

Results from the International Code Council (ICC) Public Comment Hearings in Hartford, CT (April 19-28, 2026)

Summary

Below are the twelve public comments that codes staff identified as important to BOMA members. Additionally, each public comment is color coded to denote its result at the hearings:

Green = victory; **Yellow** = mitigated; **Red** = loss.

Overall, BOMA was quite successful, achieving nine victories, one mitigation, and only two losses (both of which resulted in a maintenance of the status quo).

1. **Proposal F108-24**: Sprinkler Requirements for Lithium-Ion Vehicle Parking Garages
 - a. Description: Adds a new requirement stating that an approved automatic sprinkler system shall be provided throughout fire areas used for the parking or storage of lithium-ion or lithium metal powered vehicles where the fire area exceeds 500 square feet.
 - b. PCH Result
 - i. The Public Comment Hearing resulted in the approval of Proposal F108-24 as modified by Public Comment 1, mandating automatic fire suppression systems for all new open and enclosed public parking garages. For BOMA members, this outcome represents a strategic compromise; while it expands sprinkler requirements for new construction to align with NFPA 88A standards, it successfully avoids the costly retroactive mandates for existing structures that the original proposal might have triggered. By removing the specific "EV targeting" language, the code now provides a more predictable regulatory environment for commercial property owners and developers. This shift ensures that fire safety standards evolve with modern vehicle risks without imposing the logistical burden of monitoring specific lithium-ion parking fire areas within older facilities.
2. **Proposal F116-24**: Fire Alarm Monitoring
 - a. Description: A proposal to clarify the requirement for monitoring automatic fire-extinguishing systems, requiring them to be monitored by the building fire alarm system or a dedicated function fire alarm system.
 - b. PCH Result
 - i. The Public Comment Hearing resulted in the final disapproval of Proposal F116-24, maintaining the current code language regarding fire alarm monitoring requirements. For BOMA members, this outcome prevents the introduction of potentially confusing and redundant terminology, such as "dedicated function fire alarm system," which the committee noted was already adequately addressed in NFPA 72. By rejecting the proposal, the membership avoided the

risk of increased compliance costs or technical conflicts that could have arisen from poorly defined local requirements for monitoring automatic fire-extinguishing systems. Consequently, commercial property owners can continue to rely on existing industry standards for fire alarm integration without facing new, specialized hardware mandates or administrative ambiguity.

3. **Proposal G34-25**: Small Assembly Classification

- a. Description: A proposal to clarify the classification of small assembly spaces. It removes the word "accessory" and states that rooms used for assembly purposes that are less than 750 square feet or have an occupant load of less than 50 persons shall be classified as Group B or part of the main occupancy.
- b. PCH Results
 - i. The Public Comment Hearing resulted in the disapproval of Proposal G34-25, leaving the existing "accessory" language for small assembly spaces intact within the building code. For BOMA members, this outcome prevents the potential opening of a regulatory loophole that could have allowed buildings composed of multiple small assembly spaces to bypass critical safety requirements, such as sprinkler systems, by misclassifying as Group B. By maintaining the status quo, the decision ensures that classification remains tied to the specific use and relationship of the space to the primary occupancy, avoiding the ambiguity and "main occupancy" definition issues raised during the hearings. Consequently, property owners avoid the risk of inconsistent code interpretations that could have led to unpredictable enforcement and safety liabilities in mixed-use developments.

4. **Proposal G35-25**: Live Load for Small Assembly Areas

- a. Description: A proposal intended to clarify the classification of small assembly areas and recommend a lower uniform live load of 60 psf for small assembly areas, fixed seats, and dining areas (compared to the general 100 psf for assembly areas), arguing that the required seating/furniture distributes the load.
- b. PCH Result
 - i. The Public Comment Hearing resulted in the disapproval of Proposal G35-25, which sought to lower the uniform live load requirement for small assembly and dining areas from 100 psf to 60 psf. For BOMA members, this outcome maintains the existing higher structural standards, avoiding potential conflicts with ASCE 7 and ensuring that dining spaces remain rated for heavier loading scenarios. While the proposal aimed to offer more flexible design options for small restaurants and accessory spaces, the membership's decision to reject it prevents the confusion of having inconsistent load requirements for similar occupancy types. As a result, property owners and developers will continue to use the established 100 psf standard, ensuring long-term structural versatility even if the interior layout or seating configuration of a space changes.

5. **Proposal G96-25**: Height Increase for R-3 with NFPA 13D

- a. Description: A proposal to increase the allowable height of Group R-3 buildings to four stories when an NFPA 13D automatic fire sprinkler system is installed.
 - b. PHC Result
 - i. The Public Comment Hearing resulted in maintaining the committee's approval of Proposal G96-25 as modified (AMC2), increasing the allowable height of Group R-3 buildings and townhouses to four stories when equipped with an NFPA 13D sprinkler system. This outcome is a significant win for BOMA members engaged in urban revitalization, as it directly supports infill construction by making high-density residential projects on smaller city lots more financially viable through reduced fire suppression costs. By allowing a fourth story under a more economical sprinkler standard, the code encourages the development of housing that is essential for bringing residents back into urban centers and enhancing the value of mixed-use portfolios. Ultimately, this change provides property owners with a powerful tool to maximize density and housing affordability in tight urban footprints where traditional, expensive commercial systems often acted as a barrier to redevelopment.
6. **Proposal G116-25**: 4-Hour Rating for Garages Under Group R
- a. Description: A proposal to increase the fire-resistance rating for parking garages located under Group R occupancies from 2 hours to 4 hours. This includes the floor assembly above the garage and the fire barriers/shaft enclosures separating the egress routes.
 - b. PCH Results
 - i. The Public Comment Hearing resulted in a win for BOMA members as the proponent withdrew Proposal G116-25, which sought to increase fire-resistance ratings for parking garages located under Group R occupancies from 2 hours to 3 or 4 hours. By withdrawing the proposal, the proponent conceded to overwhelming committee feedback that lacked technical data to justify such a drastic increase in fireproofing requirements, particularly when modern sprinkler systems are already in place.
7. **Proposal G117-25**: Horizontal Building Separation Clarifications
- a. Description: A proposal aimed at clarifying the requirements for horizontal building separations (often used in podium-style buildings) by explicitly addressing the protection of vertical openings through the horizontal assembly.
 - b. PCH Result
 - i. The Public Comment Hearing resulted in the approval of Proposal G117-25 as modified by Public Comment 1, providing technical clarifications for horizontal building separations in podium-style construction. This outcome is beneficial for BOMA members as it cleans up previously confusing language regarding how vertical openings through horizontal assemblies must be protected, ensuring the code correctly references "opening protectives" rather than the openings themselves. By adopting these editorial refinements and aligning with Section 712.1, the code reduces the risk of misinterpretation by building officials during

the permitting of complex multi-story projects. Ultimately, this change supports more predictable design and inspection processes for property owners developing high-density, podium-style mixed-use buildings.

8. **Proposal G120-25: Fire-Resistance Rating for Occupiable Roofs**
 - a. Description: A proposal aimed at requiring an occupiable roof to have a fire-resistance rating equal to or greater than the floor assembly below it. The original proposal would have required the *entire* roof to be rated even if only a portion was occupiable.
 - b. PCH Result
 - i. The Public Comment Hearing resulted in the disapproval of Proposal G120-25, maintaining the existing code standards for roof fire-resistance ratings regardless of occupiable use. For BOMA members, this outcome is a significant financial victory as it prevents a mandate that would have forced the structural bays supporting occupiable roofs to meet the more stringent—and costly—fire-resistance ratings typically reserved for floor assemblies. By rejecting the proposal, the membership avoided unnecessary construction expenses and structural weight increases that the committee determined were not technically justified for roof assemblies. Consequently, property owners can continue to develop rooftop amenities and outdoor spaces without facing the prohibitive cost of over-engineering the underlying structure to meet compartmentalization standards intended for interior floors.
9. **Proposal G124-25: Type III Exterior Wall Minimums**
 - a. Description: A proposal to revise Table 601 to require all exterior walls in Type III construction to have a minimum 1-hour fire-resistance rating, while simultaneously reducing the rating for exterior bearing walls in Type IIIA from 2 hours to 1 hour to simplify construction and address current building practices.
 - b. PCH Result
 - i. The Public Comment Hearing resulted in the disapproval of Proposal G124-25, preserving the existing fire-resistance requirements for exterior walls in Type III construction. For BOMA members, this outcome maintains the established 2-hour rating for exterior bearing walls in Type IIIA buildings, rejecting an attempt to lower those standards to a 1-hour minimum. While the proponent argued that the change would simplify construction and align with real-world practices, the committee and membership determined that reducing these ratings would inappropriately blur the line between Type III and the less restrictive Type V construction. Consequently, property owners can continue to utilize the higher allowable floor areas associated with Type III construction without facing a downgrade in the structural fire-resistance standards that justify those larger footprints.
10. **Proposal G196-25: Temporary Ceiling Construction Barriers**
 - a. Description: A proposal to define and regulate "Temporary Ceiling Construction Barriers," setting structural load requirements, interior finish flammability requirements,

and specifically addressing the conditions under which plastic barriers can be installed below an automatic sprinkler system (requiring them to melt or drop out to allow sprinklers to operate).

b. PCH Result

- i. The Public Comment Hearing resulted in the disapproval of Proposal G196-25, which sought to introduce specific regulations and material standards for "Temporary Ceiling Construction Barriers." For BOMA members, this outcome is a win as it avoids the introduction of overly prescriptive requirements for temporary plastic barriers used during renovations and construction. By rejecting the proposal, the membership prevented the potential for increased project costs and compliance hurdles that would have arisen from mandating specialized "drop-out" performance standards (such as UL 723S). Property owners and facility managers can continue to utilize established construction safety protocols under Chapter 33 without the added complexity of managing new, narrow material classifications that could have limited the use of existing, cost-effective temporary protection methods.

11. **Proposal S65-25**: Structural Design for Distributed Wind Systems

- a. Description: A proposal to define "Wind Turbine Generator Systems (WTGS)" and add new text specifically assigning them to Risk Category II, unless they are paired with energy storage systems and serving as backup power for a Risk Category IV building (in which case they would be assigned Risk Category IV).

b. PCH Result

- i. The Public Comment Hearing resulted in a favorable outcome for BOMA members as the proponent withdrew Proposal S65-25, which aimed to establish specific Risk Category assignments for distributed wind turbine generator systems. By withdrawing the proposal, the proponent acknowledged committee concerns that the new language might inadvertently override established structural safety tables or create loopholes in how wind energy infrastructure is rated for storms and seismic events. For BOMA members, this withdrawal maintains a consistent and predictable structural design framework, ensuring that energy systems integrated into commercial properties remain subject to the primary Risk Category table. Consequently, property owners avoid the risk of conflicting design standards or the potential for increased structural costs that a more rigid or overlapping classification system might have imposed on sustainable energy projects.

12. **Proposal S153-25**: Salvage Sawn Lumber (Structural/Non-Structural)

- a. Description: A proposal to officially define "Salvage Lumber" and allow the use of salvage sawn lumber in both structural and non-structural applications, setting specific

criteria for inspection, testing, and design values (such as allowing 90% of the design value assigned to a recognized grade).

b. PCH Result

- i. The Public Comment Hearing resulted in the disapproval of Proposal S153-25, which sought to establish official definitions and structural design standards for the reuse of salvaged sawn lumber. While BOMA members generally support sustainability and the permissive modifications suggested in Public Comment 2, the final decision to reject the proposal was driven by lingering concerns regarding the technical reliability and enforceability of the standards for older wood. Specifically, the committee and membership remained wary of the lack of data concerning the long-term effects of age, previous temperature exposure, and fastener integrity on salvaged materials. As a result, property owners will continue to follow existing pathways for material approval, avoiding the potential liability and structural uncertainty that could have arisen from a broad, new regulatory framework for used timber.