

Matrix for ICC 1215 proposals

Proposal #	Section Number	Date of meeting proposal considered	Committee Action	Notes
Chapter 1 ADMINISTRATION PROVISIONS				
IS-OSMTH 01-01-25	101.1	01/14/26	D	
IS-OSMTH 01-02-25	101.2	01/07/26 12/10/25	Q1: AM Q2: D	Question split
IS-OSMTH 01-03-25	101.2	01/28/26	D	
IS-OSMTH 01-04-25	101.2	12/17/25	Q1: AM Q2: D Q3: D Q4: AS Q5: AS	Question split
IS-OSMTH 01-05-25	101.4	12/17/25	AS	
IS-OSMTH 01-06-25	101.5	12/17/25	AS	
IS-OSMTH 01-07-25	102.1	01/14/26	AS	
IS-OSMTH 01-08-25	103, 103.1	12/10/25	AS	
IS-OSMTH 01-09-25	105	01/14/26	D	
Chapter 2 DEFINITIONS				
IS- OSMTH 02-01-25	202	12/10/25 03/25/26	AM D	Committee reconsidered 3/25/26
IS- OSMTH 02-02-25	202	01/14/26	D	
IS- OSMTH 02-03-25	202	03/25/26	AM	
IS- OSMTH 02-04-25	202	03/25/26	D	
IS- OSMTH 02-05-25	202	03/25/26	D	
IS- OSMTH 02-06-25	202	03/25/26	D	
IS- OSMTH 02-07-25	202	01/14/26	AM	
IS- OSMTH 02-08-25	202	01/14/26	D	
IS- OSMTH 02-09-25	202	01/14/26	D	
IS- OSMTH 02-10-25	202	01/14/26	D	
IS- OSMTH 02-11-25	202	01/14/26	D	
IS- OSMTH 02-12-25	202	01/21/26 01/21/26 01/28/26	Q1: D Q2: AS Q3: D	Question split into Q1, Q2 & Q3.
IS- OSMTH 02-13-25	202	01/28/26	AS	
IS- OSMTH 02-14-25	202	01/28/26	D	
IS- OSMTH 02-15-25	202	01/28/26		WITHDRAWN
IS- OSMTH 02-16-25	202	01/28/26	AS	
IS- OSMTH 02-17-25	202	01/28/26	AS	
IS- OSMTH 02-18-25	202	01/28/26	AS	
IS- OSMTH 02-19-25	202	01/28/26	AS	
IS- OSMTH 02-20-25	202	01/28/26	AS	
IS- OSMTH 02-21-25	202	01/28/26	D	
IS- OSMTH 02-22-25	202	01/28/26	D	
IS- OSMTH 02-23-25	202	02/04/26	AM	

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Proposal #	Section Number	Date of meeting proposal considered	Committee Action	Notes
IS- OSMTH 02-24-25	202	02/04/26		WITHDRAWN
IS- OSMTH 02-25-25	202	02/04/26	AS	
IS- OSMTH 02-26-25	202	02/04/26	AS	
IS- OSMTH 02-27-25	202	02/04/26	AM	
IS- OSMTH 02-28-25	202	02/04/26	D	
Chapter 3 DESIGN				
IS-OSMTH 03-01-25	301.1	02/18/26	AS	
IS-OSMTH 03-02-25	301.2	02/18/26	AS	
IS-OSMTH 03-03-25	301.4	02/18/26	AS	
IS-OSMTH 03-04-25	301.4	02/18/26	D	
IS-OSMTH 03-05-25	301.4	02/18/26	D	
IS-OSMTH 03-06-25	301.4	02/18/26		WITHDRAWN
IS-OSMTH 03-07-25	302.3	02/18/26	AS	
IS-OSMTH 03-08-25	302.3	03/18/26	AM	
IS-OSMTH 03-09-25	303.2	02/18/26	AS	
IS-OSMTH 03-10-25	303.3, 304.3, 305.3, 306.3	02/18/26 04/01/26	AS AM	Committee reconsidered 4/1/26
IS-OSMTH 03-11-25	New 303.4, 303.4.1, 303.4.2, 303.4.3, 303.4.4, 303.4.5, 303.4.6	04/01/26	AM	
IS-OSMTH 03-12-25	305.4.5	05/06/26	AM	
IS-OSMTH 03-13-25	306.4.1	02/18/26	D	
IS-OSMTH 03-14-25	306.4.1	02/18/26		WITHDRAWN
IS-OSMTH 03-15-25	306.4.3	02/18/26	D	
IS-OSMTH 03-16-25	307.1, 307.2	02/18/26	AS	
IS-OSMTH 03-17-25	308.2	02/18/26	AS	
IS-OSMTH 03-18-25	308.2	02/18/26		WITHDRAWN
IS-OSMTH 03-19-25	308.3	02/18/26	AS	
IS-OSMTH 03-20-25	308.4	02/18/26	AS	
IS-OSMTH 03-21-25	308.4.1	02/18/26	D	
IS-OSMTH 03-22-25	new 308.4.5	05/20/26	AM	
IS-OSMTH 03-23-25	308.5.2	02/25/26	AM	
IS-OSMTH 03-24-25	308.5.3	02/25/26	AM	
IS-OSMTH 03-25-25	308.8.1	02/25/26	AS	
IS-OSMTH 03-26-25	308.8.2, 308.8.3			Moved to end of agenda
IS-OSMTH 03-27-25	308	02/25/26	AS	
IS-OSMTH 03-28-25	308.7	02/25/26	D	
IS-OSMTH 03-29-25	Table 308-1	03/25/26	AM	
IS-OSMTH 03-30-25	308.8 figs			Figures 308.8-1,2,3,4 to WG2 Kelly Cobeen assist
IS-OSMTH 03-31-25	309.1	03/04/26	AS	
IS-OSMTH 03-32-25	309	07/29/26	AM	
IS-OSMTH 03-33-25	309.1, new 309.1.1, 309.1.2, 309.1.3, 309.2 thru 309.2.1.5	07/29/26	AM	
IS-OSMTH 03-34-25	309.1	03/04/26	D	
IS-OSMTH 03-35-25	309.1	07/29/26	D	

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Proposal #	Section Number	Date of meeting proposal considered	Committee Action	Notes
IS-OSMTH 03-36-25	310.1.1	03/04/26	AS	
IS-OSMTH 03-37-25	310.1.3	03/04/26	AM	
IS-OSMTH 03-38-25	310.1.5	05/20/26	D	
IS-OSMTH 03-39-25	310.1.5	05/20/26	AM	
IS-OSMTH 03-40-25	310	07/29/26	AM	
IS-OSMTH 03-41-25	310.1, 310.1.1, 310.1.2	07/29/26	D	
IS-OSMTH 03-42-25	310.1.3	03/04/26	D	
IS-OSMTH 03-43-25	310.1.3	03/04/26	D	
IS-OSMTH 03-44-25	310	07/29/26	AS	
IS-OSMTH 03-45-25	Tables 310.1.2-1,	01/07/26 07/29/26	Q1: AS Q2: AS	Split questions for each table.
	310.1.2-2	01/07/26 07/29/26 01/07/26	Q1: AS Q2: AM Q3: AS	
IS-OSMTH 03-46-25	Table 310.1.2-2	03/04/26	D	
Chapter 7 TRANSPORTATION AND STORAGE				
IS-OSMTH 07-01-25	701.1, 701.2, new 701.2.1			To WG 3
IS-OSMTH 07-02-25	701.1, 701.2	3/11/26	AM	
IS-OSMTH 07-03-25	701.1		D	
IS-OSMTH 07-04-25	701.1	7/29/26	AS	
IS-OSMTH 07-05-25	701.2	3/11/26		WITHDRAWN
IS-OSMTH 07-06-25	701.2	3/11/26	D	
IS-OSMTH 07-07-25	702.1	7/29/26	AS	
IS-OSMTH 07-08-25	New 702.2, 702.2.1, 702.3, 702.4, 702.4.1, 702.5, 702.6			To WG3 3/11/26
IS-OSMTH 07-09-25	702.1	7/29/26	D	
IS-OSMTH 07-10-25	703	3/11/26	D	
IS-OSMTH 07-11-25	703.1	3/25/26		WITHDRAWN
IS-OSMTH 07-12-25	703.1	3/25/26	AM	
IS-OSMTH 07-13-25	703.1, new 703.2	7/29/26	D	
IS-OSMTH 07-14-25	703.1.2	3/25/26	D	
Chapter 8 ON-SITE INSTALLATION				
IS-OSMTH 08-01-25	801, 802	05/06/26 04/01/26	Q1: AM Q2: AM	Question split 3/11/26 Q1 moved to WG3
IS-OSMTH 08-02-25	801.1			4/1/26 Tabled until Jeff M reports
IS-OSMTH 08-03-25	801.2	05/06/26	D	

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[illegible]

Revisions to the text are in legislative format – strikeout of what is to be removed, and underlined for new. Revised highlighted text in the proposals indicates the changes that were modified by the committee.

Staff notes located in this document after a proponent's reason are provided to indicate proposals that may require coordination; technical information; or terminology that is not good code language (e.g. “may” or “guarantee”, the use of “when” where the use is not a function of time). Staff notes are provided to assist the committee or proponent for possible modification. It is not intended to provide an opinion.

Chapter 1 ADMINISTRATION PROVISIONS

IS-OSMTH 01-01-25 ICC 1215 Section 101.1

Proponent: Janet Thome, Tiny House Alliance USA

Revise as follows:

101.1 Purpose. The purpose of the standard is to establish minimum requirements for tiny houses to provide a reasonable level of safety, health and general welfare through affordability, structural strength, means of egress, stability, sanitation, light and ventilation, energy conservation, chassis provisions and safety to life and property from fire and other hazards and to provide a reasonable level of safety for fire fighters and emergency responders during emergency operations.

Reason: Chassis provisions were the main intent of the standard for tiny houses.

Staff note:

Committee Action: Disapproved unanimous

Committee Reason: Not needed in 101.1 because the elements of the chassis is described elsewhere in the standard.

IS-OSMTH 01-02-25

ICC 1215 Section 101.2

Proponent: Jay Crandell, Consultant

Revise as follows:

101.2 Scope. The provisions of this standard shall apply to the construction, alteration, movement, ~~enlargement~~, replacement, repair, equipment, use and occupancy location, removal and demolition of tiny houses ~~and small residential units (SRUs)~~. Tiny houses and SRUs shall conform to the requirements of the International Residential Code, except as modified by this standard.

101.2.1 Limitations of Scope. Where an enlargement of an existing dwelling unit or a multi-module dwelling unit ~~originally complying with this standard~~ exceeds the defined floor area limits of a SMALL RESIDENTIAL UNIT or TINY HOME, as applicable to the original dwelling unit's compliance with this standard, the resulting structure shall comply with the IRC.

12/10/25: Committee split question unanimously:

Q1: ~~enlargement~~,

Committee Action: Approved as modified unanimous 1/7/26

Committee Reason: Ensures that enlargement remains within the scope of the standard.

Staff note: Add definition of enlargement in 202?, or where enlargements occur, the limitations shall be within the scope of this standard? Tabled until 01/07/26 meeting.

Q2: ~~and small residential units (SRUs)~~

Committee Action: Disapproved unanimous

Committee Reason: Committee stands on previous decision to include SRUs.

Reason: There is no limit provided for “enlargement” and this is the only place the term is used. So, something that started as a tiny or small home can evidently be enlarged an unlimited amount to the extent that it should clearly not fall within the scope of this standard. The standard should address tiny homes only and avoid the allowance to grow into something much larger and skirt compliance with appropriate codes (e.g., IRC, etc.).

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In Section 202 a small residential unit (SRU) is defined as a dwelling unit that is 1,200 square feet or less. This size dwelling unit is already sufficiently addressed in the IRC (including site built and modular) and also the HUD code for manufactured housing. I've lived in both a modular home of 900 sqft and a site built home of 1,100 sqft.

They were affordable and decent homes adequately covered by existing codes and standards. It is unclear why they would also need to be included in this otherwise "tiny home" standard. It is also unclear how including "small homes" would avoid confusion regarding the scope and applicability of existing codes (IRC and HUD code). For site-built construction, do-it-yourself or otherwise, homes larger than "tiny homes" (400 sqft) are already adequately and affordably addressed by the IRC. At a minimum this standard should be limited in scope to those sizes of buildings and needs that are not already adequately addressed by the IRC and HUD code.

This aligns with the size limit indicated for a tiny home (400 sqft). If the intent is to formalize certification, inspection, and transportation of off-site modular construction in the form of an "SRU", a separate standard should be considered for that purpose and in every respect (other than perhaps certification, inspection, and transportation) the home should comply with the IRC and not conflict with the HUD code.

IS-OSMTH 01-03-25 ICC 1215 Section 101.2

Proponent: Janet Thome, Tiny House Alliance USA

Revise as follows:

101.2 Scope. The provisions of this standard shall apply to the construction, alteration, ~~movement~~ transportation, enlargement, replacement, repair, equipment, use and occupancy location, removal and demolition of tiny houses and-small residential units (SRUs). ~~Tiny houses and SRUs shall conform to~~ The tiny house structure shall comply with the requirements of the International Residential Code, except as modified by this standard.

Reason: The standard cannot lump the structure and chassis under the same compliance. The IRC does not address the chassis and the entire purpose of the standard was to add chassis provisions.

The verbiage as written would redefine and override existing federal and state laws governing motor vehicles, including trailers. By omitting all reference to the federal framework that regulates the design, manufacture, labeling, and certification of trailers under the **National Traffic and Motor Vehicle Safety Act (49 U.S.C. 30101 et seq.)**, the standard creates a dangerous and unlawful regulatory gap.

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The standard as written would disregard the Motor Vehicle Safety Act's purpose—to ensure the safety, identification, and lawful operation of motor vehicles in interstate commerce—and replace it with a privately created standard that nullifies federal oversight. This omission undermines decades of established motor vehicle regulation and threatens both public safety and regulatory integrity.

Staff note:

Committee Action: Disapproved unanimous

Committee Reason:

IS-OSMTH 01-04-25

ICC 1215 Section 101.2

Proponent: Jeffrey Munstersteiger, National Association of Home Builders (NAHB)

Revise as follows:

101.2 Scope. The provisions of this standard shall apply to the construction, alteration, movement, enlargement, ~~replacement~~, repair, equipment, and use and occupancy ~~location, removal and demolition~~ of tiny houses and small residential units (SRUs). Tiny houses and SRUs shall conform to the requirements of the International Residential Code, except as modified by this standard.

Reason: The standard doesn't have provisions addressing demolition, removal or specific siting requirements, therefore these terms are proposed to be removed.

Staff note: Five-way question split committee approved 12/17/25:

Committee Action:

Q1: ~~replacement~~ Approve deletion (as modified), unanimous

Q2: ~~repair~~ Disapproved, term will remain, unanimous

Q3: ~~location~~ Disapproved, term will remain, unanimous

Q4: ~~removal~~ Approved as submitted, unanimous

Q5: ~~demolition~~ Approved as submitted, unanimous

IS-OSMTH 01-05-25

ICC 1215 Section 101.4

Proponent: Jeffrey Munstersteiger, National Association of Home Builders (NAHB)

Revise as follows:

101.4 Compliance alternative. ~~Nothing in this standard is intended to prevent the use of designs, technologies or products as alternatives to any prescriptions in this standard, provided equivalence is demonstrated and approved by the AHJ. Listed and labeled components shall be installed in accordance with its listing, the manufacturer's installation instructions, and the applicable requirements of the construction codes adopted by the AHJ.~~

The provisions of this standard are not intended to prevent the installation of any material or to prohibit any design or method of construction not specifically prescribed by this standard, provided that any such alternative has been approved by the AHJ in accordance with R104.2.2 of the IRC.

Reason: This paragraph should be more closely aligned with that of the IRC. A reference to R104.2.2 of the IRC is added as a pointer that the alternate materials, design and methods of construction and equipment provisions must be followed.

Staff note:

Committee Action: Approved as submitted unanimous

IS-OSMTH 01-06-25

ICC 1215 Section 101.5

Proponent: Jeffrey Munstersteiger, National Association of Home Builders (NAHB)

Revise as follows:

101.5 Referenced standards. ~~The specific year, date and editions of the standards referenced by this standard are listed in Chapter 9.~~

Where this standard or a referenced standard requires equipment, materials, products or services to be listed and a listing standard is specified, the listing shall be based on the specified standard. Where a listing standard is not specified, the listing shall be based on an approved listing criteria. Listings shall be germane to the provision requiring the listing. Installation shall be in accordance with the listing and the manufacturer's instructions, and where required to verify compliance, the listing standard and manufacturer's instructions shall be made available to the AHJ.

Reason: This paragraph should be more closely aligned with that of the IRC. This text is copied from the 2024 IRC and is the best practice for referencing standards from within this standard.

Staff note:

Committee Action: Approved as submitted unanimous

IS-OSMTH 01-07-25

ICC 1215 Section 102.1

Proponent: Jeffrey Munstersteiger, National Association of Home Builders (NAHB)

Revise as follows:

102.1 General. The construction of small residential units and tiny houses shall comply with the general requirements of this standard and the applicable provisions of the construction codes adopted by the AHJ.

Where a tiny house or small residential unit is occupied or installed in a jurisdiction other than where it is constructed it shall comply with the structural design, energy conservation and occupancy provisions of the jurisdiction of its installation, and its installation shall be approved by the AHJ.

Reason: This clarification needs to be made early where it applies to the entire standard. Adding it here in this proposal for this reason.

Staff note: Committee to consider at the 1/14/26 meeting. Also see 02-25-25

Committee Action: Approved as submitted unanimous

IS-OSMTH 01-08-25

ICC 1215 Section 103, 103.1

Proponent: Shane Nilles, Self

Revise as follows:

SECTION 103

SUBMITTAL CONSTRUCTION DOCUMENTS

103.1 General requirements. The ~~submittal~~ construction documents shall meet the following requirements:

1. ~~The submittal documents shall address~~ The construction documents shall be of sufficient clarity to indicate the location, nature and extent of the work proposed and show in detail that it will conform to the provisions of this standard and the requirements of the AHJ regarding small residential units.
2. ~~The AHJ responsible for approval of submittal~~ construction documents shall clearly delineate ~~determine where delineation of~~ off-site construction components from site-built components ~~in a set of construction documents or design package is where required by the AHJ.~~

Reason: "Submittal documents" is not defined, whereas "construction documents" is. There is no current language that says that the construction documents must show compliance with this standard so item 1 is revised to include such language.

Item 2 is revised editorially for clarity that the delineation must be clearly shown where required by the AHJ.

Staff note:

Committee Action: **Approved as submitted** unanimous

IS-OSMTH 01-09-25

ICC 1215 Section 105

Proponent: Janet Thome, Tiny House Alliance USA

Revise as follows:

~~SECTION 105—~~ ~~COMPLIANCE DOCUMENTATION~~

~~**105.1 General.** The AHJ or an approved third-party inspector shall determine that the construction is compliant with the approved design documents and this standard through one of the following:~~

-
- ~~a. An approved certification label for structures subject to a state-wide construction program or,~~
 - ~~b. Approved forms for structures not subject to state-wide construction programs and shall include a data plate as described in Appendix B of this standard and records of approved inspections by the AHJ or an approved third-party inspection agency.~~

Reason: This section cannot be written because this standard would violate ICC policy by overriding federal laws.

Staff note:

Committee Action: Disapproved unanimous

Committee Reason: Essential to have this for the certifications and App B.

Chapter 2 DEFINITIONS

IS-OSMTH 02-01-25

ICC 1215 Section 202 Definitions

Proponent: Brad Wiseman, Tiny Home Industry Association

Revise as follows:

CHASSIS. The entire transportation system comprising of the drawbar and coupling mechanism, running gear assembly (wheels, tires, axles, brakes and suspension) and may include running and lights and/or an integral frame.

INTEGRAL CHASSIS. A chassis that is designed to be a permanent component of the building and provides all or part of the structural floor system.

INTEGRAL FRAME. The portion of the **INTEGRAL CHASSIS** that is a permanent structural element of the floor system of the building.

Reason:

"running lights", not "running and lights".

The definition of INTEGRAL FRAME is necessary to identify the portion of the INTEGRAL CHASSIS that is a permanent structural element of the floor system of the building. (The other elements of the INTEGRAL CHASSIS play no role as structural elements of the building installed on site.)

Staff note: 3/25/26 motion to reconsider and disapproved based on committee action on 02-03-26

Committee Action: Approved as modified unanimous

Committee Reason: Makes clear that the definition pertains to the chassis.

Committee Action 3/25/26 : Disapproved unanimous

Committee Reason: Based on committee action on 02-03-25.

IS-OSMTH 02-02-25

ICC 1215 Section 202 Definitions

Proponent: Janet Thome, Tiny House Alliance USA

Revise as follows:

CHASSIS. ~~The entire transportation system comprising of the drawbar and coupling mechanism, running gear assembly (wheels, tires, axles, brakes and suspension) and may include running and lights and/or an integral frame. The load-supporting frame of a commercial motor vehicle, exclusive of any appurtenances which might be added to accommodate cargo.~~

Reason: The standard is avoiding the motor vehicle definition and using a definition for the chassis primarily from the HUD code, which is not appropriate because the standard is beyond the scope of manufactured homes and they cannot override federal definitions.

The accurate definition is a federal definition codified into law- 49 CFR 393.5 which a standard or code cannot supersede.

Staff note:

Committee Action: Disapproved unanimous

Committee Reason: Based on previous committee action

IS-OSMTH 02-03-25

ICC 1215 Section 202 Definitions

Proponent: Mike Spooner, Self

Revise as follows:

CHASSIS. The entire transportation system comprising of the frame (main beams and crossmembers), drawbar and coupling mechanism, running gear assembly (wheels, tires, axles, brakes and suspension) and ~~may include running and lights and/or an~~ integral frame.

Reason: The house itself may or may not include an integral frame, but the chassis itself always does. I think we need a bit more clarity on “integral frame” vs. “integral chassis”. I agree with the definition of integral chassis here and I think that we should replace references to “integral frame” in the rest of the document with “integral chassis”. I believe this may have been the intention as there is no definition of “integral frame” in this section.

If “integral frame” is kept, it should be defined separately. I’ve included a suggested definition below:

INTEGRAL FRAME. The part of an INTEGRAL CHASSIS consisting of the main beams, crossmembers, and any other structural framing.

WG1 Recommendation

CHASSIS. The entire transportation and framing system comprised~~ing~~ of the drawbar and coupling mechanism, running gear assembly (wheels, tires, axles, brakes and suspension) which may be fully incorporated into the structure and may include running lights ~~and/or an integral frame~~.

~~**INTEGRAL CHASSIS.** A chassis designed to be a permanent component of the building and provides all or part of the structural floor system.~~

~~**INTEGRAL FRAME.** The portion of the CHASSIS that is a permanent structural element of the floor system of the building.~~

SMALL RESIDENTIAL UNIT (SRU). A dwelling unit that is 600 square feet or less constructed as a permanent residential structure with ~~or without an INTEGRAL~~ a CHASSIS ~~system~~.

TINY HOUSE. A SMALL RESIDENTIAL UNIT 400 square feet or less with ~~or without an INTEGRAL~~ a CHASSIS ~~system~~.

Staff note: 02-01-25, 02-03-25 thru 02-06-25 to WG1 for discussion. 1/14/26

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See 3/25/26 WG1 recommendation from Josh H.

Committee Action: Approved as modified unanimous

Committee Reason: Represents a simplification

IS-OSMTH 02-04-25 ICC 1215 Section 202 Definitions

Proponent: Macy Miller, Self

Revise as follows:

CHASSIS. The entire transportation system compriseding of the drawbar and coupling mechanism, running gear assembly (wheels, tires, axles, brakes and suspension) and may include running and lights and/or an integral frame. and chassis frame that is an integral part of the Relocatable Residential Unit or Relocatable Tiny House structure.

~~**INTEGRAL CHASSIS.** A chassis that is designed to be a permanent component of the building and provides all or part of the structural floor system.~~

Reason: Integral chassis are the only wheels needing addressed in building code because they are an integral piece of the structure. Other chassis or carrier systems are just that, and do not need to be addressed in building code.

Staff note: 02-01-25, 02-03-25 thru 02-06-25 to WG1 for discussion. 1/14/26

Committee Action: Disapproved unanimous

Committee Reason: Based on previous action on 02-03-25

IS-OSMTH 02-05-25

ICC 1215 Section 202 Definitions

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

Revise as follows:

CHASSIS. The entire transportation system comprising of the drawbar and coupling mechanism, running gear assembly (wheels, tires, axles, brakes and suspension) and may include running ~~and~~ lights and/or an integral frame.

INTEGRAL CHASSIS. ~~A chassis that is designed to be a permanent component of the building and provides all or part of the structural floor system.~~

A chassis or frame system that is used to transport a tiny house or SRU to its destination and remains a permanent part of the unit after its installation. An integral chassis may be fully incorporated into the floor system or may support a floor system above it, or a combination of both.

Reason: Definition is being improved for clarity in the application of the standard. There is no ordinarily accepted meaning of an integral chassis that is applicable to the application of this standard. There was significant discussion about chassis following the first round of comments. I believe that this definition brings together many of the comments and challenges with chassis in the standard.

Staff note: 02-01-25, 02-03-25 thru 02-06-25 to WG1 for discussion. 1/14/26

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Committee Action: Disapproved unanimous

Committee Reason: Based on previous action on 02-03-25

IS-OSMTH 02-06-25 ICC 1215 Section 202 Definitions

Proponent: Vera Struck, self

Revise as follows:

CHASSIS. The entire transportation system comprising of the drawbar and coupling mechanism, running gear assembly (wheels, tires, axles, brakes and suspension) and may include running ~~and~~ lights and/or an integral frame.

~~**INTEGRAL CHASSIS.** A chassis that is designed to be a permanent component of the building and provides all or part of the structural floor system.~~

A chassis that is designed to be a permanent component of the building and provides all or part of the structural floor system.

Reason: Integral chassis are the only wheels needing addressing in building code because they are an integral piece of the structure. Other chassis or carrier systems are just that, and do not need to be addressed in building code.

Staff note: 02-01-25, 02-03-25 thru 02-06-25 to WG1 for discussion. 1/14/26

Committee Action: Disapproved unanimous

Committee Reason: Based on previous action on 02-03-25

IS-OSMTH 02-07-25

ICC 1215 Section 202 Definitions

Proponent: Brad Wiseman, Tiny Home Industry Association

Revise as follows:

SMALL RESIDENTIAL UNIT (SRU). A dwelling unit that is 1,200 square feet or less constructed as a permanent residential structure with or without a ~~PERMANENT~~ permanent **CHASSIS** system.

TINY HOUSE. A **SMALL RESIDENTIAL UNIT** 400 square feet or less with or without a ~~PERMANENT~~ permanent **CHASSIS** system.

Modification:

SMALL RESIDENTIAL UNIT (SRU). A dwelling unit that is 1,200 square feet or less constructed as a permanent residential structure with or without an **INTEGRAL CHASSIS**.

TINY HOUSE. A **SMALL RESIDENTIAL UNIT** 400 square feet or less excluding loft areas with or without an **INTEGRAL CHASSIS**.

Reason:

PERMANENT CHASSIS is not a defined term, but CHASSIS is. The word, permanent, is used in a generic sense, so the correct way to write it is "permanent CHASSIS."

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As it relates to "permanent CHASSIS", the word, system, is superfluous and should be removed.

Staff note:

Committee Action: Approved as modified

Committee Reason: Language is clearer and to be more consistent with IRC definition with respect to lofts.

IS-OSMTH 02-08-25 ICC 1215 Section 202 Definitions

Proponent: Janet Thome, Tiny House Alliance USA

Revise as follows:

TINY HOUSE. ~~A SMALL RESIDENTIAL UNIT 400 square feet or less with or without a PERMANENT CHASSIS system.~~ A dwelling that is 400 square feet or less in floor area, excluding lofts, with or without a chassis.

Reason: The Small Residential Unit hijacked the tiny house standard and there is no need for the term. Adding the chassis takes the standard back to the original intent of the standard and need of the tiny house industry.

The term tiny house does not need to be a subcategory under the SRU because it's arbitrary and unconstitutional.

Staff note:

Committee Action: Disapproved unanimous

Committee Reason: Based on previous committee action on 02-07-25

IS-OSMTH 02-09-25

ICC 1215 Section 202 Definitions

Proponent: Kaylee DeGrace, self

Revise as follows:

TINY HOUSE. A **SMALL RESIDENTIAL UNIT** 400 square feet or less with or without an ~~PERMANENT~~ INTEGRAL CHASSIS system.

Reason: Maintains consistency with other definitions, providing clarity. The integral chassis definition also includes the quality of permanence, so nothing is lost.

Staff note:

Committee Action: **Disapproved** unanimous

Committee Reason: Based on previous committee action on 02-07-25

IS-OSMTH 02-10-25

ICC 1215 Section 202 Definitions

Proponent: Janet Thome, Tiny House Alliance USA

Revise as follows:

SMALL RESIDENTIAL UNIT (SRU). ~~A dwelling unit that is 1,200 square feet or less constructed as a permanent residential structure with or without a~~ **PERMANENT CHASSIS** ~~system.~~

Reason: The term Small Residential is arbitrary and unconstitutional. It lacks a rational basis.

The Small Residential Unit (SRU) is a term that is not enforceable, not currently recognized by HUD, building officials, architects, engineers, designers, builders, loan officers, insurance agents, legislators, city council members, planning departments, code enforcement, testing labs, third party agencies, manufacturers of products, NHTSA, DOT, consumers, police officers, and firefighters to name only a few organizations and types of industries that the term Small Residential Unit could affect if the standard remains with the focus of the Small Residential Unit.

Staff note:

Committee Action: Disapproved unanimous

Committee Reason: Based on previous committee action on 02-07-25

IS-OSMTH 02-11-25

ICC 1215 Section 202 Definitions

Proponent: Mike Spooner, Self

Revise as follows:

SMALL RESIDENTIAL UNIT (SRU). A dwelling unit that is 1,200 square feet or less constructed as a permanent residential structure with or without a ~~PERMANENT~~ an INTEGRAL CHASSIS system.

TINY HOUSE. A **SMALL RESIDENTIAL UNIT** 400 square feet or less with or without a ~~PERMANENT~~ an INTEGRAL CHASSIS system.

Reason: “Permanent Chassis” should be changed to “Integral Chassis” to match the updated terminology.

Staff note:

Committee Action: Disapproved unanimous

Committee Reason: Based on previous committee action on 02-07-25

IS-OSMTH 02-12-25

ICC 1215 Section 202 Definitions

Proponent: Macy Miller, Self

Revise as follows:

Q1: - ~~SMALL RELOCATABLE RESIDENTIAL UNIT (SRRU).~~ [Q2: A dwelling unit that is 4,200 600 square feet or less] constructed as a permanent residential structure with or without an ~~PERMANENT INTEGRAL CHASSIS~~ system.

SMALL RESIDENTIAL UNIT (SRU). A dwelling unit that is 600 square feet or less constructed as a permanent residential structure with or without a **PERMANENT CHASSIS** system.

Staff note: Tabled to 1/21/26 meeting. Question split into two questions 1/21/26.
Off table on 1/28/26 split to third question.

Committee Action Q1: Disapproved 8-3

Committee Reason Q1:

Committee Action Q2: Approved as submitted 9-2-1

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Q3:

RELOCATABLE TINY HOUSE. ~~A **SMALL RESIDENTIAL UNIT** 400-square feet or less with or without a **PERMANENT CHASSIS** system.~~ A tiny house that is anchored to an **INTEGRAL CHASSIS** that can be **INSTALLED** in a jurisdiction. Also known as a tiny house on wheels or a movable tiny house.

Committee Action Q3: Disapproved unanimous

Committee Reason:

Reason: Because SRU doesn't make sense, the unique aspect isn't the size of the structure, it's the fact it exists on a chassis and is relocatable. A relocatable tiny house is unique from other relocatable structures because they are granted exemptions based on their size limitation.

Staff note Q3: Tabled to 1/28/26 meeting. Q3 motion on floor is to disapprove, Chase 1st, Josh 2nd.

IS-OSMTH 02-13-25 ICC 1215 Section 202 Definitions

Proponent: Brad Wiseman, Tiny Home Industry Association

Revise as follows:

EGRESS ROOF ACCESS WINDOW. A *skylight* or roof window designed and installed to satisfy the *emergency escape and rescue opening* requirements of IRC Section R319.2.

LANDING PLATFORM. A landing provided as the top step of a *stairway* accessing a *loft*.

LOFT. A floor level located more than 30 inches (762 mm) above the main floor, open to the main floor on one or more sides with a *ceiling height* of less than 6 feet 8 inches (2032 mm) and used as a living or sleeping space.

Reason:

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Need these definitions to support adding provisions from 2024 IRC Appendix BB.

Staff note:

Committee Action: Approved as submitted unanimous

IS-OSMTH 02-14-25 ICC 1215 Section 202 Definitions

Proponent: Janet Thome, Tiny House Alliance USA

Revise as follows:

THIRD-PARTY INSPECTION AGENCY. An approved entity determined by this standard, administrative rules, or applicable states statutory requirements to be qualified by reason of facilities, personnel, experience, demonstrated reliability, and independence of judgment to inspect **SMALL RESIDENTIAL UNITS**, and panelized components for compliance with the **CONSTRUCTION DOCUMENTS, COMPLIANCE CONTROL PROGRAM**, and applicable codes.

Reason: Requirements for third parties are also determined by administrative rule making.

Staff note:

Committee Action: **Disapproved** unanimous

Committee Reason:

IS-OSMTH 02-15-25

ICC 1215 Section 202 Definitions

Proponent: Janet Thome, Tiny House Alliance USA

Revise as follows:

THIRD-PARTY INSPECTOR. An approved person determined by administrative rules or applicable statutory requirements to be qualified by reason of experience, demonstrated reliability, and independence of judgment to inspect **SMALL RESIDENTIAL UNITS**, building and ~~portions~~ portions thereof, for compliance with the construction documents, **COMPLIANCE CONTROL PROGRAM**, and applicable building code. A third-party inspector may work under the direction of a **THIRD-PARTY INSPECTION AGENCY**.

Reason: Third party qualifications are also determined by administrative rules.

Staff note: Editorial typo

Committee Action: **WITHDRAWN** by proponent

IS-OSMTH 02-16-25

ICC 1215 Section 202 Definitions

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

Revise as follows:

DEAD LOADS. The weight of the materials of construction incorporated into the building, including but not limited to walls, floors, roofs, ceilings, stairways, built-in partitions, finishes, cladding, and other similarly incorporated architectural and structural items, and fixed service equipment.

Reason: Definition is being added because of proposed change in section 302. This definition is copied from the IRC definition of the same. It is necessary because there is no ordinarily accepted meaning of dead load that is acceptable to the use of this standard. A partial description of dead load was provided in section 308.5.3, but it is better to use the IRC definition to avoid potential conflicts.

Staff note: “but not limited to” deleted as editorial

Committee Action: **Approved as submitted** unanimous

IS-OSMTH 02-17-25

ICC 1215 Section 202 Definitions

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

Revise as follows:

FIRE SEPARATION DISTANCE. The distance measured at a right angle from the tiny house or SRU exterior wall face to one of the following:

1. To the closest interior lot line.
2. To the centerline of a street, an alley or public way.
3. To an imaginary line between two buildings or townhouse units on the lot.

Reason: Definition is being added because of proposed change in section 302. This definition is modeled from the IRC definition of the same. It is necessary because there is no ordinarily accepted meaning of fire separation distance that is acceptable to the use of this standard.

Staff note:

Committee Action: Approved as submitted unanimous

IS-OSMTH 02-18-25

ICC 1215 Section 202 Definitions

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

Revise as follows:

FUEL GAS. A natural gas, manufactured gas, liquified petroleum gas or a mixture of these. Most fuel gases are composed of hydrocarbons and, under ordinary conditions, are gaseous.

Reason: Definition added due to changes proposed to section 303. There is no ordinarily accepted meaning of fuel gas appropriate to the application of this standard.

Staff note: Most fuel gases are composed of hydrocarbons and, under ordinary conditions, are gaseous.

Removed as commentary by staff

Committee Action: **Approved as submitted** unanimous

IS-OSMTH 02-19-25

ICC 1215 Section 202 Definitions

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

Revise as follows:

LABELED. Equipment, materials or products to which have been affixed a label, seal, symbol or other identifying mark of a nationally recognized testing laboratory, approved agency or other organization concerned with product evaluation that maintains periodic inspection of the production of such labeled items and whose labeling indicates either that the equipment, material or product meets identified standards or has been tested and found suitable for a specified purpose.

Reason: The term labeled is used throughout the standard, and does not carry an ordinarily accepted meaning acceptable to its application. This version is copied from the IRC.

Staff note:

Committee Action: **Approved as submitted** unanimous

IS-OSMTH 02-20-25

ICC 1215 Section 202 Definitions

Proponent: Jeffrey Munstersteiger, National Association of Home Builders (NAHB)

Revise as follows:

LISTED. Equipment, materials, products or services included in a list published by an organization acceptable to the code official and concerned with evaluation of products or services that maintains periodic inspection of production of listed equipment or materials or periodic evaluation of services and whose listing states either that the equipment, material, product or service meets identified standards or has been tested and found suitable for a specified purpose. Terms that are used to identify listed equipment, products or materials include “listed,” “certified,” “classified” or other terms as determined appropriate by the listing organization.

Reason: The term listed is used throughout the standard, and does not carry an ordinarily accepted meaning acceptable to its application. This version is copied from the IRC.

Staff note:

Committee Action: **Approved as submitted** unanimous

IS-OSMTH 02-21-25

ICC 1215 Section 202 Definitions

Proponent: Kaylee DeGrace, self

Revise as follows:

BUILDER. The individual or entity responsible for construction of the building and recognized by the Authority Having Jurisdiction as having the authority to do so or the owner-occupant.

Reason: Owner-builders should not need permission from the AHJ to build their own home.

Staff note:

Committee Action: **Disapproved** unanimous

Committee Reason: The definition is adequate.

IS-OSMTH 02-22-25

ICC 1215 Section 202 Definitions

Proponent: Kaylee DeGrace, self

Revise as follows:

~~PERMANENT FOUNDATION SYSTEM~~. A foundation system for **SMALL RESIDENTIAL UNITS** designed to meet the applicable building code to accommodate all loads and transmitting resulting loads to the supporting soil.

Reason: Whether it is permanent or temporary is irrelevant as long as it transmits the loads. This is especially critical for movable tiny houses with a chassis.

Staff note: Does definition exist within the document? Look in standard to check. Tabled until staff can verify or foundation systems is discussed. 1/28/26. Likely to come off table at the end of chapter 3.
1/28/26: Jeff M, Chase B, motion to disapprove, IRC does not address this and would add ambiguity.

Committee Action: Disapproved 7-2

Committee Reason: Maintains consistency with the scope of the standard to address Permanent Residential Dwellings

IS-OSMTH 02-23-25

ICC 1215 Section 202 Definitions

Proponent: Mike Spooner, self

Revise as follows:

PERMANENT FOUNDATION SYSTEM. A foundation system for **SMALL RESIDENTIAL UNITS** designed to meet the applicable building code to accommodate all loads and transmitting resulting and transmit all loads to the supporting soil.

Reason: The definition was grammatically awkward and could be simplified. Alternatively, the term may be removed altogether since it is not used anywhere in the document and the word “permanent” may cause confusion.

Staff note: Strike entire definition

Committee Action: **Approved as modified** unanimous

Committee Reason: Definition does not appear in the body of the text.

IS-OSMTH 02-24-25

ICC 1215 Section 202 Definitions

Proponent: Macy Miller, Self

Revise as follows:

SECTION 202 DEFINITIONS

Abbreviations. The following abbreviations, when used in this standard, shall have the following meanings, unless the context clearly indicates otherwise.

- (1) AHJ – Authority having jurisdiction
- (2) APA—The Engineered Wood Association
- (3) ASTM – American Society for Testing and Materials
- (4) DOT – Department of Transportation
- (5) DRA—Design review agency
- (6) IBC – International Building Code
- (7) ICC – International Code Council, Inc.
- (8) IRC – International Residential Code
- (9) MBI – Modular Building Institute
- (10) NEC – National Electrical Code
- (11) NFPA--National Fire Protection Association
- (12) QA – Quality assurance
- (13) ~~SRU—Small residential unit~~ RRU – Relocateable residential unit
- (14) TPI—Third-party inspector
- (15) TPIA—Third-party inspection agency
- (16) RTH - Relocatable Tiny House

Reason: *Alternative* MTH - Movable Tiny House Reason: To bring language in alignment with comments proposed at PCH.

Staff note: WITHDRAWN by proponent 2/4/26

IS-OSMTH 02-25-25

ICC 1215 Section 202 Definitions

Proponent: Shane Nilles, self

Revise as follows:

AUTHORITY HAVING JURISDICTION (AHJ). Organization, political subdivision, office, building official or individual charged with the responsibility of administering and enforcing the provisions of the applicable building code of the jurisdiction where an SRU will be occupied including a state agency or local building department.

Reason: AHJ is used throughout but definition does not clarify what jurisdiction it refers to. Note: “where it will be occupied” is taken from section 310.1.

Staff note:

Committee Action: **Approved as submitted** unanimous

IS-OSMTH 02-26-25

ICC 1215 Section 202 Definitions

Proponent: Shane Nilles, self

Revise as follows:

GRADE PLANE. A reference plane representing the average of the finished ground level adjoining the building at all exterior walls. Where the finished ground level slopes away from the exterior walls, the reference plane shall be established by the lowest points within the area between the building and the lot line or, where the lot line is more than 6 feet from the building between the structure and a point 6 feet from the building.

Reason: Section 308.8.1 refers to “grade plane” but that is undefined in the standard so the definition needs to be added.

Staff note: Identical from IRC def. “shall” would imply a provision within def

Committee Action: **Approved as submitted** unanimous

IS-OSMTH 02-27-25

ICC 1215 Section 202 Definitions

Proponent: Macy Miller, self

Revise as follows:

INSTALLATION. ~~The assembly of a SMALL RESIDENTIAL UNIT , component or PANELIZED SYSTEM on site and the process of affixing the modular building, MODULAR COMPONENT or PANELIZED SYSTEM to land, a foundation, or an existing building.~~

INSTALLATION (INSTALLED) . The construction required for the fixed placement of a RRU SMALL RESIDENTIAL UNIT and RTH, including interconnections, the anchorage system and connections thereto, and to the water, fuel gas, electrical and sewage systems and connections thereto, that are required for occupancy.

Reason: Brings language in alignment with comments proposed at PCH.

Staff note: Editorial removal of ‘thereto, and connections thereto’

Committee Action: **Approved as modified** unanimous

Committee Reason:

IS-OSMTH 02-28-25

ICC 1215 Section 202 New Definitions

Proponent: Macy Miller, self

Revise as follows:

BODY LENGTH. The longest dimension of a RRU or RTH SMALL RESIDENTIAL UNIT, excluding drawbar and coupling mechanism, measured horizontally perpendicular to the axles.

BODY WIDTH. The widest dimension of an RRU or RTH SMALL RESIDENTIAL UNIT, excluding removable appendages, measured horizontally parallel to the axles.

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

HEIGHT, RELOCATABLE SMALL RESIDENTIAL UNIT. The vertical measurement of a RELOCATABLE SMALL RESIDENTIAL UNIT from the bottom of the wheels to the highest point of the roof or other permanent appendage.

Reason: Brings language in alignment with comments proposed at PCH.

Staff note: These definitions may be used again during further development.

Committee Action: **Disapproved** unanimous

Committee Reason:

Chapter 3 DESIGN

IS-OSMTH 03-01-25 ICC 1215 Section 301.1

Proponent: Shane Nilles, Self

Revise as follows:

301.1 Application. The design of small residential units ~~off-site construction~~ shall be in accordance with the provisions of the applicable codes and standards adopted by the AHJ. The requirements in this standard shall be in addition to the requirements of the applicable codes and standards.

Reason: Section 301.1 for design refers to "off-site construction", but it should apply to SRUs regardless as to whether it in off-site or on-site construction.

Staff note: Small Residential Units (editorial)

Committee Action: Approved as submitted unanimous

IS-OSMTH 03-02-25

ICC 1215 Section 301.2

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

Revise as follows:

~~301.2 Alternative materials, design and methods of construction and equipment.~~ The provisions of this standard are not intended to prevent the use of alternate materials and methods permitted by Section 104.11 of the IBC or Section R104.11 of the IRC.

Reason: This is already covered by section 101.4. The administrative provisions is the correct location for this requirement. Therefore, it's proposed to be deleted in this comment, and following sections renumbered accordingly.

Staff note:

Committee Action: **Approved as submitted** unanimous

IS-OSMTH 03-03-25

ICC 1215 Section 301.4

Proponent: Shane Nilles, Self

Revise as follows:

301.4 Tiny Houses. ~~Tiny houses shall comply with this standard and the locally adopted edition of the residential construction code.~~

Reason: Section 301.4 is no longer necessary with this correction as tiny homes are SRUs and the general section already requires compliance with the AHJ adopted codes.

Staff note:

Committee Action: **Approved as submitted** unanimous

IS-OSMTH 03-04-25

ICC 1215 Section 301.4

Proponent: Brad Wiseman, Tiny Home Industry Association

Revise as follows:

301.4 Tiny Houses. Tiny houses shall comply with this standard and the locally adopted edition of the ~~residential construction code~~ IRC.

Reason: Use proper references to the IRC (International Residential Code) and the IBC (International Building Code).

Staff note:

Committee Action: Disapproved 8-1

Committee Reason: Based on previous action on 03-03-25

IS-OSMTH 03-05-25

ICC 1215 Section 301.4

Proponent: Macy Miller, Self

Revise as follows:

301.4 Relocatable Tiny Houses. Relocatable Tiny houses shall comply with this standard and the locally adopted edition of the residential construction code.

Reason: Brings alignment.

Staff note:

Committee Action: **Disapproved** unanimous

Committee Reason: Based on previous action on 03-03-25

IS-OSMTH 03-06-25

ICC 1215 Section 301.4

Proponent: Mike Spooner, Self

Revise as follows:

301.4 Tiny Houses. Tiny houses built to this standard ~~shall comply with this standard~~ and shall also comply with the locally adopted edition of the residential construction code and Appendix BB.

Reason: The purpose of this subsection and why tiny houses are specifically called out seems unclear. I think this wording change helps to clarify the purpose, assuming I understood it correctly.

If Appendix BB would only apply if adopted, I suggest adding ", if adopted" after "Appendix BB".

Staff note: WITHDRAWN by proponent

IS-OSMTH 03-07-25

ICC 1215 Section 302.3

Proponents: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)
Shane Nilles, Self

Revise as follows:

~~302.3 Construction Documents.~~ ~~Construction documents shall be submitted to the AHJ.~~

Reason: Section 103 already controls submittal documents. This sentence provides nothing in addition to the section 103 text and therefore its proposed to be deleted here.

Nilles: 302.3 is not necessary as it is covered in chapter 1.

Staff note:

Committee Action: **Approved as submitted** unanimous

IS-OSMTH 03-08-25

ICC 1215 New Section 302.3

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

Revise as follows:

302.3 Exterior walls. Construction, projections, openings and penetrations of exterior walls of tiny houses and small residential units shall comply with IRC Table R302.1(1) based on fire separation distance; or tiny houses or small residential units equipped throughout with an automatic sprinkler system installed in accordance with IRC Section P2904 or NFPA 13D shall comply with IRC Table R302.1(2) based on fire separation distance. For the purposes of determining fire separation distance, tiny houses, small residential units dwellings, townhouses and accessory buildings on the same lot shall be assumed to have an imaginary line between them. Where a new tiny house or small residential unit is to be occupied, installed, erected or constructed on the same lot as an existing tiny house, small residential unit, dwelling, townhouse or accessory building, the location of the assumed imaginary line with relation to the existing tiny house, dwelling, townhouse accessory building shall be such that the existing tiny house, small residential unit, dwelling, townhouse or accessory building meets requirements of this section. Where a new tiny house or small residential unit is to be occupied, installed, erected or constructed on a lot adjacent to an existing tiny house, small residential unit, dwelling, townhouse or accessory building, the location of the new tiny house or small residential unit shall be located a minimum of 10-feet from the existing dwelling, townhouse or accessory building and it's projections. Nothing in this section prevents greater separation requirements as required by the AHJ.

Reason: This section is establishing separation requirements based on a fire separation distance similar to that of the IRC. Since tiny houses and SRU can be constructed on a chassis, and be somewhat mobile it is appropriate to modify the base separation requirements of the IRC. In the proposed text, separation of new tiny houses and SRU are required to be at least 10-feet from any existing structure on an adjacent lot. This is the same distance that would be required for two units on the same lot, constructed without fire resistant rated construction on the exposed sides.

WG2 recommendation:

302.3 Fire separation distance. Individual *small residential units* shall be located with a minimum fire separation distance of 5 feet, and with a minimum 10 feet of horizontal distance measured at a right angle from the SRU exterior wall face to any other buildings on the same lot.

Exception: Small residential units that comply with the Fire-Resistant Construction requirements in Section 302 of the IRC.

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Staff note: 2/18/26 motion to table for WG2 discussion approved.

WG2 reported to committee on 3/18/26. Motion to approve as modified by WG2 (excluding the illustration)

Committee Action: Approved as modified 9-1
Amendment approved as modified 8-2

Committee Reason: More effectively explains fire separation distance to the user of the standard.

IS-OSMTH 03-09-25 ICC 1215 Section 303.2

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

Revise as follows:

303.2 Application. The design and installation of mechanical and fuel gas systems shall be in accordance with the provisions of the mechanical and fuel gas codes and standards adopted by the AHJ except as modified by this section. ~~The requirements in this section shall be in addition to the requirements of the applicable codes and standards.~~

Reason: This revision is primarily for clarity. The standard modifies the adopted code as it relates to tiny houses and SRU's regulated by the standard.

Staff note:

Committee Action: Approved as submitted unanimous

IS-OSMTH 03-10-25

ICC 1215 Sections 303.3, 304.3, 305.3 & 306.3

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

Revise as follows:

303.3 Construction Documents. The design documentation Construction documents required by section 103 shall describe and delineate the portions of the systems that are to be constructed off site from those that are to be constructed on site.

304.3 Construction Documents. The design documentation Construction documents required by section 103 shall describe and delineate the portions of the systems that are to be constructed off site from those that are to be constructed on site.

305.3 Construction Documents. The design documentation Construction documents required by section 103 shall describe and delineate the portions of the systems that are to be constructed off site from those that are to be constructed on site.

306.3 Construction Documents. The design documentation Construction documents required by section 103 shall describe and delineate the portions of the systems that are to be constructed off site from those that are to be constructed on site.

Reason: The changes proposed in each of the four sections are intended to point back to the construction documents that are required to be submitted to the AHJ as the location of this information. Without the pointer it could be interpreted that this information wasn't required to be submitted.

Staff note: Committee reconsidered 4/1/26. All sections deleted.

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Committee Action: Approved as submitted unanimous

Committee Action 4/1/26 : Approved as modified unanimous

Committee Reason: Based on committee action on 03-11-25.

IS-OSMTH 03-11-25

ICC 1215 New Sections 303.4, 303.4.1, 303.4.2, 303.4.3, 303.4.4, 303.4.5 & 303.4.6

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

Revise as follows:

303.4 Connections to site utility. When tiny homes and small residential units built on a permanent chassis contain appliances that utilize fuel gas, connections to fuel gas supplies shall comply with this section.

303.4.1 Connections to utilities required. Where a fuel gas service is available at the location of occupancy or installation provided by a fuel gas utility, connection to the fuel gas utility shall be required.

303.4.2 Shutoff. An approved type shutoff valve that is constructed of materials compatible with the piping, pressure and fuel gas type shall be installed upstream of any connection to the tiny home or small residential unit.

303.4.3 Appliance compatibility. Prior to connection to any fuel gas source, compatibility of fuel gas utilizing appliances, equipment and piping systems with the fuel gas type being supplied shall be required.

303.4.4 Conversion of appliances and equipment . Conversion of fuel gas utilizing appliances, equipment and systems to utilize a different fuels gas type shall be made by persons acceptable to the AHJ.

303.4.5 Leak testing. Where required by the AHJ, fuel gas delivery systems shall be tested for leaks by one of the methods permitted by IRC section G2417, or by another means approved by the AHJ.

303.4.5.6 Capping of systems. When a tiny house or small residential unit is disconnected from a fuel gas supply, the delivery outlet of the supply side shall be properly capped.

Reason: These new sections address the use of fuel gas connections to tiny homes and SRU. While this is being submitted in a single comment, if the committee so desired to not require connection to an onsite utility, the remainder of the sections should be retained to address leak testing, and capping of utility outlets when a unit is disconnected.

WG2 4/1/26 Recommendation:

SECTION 303 MECHANICAL

303.1 Scope. The provisions of this section shall govern the design and installation of mechanical and fuel gas systems for on-site and off-site construction.

303.2 Application. The design and installation of mechanical and fuel gas systems shall be in accordance with the provisions of the mechanical and fuel gas codes and standards adopted by the AHJ except as modified by this section. ~~The requirements in this section shall be in addition to the requirements of the applicable codes and standards.~~

~~**303.3 Construction Documents.** The design documentation Construction documents required by section 103 shall describe and delineate the portions of the systems that are to be constructed off-site from those that are to be constructed on-site.~~

303.4 Connections to site utility. When tiny homes and small residential units built on a permanent chassis contain appliances that utilize fuel gas, connections to fuel gas supplies shall comply with this section.

303.4.1 Shutoff. An approved shutoff valve that is constructed of materials compatible with the piping, pressure and fuel gas type shall be installed upstream of any connection to the tiny house or small residential unit.

303.4.2 Compatibility. The fuel gas piping system and appliances shall be compatible with the fuel gas type and service pressure supplied.

303.4.3 Leak testing. Where required by the AHJ, fuel gas piping systems shall be tested for leaks by one of the methods permitted by IRC section G2417, or by another means approved by the AHJ.

303.4.4 Capping of systems. When a tiny house or small residential unit is disconnected from a fuel gas supply, the delivery outlet of the supply side shall

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be properly capped

Staff note: 2/18/26 tabled to WG2. WG 2 reported on 4/1/26.

Brad will submit the WG2 recommendation 4/1/26. See Brad email 4/1/26

Committee Action: **Approved as modified** unanimous

Committee Reason: Section 303.3 is redundant with the requirements of Section 103.1 as modified by comment IS-OSMTH 01-08-25 which was approved as submitted.

IS-OSMTH 03-12-25 ICC 1215 New Sections 305.4 & 305.5

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

Revise as follows:

305.4 Protection against contamination. Connections shall not be made to a potable water supply in a manner that could contaminate the water supply or provide a cross connection between the supply and a source of contamination except where approved backflow prevention assemblies, backflow prevention devices or other means or methods are installed to protect the potable water supply. Cross connections between an individual water supply or storage system and a potable public water supply shall be prohibited.

305.5 Disconnection. When tiny homes and small residential units built on a permanent chassis are disconnected for a water supply source, the water supply side outlet shall be properly capped.

Reason: These added sections control the connection of movable tin houses and SRU to a private or public potable water connection. Unlike Manufactured Homes and site built units, these are intended to be more mobile, and its important from a public health perspective to protect the water supply from any potential cross contamination from water stored in the units. Additionally, it requires that when a unit is disconnected, the supply outlet shall be capped for the same reasons.

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WG2 recommendation: 5/6/26

305.4 Protection against contamination. Connection shall not be made to the local water supply without approval by the AHJ. The connection, piping between the SRU and the supply, and any backflow prevention devices or other methods to prevent contamination of the water supply shall comply with the requirements of the local AHJ or water supplier as applicable.

305.5 Disconnection. When tiny homes and small residential units built on a permanent chassis are disconnected from a water supply source, the water supply side outlet shall be properly capped.

Staff note: : 2/18/26 tabled to WG2 5/6/26 tabled to end of the day

Committee Action: Approved as modified unanimous

Committee Reason: as per WG2 recommendation

IS-OSMTH 03-13-25 ICC 1215 Section 306.4.1

Proponent: Kaylee DeGrace, Self

Revise as follows:

306.4.1 Tiny Houses. ~~For Small Residential Units 400~~ 250 sq ft or less in floor area shall be exempted from all requirements for automatic sprinkler systems, and for Small Residential Units 251-400 sq ft in floor area, the provisions of Sections 306.4.2 and 306.4.3 shall be permitted.

Reason: Structures under 250 sq ft are too small to accommodate sprinkler systems, especially when they are movable houses. The added weight and bulk of holding tanks for the water is not feasible, and movable tiny houses should also not be required to hook up to pressurized water systems because they are often designed for off-grid installations.

Staff note:

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Committee Action: Disapproved unanimous

Committee Reason: Not appropriate place for scoping requirements for sprinklers
NFSA's intent in the inclusion of 306.4 was to provide guidance "when sprinklers are provided" not to use this standard to allow for exemptions for sprinklers. 306.4.1 provides a path to allow a relaxation of sprinkler installation rules based on any small unit under 400 sq ft - by only having these apply to relocatable units, it will cause non-relocatable units to incur additional burdensome installation rules

IS-OSMTH 03-14-25 **ICC 1215 Section 306.4.1**

Proponent: Macy Miller, Self

Revise as follows:

306.4.1 Relocatable Tiny Houses. For ~~Small~~ Relocatable Residential Units 400 sq ft or less in floor area, the provisions of Sections 306.4.2 and 306.4.3 shall be permitted.

Reason: Brings alignment.

Staff note: WITHDRAWN by proponent

IS-OSMTH 03-15-25

ICC 1215 Section 306.4.3

Proponents: Vera Struck, Self and Janice Kenney, Self

Revise as follows:

306.4.3 Lofts. Sprinkler protection shall be provided to cover the floor area under lofts greater than 4 ft in width.

Exception: Off-Grid Movable tiny houses less than 250 SF shall not be required to have sprinklers above or under lofts.

Reason: As a dweller in a 150SF 18' tiny house with 2 lofts, one 6'x8' and another 6' x 7', that store bedding and craft supplies and clothing, the requirement to install sprinklers below them is not only cost prohibitive, but impossible. I have a 30 gallon water tank that gets filled each week and I have a 4 gal. water heater ; neither can be used for a fire sprinkler system. Especially for those of us living off-grid without a public water source.

I have 2 means of egress in this small tiny house; if there is a fire, I have extinguishers under my sink and/ or I would escape easily.

Staff note:

Committee Action: Disapproved unanimous

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Committee Reason: Standard does not address off-grid. More relaxation would conflict with NFPA 13.

IS-OSMTH 03-16-25 ICC 1215 Sections 307.1 & 307.2

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

Revise as follows:

SECTION 307 EXTERIOR WALLS (Reserved)

~~**307.1 Scope.** The provisions of this chapter shall govern the minimum requirements for exterior walls; exterior wall coverings; exterior wall openings; exterior windows and doors; and architectural trim.~~

-

~~**307.2 Application.** The requirements for exterior walls shall be in accordance with the provisions of the codes and standards adopted by the AHJ.~~

Reason: Section 101.2 already adequately covers that tiny homes and SRU are required to comply with the IRC except as modified by this standard. Section 307 provides no such modifications so is proposed to be deleted. The section is however marked reserved, so if in a future comment period proposals are submitted for exterior walls, they can be placed here without further renumbering.

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Staff note:

Committee Action: Approved as submitted unanimous

IS-OSMTH 03-17-25 ICC 1215 Section 308.2

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

Revise as follows:

308.2 Application. Structural design and construction shall be in accordance with the International Residential Code (IRC), except as specifically modified by this section.

~~EXCEPTION: Where provided, the integral frame and related structural connections not covered by the IRC shall be in accordance with this section.~~

Reason: This isn't an exception, it says the same thing as its parent section 308.2, therefore it's proposed to delete this exception.

Staff note:

Committee Action: Approved as submitted unanimous

IS-OSMTH 03-18-25

ICC 1215 Section 308.2

Proponent: Mike Spooner, Self

Revise as follows:

308.2 Application. Structural design and construction shall be in accordance with the International Residential Code (IRC), except as specifically modified by this section.

EXCEPTION: Where provided, the integral frame chassis and related structural connections not covered by the IRC shall be in accordance with this section.

Reason: Section 308 contains a number of references to “integral frame”, with this being only the first. I believe these should be replaced by “integral chassis” for consistency with the term we’ve defined in the standard.

If “integral frame” is kept, it should be defined separately. I’ve included a suggested definition below:

INTEGRAL FRAME. The part of an INTEGRAL CHASSIS consisting of the main beams, crossmembers, and any other structural framing.

It may be more appropriate to use the term “integral chassis frame” if the purpose is to refer specifically to the part of the chassis that consists of the main beams and crossmembers, in which case defining it separately may not be necessary.

Staff note: WITHDRAWN by proponent

IS-OSMTH 03-19-25

ICC 1215 Section 308.3

Proponent: Shane Nilles, Self

Revise as follows:

308.3 Fastening. ~~Dwelling~~ Structural fastening shall be in accordance with the IRC, except as modified by this section. For framing-to-framing connections, alternative fasteners shall be permitted to be substituted for those specified in the IRC, provided equivalent capacity is demonstrated in accordance with accepted engineering practices. ~~For alternative wall and roof sheathing to framing fasteners, a Listed fastener or an engineered design shall be provided demonstrating equivalent shear wall and diaphragm capacity.~~

Reason: "dwelling fastening" is unclear, "structural fastening" seems more appropriate. "Accepted engineering practices" addresses use of fasteners either in accordance with their approved documentation, or by engineered design. By adding it to the 2nd sentence, the 3rd sentence can be deleted.

Staff note: editorial

Committee Action: **Approved as submitted** unanimous

IS-OSMTH 03-20-25

ICC 1215 Section 308.4

Proponent: Shane Nilles, Self

Revise as follows:

308.4 Integral frame and floor system. ~~The dwelling integral frame and floor system shall be in accordance with the following:~~ **Floor framing.** Floor framing shall be part of the engineered integral frame or shall be in accordance with the IRC.

308.4.1 General. ~~Dwellings constructed in accordance with this standard shall be permitted to be constructed with or without a permanent integral frame.~~

308.4.2 Integral frame design. ~~Where an integral frame is provided, portions of the integral frame that support loads specified in the IRC Section R301.1 shall be engineered in accordance with the IRC Section R301.1.3.~~

308.4.1 3 Floor framing. ~~Floor framing shall be part of the engineered integral frame or shall be in accordance with the IRC.~~ **Integral frame and floor system.** Small residential units are permitted to be constructed with or without an integral frame. Portions of the integral frame that support loads specified in the IRC Section R301.1 shall be engineered in accordance with the IRC Section R301.1.3.

308.4.2-4 Floor sheathing. Floor sheathing shall be in accordance with the IRC.

Reason: The general provision is for the floor system to be per the IRC or with an engineered integral frame. Therefore it should be moved to the beginning of the section, and the integral frame provisions are moved to a subsection. The language is also consolidated into less sections for clarity.

Staff note:

Committee Action: Approved as submitted 8-1

IS-OSMTH 03-21-25

ICC 1215 Section 308.4.1

Proponents: Vera Struck, Self, Janice Kenney, Movable Tiny House Legislative Task Force (MASS.) and Macy Miller, Self

Revise as follows:

308.4.1 General. Dwellings constructed in accordance with this standard shall be permitted to be constructed with ~~or without a permanent~~ an integral frame chassis.

Reason: A dwelling without the integral frame/chassis would be covered under other modular standards and is duplication here is unnecessary. Also, the standard neglects to define "integral frame".

Miller: A dwelling without the integral frame/chassis would be covered under other modular standards and is duplicative here. We don't define integral frame - is this meant to be chassis or do we need to define 'integral frame'?

Staff note:

Committee Action: Disapproved unanimous

Committee Reason: Based on previous committee action

IS-OSMTH 03-22-25

ICC 1215 New Section 308.4.5

Proponents: Mike Spooner, Self

Revise as follows:

308.4.5 Bottom board. SRUs with integral chassis shall have the underside of the floor system protected from moisture, road spray, pest intrusion, and air leakage by an airtight, corrosion, water, and pest-resistant material.

Reason: The standard doesn't currently address the bottom of the floor system which is unique to tiny homes on integral chassis. I don't believe anything in the IRC addresses this, but if there are relevant provisions we should probably call them out.

More generally, it's not clear to me how much of what is in the IRC is applicable to building within a chassis frame. Are the provisions of R505 "Cold-Formed Steel Floor Framing" applicable? Do the increased insulation values for steel framed floors from table N1102.2.6 apply?

Staff note: to WG2 2/25/26

WG2 recommendation 5/20/26:

IS-OSMTH 03-22-25 submitted by Mike Spooner
Original comment:

308.4.5 Bottom board. SRUs with integral chassis shall have the underside of the floor system protected from moisture, road spray, pest intrusion, and air leakage by an airtight, corrosion, water, and pest-resistant material.

Proposed resolution:

308.4.5 Bottom board. The underside of the SRU floor assembly shall be protected from transportation damage.

Committee Action: Approved as modified 8-1

Committee Reason: Doesn't need to be damage-type specific but for transportation protection in general.

IS-OSMTH 03-23-25

ICC 1215 Section 308.5.2

Proponent: Kelly Cobeen, Wiss Janney Elstner Associates

Revise as follows:

308.5.2 Dwelling end wall connections to the integral frame. Dwelling end wall connections to the integral frame shall comply with one of the following:

1. Engineered in accordance with IRC Section R301.1.3 or,
2. Section 308.8.3

Where the alternative end wall bracing provisions of Section 308.4 ~~308.8.2~~ **308.8.4** are used, the dwelling to end wall connection shall meet the requirements of Section ~~308.4~~ **308.8.2** **308.8.4** in addition to the requirements of this Section.

Reason: Section 308.4 does not appear relevant to this discussion.

Staff note: 308.8.4 is the right section

Committee Action: **Approved as modified** unanimous

Committee Reason: Corrected reference to right section.

IS-OSMTH 03-24-25 **ICC 1215 Section 308.5.3**

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

Revise as follows:

308.5.3 Dwelling to permanent integral frame connection for transportation.

Where required by Section 308.5.1, in addition to the requirements of IRC Section R301.1.3, side wall connections to the integral frame shall be engineered to meet the requirements of this section.

The dwelling shall be connected to the integral frame using fasteners or other connectors distributed along the length of each side wall. The summed allowable stress design capacity of fasteners or connections on both side walls shall be capable of resisting a horizontal allowable stress load, H , calculated in accordance with Equation 308-1.

$$H = (D + \overline{F_I}) 1.25 \quad \text{Equation 308-1}$$

Where:

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

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~~D = Dead load (lb), (actual self-weight of full dwelling above the top of the integral frame the full *dead load* of the unit being restrained by connections being designed at the time of shipment)~~ **but not less than 350 lb/ft times the side wall length.**

~~F_T = Floor Transport floor load (lb), (allowance for built-in items-minimal personal property and contents in place at time of transport) = 10 lb/sq ft times gross floor area~~

Reason: The definition of dead load was proposed to be added in another comment; this section is revised to reflect the availability of the definition. Given the scope of this standard allowing units up to 1,200 sq ft it's not appropriate to provide a one size fits all deadload of 350 lb per lineal foot of sidewall. There are too many variables to make such a minimum statement without substantiation. Additionally, attempting to be prescriptive for the broad range of unit sizes now allowed by this standard, this will under design large units, over design small units or both. In the second paragraph, this proposal changes the terminology to differentiate the transport load from the from design floor load, so it isn't easily confused thereby allowing the floor load of units to be designed at 10 psf. The phrase "built-in items" is also removed as these are part of the dead load and are accounted in the definition of dead load.

Staff note:

Committee Action: Approved as modified 8-2-1

Committee Reason: This is a proper minimum. Floor load in the transport configuration is considered separately.

IS-OSMTH 03-25-25

ICC 1215 Section 308.8.1

Proponent: Kelly Cobeen, Wiss Janney Elstner Associates

Revise as follows:

308.8.1 Scoping limits for prescriptive provisions. Where specified in Section 308, each dwelling and each module in a multi-module dwelling shall meet all of the following scoping limits:

- ~~1. In Exposure C, ultimate wind speed not greater than 115 MPH (Table R301.2),~~

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~~2. In Exposure B, ultimate wind speed not greater than 130 MPH (Table R301.2)~~

1. In Exposure C, ultimate wind speed not greater than 115 MPH (Table R301.2) or in Exposure B, ultimate wind speed not greater than 130 MPH (Table R301.2)

Reason: Section 308.8.1 charging language indicates that all of the scoping items need to be met. However, when considering Items 1 and 2, only one of the two can be met because the site will either be in Exposure B or C. Combining these into a single item with "or" noted will eliminate this issue.

Staff note:

Committee Action: Approved as submitted unanimous

IS-OSMTH 03-26-25

ICC 1215 Sections 308.8.2 & 308.8.3

Proponent: Mike Spooner, self

Revise as follows:

308.8.2 Side wall to integral frame prescriptive connection. The sidewall connection to the integral frame chassis shall be permitted to be in accordance with Figure 308.8-1 or Figure 308.8-6. All aspects of construction other than connection of the side wall to the integral frame chassis shall conform to applicable provisions of this standard and the IRC.

308.8.3 End wall to integral frame prescriptive connection. The sidewall end wall connection to the integral frame chassis shall be permitted to be in accordance with Figure 308.8-2 or Figure 308.8-7. All aspects of construction other than connection of the end wall to the integral frame chassis shall conform to applicable provisions of this standard and the IRC.

Reason: Adding this detail to the existing detail would cover two of the primary ways that tiny homes have traditionally been constructed on a trailer chassis. This design reduces risk of condensation and thermal bridging between the chassis and the subfloor with a separate wood floor assembly on top of the chassis. It is common in

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manufactured homes and also aligns with the prescriptive detail for ANSI 119.5 park model RVs.

Staff note: Move to end of agenda for proponent to continue work.

Committee Action:

Committee Reason:

IS-OSMTH 03-27-25 ICC 1215 Section 308

Proponent: Shane Nilles, Self

Revise as follows:

308.5 ~~Dwelling e~~Connection to integral frame. Connection of the dwelling building shell to the integral frame shall be in accordance with the IRC and the following:

308.5.1 ~~Dwelling s~~Side wall connections to the integral frame. Dwelling sSide wall connections to the integral frame shall comply with one of the following:

1. Engineered in accordance with IRC Section R301.1.3 and, for dwellings constructed on a permanent integral frame, the additional load requirements of Section 308.5.3 or,
2. Section 308.8.2

308.5.2 ~~Dwelling e~~End wall connections to the integral frame. Dwelling eEnd wall connections to the integral frame shall comply with one of the following:

3. Engineered in accordance with IRC Section R301.1.3 or,

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4. Section 308.8.3

Where the alternative end wall bracing provisions of Section 308.4 are used, the ~~dwelling to~~ end wall connection shall meet the requirements of Section 308.4 in addition to the requirements of this Section.

308.5.3 Dwelling Connection to permanent integral frame connection for transportation. Where required by Section 308.5.1, in addition to the requirements of IRC Section R301.1.3, side wall connections to the integral frame shall be engineered to meet the requirements of this section.

The ~~dwelling~~ side walls shall be connected to the integral frame using fasteners or other connectors distributed along the length of each side wall. The summed allowable stress design capacity of fasteners or connections on both side walls shall be capable of resisting a horizontal allowable stress load, H, calculated in accordance with Equation 308-1.

$$H = (D + F) 1.25 \quad \text{Equation 308-1}$$

Where:

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

D = Dead load (lb), (actual self-weight of full dwelling above the top of the integral frame at the time of shipment) but not less than 350 lb/ft times the side wall length.

F = Floor load (lb), (allowance for built-in items and contents in place at time of transport) = 10 lb/sq ft times gross floor area

308.6 Dwelling wWall bracing. ~~Dwelling w~~Wall bracing shall ~~comply~~ be provided in accordance with one of the following:

1. ~~In accordance with~~ The prescriptive provisions of the IRC, or
2. Engineered in accordance with IRC Section R301.1.3, or
3. Section 308.8.4.

308.7 Dwelling rRoof sheathing. ~~Dwelling r~~Roof sheathing shall comply with one of the following:

1. Engineered in accordance with IRC Section R301.1.3, or
2. Section 308.8.5.

308.8 Prescriptive alternative provisions. Each ~~dwelling~~ SRU or module in a multi-module ~~dwelling~~ SRU meeting the scoping limits of Section 308.8.1 shall be permitted to use the alternative provisions of Sections 308.8.2 through 308.8.5.

308.8.1 Scoping limits for prescriptive provisions. Where specified in Section 308, each ~~dwelling~~ SRU and each module in a multi-module dwelling shall meet all of the following scoping limits:

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Reason: Section 308 refers to part of the building as the "dwelling" which is undefined but is typically used to describe a whole building. This comment either deletes "dwelling" where it is not necessary or replaces it with more appropriate terminology.

Section 308.6 creates a confusion by describing the options as complying with the IRC, or a specific section within the IRC. The intent is to either comply with the prescriptive IRC provisions, or the engineered path in the IRC. This comment revises the language accordingly.

Staff note:

Committee Action: **Approved as submitted** unanimous

IS-OSMTH 03-28-25 ICC 1215 Section 308

Proponent: Mike Spooner, Self

Revise as follows:

308.7 Dwelling roof sheathing. Dwelling roof sheathing shall comply with one of the following:

1. In accordance with the IRC, or
2. Engineered in accordance with IRC Section R301.1.3, or
3. Section 308.8.5.

Reason: As this currently reads, it suggests that any home that doesn't meet the prescriptive scope of 308.8.1 must have the roof sheathing engineered. I believe it should include the option of "In accordance with the IRC" like the wall bracing section above it.

Staff note:

Committee Action: **Disapproved** unanimous

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Committee Reason: The engineering is covered in 308.8.5.

IS-OSMTH 03-29-25

ICC 1215 Section 308, Table 308-1

Proponent: Mike Spooner, Self

Revise as follows: Replace table with following:

Table 308-1. Construction requirements for roof sheathing.

<u>Ratio of side wall length divided by least end wall length</u>	<u>Construction Type</u>	<u>Sheathing Nailing at Supported Edges</u>	<u>Sheathing Nailing at All Panel Edges</u>	<u>Field Nailing</u>
<u>0 to 3.0</u>	<u>Unblocked</u>	<u>8d@6"</u>	<u>=</u>	<u>8d@12"</u>
<u>3.1 to 5.5</u>	<u>Blocked</u>	<u>=</u>	<u>8d@6"</u>	<u>8d@12"</u>
<u>Greater than 5.5</u>	<u>Not Permitted</u>	<u>Not Permitted</u>	<u>Not Permitted</u>	<u>Not Permitted</u>

<u>Ratio of side wall length divided by least end wall length</u>	<u>Blocking</u>	<u>Nailing at Supported Edges</u>	<u>Nailing in Field</u>
<u>Less than 3.0</u>	<u>Optional</u>	<u>8d@6"</u>	<u>8d@12"</u>

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<u>3.1 to 5.5</u>	<u>Required</u>	<u>8d@6"</u>	<u>8d@12"</u>
<u>Greater than 5.5</u>	<u>Out of Scope, Use IRC</u>	<u>Out of Scope, Use IRC</u>	<u>Out of Scope, Use IRC</u>

Reason: I found the original table confusing. At face value it seems to say that ratios from 0 to 3.0 must be unblocked. For ratios greater than 5.5 “Not Permitted” suggests it is not allowed at all, when I believe the intention is to communicate that it is out of the scope defined in 308.8.1 and so the IRC must be used instead. I removed the second edge nailing column because I thought it was redundant since edges with blocking would also be considered “supported”.

Staff note: Move to end of agenda for proponent to continue work 2/25/26.
See Mike’s tables as per 3/25/26 email.

Committee Action: Approved as modified

Committee Reason:

IS-OSMTH 03-30-25

ICC 1215 Section 308, figures 308.8.-1,2,3,4

Proponent: Shane Nilles, Self

Revise as follows: (Please refer to the text callouts in the figures)

Replace 1” low-compressibility insulation at perimeter with 2x member or other material with equivalent compression strength, or calculations must be done to demonstrate that the insulation will resist all loads including resulting forces from overturning of shear walls.

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Reason: 1" low-compressibility insulation does not account for the resulting forces from overturning of shear walls. Replace with 2x member or other material with equivalent compression strength, or calculations must be done to demonstrate that the insulation will resist all loads.

Revise as follows:

Replace insulation with 2x member or equivalent bearing strength, or calculations for Z must be revised (See AWC TR12). The referenced Z value per Table 12B of the NDS is not applicable where there is a gap between the members (the 1" insulation would be considered a gap).

Reason: The referenced Z value per Table 12B of the NDS is not applicable where there is a gap between the members (the 1" insulation would be considered a gap). Replace insulation with 2x member or equivalent bearing strength, or calculations for Z must be revised (See AWC TR12).

Revise as follows:

The threaded rod anchor option needs to be upsized so that the root diameter of the threaded rod is no less than the full-body diameter of the bolt option.

Reason: NDS Table 12A is based on full-body diameter bolts (See footnote 2 of the table). If threaded rod is provided as an option for the bottom plate connection then the calculations need to be revised or the threaded rod should be upsized so that the root diameter of the threaded rod is no less than the full-body diameter of the bolt option.

Revise as follows:

Provide plate washers for the Alternative End Wall Shear Wall anchor bolts per SDPWS 4.3.6.4.3 or calculations must be done to demonstrate that it meets the exception therein.

Reason: SDPWS 4.3.6.4.3 requires plate washers for anchors unless it can be demonstrated that it meets the exception therein.

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Staff note: Committee moved comment to WG2 3/4/26

Committee Action:

Committee Reason:

IS-OSMTH 03-31-25 **ICC 1215 Section 309.1**

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

Revise as follows:

SECTION 309 **SLEEPING LOFTS**

309.1 Sleeping lofts. Sleeping lofts shall comply with IRC section R.315.

Exception. Where applicable the appendix is adopted, provisions of Appendix BB104 shall ~~replace provisions of IRC section R.315~~ apply.

Reason: This proposal cleans up the application of the appendix for sleeping lofts.

Staff note:

Committee Action: **Approved as submitted** unanimous

IS-OSMTH 03-32-25

ICC 1215 new Section 309

Insert new Section 309 ahead of current Section 309 and renumber subsequent sections accordingly

Proponent: Brad Wiseman, Tiny Home Industry Association

Revise as follows:

SECTION 309 **CEILING HEIGHT**

309.1 Minimum ceiling height. *Habitable space* and hallways in TINY HOUSES and SRUs composed of multiple TINY HOUSES joined to form one residential structure shall have a *ceiling height* of not less than 6 feet 8 inches (2032 mm). Bathrooms, toilet rooms and *kitchens* in TINY HOUSES and SRUs composed of multiple TINY HOUSES joined to form one residential structure shall have a *ceiling height* of not less than 6 feet 4 inches (1930 mm). Obstructions including, but not limited to, beams, girders, ducts and lighting, shall not extend below these minimum *ceiling heights*.

Exception: *Ceiling heights* in *lofts* are permitted to be less than 6 feet 8 inches (2032 mm).

Reason: Provide reduced ceiling heights for Tiny Houses as specified in 2024 IRC Appendix BB.

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Note: Any provisions of 2024 IRC Appendix BB to be included in this standard must be explicitly added to this standard if this standard is to also be included in the IRC as an optional compliance path for residential structures built according to this standard.

Staff note: Committee moved comment to WG2 3/4/26

WG2 7/29/26 recommendation:

SECTION 309 CEILING HEIGHT

309.1 Minimum ceiling height. Habitable space and hallways in SRUs shall have a ceiling height of not less than 6 feet 8 inches (2032 mm). Bathrooms, toilet rooms and kitchens in SRUs shall have a ceiling height of not less than 6 feet 4 inches (1930 mm). Obstructions including, but not limited to, beams, girders, ducts and lighting, shall not extend below these minimum ceiling heights.

Exception: Ceiling heights in lofts are permitted to be less than 6 feet 8 inches (2032 mm).

SECTION 309 LOFTS

309.0 Lofts. Where provided, lofts shall comply with IRC Section R315 or the provisions of this section, as applicable.

Exception. Where the Tiny Houses Appendix of any version of the IRC is adopted, provisions for lofts as given in that appendix shall apply.

309.1 Minimum loft area and dimensions. Lofts shall meet the minimum area and dimension requirements of Sections 309.1.1 through 309.1.3 of this standard.

309.1.1 Minimum area. Lofts shall have a floor area of not less than 35 square feet (3.25 m).

309.1.2 Minimum horizontal dimensions. Lofts shall be not less than 5 feet (1524 mm) in any horizontal dimension.

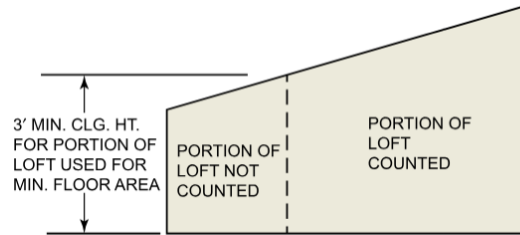
309.1.3 Height effect on loft area. Portions of a loft with a sloped ceiling measuring less than 3 feet (914 mm) from the finished floor to the finished ceiling shall not be considered as contributing to the minimum required area for the loft. See Figure 309.1.3.

Exception: Under roofs with a minimum slope of 6 units vertical in 12 units horizontal (50-percent slope), portions of a loft with a sloped ceiling

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measuring less than 16 inches (406 mm) from the finished floor to the finished ceiling shall not be considered as contributing to the minimum required area for the loft.

FIGURE 309.1.1.3 – HEIGHT EFFECT ON LOFT AREA



For SI: 1 foot = 304.8 mm.

309.2 Loft access and egress. Lofts in SRUs may use any means of access and egress described in Sections 309.2.1 through 309.2.4 of this standard. The loft access and egress element along its required minimum width shall meet the loft where its ceiling height is not less than 3 feet (914 mm).

309.2.1 Stairways. Stairways accessing lofts shall comply with IRC Section R315.5.2 or with Sections 309.2.1.1 through 309.2.1.7 of this standard.

309.2.1.1 Width. Stairways accessing a loft shall not be less than 17 inches (432 mm) in clear width at or above the handrail. The width below the handrail shall be not less than 20 inches (508 mm).

309.2.1.2 Headroom. The headroom above stairways accessing a loft shall be not less than 6 feet 2 inches (1880 mm), as measured vertically, from a sloped line connecting the tread, landing or landing platform nosings in the center of their width and vertically from the landing platform along the center of its width.

309.2.1.3 Treads and risers. Risers for stairs accessing a loft shall be not less than 7 inches (178 mm) and not more than 12 inches (305 mm) in height. Tread depth and riser height shall be calculated in accordance with one of the following formulas:

1. The tread depth shall be 20 inches (508 mm) minus four-thirds of the riser height.
2. The riser height shall be 15 inches (381 mm) minus three-fourths of the tread depth.

309.2.1.4 Landings. Intermediate landings and landings at the bottom of stairways shall comply with IRC Section R318.7.6, except that the depth in the direction of travel shall be not less than 24 inches (610 mm).

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309.2.1.5 Landing platforms. The top tread and riser of stairways accessing lofts shall be constructed as a *landing platform* where the *loft ceiling height* is less than 6 feet 2 inches (1880 mm) where the *stairway* meets the *loft*. The *landing platform* shall be not less than 20 inches (508 mm) in width and in depth measured horizontally from and perpendicular to the *nosing* of the *landing platform*. The *landing platform* riser height to the loft floor shall be not less than 16 inches (406 mm) and not greater than 18 inches (457 mm).

Committee Action: **Approved as modified** unanimous

Committee Reason: Intends to bring provisions of the 2024 IRC Appendix BB Tiny Houses into Chapter 3 of the standard in a more organized way.

IS-OSMTH 03-33-25

ICC 1215 Section 309.1, new 309.1.1 thru 309.1.3, 309.2 thru 309.2.1.5

Proponent: Brad Wiseman, Tiny Home Industry Association

Revise as follows:

309.1 Sleeping lofts. Sleeping lofts shall comply with IRC section R.315 or the provisions of this section.

Exception. Where applicable, provisions of Appendix BB shall replace provisions of IRC section R.315 or the provisions of this section.

309.1.1 Minimum loft area and dimensions. Lofts used as a sleeping or living space shall meet the minimum area and dimension requirements of Sections 309.1.1 through 309.1.3 of this standard.

309.1.1 Minimum area. Lofts shall have a floor area of not less than 35 square

feet (3.25 m).

309.1.2 Minimum horizontal dimensions. Lofts shall be not less than 5 feet (1524 mm) in any horizontal dimension.

309.1.3 Height effect on loft area. Portions of a *loft* with a sloped ceiling measuring less than 3 feet (914 mm) from the finished floor to the finished ceiling shall not be considered as contributing to the minimum required area for the loft. See Figure 309.1.3.

Exception: Under gable roofs with a minimum slope of 6 units vertical in 12 units horizontal (50-percent slope), portions of a *loft* with a sloped ceiling measuring less than 16 inches (406 mm) from the finished floor to the finished ceiling shall not be considered as contributing to the minimum required area for the *loft*.

FIGURE 309.1.3—HEIGHT EFFECT ON LOFT AREA

309.2 Loft access and egress. Lofts in TINY HOUSES and SRUs composed of multiple TINY HOUSES joined to form one residential structure may use any means of access and egress described in Sections 309.2.1 through 309.2.4 of this standard. Lofts in SRUs greater than 400 square feet and not composed of multiple TINY HOUSES joined to form one residential structure may use the means of access and egress described in Section 309.2.1 of this standard. The *loft* access and egress element along its required minimum width shall meet the *loft* where its *ceiling height* is not less than 3 feet (914 mm).

309.2.1 Stairways. Stairways accessing *lofts* shall comply with IRC Section R318.7 or with Sections 309.2.1.1 through 309.2.1.7 of this standard.

309.2.1.1 Width. Stairways accessing a *loft* shall not be less than 17 inches (432 mm) in clear width at or above the *handrail*. The width below the *handrail* shall be not less than 20 inches (508 mm).

309.2.1.2 Headroom. The headroom above *stairways* accessing a *loft* shall be not less than 6 feet 2 inches (1880 mm), as measured vertically, from a sloped line connecting the tread, landing or *landing platform nosings* in the center of their width and vertically from the *landing platform* along the center of its width.

309.2.1.3 Treads and risers. Risers for *stairs* accessing a *loft* shall be not less than 7 inches (178 mm) and not more than 12 inches (305 mm) in height. Tread depth and riser height shall be calculated in accordance with one of the following formulas:

1. The tread depth shall be 20 inches (508 mm) minus four-thirds of the riser height.

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2. The riser height shall be 15 inches (381 mm) minus three-fourths of the tread depth.

309.2.1.4 Landings. Intermediate landings and landings at the bottom of *stairways* shall comply with IRC Section R318.7.6, except that the depth in the direction of travel shall be not less than 24 inches (610 mm).

309.2.1.5 Landing platforms. The top tread and *riser* of *stairways* accessing *lofts* shall be constructed as

Reason:

Correct the style of reference to IRC Section R315.

Add the option to use the provisions for sleeping lofts given in the Tiny Houses appendix of the IRC.

Please note the missing FIGURE 309.1.3 is the one given in FIGURE BB104.1.3 of the Tiny Houses appendix of the IRC (2024 IRC Appendix BB).

Any provisions of 2024 IRC Appendix BB must be explicitly included in this standard if this standard is to also be included in the IRC as an optional compliance path for residential structures built according to this standard.

Staff note: Committee moved comment to WG2 3/4/26

WG2 7/29/26 recommendation:

SECTION 309 CEILING HEIGHT

309.1 Minimum ceiling height. Habitable space and hallways in SRUs shall have a ceiling height of not less than 6 feet 8 inches (2032 mm). Bathrooms, toilet rooms and kitchens in SRUs shall have a ceiling height of not less than 6 feet 4 inches (1930 mm). Obstructions including, but not limited to, beams, girders, ducts and lighting, shall not extend below these minimum ceiling heights.

Exception: Ceiling heights in lofts are permitted to be less than 6 feet 8 inches (2032 mm).

SECTION 309 LOFTS

309.0 Lofts. Where provided, lofts shall comply with IRC Section R315 or the provisions of this section, as applicable.

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Exception. Where the Tiny Houses Appendix of any version of the IRC is adopted, provisions for lofts as given in that appendix shall apply.

309.1 Minimum loft area and dimensions. Lofts shall meet the minimum area and dimension requirements of Sections 309.1.1 through 309.1.3 of this standard.

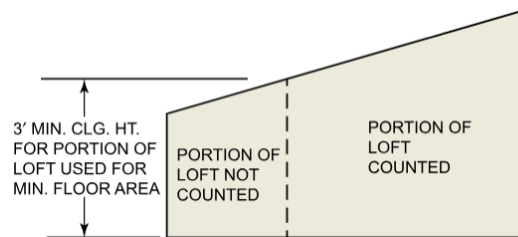
309.1.1 Minimum area. Lofts shall have a floor area of not less than 35 square feet (3.25 m).

309.1.2 Minimum horizontal dimensions. Lofts shall be not less than 5 feet (1524 mm) in any horizontal dimension.

309.1.3 Height effect on loft area. Portions of a loft with a sloped ceiling measuring less than 3 feet (914 mm) from the finished floor to the finished ceiling shall not be considered as contributing to the minimum required area for the loft. See Figure 309.1.3.

Exception: Under roofs with a minimum slope of 6 units vertical in 12 units horizontal (50-percent slope), portions of a loft with a sloped ceiling measuring less than 16 inches (406 mm) from the finished floor to the finished ceiling shall not be considered as contributing to the minimum required area for the loft.

FIGURE 309.1.1.3 – HEIGHT EFFECT ON LOFT AREA



For SI: 1 foot = 304.8 mm.

309.2 Loft access and egress. Lofts in SRUs may use any means of access and egress described in Sections 309.2.1 through 309.2.4 of this standard. The loft access and egress element along its required minimum width shall meet the loft where its ceiling height is not less than 3 feet (914 mm).

309.2.1 Stairways. Stairways accessing lofts shall comply with IRC Section R315.5.2 or with Sections 309.2.1.1 through 309.2.1.7 of this standard.

309.2.1.1 Width. Stairways accessing a loft shall not be less than 17 inches (432 mm) in clear width at or above the handrail. The width below the handrail shall be not less than 20 inches (508 mm).

309.2.1.2 Headroom. The headroom above stairways accessing a loft shall be not less than 6 feet 2 inches (1880 mm), as measured vertically, from a sloped line connecting the tread, landing or landing platform nosings in the center of their width and vertically from the landing platform along the center of its width.

309.2.1.3 Treads and risers. Risers for stairs accessing a loft shall be not less than 7 inches (178 mm) and not more than 12 inches (305 mm) in height. Tread depth and riser height shall be calculated in accordance with one of the following formulas:

3. The tread depth shall be 20 inches (508 mm) minus four-thirds of the riser height.
4. The riser height shall be 15 inches (381 mm) minus three-fourths of the tread depth.

309.2.1.4 Landings. Intermediate landings and landings at the bottom of stairways shall comply with IRC Section R318.7.6, except that the depth in the direction of travel shall be not less than 24 inches (610 mm).

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309.2.1.5 Landing platforms. The top tread and riser of stairways accessing lofts shall be constructed as a *landing platform* where the *loft ceiling height* is less than 6 feet 2 inches (1880 mm) where the *stairway* meets the *loft*. The *landing platform* shall be not less than 20 inches (508 mm) in width and in depth measured horizontally from and perpendicular to the *nosing* of the *landing platform*. The *landing platform* riser height to the loft floor shall be not less than 16 inches (406 mm) and not greater than 18 inches (457 mm).

Committee Action: Approved as modified unanimous

Committee Reason: Intends to bring provisions of the 2024 IRC Appendix BB Tiny Houses into Chapter 3 of the standard in a more organized way.

IS-OSMTH 03-34-25 ICC 1215 Section 309.1

Proponent: Shane Nilles, Self

Revise as follows:

309.1 Sleeping lofts. Sleeping lofts shall comply with IRC section R.315.

Exception. Where ~~applicable~~ adopted, the provisions of Appendix BB shall replace provisions of IRC section R.315.

Reason: Where “applicable” is not clear as it implies that the appendix provisions could replace R315 even if the appendix isn’t adopted.

NOTE: As Section 102.1 requires the SRU to comply with all applicable provisions of the codes adopted by the AHJ, it may be more appropriate to delete this section entirely.

Staff note:

Committee Action: Disapproved unanimous

Committee Reason: Based on previous action on 03-31-25

IS-OSMTH 03-35-25

ICC 1215 Section 309.1

Proponent: David Tompos, Sr., NTA

Revise as follows:

309.1 Sleeping lofts. Sleeping lofts shall comply with IRC section R.315.

Exceptions:

1. Where applicable, provisions of Appendix BB shall replace provisions of IRC section R.315.

2. Minimum ceiling height. Habitable spaces and hallways in SRU's and tiny houses shall have a ceiling height of not less than 6 feet 8 inches. Bathrooms, toilet rooms and kitchens shall have a ceiling height of not less than 6 feet 4 inches. Obstructions including, but not limited to, beams girders, ducts and lighting, shall not extend below these minimum ceiling heights.

3. Minimum dimensions. Lofts shall not be less than 5 feet in any horizontal direction.

4. Landing platform. The landing platform shall be 18 inches to 22 inches in depth measured from the nosing to the landing platform to the edge of the loft.

Reason: The transportation height limitations limit the ceiling height of the SRU's and Tiny houses when lofts are provided. Other changes are consistent with the Appendix BB.

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Staff note: Committee moved comment to WG2 3/4/26

Committee Action: Disapproved unanimous

Committee Reason: Per previous committee action on 03-32-25, 03-33-25 & 03-40-25

IS-OSMTH 03-36-25 ICC 1215 Section 310.1.1

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

Revise as follows:

310.1.1 Building Thermal Envelope. Small residential units shall comply with Section N1101.13 of the IRC.

Exceptions:

- a. Buildings whose peak energy usage is less than $3.4 \text{ Btu/h} \times \text{ft}^2$ (10.7 W/m^2) or 1.0 watt/ft^2 of floor area for space-conditioning purposes are exempt to thermal envelope insulation.
- b. The Code official or other AHJ shall be permitted to deem a national state or local energy-efficiency program to exceed the energy efficiency required by this code. Small residential units approved in writing by such an energy-efficiency program shall be considered to be in compliance with this code.
- c. Small residential units complying with Section 310.1.2.

Reason: This proposal adds an additional compliance pathway utilizing an above code program. Examples of programs that could be applicable are Energy Star, DOE Zero-Energy Ready Homes, NGBS, or LEED; and there are likely several others. This is consistent with the application of energy conservation requirements of the IECC and is a passive way to encourage the use of these programs.

Staff note:

Committee Action: Approved as submitted unanimous

IS-OSMTH 03-37-25

ICC 1215 Sections 310.1.3 & 202

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

Revise as follows:

310.1.3 Building Maximum Air Leakage Rate. The small residential units or each module shall be tested for air leakage. Testing shall be conducted in accordance with ANSI/RESNET/ICC 380, ASTM E779, or ASTM E1827 or ASTM E3158 and the air leakage rate reported at a pressure differential of 0.2 inch water gauge (50 Pa). The small residential unit shall have an air leakage rate not exceed greater than 2.0 air changes per hour 0.27 cubic feet per minute per square foot of the testing unit enclosure area.

TESTING UNIT ENCLOSURE AREA. The sum of the area of ceiling, floors and walls separating a tiny home or small residential unit's conditioned space from the exterior or from adjacent conditioned or unconditioned spaces.

Reason: This proposal makes editorial and technical changes to improve the air leakage requirements and make them more appropriate for small residential buildings. Key technical changes:

Removes ASTM E3158 as this test method is for large or multizone buildings.

Changes from ACH50 to CFM50/SF which is more appropriate for small buildings.

Adds CFM50/SF requirement of 0.27 which is consistent with small residential requirements of IECC.

Adds definition of testing unit enclosure area based on the definition from the IECC..

MODIFICATION (below):

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310.1.3 Building Air Leakage Rate. The **SMALL RESIDENTIAL UNIT** shall be tested for air leakage at a pressure differential of 0.2 inch water gauge (50 Pa), not to exceed 0.27 cubic feet per minute per square foot of the **TESTING UNIT ENCLOSURE AREA**

Staff note: The new definition is not adjusted by this modification.

Committee Action: **Approved as modified** unanimous

Committee Reason:

IS-OSMTH 03-38-25 ICC 1215 Sections 310.1.5

Proponent: Kaylee DeGrace, Self

Revise as follows:

~~310.1.5 Interior lighting.~~ ~~All permanently installed lamps and luminaires shall contain only high-efficacy lighting sources and shall be controlled with either a manual dimmer or an occupant sensor control.~~

Reason: Lighting uses such little energy that it's regulation has little to no overall impact. Also, some energy efficient lighting has been proven to have adverse health outcomes. As long as it's not going to catch on fire - let people do whatever they want. Most people will take the cost-saving route anyway.

Staff note: To WG2 1/7/26

WG2 recommendation 5/20/26:

Kaylee's comment seeks to delete Section 310.1.5 entirely.

310.1.5 Interior lighting. All permanently installed lamps and luminaires shall contain only high-efficacy lighting sources and shall be controlled with either a manual dimmer or an occupant sensor control.

Proposed resolution: Approve as submitted (these provisions already exist in IRC N1104.1)

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Committee Action: Disapproved unanimous

Committee Reason: Based on committee action on 03-39-25.

IS-OSMTH 03-39-25 **ICC 1215 Sections 310.1.5**

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

Revise as follows:

310.1.5 Interior lighting-Lighting equipment. All permanently installed lamps and luminaires shall contain only high-efficacy lighting sources ~~and shall be controlled with either a manual dimmer or an occupant sensor control.~~

Reason: This proposal removes the lighting control requirements. As written, this would require lighting controls on exterior lighting, because titles are not enforceable and that is the only part of the section that pointed to interior lighting. Lighting controls provide energy savings when there are large amounts of lighting or the potential for lighting to be left on for long periods. In a small residential unit, both are highly unlikely.

Staff note: To WG2 1/7/26

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WG2 recommendation 5/20/26:

Jeffrey's comment seeks to delete a portion of Section 310.1.5 and change the name of the section.

310.1.5 Interior lighting Lighting equipment. All permanently installed lamps and luminaires shall contain only high-efficacy lighting sources. ~~and shall be controlled with either a manual dimmer or an occupant sensor control.~~

Exception: Dimmers or occupancy controls are not required in Tiny Houses.

Proposed resolution: Disapproved based on deletion of the section entirely if IS-OSMTH 03-38-25 is resolved as proposed.

(Note: Jeffrey previously expressed concern that we should not require the use of dimmers or an occupant sensor control for permanently installed lights and luminaires. The IRC requires the use of such equipment with permanently installed lighting hardware, but if we want to take exception to this requirement, we will need to refer this back to WG2 to create the necessary verbiage.)

Committee Action: **Approved as modified** unanimous

IS-OSMTH 03-40-25 ICC 1215 new Section 310

Proponent: Brad Wiseman, Tiny Home Industry Association

Revise as follows: Insert new Section 310 and renumber existing Section 310 as Section 311

SECTION 310—EMERGENCY ESCAPE AND RESCUE OPENINGS

310.1 General. SRUs shall meet the requirements of IRC Section R319 for emergency escape and rescue openings.

Exception: Egress roof access windows in lofts used as sleeping rooms shall be deemed to meet the requirements of IRC Section R319 where installed such that the bottom of the opening is not more than 44 inches (1118 mm) above the *loft* floor, provided the egress roof access window complies with the minimum opening area requirements of IRC Section R319.2.1.

Exception: An egress access window installed in an exterior wall at a landing adjacent to and serving as a means of access to a loft used as a sleeping room shall be deemed to meet the egress requirements of IRC Section R319 for that loft, provided that the egress access window otherwise complies with the provisions of IRC Section R319.

Reason:

Add provisions for sleeping loft egress as currently provided by 2024 IRC Appendix BB. Add the option to install the egress window for the sleeping loft at the landing that serves as a means of access to the sleeping loft.

Note: Any provisions of 2024 IRC Appendix BB to be included in this standard must be explicitly added to this standard if this standard is to also be included in the IRC as an optional compliance path for residential structures built according to this standard.

Staff note: Committee moved comment to WG2 3/4/26

WG2 7/29/26 recommendation:

SECTION 309 CEILING HEIGHT

309.1 Minimum ceiling height. Habitable space and hallways in SRUs shall have a ceiling height of not less than 6 feet 8 inches (2032 mm). Bathrooms, toilet rooms and kitchens in SRUs shall have a ceiling height of not less than 6 feet 4 inches (1930 mm). Obstructions including, but not limited to, beams, girders, ducts and lighting, shall not extend below these minimum ceiling heights.

Exception: Ceiling heights in lofts are permitted to be less than 6 feet 8 inches (2032 mm).

SECTION 309

LOFTS

309.0 Lofts. Where provided, lofts shall comply with IRC Section R315 or the provisions of this section, as applicable.

Exception. Where the Tiny Houses Appendix of any version of the IRC is adopted, provisions for lofts as given in that appendix shall apply.

309.1 Minimum loft area and dimensions. Lofts shall meet the minimum area and dimension requirements of Sections 309.1.1 through 309.1.3 of this standard.

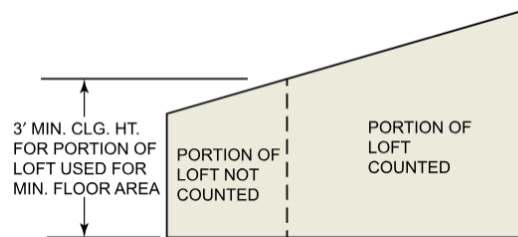
309.1.1 Minimum area. Lofts shall have a floor area of not less than 35 square feet (3.25 m²).

309.1.2 Minimum horizontal dimensions. Lofts shall be not less than 5 feet (1524 mm) in any horizontal dimension.

309.1.3 Height effect on loft area. Portions of a loft with a sloped ceiling measuring less than 3 feet (914 mm) from the finished floor to the finished ceiling shall not be considered as contributing to the minimum required area for the loft. See Figure 309.1.3.

Exception: Under roofs with a minimum slope of 6 units vertical in 12 units horizontal (50-percent slope), portions of a loft with a sloped ceiling measuring less than 16 inches (406 mm) from the finished floor to the finished ceiling shall not be considered as contributing to the minimum required area for the loft.

FIGURE 309.1.1.3 – HEIGHT EFFECT ON LOFT AREA



For SI: 1 foot = 304.8 mm.

309.2 Loft access and egress. Lofts in SRUs may use any means of access and egress described in Sections 309.2.1 through 309.2.4 of this standard. The loft access and egress element along its required minimum width shall meet the loft where its ceiling height is not less than 3 feet (914 mm).

309.2.1 Stairways. Stairways accessing lofts shall comply with IRC Section R315.5.2 or with Sections 309.2.1.1 through 309.2.1.7 of this standard.

309.2.1.1 Width. Stairways accessing a loft shall not be less than 17 inches (432 mm) in clear width at or above the handrail. The width below the handrail shall be not less than 20 inches (508 mm).

309.2.1.2 Headroom. The headroom above stairways accessing a loft shall be not less than 6 feet 2 inches (1880 mm), as measured vertically, from a sloped line connecting the tread, landing or landing platform nosings in the center of their width and vertically from the landing platform along the center of its width.

309.2.1.3 Treads and risers. Risers for stairs accessing a loft shall be not less than 7 inches (178 mm) and not more than 12 inches (305 mm) in height. Tread depth and riser height shall be calculated in accordance with one of the following formulas:

5. The tread depth shall be 20 inches (508 mm) minus four-thirds of the riser height.
6. The riser height shall be 15 inches (381 mm) minus three-fourths of the tread depth.

309.2.1.4 Landings. Intermediate landings and landings at the bottom of stairways shall comply with IRC Section R318.7.6, except that the depth in the direction of travel shall be not less than 24 inches (610 mm).

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309.2.1.5 Landing platforms. The top tread and riser of stairways accessing lofts shall be constructed as a *landing platform* where the *loft ceiling height* is less than 6 feet 2 inches (1880 mm) where the *stairway* meets the *loft*. The *landing platform* shall be not less than 20 inches (508 mm) in width and in depth measured horizontally from and perpendicular to the *nosing* of the *landing platform*. The *landing platform* riser height to the loft floor shall be not less than 16 inches (406 mm) and not greater than 18 inches (457 mm).

Committee Action: **Approved as modified** unanimous

Committee Reason: Intends to bring provisions of the 2024 IRC Appendix BB Tiny Houses into Chapter 3 of the standard in a more organized way.

IS-OSMTH 03-41-25

ICC 1215 Sections 310.1, 310.1.1, 310.1.2

Proponent: Jay Crandell, Consultant

Revise as follows:

310.1 Energy Efficiency requirements. Small residential units and tiny houses shall comply with the applicable energy code requirements of the jurisdiction where the small residential units will be occupied. Where the jurisdiction does not have energy code provisions for ~~small residential units, the small residential unit shall comply with this section.~~ homes, the latest edition of the International Residential Code (IRC) Chapter 11 shall apply. The building thermal envelope of tiny homes of 400 square feet or less is permitted to comply with Table 310.1.2-1 or Table 310.1.2-2 provided the structure complies with section 310.1.3, 310.1.4, and 310.1.5.

~~**310.1.1 Building Thermal Envelope.** Small residential units shall comply with Section N1101.13 of the IRC.~~

Exceptions:

- ~~a. Buildings whose peak energy usage is less than 3.4 Btu/h × ft² (10.7 W/m²) or 1.0 watt/ft² of floor area for space conditioning purposes are exempt to thermal envelope insulation.~~
- ~~b. Small residential units complying with Section 310.1.2.~~

~~**310.1.2 Alternative Building Thermal Envelope.** Small residential units and associated modules with a gross conditioned floor less than 400 square feet are permitted to comply with Table 310.1.2-1 or Table 310.1.2-2 provided the structure complies with section 310.1.3, 310.1.4, and 310.1.5.~~

Reasons:

1.
A different comment requested removal of SRUs from the scope of this standard. However, if that does not occur, this section needs revision to avoid using this standard as a means to bypass minimum energy code requirements for many typical small homes of 800 to 1200 sq ft.
2. The alternative building thermal envelope section should only apply to tiny homes and this change also results in simplification of the section (deletion of Section 310.1.1 since those requirements, with exception of exception 'b' , are already required or exceptions in the IRC Chapter 11.

Staff note: All energy related comments (i.e. Sec 310) to go to WG 2 for group consideration and recommendation to main committee by a March 2026 time frame.
Stay in WG 2 7/29/26

Committee Action: **Disapproved** unanimous

Committee Reason: The SRU size has been reduced to 600 sq.ft.

IS-OSMTH 03-42-25

ICC 1215 Section 310.1.3

Proponent: Jay Crandell, Consultant

Revise as follows:

~~**310.1.3 Building Air Leakage Rate.** The small residential units or each module shall be tested for air leakage in accordance with ANSI/RESNET/ICC 380, ASTM E779, ASTM E1827 or ASTM E3158 and the air leakage rate reported at a pressure differential of 0.2 inch water gauge (50 Pa) shall not~~

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~~exceed 2.0 air changes per hour.~~

Reason:

This section is recommended for deletion and instead rely on the air leakage rate and coordinated ventilation requirements in the IRC. A max 2.0 ACH (or lower) may likely create indoor air quality issues and potentially high indoor humidity affecting building assembly performance and durability (especially in colder climate zones) unless enhanced ventilation methods and building assembly moisture control provisions are implemented. This concern is primarily because this standard is dealing with tiny homes with potentially low air-volume to occupant ratios in comparison to homes typically constructed per the IRC.

By deleting this section, the air leakage requirements in Chapter 11 of the IRC (or local energy code) would apply per Section 310.1. A separate proposal to better convey this requirement by referencing the IRC Chapter 11 is addressed in separate comment on Section 310.1. Alternatively, the IRC's air leakage rate and ventilation requirements should be referenced here in Section 310.1.3.

Staff note:

Committee Action: Disapproved unanimous

Committee Reason: Based on previous action on 03-37-25

IS-OSMTH 03-43-25 ICC 1215 Section 310.1.3

Proponent: Brad Wiseman, Tiny Home Industry Association

Revise as follows:

310.1.3 Building Air Leakage Rate. The small residential units or each module shall be tested for air leakage in accordance with ~~ANSI/RESNET/ICC 380, ASTM E779, ASTM E1827 or ASTM E3158~~ the

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testing methods required in IRC Section N1102.5.1.2 and the air leakage rate reported at a pressure differential of 0.2 inch water gauge (50 Pa) shall not exceed one or more of the following:

1. 2.0 air changes per hour.

2. 0.30 cubic feet per minute per square foot of the DWELLING UNIT ENCLOSURE AREA

Reason:

Due to the potentially controversial nature of the provisions of this section, we need to carefully consider whether this section should be modified, replaced or removed altogether.

As currently written, the required blower door test specifies less than 2.0 air changes per hour, a requirement that becomes increasingly difficult to attain as the building or module size is reduced. A more appropriate measure of air leakage would set a limit on the rate of air flow per square foot of building envelope, which is a metric that treats all buildings equally, regardless of their size.

In the case we would use this modification, we would also need to add the following definition. (Italicized words are defined terms in the IRC and may also need to be defined in this standard.)

DWELLING UNIT ENCLOSURE AREA. The sum of the areas of ceilings, floors and walls that separate the *conditioned space* of a *dwelling unit* from the exterior, its adjacent unconditioned spaces and adjacent *dwelling units*.

Note: The example modifications add existing provisions for air leakage rate as specified in 2024 IRC Appendix BB Tiny Houses.

Energy provisions for any type of building are a potential source of controversy. We need to carefully consider any such provisions to be included in this standard.

In my opinion, it's more important to establish a Tiny House standard that is "acceptable" (and I mean that in the very most literal sense of the word) than it is for the standard to be comprehensive in its coverage of the subject matter. The goal is to help make Tiny Houses more easily permitted for permanent residential use. We cannot achieve that goal if the standard includes content that makes the standard self-disqualifying due to the inclusion of excessively controversial provisions.

We also need to make sure that we don't inadvertently include provisions that are unreasonably difficult to achieve in a small residential space. For instance, if we stick with that maximum of 2.0 air changes per hour metric @ 50 Pascals pressure

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differential, we will make it quite difficult for Tiny Houses under 200 square feet to meet the air leakage requirement without having to resort to extreme measures such as clamped gaskets around exterior doors and windows.

We also need to consider whether our energy provisions might inadvertently negatively affect interior air quality.

Staff note:

Committee Action: Disapproved unanimous

Committee Reason: Based on previous action on 03-37-25

IS-OSMTH 03-44-25 ICC 1215 Revised Section 310

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

Revise as follows:

SECTION 310 ENERGY EFFICIENCY

~~**310.1 Energy Efficiency requirements.** Small residential units shall comply with the applicable energy code requirements of the jurisdiction where the small residential units will be occupied. Where the jurisdiction does not have energy code provisions for small residential units, the small residential unit shall comply with this section.~~

~~**310.1.1 Building Thermal Envelope.** Small residential units shall comply with Section N1101.13 of the IRC.~~

Exceptions:

- ~~a. Buildings whose peak energy usage is less than 3.4 Btu/h × ft² (10.7 W/m²) or 1.0 watt/ft² of floor area for space-conditioning purposes are exempt to thermal envelope insulation.~~
- ~~b. Small residential units complying with Section 310.1.2.~~

~~**310.1.2 Alternative Building Thermal Envelope.** Small residential units and~~

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~~associated modules with a gross conditioned floor less than 400 square feet are permitted to comply with Table 310.1.2-1 or Table 310.1.2-2 provided the structure complies with section 310.1.3, 310.1.4, and 310.1.5.~~

~~**310.1.3 Building Air Leakage Rate.** The small residential units or each module shall be tested for air leakage in accordance with ANSI/RESNET/ICC 380, ASTM E779, ASTM E1827 or ASTM E3158 and the air leakage rate reported at a pressure differential of 0.2 inch water gauge (50 Pa) shall not exceed 2.0 air changes per hour.~~

~~**310.1.4 Space-conditioning equipment.** Heating and cooling equipment shall be sized in accordance with ACCA Manual S based on building loads calculated in accordance with ACCA Manual J or other approved heating and cooling calculation methodologies. The ductwork shall be located completely on the conditioned side of the building thermal envelope.~~

~~**310.1.5 Interior lighting.** All permanently installed lamps and luminaires shall contain only high-efficacy lighting sources and shall be controlled with either a manual dimmer or an occupant sensor control.~~

310.1 Energy Efficiency requirements. Small residential units shall comply with Sections 310.1.1. Small residential units with a gross conditioned floor area less than 400 square feet are permitted to comply with Section 310.2.

310.1.1 Energy Code Compliance. Small residential units shall comply with Section N1101.13 of the IRC.

Exception:

Buildings whose peak energy usage is less than 3.4 Btu/h × ft² (10.7 W/m²) or 1.0 watt/ft² of floor area for space-conditioning purposes are exempt to thermal envelope insulation.

310.2 Alternative Energy Code Compliance. Small residential units with a gross conditioned floor area less than 400 square shall comply with Sections 310.2.1 through Section 301.2.4.

310.2.1 Building Thermal Envelope. The building thermal envelope shall meet the requirement of Table 310.2.1 or Table 310.2.2 based on the climate zone. Assemblies shall have a U-factor equal to or less than that specified in Table 310.2.1. Assemblies with an R-value of insulation materials equal to or great than that specified in Table 310.2.2 shall be an alternative to the U-factor in Table 310.2.1.

310.2.2 Building Air Leakage Rate. The small residential units or each module shall be tested for air leakage in accordance with ANSI/RESNET/ICC 380, ASTM E779, ASTM E1827 or ASTM E3158 and the air leakage rate reported at a

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pressure differential of 0.2 inch water gauge (50 Pa) shall not exceed 2.0 air changes per hour.

310.2.3 Space-conditioning equipment. Heating and cooling equipment shall be sized in accordance with ACCA Manual S based on building loads calculated in accordance with ACCA Manual J or other approved heating and cooling calculation methodologies. The duct- work shall be located completely on the conditioned side of the building thermal envelope.

310.2.4 Interior lighting. All permanently installed lamps and luminaires shall contain only high-efficacy lighting sources and shall be controlled with either a manual dimmer or an occupant sensor control.

Reason: This proposal re-organizes the energy section to set clear and enforceable requirements for energy compliance and clearly differentiate energy code requirements for dwelling units 400 SF and less. It improves clarity and application of the section and assembles it into a bit more logical order. The only new text is the first sentence of the first section, which is italicized if the formatting stays in place. This sentence is necessary to accomplish the intent of this proposal. It is desired that if other changes to these sections are approved, the order and application of this section would remain as it's shown here, with the technical changes of the other comments incorporated into it.

Staff note: This comment should be considered by the committee as part of my comment reordering the energy section 310.

This comment is only proposing to renumber the two tables in conjunction with the other proposal. The full tables are not shown in this comment as no other changes to them are proposed.

TABLE

310.2.1 310.1.2.1 – MAXIMUM THERMAL ENVELOPE EFFICIENCY U-FACTORS

a

Table

310.2.2 310.1.2.2 – MINIMUM THERMAL ENVELOPE EFFICIENCY R-VALUES a

Note: Vote will reflect the format in a logical way but subject to changes as per previous committee action

Committee Action: Approved as submitted unanimous

IS-OSMTH 03-45-25

ICC 1215 Tables 310.1.2-1 and 310.1.2-2

Proponent: Jay Crandell, Consultant

Revise as follows:

Both tables are missing maximum SHGC requirements for vertical fenestration and skylights. This will also require changing the tables' titles to include SHGC (not just U-factor).

(NOTE: Not able to import the tables and add rows with underline, but the intent is to require same as 2024 IRC Chapter 11).

Table 310.1.2-1

Q1:

INSULATION ENTIRELY ABOVE DECK

CZ0-2: ~~0.039~~ 0.051

CZ3: ~~0.039~~ 0.047

CZ4 Except Marine: ~~0.032~~ 0.047

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CZ5 and Marine 4: ~~0.032~~ 0.047

CZ6: ~~0.032~~ 0.038

CZ7&8: ~~0.028~~ 0.038

WOOD-FRAMED WALL

CZ 4 except marine: ~~0.054~~ 0.053

CZ 5 and Marine 4: ~~0.054~~ 0.053

Committee action: Approved as submitted unanimous

Q2:

Maximum Thermal Envelope Efficiency U- and
F-Factors^a

HEATED FLOOR

SLAB ON GRADE (F-factors)

Staff note: Q2 to be assigned to WG 2 for recommendation to main committee to clarify the application of the F-factor for March 2026 time frame. 1/7/26

Committee action 7/29/26: Disapproved unanimous

Reason:

Table 310.1.2-2

Q1:

INSULATION ENTIRELY ABOVE DECK

CZ0-2: ~~25ci~~ 18ci

CZ3: ~~25ci~~ 20ci

CZ4 Except Marine: ~~30ci~~ 20ci

CZ5 and Marine 4: ~~30ci~~ 20ci

CZ6: ~~30ci~~ 25ci

CZ7&8: ~~35ci~~ 25ci

WOOD-FRAMED WALL

CZ 3: 20 or 13+5ci or 0+12.5ci ~~15ci~~

CZ 4 except marine: ~~25~~20 or 15+5ci or 13+6ci or 0+15ci~~20ci~~

CZ 5 and Marine 4: ~~25~~20 or 15+5ci or 13+6ci or 0+15ci~~20ci~~

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Committee action: Approved as submitted

Q2:

HEATED FLOOR SLAB ON GRADE^d

d. Installed below the full area of the heated floor slab on grade heating element and continuing to abut with and include the exterior vertical edge of the slab heated floor face of vertical insulation to create a continuous barrier.

Staff note: Q2 to be assigned to WG 2 for recommendation to main committee to clarify the application of the F-factor for March 2026 time frame. 1/7/26

Committee action 7/29/26: Approved as modified

Reason: Heated floor to be included in the Table but not slab on grade.

Q3:

a. R-values are minimums. Where insulation is installed in a cavity with a depth that is less than the label or design thickness of the insulation, the installed R-value of the insulation shall be reduced due to compression in accordance with the manufacturer's data and shall not be less than the R-value specified in the table. Components not listed in this table shall comply with the requirements of the 2024 edition of the International Residential Code.

Committee action: Approved as submitted

Reason:

SHGC values are very important for energy efficiency (and cooling equipment sizing) and should be included in a manner similar to 2024 IRC Chapter 11 for Climate Zones 0 - 4 (except Marine).

It is recognized that Tables 310.1.2-1 and 310.1.2-2 have relaxed U-factors and R-values for ceiling insulation. We accept this relaxation only if the tables are exclusively limited to the special application of tiny homes, not small homes (as addressed in a separate comment by this proponent). However, consistent treatment of above-deck roof insulation was not made in making ceiling insulation adjustments. For tiny homes, use of above deck insulation (or structural insulated roof panels) should not be comparatively disadvantaged as a practical option. This proposal provides adjustments to U-factors and R-values for "insulation entirely above deck" to better align them with

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adjustments made to “ceiling” R-values – both of which are different methods to insulate a roof system.

Also, we suggest reviewing how three roof system insulation options are addressed in the 2027 IECC-R/IRC Ch11 draft provisions as a more complete set of options for tiny homes which may benefit from these improved code provisions. We also recommend that the roof insulation requirements in Climate Zone 5 (as distinct from Marine 4) should be increased to something higher than R21 for “ceilings” and the equivalent R20ci as proposed herein for “insulation entirely above deck”. Similar increase should be considered for Climate Zones 7 and 8 (e.g., R38 ceiling and R30ci above deck). Again, we only accept relaxation of insulation requirements for tiny homes of 400 sqft or less.

It is recognized that Tables 310.1.2-1 and 310.1.2-2 have relaxed U-factors and R-values for some conditions such as ceiling insulation (addressed in separate comment) and for Climate Zones 4 and 5 as addressed in this comment. We accept this relaxation only if the tables are exclusively limited to the special application of tiny homes, not small homes (as addressed in a separate comment by this proponent).

This comment ensures that the adjusted wall insulation levels in Climate Zones 4 and 5 (to make an intermediate step between Climate Zones 3 and 6-8) are done with equivalent R-value options. The current options are not equivalent and in some cases not compliant with the required U-factor.

First, the U-factor for CZs 4 and 5 in Table 310.1.2-1 is slightly adjusted to 0.054 from 0.053 to better align with the adjusted R-value options provided in Table 310.1.2-2.

Second, the R-value options are adjusted to properly accommodate an intermediate step between CZ 3 and CZ 6-8. R20 is changed to R25 to align with the U-factor that the other options comply with. R20 is used in CZ 3 where the Ufactor is 0.060, confirming that it is not equivalent with the U-factor of 0.053 (or 0.054 as proposed here). In addition, an option for R13+6ci is added to compliment the 15+5ci option (which allows for consistent use of R13 cavity insulation through all climate zones). Finally, the 0+20ci option is too stringent as evidenced by its use in CZ 6-8 with its much lower U-factor. A 0+15ci option is proposed instead because it is actually consistent with the U-factor proposed for CZ 4 and 5 (U-0.054). This then necessitated an small adjustment of the 0+15ci option in CZ 3 to 0+12.5ci to make it more closely aligned with the U-factor of 0.060 required for that climate zone.

As an additional recommendation, it is suggested that a footnote be added to both tables. The footnote should point to the vapor control requirements in IRC Section R702.7.

The vapor control methods required by climate zone will vary depending

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on which insulation option is selected and these need to be coordinated to ensure any option selected is appropriately executed in compliance with IRC Section R702.7.

The F-factors provided in Table 310.1.2-1 are not U-factors as indicated in the table heading. These F-factors are based on a slab being in ground contact and includes the effect of coupled heat flow through the ground and the net effect is characterized as an F-factor which is heat transfer per lineal foot of a slab perimeter (not the floor area like an elevated floor system). Thus, if the intent is to include heated slabs using F-factors as presented in the table then they should be indicated as such for technical consistency (which this proposal does), including change to footnote 'd' to accurately describe the application of R-values based on the F-factors for heated slabs on grade. If instead the intent is to have separate insulation requirements for an elevated floor that has heating elements in or on it, then the "FLOOR" category should be used and actually enhanced in insulation level due to the more direct conductive heat loss caused by a heated floor system above unconditioned space.

This proposal clarifies footnote 'a' to ensure that proper R-value adjustment is made for insulation that is compressed in a cavity and that the adjustment be based on the manufacturer's data. This footnote is also applicable to Table 310.1.2-1 since alternative assemblies justified by use of U-factors may also use compressed insulation. A primary example would be an alternative wall assembly that uses conventional R19 batt insulation in a 2x6 wall (instead of the prescribed R20). It actually has an R18 and this should be used in demonstrating U-factor compliance of the overall wall assembly.

Staff note:

Committee Action: See results in each individual question above.

IS-OSMTH 03-46-25

ICC 1215 Table 310.1.2-2

Proponent: Kaylee DeGrace, Self

Revise as follows:

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Create a separate line for skirting that differentiates it from a crawl wall and reduce the R-value.

Reason:

Skirting for movable tiny houses needs to be impermanent and lightweight enough for eventual transport. It cannot be too costly to replace upon relocation.

Staff note:

Committee Action: Disapproved unanimous

Committee Reason: Comment did not propose a value.

Chapter 7 TRANSPORTATION AND STORAGE

IS-OSMTH 07-01-25

ICC 1215 Sections 701.1, 701.2, new 701.2.1

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

SECTION 701 GENERAL

701.1 General. ~~Units with an integral chassis which have been manufactured or constructed off-site shall comply with the provisions of this chapter. An SRU constructed off-site and its chassis shall be built to withstand the effects of highway movement such that the SRU is transported and installed as a habitable dwelling. Chassis systems used to transport tiny houses, and small residential units shall comply with this chapter.~~

Exception: ~~A chassis used as an independent carrier system to transport the SRU where no portion of that system is a permanent component of the building. Carrier systems that are not an integral chassis, are not required to comply with section 703.~~

701.2 Chassis. SRUs are permitted to be built with or without an integral chassis.

701.2.1 Unit integrity. Tiny homes and small residential unit chassis systems must be designed and constructed to withstand the effects of highway movement such that the unit is transported safely and is delivered and installed as a habitable dwelling.

Reason: The definition of integral chassis was revised in another comment and it is a critical part of this code change. This proposal rewrites the exception to 701.1 by saying carrier systems are exempt from the structural design requirements of the standard, but leaves in place the requirement that any carrier system is capable of delivering the unit intact and in a habitable condition. And this breaks out under unit integrity that expectation to deliver units in habitable condition.

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Staff note: Ask Jeff if there was an intended revision to 701.2, no, just for clarity 3/4/26.

Committee motioned to table till proponent is present 3/11/26

Committee motioned 8-1 to move to WG2 3/25/26.

Remains tabled: 7/29/26

Committee Action:

Committee Reason:

IS-OSMTH 07-02-25 ICC 1215 Sections 701.1, 701.2

Proponent: Shane Nilles, Self

SECTION 701 GENERAL

701.1 General. ~~Units SRUs with an integral chassis which have been manufactured or constructed off-site shall comply with the provisions of this chapter. An~~ In addition to the requirements of Section 308, the SRU constructed off-site and its chassis shall be built to withstand the effects of transportation, including highway movement such that the SRU is transported and installed as a habitable dwelling.

Exception: A chassis used as an independent carrier system to transport the SRU where no portion of that system is a permanent component of the building.

701.2 Chassis. ~~SRUs are permitted to be built with or without an integral chassis.~~

Reason: Cleans up terminology and editorial rewrite of 701.1 for clarity. 701.2 is proposed to be deleted as it is covered in Section 308.4

Staff note:

701.1 General. SRUs with an integral chassis shall comply with the provisions of this chapter. In addition to the requirements of Section 308, the SRU and its chassis shall be built to withstand the effects of transportation.

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Committee Action: **Approved as modified** unanimous

Committee Reason: It recognizes potential movement that may not include highway transportation. Also incorporates on-site and manufactured SRUs.

IS-OSMTH 07-03-25 ICC 1215 Section 701.1

Proponent: Mike Spooner, Self

SECTION 701 GENERAL

701.1 General. Units with an integral chassis ~~which have been manufactured or constructed off-site~~ shall comply with the provisions of this chapter. An SRU ~~constructed off-site~~ and its chassis shall be built to withstand the effects of highway movement during transportation without compromising its integrity as a habitable dwelling. ~~such that the SRU is transported and installed as a habitable dwelling.~~

Reason: I believe that homes constructed on-site with an integral chassis should also comply with the transportation provisions since they could be moved at a later date. I found the second sentence of 701.1 grammatically awkward and confusing. I've suggested an alternative phrasing.

Staff note:

Committee Action: **Disapproved** unanimous

Committee Reason: Based on previous committee action on 07-02-25

IS-OSMTH 07-04-25

ICC 1215 Section 701.1

Proponents: Janet Thome, Tiny House Alliance USA
Mike Spooner, self

Revise as follows:

701.1 General. Units with an integral chassis which have been manufactured or constructed off-site shall comply with the provisions of this chapter. An SRU constructed off-site and its chassis shall be built to withstand the effects of highway movement such that the SRU is transported and installed as a habitable dwelling.

~~**Exception:** A chassis used as an independent carrier system to transport the SRU where no portion of that system is a permanent component of the building.~~

Reason:

Thome:

The exception for the independent carrier as currently written system would not have to comply to federal laws that states must follow which would override multiple laws and ICC policy. I have stricken the section without replacement for the following reasons.

I am objecting to the **exception in Chapter 7, Section 701.1 of the ICC/THIA 1215 standard**, which allows an “**independent carrier system**” to transport Small residential Units (SRUs) without compliance with federal motor-vehicle safety requirements. This provision effectively removes this type of chassis from the **NHTSA and DOT safety and registration system**, creating what I call a ‘**Ghost Trailer-**’

A carrier system that acts as a temporary chassis with no VIN, no certification labels, and no FMVSS compliance. For more than fifty years this loophole has enabled untraceable, untaxed, not properly insured trailers to operate on public highways outside of federal oversight with all the liability on the transporter. By institutionalizing this exception, ICC 1215 legitimizes an illegal practice, undermines federal safety law, invites tax evasion, and poses a direct risk to public safety.

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Spooner:

The definition of “integral chassis” already excludes carrier systems. It’s not clear to me what the purpose of the exception is, unless it’s simply to point out that independent carrier systems are beyond the scope of this standard. I’m certain that these systems would still be subject to DOT regulation and must be built to withstand highway movement, so I’m not sure what is being exempted.

Staff note: To WG 3 as part of their upcoming recommendation 5/27/26.

Committee Action: **Approved as submitted** unanimous

IS-OSMTH 07-05-25

ICC 1215 Section 701.2

Proponents: Vera Struck, Self and Janice Kenney, Movable Tiny House Legislative Task Force (MASS.)

Revise as follows:

701.2 Chassis. SRUs are permitted to be built with ~~or without~~ an integral chassis.

Reason: A dwelling without the integral chassis would be covered under other modular standards and thus should not be duplicated here.

Staff note: WITHDRAWN BY PROPONENT 3/11/26

IS-OSMTH 07-06-25

ICC 1215 Section 701.2

Proponents: Macy Miller, Self

Revise as follows:

701.2 Chassis. SRRUs are permitted to be built with ~~or without~~ an integral chassis.

Reason: A dwelling without the integral chassis would be covered under other modular standards and is duplicative here.

Staff note:

Committee Action: **Disapproved** unanimous

Committee Reason: Based on previous committee action on 07-02-25

IS-OSMTH 07-07-25

ICC 1215 Section 702.1

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

SECTION 702 CHASSIS

702.1 Chassis. All Integral chassis shall be built in compliance with DOT requirements and have verification by documentation indicating the chassis complies with DOT requirements for the loads and weights shown on the data plate.

Reason: This comment clarifies that the standard is regulating integral chassis, not carrier systems.

Staff note: Ask Jeff if there was an intended revision to 701.2. WG 3 to continue work on this. 5/27/26

Committee Action: **Approved of submitted** unanimous

IS-OSMTH 07-08-25

ICC 1215 New Sections 702.2, 702.2.1, 702.3, 702.4, 702.4.1, 702.5, 702.6

Proponent: David Tompos, Sr., NTA, Inc.

Revise as follows:

702.2 Axles. Axles and their connecting hardware must be capable of supporting the static running gear design loads, without exceeding maximum allowable design axles loads as recommended by the axle manufacturer.

702.2.1 Recycled axles. Before reuse, all axles, including component parts, must be reconditioned as required pursuant to a program accepted and labeled by a nationally recognized testing agency.

702.3 Spring assemblies. Spring assemblies(springs, hangers, shackles, and mounting bolts) must be capable of supporting the running gear design loads, without exceeding maximum allowable stresses for design life as recommended by the spring assembly manufacturer.

702.4 Tires. Tires must be selected, sized, and fitted to the rims and axles so the static dead load supported by the running gear does not exceed the load capacity of the tires. Tire must not be loaded beyond the load rating marked on the sidewall of the tire.

702.4.1 Inflation pressure. The load and cold inflation pressure imposed on the rim or wheel must not exceed the rim and wheel manufacturer's instructions even if the tire has been approved for a higher load or inflation.

702.5 Coupling mechanism. The coupler mechanism shall have a certified load rating capable of carrying the actual imposed design loads, when installed in accordance with the manufacturer's instructions. As part of the coupler mechanism there shall be an approved breakaway system.

702.6 Location. Location of the running gear assembly must be determined by documented engineering analysis, taking into account the gross weight (including contents), total length of the unit, and the necessary coupling hitch weight. Weight shall be checked with the home in the level position.

Reason: If the home is to be considered to be transported the specific components must be inspected and verified by the manufacturer or builder to ensure a safe transport

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to the site. Just adding a VIN number or a certified frame does not provide assurance that the home installed on a chassis will be in compliance with DOT requirements.

Staff note: Committee motioned to WG3 3/11/26
Remains in WG 3: 7/29/26

Committee Action:

Committee Reason:

IS-OSMTH 07-09-25 ICC 1215 Section 702.1

Proponent: Janet Thome, Tiny House Alliance USA

Revise as follows:

702.1 Chassis. All chassis shall be built in compliance with DOT requirements and have verification by documentation indicating the chassis complies with DOT requirements for the loads and weights shown on the data plate federal laws for motor vehicles, which include trailers. Manufacturers shall obtain a WMI Code from SAE to legally issue VIN numbers on the trailers for sale and follow all NHTSA, FMVSS, FMCSA, standards, and requirements, and any additional state requirements. Manufacturers shall self-certify the trailers which is required by NHTSA and requires labeling of the trailer. Manufacturers shall follow all state requirements for trailers that include, but are not limited to the issuing of MSCs/MCOs, bill of sale, registration, titling, and a possible inspection by the state patrol. Manufacturers of trailers that build trailers in two or more stages shall comply with CFR Title 49 PART 568—VEHICLES MANUFACTURED IN TWO OR MORE STAGES—ALL INCOMPLETE, INTERMEDIATE AND FINAL-STAGE MANUFACTURERS OF VEHICLES MANUFACTURED IN TWO OR MORE STAGES Owner builders shall follow all state laws to obtain a VIN number and for compliance.

Reason: Please refer to 07-02-25 reason statement with the following:

702.1 as written would override federal requirements and create its own requirements for the data plate. Listing only DOT, is an omission of the rest of the federal requirements that preempt all codes and standards.

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There are federal specific laws that exist for manufacturers that build trailers in two or more stages and they cannot be denied by purposely omitting them.

Staff note: In discussion with WG3 5/27/26.

Committee Action: Disapproved unanimous

Committee Reason: Code official would be unable to navigate through this based on various Federal laws and other jurisdictions.

IS-OSMTH 07-10-25 ICC 1215 Section 703

Proponent: Kaylee DeGrace, Self

Revise as follows:

~~SECTION 703-~~ ~~STRUCTURAL SUPPORT DURING TRANSPORTATION~~

~~703.1 Connection to an integral chassis. Connection of the SRU to the chassis for in-transit conditions shall be in accordance with acceptable engineering practice.~~

Reason: Is redundant to 701.1-702.1.

Staff note:

Committee Action: Disapproved unanimous

Committee Reason: Deletion not appropriate with other comments on the subject pending.

IS-OSMTH 07-11-25

ICC 1215 Section 703.1

Proponent: Kelly Cobeen, Wiss Janney Elstner Associates

Revise as follows:

SECTION 703

STRUCTURAL SUPPORT DURING TRANSPORTATION

703.1 Connection to an integral chassis. ~~Connection of the SRU to the chassis for in-transit conditions~~ Where not fastened in accordance with Section 308.5, fastening shall be in accordance with acceptable engineering practice.

Reason: Section 703.1 is currently in conflict with Section 308.5 that addresses one approach for attaching the dwelling to the chassis for in-transit conditions. This would resolve the current conflict.

Staff note: WITHDRAWN by proponent 3/25/26

IS-OSMTH 07-12-25

ICC 1215 Section 703.1

Proponent: Mike Spooner, self

Revise as follows:

SECTION 703

STRUCTURAL SUPPORT DURING TRANSPORTATION

703.1 Connection to an integral chassis. Connection of the SRU to ~~the~~ **an integral** chassis for in-transit conditions shall be in accordance with Section 308.5 ~~acceptable engineering practice.~~

Reason: Section 308.5 covers attachment to the integral chassis.

Staff note: Committee tabled till Kelly Cobeen can discuss 07-11-25 3/11/26

Committee Action: **Approved as modified** unanimous

Committee Reason:

IS-OSMTH 07-13-25

ICC 1215 Section 703.1, new 703.2

Proponent: Janet Thome, Tiny House Alliance USA

Revise as follows:

703.1 Connection to an integral chassis. Connection of the SRU to the chassis for in-transit conditions shall be in accordance with ~~acceptable engineering practice~~ NHTSA.

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FMVSS, FMCSA, additional state laws and in accordance with acceptable engineering practices.

703.2 Temporary connection. Temporary connection of the temporary chassis system to the Modular structure shall be in compliance with the FMCSA standards and all DOT requirements for cargo securement.

Reason:

Please refer to 07-02-25 and 07-03-25 reason statements with the following:, the verbiage as written would override federal requirements of trailers that are already in existence.

Cargo securement regulations, primarily set by the FMCSA require that cargo on large commercial vehicles be firmly immobilized or secured to prevent shifting, falling, or spilling during transit. This involves using a combination of strong structures, tiedowns, bracing, blocking, and other restraints to withstand specific forces.

Regulations specify minimum numbers of tiedowns, requirements for different cargo types, and rules for inspecting the load at regular intervals.

With all the wrecks that have occurred because of the 'Ghost Trailers', it is crucial that there is no exception for this type of trailer. The standard as written would keep this method so it is undetected and to continue this illegal transport.

Staff note: In discussion with WG3 5/27/26.

Committee Action: Disapproved unanimous

Committee Reason: Not part of the permanent structure therefore out of scope.

IS-OSMTH 07-14-25

ICC 1215 New Section 703.1.2

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

703.1.2 Contents during transport. Personal property and contents shall be removed before transportation of any unit.

Exception: Fixed equipment and components that are calculated as part of the unit's dead load are not required to be removed.

Reason: This comment intends to clarify the expectation that moving of units requires removal of most contents constituting the units live load.

Staff note:

Committee Action: Disapproved 8-1

Committee Reason: Too difficult to enforce. Should be included in manufacturers owners manual.

Chapter 8 ON-SITE INSTALLATION

IS-OSMTH 08-01-25 ICC 1215 Section 801.1

Proponent: Shane Nilles, Self

Revise as follows:

Question 1:

~~SECTION 801~~

~~GENERAL~~

~~**801.1 General.** The manufacturer or builder shall provide submittal documents that shall be in accordance with Section 107 of the IBC or Section R105.3 or R106 of the IRC or in accordance with the regulations imposed by the AHJ at the site where the building is to be placed.~~

Staff note: Committee moved Q1 to WG3 3/11/25

Committee Action: Approved as modified unanimous

Committee Reason: Delete Section 801 and preserving Chap 8 as reserved.

Question 2:

~~SECTION 802~~

~~FOUNDATION~~

~~**802.4**~~ **308.4 Foundation.** Foundation shall be constructed in accordance with Chapter 4 of the IRC.

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Reason: Section 308 includes all other structural design; there doesn't appear to be a reason that the foundation portion is not also in that section.

Staff note: Not clear how the remainder of Section 802 is addressed.

Staff note: Committee split the question. Committee moved Q1 to WG3 3/11/25

Staff note: The mod will move all of section 802 to a new 308.3 and renumber accordingly 4/1/26

Committee Action: **Approved as modified** unanimous

Committee Reason: Per proponent reason statement but to section 308.3.

IS-OSMTH 08-02-25 ICC 1215 Section 801.1

Proponent: Jeffrey Munsterteiger, National Association of Home Builders

Revise as follows:

SECTION 801

GENERAL

801.1 General. ~~The manufacturer or builder shall provide submittal documents that shall be in accordance with Section 107 of the IBC or Section R105.3 or R106 of the IRC or in accordance with the regulations imposed by the AHJ at the site where the building is to be placed.~~ The design and construction of site-built foundations shall comply with this section.

Reason: This comment revises the first sentence to say what most general statements are expected to say regarding the scope of the section.

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Staff note: Jeff to offer new scoping statement for Chapter 8 since Section 803 will remain. 4/1/26
Reserved till Jeff reports.

Committee Action:

Committee Reason:

IS-OSMTH 08-03-25 ICC 1215 New Section 801.2

Proponent: David Tompos, Sr., NTA, Inc.

Revise as follows:

801.2 Installation. The SRU and Tiny house must be installed in compliance with the manufacturer's installation instructions or the local authority having jurisdiction.

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Exception: When the manufacturer's instructions are not available, the home may be set in locations with a design roof live load of 20lbs/sf and wind loads of less than 130mph as follows:

Supports under the two main structural frame members will be located 2ft from each end and 8ft O.C. along the length of the home. Additional supports will be located at each corner of the home. Each support must have a load capacity of 5000lbs. The supports must be designed by a Registered Engineer or Architect or certified and labeled by a Nationally Recognized testing Agency.

Vertical tie downs must be installed at each corner of the house and diagonal ties must be installed within 2ft of each end of the home and 8ft O.C. along the length of the house. The vertical and diagonal ties must have a design load capacity of 3150lbs. The vertical and diagonal ties must be attached to an anchoring system having a load capacity of 3150 lbs. The vertical and diagonal ties and the anchoring system must be certified and labeled by a Nationally Recognized Testing Agency.

Reason: More prescriptive than having to hire an engineer.

Staff note:

Committee Action: **Disapproved** unanimous

Committee Reason: Other WGs are working on this material in other sections where it can be better addressed.

IS-OSMTH 08-04-25

ICC 1215 Sections 802 and 803

Proponent: Kelly Cobein, Wiss Janney Elstner Associates

Revise as follows:

As noted in the First Committee Action Report, my previous public comment on chapter 8 has been reserved pending completion of this ballot. A very significant amount of work

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is needed on the foundations chapter. Two directions are viable - one is permanent foundations in accordance with the IRC and fully conforming to the IRC and the second is installation for gravity loads and anchorage for wind and seismic for dwellings with integral chassis. There have been group discussion about drawing from available manufactured housing information to pre-engineer prescriptive solutions to address these needs consistent with IRC and IBC wind and seismic requirements. Short of this it will be necessary to require engineered installation and anchorage systems.

Reason: See above.

Staff note: Comment to committee, not actionable.

Committee Action: n/a

IS-OSMTH 08-05-25 ICC 1215 Section 802.1

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

Revise as follows:

802.1 Foundation. Foundation shall be constructed in accordance with Chapter 4 of the IRC, except as modified by this section.

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Reason: This comment is adding text clarifying that the remainder of the section modifies IRC foundation requirements.

Staff note: WITHDRAWN by proponent 5/6/26

IS-OSMTH 08-06-25

ICC 1215 Sections 802.1 and 802.3.2

Proponent: Kol Peterson, Self

Revise as follows:

SECTION 802

FOUNDATION

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802.1 Foundation. Foundation shall be constructed in accordance with Chapter 4 of the IRC unless AHJ determines that Tiny Houses on Wheels do not require a foundation.

802.3.2 Material. Footing material shall provide equal load bearing capacity and resistance to decay. Footing material shall be one of the following:

1. Four-inch nominal precast concrete pads meeting ASTM C90-23.
2. Six inch minimum poured in place concrete pads, slabs, or ribbons with at least a 28-day compressive strength of 3000 pounds per square inch.
3. Pressure treated plywood is to be rated exposure 1 or exterior sheathing in accordance with PS-1-95.
4. ABS footing pads that are listed or labeled for the required load capacity for use in the soil classification at the site.
5. Other materials that are certified by a registered design professional and accepted by the local AHJ.
6. Not requiring a foundation altogether is acceptable if the AHJ does not require legally inhabited recreation vehicles to have foundations.

Reason: We are providing comments on the ICC 1215 sections that relate to Foundation and Anchoring systems.

We operate a licensed general contractor business installing Tiny Homes on Wheels (THOWs) in a jurisdiction that has greater adoption of this housing types than other jurisdictions in the US. Indeed, our business is solely focused on providing RV hookups, and setting up THOWs for clients once THOWs have been delivered to the site.

We have unique credibility to offer recommendations to these two components of the ICC 1215 draft code. Our recommendations are based on years of first-hand experience successfully installing tens of legal tiny houses on wheels on residential properties in different site conditions.

Our extensive field experience demonstrates that permanent foundations are unnecessary for THOWs and often work against their intended purpose. Many THOWs are designed for periodic relocation, making permanent, site-specific foundations incompatible with their inherent mobility and flexibility.

In practice, we install THOWs on piers as described in 802.4(1), placed on 20" x 20" x 2" pavers over compacted sand. This approach eliminates the need for both a foundation and compacted gravel while providing stable, settlement-free installation on virtually any dirt surface.

Pier systems offer a key advantage: portability. Unlike permanent foundations, they can be easily transported when a THOW is relocated. Permanent foundations also present practical challenges—a sonotube pier foundation designed for one THOW may be incompatible with another due to differences in chassis design and vertical load points. This means foundations often require customization for individual units, adding cost without providing meaningful benefit.

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THOWs function essentially as non-motorized travel trailers. Just as homeowners may legally park travel trailers on unpaved surfaces in their yards, THOWs can similarly be parked and occupied on residential properties without foundations.

As currently drafted, Section 802.1 implies that foundations are mandatory. This does not reflect how jurisdictions like ours have successfully regulated occupied THOWs for years. We recommend revising Section 802.1 to state explicitly that permanent foundations are optional. While Chapter 4 may ultimately provide alternative compliance paths, this section should make the optional nature of foundations clear on its face.

Staff note:

Committee Action: Disapproved unanimous

Committee Reason: Whatever means that translates the load is a foundation.

IS-OSMTH 08-07-25 ICC 1215 Section 802.3.1

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

Revise as follows:

802.3.1 Depth. Footing depth shall be in accordance with section R403.1.4 of the IRC.

Exceptions:

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1. The footing of the SRU shall not be required to be placed below the frost line when the underside of the unit is protected with a foundation wall or skirting having an insulation value of R-6 minimum from the underside of the unit to grade.
2. ~~A monolithic slab is permitted above the frost line where site-specific conditions including soil characteristics, site preparation, ventilation and insulative properties of the under floor enclosure are considered.~~

Reason: Exception 2 doesn't provide enough specificity for the AHJ to consider permitting a monolithic slab above the frost line. What are the conditions of the items listed that need be met for this approval?

This exception should be deleted unless it is made clearer for the standard's user to properly apply the section.

Staff note:

Committee Action: **Approved as submitted** unanimous

IS-OSMTH 08-08-25 ICC 1215 Section 802.3.2

Proponent: Jeffrey Munsterteiger, National Association of Home Builders (NAHB)

Revise as follows:

802.3.2 Material. ~~Footing material shall provide equal load bearing capacity and resistance to decay. Footing material shall be one of the following:~~ Materials used for footings supporting tiny houses shall comply with the IRC, or one of the materials in this section.

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2. ~~Four-inch nominal~~ Precast concrete pads ~~meeting ASTM C90-23~~ complying with ACI 318.
3. ~~Six-inch minimum~~ Poured in place concrete pads, slabs, or ribbons with at least a 28-day compressive strength of 3000 pounds per square inch.
4. ~~Pressure~~ Preservative treated plywood ~~is to be~~ rated exposure 1 or exterior sheathing in accordance with PS-1-95 and which complies with IRC R304.
7. ABS footing pads that are listed or labeled for the required load capacity for use in the soil classification at the site.
5. Other materials that are certified by a registered design professional and accepted by the local AHJ.

Reason: Section 802.3.2 is material specifications for footings, which is in addition to requirements of the IRC. Revisions in the paragraph reflect this. The sentence deleted says materials "shall provide equal loadbearing capacity and resistance to decay" but doesn't clarify further regarding equal to what.

In items 1 and 2, the minimum thickness are minimum design requirements, not material specifications.

In item 3, industry doesn't generally refer to treated materials as pressure treated, as there are other treatment methods. And wood materials need to meet the decay resistance requirements of IRC R304, so that's clarified in that section.

Additionally in item 1, I've further researched the standard for precast footings and believe that ACI 318 is the correct standard. This proposal seems to be based primarily on federal HUD requirements for Manufactured Homes, which in many cases are extremely out of date. I searched for examples of how precast footing manufactures are specifying their footings, and in ESR-5035 is just one example, and they are listing their precast footings in accordance with ACI 318.

Staff note: 308.3

Committee Action: Approved as submitted unanimous

IS-OSMTH 08-09-25 ICC 1215 Section 802.4

Proponent: Mike Spooner, self

2025 ICC 1215 - Standard Comment and Proposals

Revise as follows:

802.4 Piers. Piers shall be capable of transmitting the vertical live and dead loads to the footing or foundation. Piers shall be one of the following:

1. Concrete block (open or closed cell) meeting ASTM C90-23 and **TMS 402/602-22**, 8 inches x 8 inches x 16 inches single layer **-wythe stack** maximum 36 inches high ~~and~~ or double **-wythe stack** interlocked blocks maximum 67 inches high. Mortar is not required unless written in the installation instructions or required by the design professional or the AHJ.
2. Metal or other approved piers shall be listed or labeled and installed in compliance with the manufacturer's installation instructions.
3. Other materials that are certified by a registered design professional and accepted by the local AHJ.

Reason: believe "stack" is clearer than "layer" and also matches the language from Appendix A.

Staff note: 308.3

Committee Action: **Approved as modified** unanimous

Committee Reason: Consistent language with TMS 402.

IS-OSMTH 08-10-25

ICC 1215 Section 802.5

Proponent: Kol Peterson, Self

Revise as follows:

802.5 Anchorage. Anchorage systems shall comply with one of the following:

1. IRC, section R403.1.6.
2. Designed by a registered design professional.
3. Requirements of the local AHJ.

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4. Not requiring an anchorage system is acceptable, especially if the AHJ does not require legally inhabited recreation vehicles to have anchorage.

Reason: Mandatory ground anchoring requirements create unnecessary barriers to THOW installation by increasing complexity, time, and cost without corresponding safety benefits in many locations. THOWs differ fundamentally from manufactured homes, yet this draft's foundation and anchoring language blurs that distinction. THOWs are not HUD-code manufactured homes and should not be treated as such.

The mobility of THOWs is not theoretical—we regularly relocate units for our customers. Concerns about high winds, lateral movement, and overturning, while valid for some regions, do not apply universally. In many markets, including ours, these risks are negligible for properly weighted THOWs.

This draft should explicitly state that anchorage systems are not required in all cases. Without such clarification, jurisdictions may incorrectly interpret this code as mandating anchoring for all THOWs—a requirement that conflicts with existing successful regulatory frameworks.

Several Oregon jurisdictions currently permit occupied THOWs on residential properties without requiring foundations or anchoring systems. Notably, Deschutes County explicitly prohibits permanent attachments between THOW chassis and the ground as a condition of compliance. Other examples include Clackamas County, Lane County, and the City of Portland—all of which have adopted workable THOW regulations without foundation or anchoring mandates.

Staff note:

Committee Action: **Disapproved** unanimous

Committee Reason: Local AHJ may not require anchoring system. Outside the scope of the this standard to that that pertains to RVs.

IS-OSMTH 08-11-25 ICC 1215 Section 803

Proponent: Shane Nilles, Self

Revise as follows:

~~SECTION 803~~

~~CONNECTIONS~~

~~803.1~~ 103.1.2 Manufacturer instructions. The manufacturer or builder shall provide instructions that describe the details for:

1. Foundation loads, anchorage details and required capacity of anchorage devices.
2. Maximum foundation support, spacings, and any additional information necessary for the proper support of the building.
3. Information on the connection of building or plumbing, gas, electrical services.
4. Installation of all other items necessary to complete the SRU on site.

Reason: These requirements belong with the rest of the construction document requirements. If there are technical requirements that are necessary to be outlined as part of an “on-site” section, they could reference the construction documents section as part of those requirements if necessary.

WG 3 recommendation Option 2 for moving Section 803 to reside in Chapter 1:

103.1 General requirements. The construction documents shall meet comply with this section and the following requirements:

1. The construction documents shall be of sufficient clarity to indicate the location, nature and extent of the work proposed and show in detail that it will conform to the provisions of this standard and the requirements of the AHJ regarding small residential units.
2. The construction documents shall delineate off-site construction components from site-built components where required by the AHJ.

103.1.1 Additional requirements for non-site-specific components, buildings, small residential units and tiny houses. Off-site construction components and small residential units and tiny houses that do not have site-specific design criteria shall be noted as such on the construction documents. These documents, and any data plates must specify the design criteria for the unit. The AHJ shall verify that the proposed small residential units and or tiny houses meets the design criteria and requirements for its site location.

<Section 803 moved here>

103.1.2 Manufacturer instructions. The manufacturer or builder shall provide instructions that describe the details for:

1. Foundation loads, anchorage details and required capacity of anchorage devices.
2. Maximum foundation support, spacings, and any additional information necessary for the proper support of the building.
3. Information on the connection of building or plumbing, gas, electrical services.

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4. Installation of all other items necessary to complete the SRU on site.

Staff note:

Committee Action: **Approved as modified** unanimous

Committee Reason: As per WG3 Option 2 recommendation.

IS-OSMTH 08-12-25

ICC 1215 Section 803.1

Proponent: Mike Spooner, Self

Revise as follows:

SECTION 803

CONNECTIONS

803.1 Manufacturer instructions. For SRUs manufactured off-site, the manufacturer or builder shall provide instructions that describe the details for:

2. Foundation loads, anchorage details and required capacity of anchorage devices.
3. Maximum foundation support, spacings, and any additional information necessary for the proper support of the building.
4. Information on the connection of building or plumbing, gas, electrical services.
5. Installation of all other items necessary to complete the SRU on site.

Reason: If building on-site (e.g. owner-builder), the builder and installer would be one and the same, making manufacturer instructions unnecessary.

The foundation and anchorage may still require engineering, but that is covered elsewhere in the standard and would be in the submittal documents.

Staff note:

Committee Action: Disapproved unanimous

Committee Reason: Not persuasive with respect to the importance of the change.

Chapter 9 REFERENCED STANDARDS

IS-OSMTH 09-01-25 ICC 1215 Section

Proponent:

Revise as follows:

Reason:

Staff note:

Committee Action:

Committee Reason:

APPENDIX B

IS-OSMTH APP B 1 2025 ICC 1215 Section Appendix B

Proponent: Janet Thome, Tiny House Alliance USA

Revise as follows: Delete all

~~Appendix B~~ ~~SMALL RESIDENTIAL UNIT DATA PLATE~~

~~Small Residential Data Plates shall display information pertinent to the structures constructed for use by AHJ's. Data required shall include but not be limited to:~~

- ~~• BUILDER NAME (MANUFACTURER)~~
- ~~• BUILDER CONTACT INFORMATION (MAN. SITE)~~
- ~~• WIND LOAD~~
- ~~• ROOF LIVE/DEAD LOAD~~
- ~~• SNOW LOAD~~
- ~~• FLOOR LIVE LOAD~~
- ~~• SEISMIC/RICHTER CATEGORY~~
- ~~• HEATING/COOLING THERMAL DESIGN ZONE~~
- ~~• GROSS WEIGHT OF STRUCTURE~~

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- ~~BUILD DATE~~
- ~~SERIAL NUMBER~~
- ~~LIST OF CODES/OCCUPANCY CLASSIFICATION~~
- ~~ELECTRICAL PANEL BOX RATING~~

Location. ~~Small Residential Unit Data Plate shall be placed on the interior of the structure, near the distribution panel on a closet wall or in a cabinet under the kitchen sink in the unit.~~

Material. ~~Small Residential Unit Data Plate shall be constructed of material durable to water, heat and fading.~~

Example ~~Small Residential Unit Data Plate.~~

Small Residential Unit Data Plate	
Builder/Manufacturer Contact Info: (Name, address, Email, Phone, Web)	Additional Documents with DataPlate: ResCheck
Date of Build: Serial Number: Weight (LL/DL) Wind Load (Zone) Roof Load (LL/DL) Floor (LL) Snow Load Seismic Risk Category (Zone/g) Heating/Wiring (AMP) Thermal Resistance Values: (Roof/Walls/Floor) List of Codes/Occupancy Classification	Special Installation/Handling Instructions Y/N  The builder certifies to the best of their knowledge and belief that this Movable Tiny House has been inspected in accordance with the requirements of the AHJ (Authority having jurisdiction) and is in compliance with the IRC and ICC/THIA Standard 1215.

Reason:

An SRU can be either on or off a chassis. This appendix cannot be written because this standard would violate ICC policy by overriding federal laws.

The data plate statement is not appropriate to the standard. No where in the standard is the term Movable Tiny House is defined or found in text anywhere else in the standard. It is referring to a tiny house on wheels with an integrated trailer. The tiny house that is delivered on the temporary carrier system or the 'Ghost Trailer' does not have a permanent chassis.

The data plate statement is basically giving the builder the ability to self -certify that the Movable Tiny House Is Inspected, but What Agency Inspects Them?
How could a Movable Tiny House comply to the IRC, if Movable Tiny Houses are not in the code?

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How can a Movable Tiny House be inspected by the requirements of an AHJ, if they are only guided by ICC 1215, that has denied most federal requirements that states are mandated to follow?

Staff note:

Committee Action: Disapproved unanimous

Committee Reason: Data plate is needed. No federal pre-emption as per ICC BOD determination.

IS-OSMTH APP B 2 2025 ICC 1215 Section Appendix B

Proponent: Kaylee DeGrace, Self

Revise as follows:

Appendix B SMALL RESIDENTIAL UNIT DATA PLATE

Small Residential Unit Data Plates shall display information pertinent to the structures constructed for use by AHJ's. Data required shall include but not be limited to the following ~~(and builders may opt to include additional information):~~

Reason:

AHJs should not be given the leeway to require additional data points ad libitum.

Staff note: Vera offered to update the data plate example with new text desired by the committee.

Committee Action: Approved as modified unanimous

Committee Reason: Deemed unnecessary and extraneous.

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ICC 1215 Section Appendix B

Proponent: Kelly Cobeen, Wiss Janney Elstner Associates

Revise as follows:

Appendix B

SMALL RESIDENTIAL UNIT DATA PLATE

Small Residential Data Plates shall display information pertinent to the structures constructed for use by AHJ's. Data required shall include but not be limited to:

- BUILDER NAME (MANUFACTURER)
- BUILDER CONTACT INFORMATION (MAN. SITE)
- WIND LOAD BASIC WIND SPEED WIND EXPOSURE CATEGORY, AND WHETHER OR NOT DESIGNED FOR WINDBORNE DEBRIS
- ROOF LIVE/DEAD LOAD
- ROOF DESIGN SNOW LOAD
- FLOOR LIVE LOAD
- SEISMIC/RICHTER CATEGORY SEISMIC DESIGN CATEGORY AND DESIGN SHORT PERIOD SPECTRAL RESPONSE ACCELERATION, SDS
- HEATING/COOLING THERMAL DESIGN ZONE
- GROSS WEIGHT OF STRUCTURE
- BUILD DATE
- SERIAL NUMBER
- LIST OF CODES/OCCUPANCY CLASSIFICATION
- ELECTRICAL PANEL BOX RATING

Reason:

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See above

Staff note:

Committee Action: Approved as submitted unanimous