

Glenn Youngkin Governor

Juan Pablo Segura Secretary of Commerce and Trade

## COMMONWEALTH of VIRGINIA

Maggie Beal Interim Director

# DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

**TO:** Virginia Code Development Stakeholders

**FROM:** Jeff Brown, Deputy Director of Building and Fire Regulation

**DATE**: June 10, 2025

**SUBJECT:** 2024 Code Development Cycle Updates

The 2024 Code Development Cycle is underway! Virginia's online code development system (cdpVA) opened for submission of code change proposals for the 2024 Code Development Cycle (CDC) on April 1<sup>st</sup>, and the tentative deadline for submission of code change proposals for the 2024 CDC is October 8, 2025. However, we encourage you to submit your code change proposals as early as possible to ensure the greatest amount of time for discussion.

Study Groups will begin meeting later this month and Sub-Workgroups will begin meeting in July, ahead of the first Combined General Stakeholder Meeting, tentatively scheduled for July 29, 2025.

Initial drafts of all of the 2024 Base Documents (USBC, SFPC, IBSR, VEBC, and VPMC) are now available on the 2024 Code Development Cycle webpage. A link has also been posted on cdpVA.

Please see the attachments to this memo for additional important information and details, and check cdpVA regularly for the most up-to-date information.

As always, do not hesitate to contact our office with any questions or concerns by email: <a href="mailto:codedevelopment@dhcd.virginia.gov">codedevelopment@dhcd.virginia.gov</a> or by phone: 804-371-7150.

c: Maggie Beal, Interim Director BFR Staff





#### 2024 Study Groups and Sub-Workgroups

The following Study Groups and Sub-Workgroups are currently being formed and will meet during the 2024 Virginia Code Development Cycle:

**Heating and Cooling Study Group (1**<sup>st</sup> **Meeting June 23, 2025):** Based on increased inquiries and concerns received in recent years regarding the requirements in the Uniform Statewide Building Code (USBC) related to providing heating and cooling in certain rental units, DHCD has determined that a DHCD Study Group will be convened during the 2024 Virginia Code Development Cycle to discuss this issue and review the existing USBC requirements.

Single Exit Stair Buildings Study Group (1<sup>st</sup> Meeting June 24, 2025): As directed by House Bill 368 and Senate Bill 195 (2024), the Board of Housing and Community Development (Board) convened a Single-staircase Advisory Group to provide recommendations for allowing a single stair exit for Group R-2 buildings up to six stories in height. The final report of the Advisory Group included a recommendation to convene a special workgroup (DHCD Study Group) during the 2024 Code Development Cycle to continue discussing this topic.

Expediting Permits and Certificates of Occupancy Study Group (1st Meeting June 25, 2025): DHCD received a request from Delegate Milde, as recommended by the Councils, Cities, and Towns Subcommittee #2 regarding <a href="House Bill 2682">House Bill 2682</a> (2025), to convene a special workgroup (DHCD Study Group) during the 2024 Code Development Cycle to identify changes to the Uniform Statewide Building Code to streamline the processes for reviewing and issuing building permits and certificates of occupancy.

**Statewide Fire Prevention Code Sub-Workgroup (1**st Meeting July 8, 2024): This standing sub-workgroup will meet to discuss SFPC related changes and proposals in an effort to reach consensus on as many proposed changes as possible, ahead of the full General Stakeholder Workgroups that will begin meeting to review code change proposals in July.

**Energy Sub-Workgroup (1**<sup>st</sup> **Meeting July 9, 2025):** This standing sub-workgroup will meet to discuss energy related changes and proposals in an effort to reach consensus on as many proposed changes as possible, ahead of the full General Stakeholder Workgroups that will begin meeting to review code change proposals in July.

Information regarding Study Groups and Sub-Workgroups will be distributed by email directly to members of those groups and will also be posted on cdpVA. If you are not a member of a Study Group or Sub-Workgroup, but would like to be added to the email distribution list for a specific group, as an interested party, please contact <a href="mailto:codedevelopment@dhcd.virginia.gov">codedevelopment@dhcd.virginia.gov</a>.





### **2024 General Stakeholder Workgroup Meetings**

General Stakeholder Workgroup meetings will be convened three times during the 2024 Code Development Cycle for the purpose of discussing all individual code change proposals. The following is the tentative schedule for the General Stakeholder Workgroup meetings:

July 29, 2025: 1<sup>st</sup> General Stakeholder Workgroup Meeting

October 2025: 2<sup>nd</sup> General Stakeholder Workgroup Meeting (Exact Date TBD)

November 2025: 3rd General Stakeholder Workgroup Meeting (Exact Date TBD)

Meeting agendas will be posted on cdpVA and distributed to our Code Development stakeholders list (via Constant Contact) approximately 3 weeks prior to each General Stakeholder Workgroup meeting. The agendas will include a list of proposals that will be discussed at the meeting, as well as the meeting details (time, location, etc.). All proposals on the agenda will be available for viewing in cdpVA.

**NOTE:** All meeting dates and deadlines are <u>tentative</u>. Tentative schedules and meeting dates should only be used as a guide. Meetings may evolve over the course of the process and additional meetings will be added as needed. The most up-to-date meeting information for all Study Group, Sub-Workgroup and General Stakeholder Workgroup meetings will be posted on <u>cdpVA</u> when available.

#### **DHCD Code Development External Communications**

The <u>Virginia Regulatory Town Hall</u> is the official source for information regarding meetings, notices, and regulatory actions by the Board of Housing. You can sign up for Town Hall notifications here: <a href="https://townhall.virginia.gov/L/Register.cfm">https://townhall.virginia.gov/L/Register.cfm</a>

Our online Code Development system <a href="cdpVA">cdpVA</a> is utilized as the primary source for information regarding code change proposals and stakeholder meetings (Study Groups, Sub-Workgroups, and General Stakeholder Workgroups) during the code development process. Please log into cdpVA to see additional information and continue to check cdpVA regularly throughout the cycle for the most upto-date information.

We also utilize Constant Contact to distribute information and updates regarding the code development process, including General Stakeholder Workgroup meeting information. If you are not already on our "Code Development" Constant Contact email list and would like to be added, please contact codedevelopment@dhcd.virginia.gov.

**Note:** If you received this memo by email, directly from "Virginia Department of Housing and Community Development" via Constant Contact (look at the bottom of the email for the Constant Contact logo), you are already on our Code Development list. If we verify that you are on the contact list, but you are not receiving the emails, please check your spam folder and firewall settings, as Constant Contact might be blocked.





#### **Items for Consideration**

The following are some topics for consideration, to get the discussions jump started, as you begin preparing for the 2024 Virginia Code Development cycle. The list includes items that we are aware of in the existing regulations that need some attention, as well as some significant changes in the 2024 I-Codes. This is not a comprehensive, all-inclusive list. Stakeholders are strongly encouraged to review the existing 2021 Virginia regulations and the 2024 I-Codes and related standards for any significant changes that might benefit from Virginia specific amendments.

- VCC 103.1.1: Consider revising the language of Sections 103.1.1 and 310.6 of the VCC, and Section 102.2.2 of the VEBC for better correlation and clarification as to when the VEBC can be used for existing buildings and structures otherwise covered by the VRC.
- VCC 108.2:
  - Item 14.1: Consider revising the item to clarify the permit requirements for the replacement of safety glazing.
  - Item 14.4: Consider revising the item to clarify the permit requirements for the replacement of gas appliances.
- VCC 310.4.2: Consider adding non-proprietor occupied lodging houses (B&B) to the list, for clarity.
- VCC 310.6.1: Consider adding live/work units (which have been historically included within the scoping provisions of the IRC/VRC) to the list.
- **VCC 406.5.11:** Operation restrictions belong in the SFPC and not the VCC; consider deleting/revising accordingly.
- VCC 407.4.1.1: Compare existing Virginia amendment with Sections 1010.2.4 and 1010.2.13 of the 2024 IBC and determine whether the existing amendment is still warranted.
- VCC 407.4.3 (item 6), 422.3.1: Consider amending Sections to fix the broken references to Section 1002.2 (similar to B407.4-21).
- VCC 408.9.2 and 909.6: Consider revising to avoid potential conflict between the two sections
  with respect to the requirement for maintenance of a tenable environment in the zone of fire
  origin.
- VCC 508.5 and 508.5.7: Consider clarifying whether live/work units constructed in accordance with the VRC must be provided with an automatic sprinkler system.
- VCC 717.6.2.2 (and VMC 607.6.2.2): Consider deleting existing amendment if the model code (IBC 717.2.3 and 717.6.2.1.2) achieves the original intent of Virginia amendment.
- VCC 903.3.1.2: Consider emergency regulations approved by the BHCD.
- VCC 1015.8: Base Document revised with 2024 IBC terminology to avoid having two different points of measurement (top of the sill 2021 VCC, and bottom of the clear opening 2024 IBC). Review and consider whether additional revisions are in order.
- VCC Chapter 30: Consider relocating the "alteration and repair" provisions to the VEBC, and the "maintenance" provisions to the VPMC/SFPC, respectively.





- VCC 3007.9.1: There appears to be varying interpretations of the provisions, with some requiring a protected path from FSAE to all exit stairs. Consider amending the Section to clarify its intent.
- **IBC 3103.1.3:** Consider amending to correlate permit requirements with VCC Section 108.2.
- **VCC Chapter 35** (typical for all other codes): Review and determine which edition of standards referenced by existing Virginia amendments is most appropriate for incorporation.

#### • VRC R302.3:

- 2024 IRC breaks down the requirements of the Section in multiple subsections and includes certain technical changes conflicting with the VA amendment, such as the required fire-resistance rating for dwelling unit separation wall assemblies that are constructed on a lot line. Base Document revised to maintain the existing VA amendment. Review and consider whether additional revisions are in order.
- Consider deleting the Virginia amendment for separation walls applicable to two-family dwellings located on the lot line. See RB66-19 for reasoning.
- If VA amendment is maintained, consider relocating VA amendment ("Dwelling unit separation wall assemblies that are constructed on a lot line shall be constructed as required in Section R302.2 for townhouses.") after the exceptions.
- **IRC R302.3.5:** New section for stacked two-family dwelling units where a sprinkler system is not provided for both units. Requires assemblies separating the dwelling units to be constructed in a manner that limits the transfer of smoke; and a notification appliance in each dwelling unit which must be connected to smoke alarms in the other dwelling unit.
- VRC R303.4 (2024 IRC R325.3): Review and determine whether the Section should require WHMV per M1505.4, instead of "mechanical ventilation per M1505".
- **VRC R303.10.1:** The section has essentially no impact as Section R303.10 already requires heating facilities for all dwelling units. Consider deleting.
- VRC R308.4.5: Essentially the same requirements as the IRC with slight difference in syntax. Consider deleting Virginia amendment if the IRC achieves the intent of amendment.
- VRC R408.3 (item 2.4): The main intent of the original Virginia amendment was to reorganize and clarify existing requirements of Section R408, which is now adequately addressed by the IRC. Consider deleting Virginia amendment.
- VRC R602.12: Per FEMA, "Virginia weakens wind resilience in R602.12 by extending the size of the building for which the simplified wall bracing method can be used..." Review and determine whether the current IRC achieves the intent of Virginia amendments; if so, consider deleting Virginia amendments.
- **IRC E3902:** GFCI protection requirements expanded to several new locations.
- **IMC 403.3:** Equation 4-9 was modified, with a factor equivalent to 3% of the conditioned floor area, rather than the former factor of 1%. This will increase the ventilation requirements by 30–50% per dwelling unit.





- VMC 510.6.1.1: This Section refers to Section 713.11 of the IBC/VCC. Consider amending the Section to refer to a different VCC/IBC section applicable to requirements related to hazardous duct penetrations of shafts (VCC/IBC Section 713.10?), or delete amendment.
- VMC 1109.2.5: Consider amending the Section based on proposal M75-24, which was approved at the CAH1 for inclusion in the 2027 IMC (no public comments were submitted for the CAH2; the proposal was placed on the consent agenda).
- **VECC Table C301.1:** Consider deleting all non-Virginia localities from the Table. (typical for commercial and residential provisions)
- IECC C402.6.2: Allowable air leakage rate reduced from 0.40 cfm/ft² to 0.35 cfm/ft². Exception allowing the air leakage rate to exceed 0.40 cfm/ft² but not more than 0.60 cfm/ft² (see Section C402.5.3 of the 2021 IECC/VECC) changed to allowing to exceed 0.35 cfm/ft² but not more than 0.45 cfm/ft²
- **IECC C403.7.4.1:** Concerns raised regarding the mandate to install ERVs in certain multifamily buildings. Review and consider whether amendments might be appropriate.
- **VECC C501.2:** Section should be reviewed for any potential conflicts and correlation issues with the VEBC.
- **VECC C505:** Currently, there is no link between the VEBC and this Section, which deems the Section unenforceable. Review and consider amending or deleting the Section, as applicable, to avoid confusion and misinterpretations.
- **IECC R401.2.1** and **R408**: Additional Efficiency Requirements applicable to the prescriptive method of compliance expanded. Ten minimum credits now are required, from not less than two measures specified in Table R408.2; and five additional credits required for dwelling units with more than 5,000 square feet of living space located above grade plane.
- **VECC Tables R402.1.2 and R402.1.3:** The basement wall insulation requirements for buildings in CZ 5 are more stringent than those for wood-framed walls. Review basement wall insulation R-values/U-factors in contrast with existing VA amendment for wood-framed wall insulation and consider revising, as applicable.
- **IECC R403.6.5:** Requires controls, such as timers, occupant sensors, humidity sensors, etc. for exhaust systems designed for intermittent operation, when serving bathrooms or toilet rooms.
- **IECC R404.2:** Requirements for interior lighting controls expanded. 2024 IECC requires all permanently installed luminaires in habitable spaces to be controlled with a manual dimmer or with an automatic shutoff control that automatically turns off lights within 20 minutes after all occupants have left the space.
- **VEBC 202:** Review definitions for "Building", "Repair", "Structure", "Alteration", and consider revising accordingly to ensure they are all encompassing, and for additional clarity.
- **VEBC 304.2, item 3:** The Section appears to impose requirements more stringent than Section 1015.8 of the VCC. Consider deleting or revising item 3, to comport with the VCC.
- **VEBC 503.1 and 601.3:** Consider revising for better correlation and consistency. Also, ensure consistency in the scoping provisions, i.e. "buildings and structures" vs "structures".





- **VEBC 601.4.8** (and subsections): The Section requires "altered" equipment to comply with the Section. Its subsections, however (601.4.8.1 and 601.4.8.2), set forth requirements for "new" HVAC equipment. Consider revising, as applicable, to avoid confusion.
- **VEBC 603.3:** The construction of partition walls is interpreted by some as creating "new spaces", which would require compliance with the VCC (including Chapter 9). Consider revising, as necessary, to clarify the meaning of "new spaces".
- **VPMC 104.4.1:** Consider adding the following option for meeting the qualification requirements for technical assistants, for correlation with Section 105.2.1 of the VCC: "including high school technical training programs or college engineering, architecture, or construction degree programs".
- **IPMC 311:** New requirements for community storm shelters to be evaluated annually and when requested by the authority having jurisdiction in accordance with ICC 500.
- **VPMC 606.1:** Consider revising text to clarify that "Such inspection shall be carried out by an agency or department designated by the local governing body.", in accordance with § 36-105(C5) of the Code of Virginia.
- **VPMC 702.4:** Review last sentence, which allows for the installation of bars, grills, etc., over EEROs, for potential conflicts with Section 304.3.1 of the VEBC, and revise as/if applicable.
- **SFPC 202:** Review "Smokeless propellants" definition and consider clarifying what NA 3178 stands for, and whether it should be considered a standard incorporated by reference.
- **SFPC 311.1.1:** VPMC is not enforced by all localities. Where not enforced, it is unclear which AHJ is to determine whether the abatement was achieved. Review and consider deleting the following text: "...until declared abated in accordance with the Virginia Maintenance Code or the applicable building code."
- **SFPC 320.4:** New provisions to the 2024 IFC setting forth requirements for the storage of lithium-ion and lithium batteries. Base Document revised to remove "new construction" provisions. Review and determine whether additional revisions are in order.
- **SFPC 507:** Consider revising provisions that could be viewed as new construction requirements.
- **SFPC 3303.1:** Consider revising/deleting, as applicable, the following sentence: "*The plan shall be submitted and approved before a building permit is issued*." Also, consider limiting the scope of Section 3303.
- **SFPC 4005:** The 2024 IFC adds comprehensive automatic sprinkler system requirements for the storage of distilled spirits and wines. Base Document revised to delete several sections and main sections revised to keep in line with the existing VA amendment in Section 4005.1. Review and determine whether additional revisions are in order.
- **SFPC 4104.5:** Section amended by VA. The 2024 IFC reduces the distance to 10' and adds an exception for small cooking tents. Base Document maintains the existing amendment. Review and determine whether the existing amendment is to be kept or deleted.
- **SFPC 5003.1.1:** Consider adding language to the section to account for buildings built prior to the 1993 USBC edition (there were no "control area" reg'ts prior to the 1993 BOCA).





- **SFPC 5003.8.3.5** and **5003.11**: The following statement appears to be incorrect: "*The aggregate quantity is allowed to exceed the maximum allowable quantities per control area specified in the applicable building code*". Base Document revised to remove what appears to be a conflict. Review and determine whether additional revisions are in order.
- **SFPC 5809:** New comprehensive provisions for on-demand hydrogen mobile fueling operations. Base Document revised to match the intent of 5707.1. Review and determine whether additional revisions are in order.
- VADR 13VAC5-31-210: Consider revising for better correlation with Section 108 of the VCC.
- VADR 13VAC5-31-30: Determine whether rope courses should be covered under the VADR.



