North Central Texas
Council of Governments

Recommended Amendments to the 2024 International Existing Building Code

North Central Texas Council of Governments Region

The following sections, paragraphs, and sentences of the *2024 International Existing Building Code* are hereby amended as follows: Standard type is text from the IEBC. Underlined type is text inserted. ~~Lined through type is deleted text from IEBC.~~ A double asterisk (**) at the beginning of a section identifies an amendment carried over from the 2021 edition of the code and a triple asterisk (***) identifies a new or revised amendment with the 2024 code.

***Section 102.4; change to read as follows:**

[A] 102.4 Referenced codes and standards. The codes, when specifically adopted, and standards referenced in this code shall be considered part of the requirements of this code to the prescribed extent of each such reference and as further regulated in Sections 102.4.1 and 102.4.2. {No change to rest of section.}

(Reason: To not inadvertently adopt other codes (i.e., Wildland Urban Interface Code, etc.…) by reference.)

***** Section 102.4.3 add to read as follows:**

102.4.3 Electrical. The provisions of the local adopted Electrical Code shall apply to the installation of electrical systems, including alterations, repairs, replacement, equipment, appliances, fixtures, fittings and appurtenances thereto.

(Reason: Added to IEBC for consistency with IBC. This was dropped when ICC quit publishing the ICC Electrical Code, but the Electrical Code still should be referenced regardless of how it is adopted.)

***Section 104.2.4.1 Flood hazard areas.** (Jurisdictions may consider the option to **amend** or **delete** depending on local enforcement and flood hazard ordinances.)

(Reason: Added to IEBC for consistency with IBC. Flood hazard ordinances may be administered by other departments within the city.)

***Section 104.3.1 Determination of substantially improved or substantially damaged existing buildings and structures in flood hazard areas.** (Jurisdictions may consider the option to **amend** or **delete** depending on local enforcement and flood hazard ordinances**.)**

(Reason: Added to IEBC for consistency with IBC. Flood hazard ordinances may be administered by other departments within the city.)

***Section 202; amend definition of Existing Building as follows:**

Existing Building - A building, structure, or space with an approved final inspection issued under a code edition which is at least 2 published code editions preceding the currently adopted building code; a building, structure or space that is undergoing a change of occupancy or use. ~~erected prior to the date of adoption of the appropriate code, or one for which a legal building permit has been issued.~~

(Reason: To prevent potential abuses in new construction and shell buildings.)

****** Section 302.2 Additional Codes; Amend to read as follows:**

302.2: Additional Codes

Alterations, repairs, additions and changes of occupancy to, or relocation of, existing buildings and structures shall comply with the provisions for alterations, repairs, additions and changes of occupancy or relocation, respectively, in this code and the International Energy Conservation Code , International Fire Code, International Fuel Gas Code, International Mechanical Code, International Plumbing Code, International

Private Sewage Disposal Code, International Property Maintenance Code, International Residential Code and NFPA 70 and any other Codes or other ordinances adopted by the authority having jurisdiction. Where provisions of the other codes conflict with provisions of this code, the provisions of this code shall take precedence.

(Reason: Some of the codes listed in this 2024 change may not be adopted by all jurisdictions, additionally there may be specific city ordinances that take precedent over adopted codes.)

***Section 306.1 Scope; add exceptions to read as follows:**

Exceptions:

1. Components of projects regulated by and registered with Architectural Barriers Division of Texas Department of Licensing and Regulation shall be deemed to be in compliance with the requirements of this chapter.

(Reason: To coordinate with the IBC and State Law for accessibility.)

*** Section 309.2.1 Automatic sprinkler systems; delete this section**

(Reason: Combustible exterior wall coverings are already addressed in Section 309.2. This proposal is a response to the Grenfell Fire in London. COG amendments in DFW area address high rise buildings aggressively changing the definition to 55 feet, sprinklered and enforcement history of NFPA 285 addressing combustible materials testing.)

Section 401.3 Flood Hazard Areas; delete this section.

(Reason: Flood hazard ordinances may be administered by other departments within the city.)

Section 405.2.6 Flood Hazard Areas; delete this section.

(Reason: Flood hazard ordinances may be administered by other departments within the city.)

***Section 502.2 Flood Hazard Areas; delete this section.**

(Reason: Flood hazard ordinances may be administered by other departments within the city)

Section 503.2 Flood hazard areas; delete this section.

(Reason: Flood hazard ordinances may be administered by other departments within the city)

***Section 503.18 Enhanced classroom acoustics; add after paragraph to read as follows:**

Compliance with the Texas Accessibility Standards is not considered equivalent compliance for the purpose of enforcement of this code section.

(Reason: TAS does not address this criteria in their evaluation, and it is justifiably required for alterations in existing buildings.)

Section 504.1.2; change to read as follows:

504.1.2 Existing fire escapes. Existing fire escapes shall continue to be accepted as a component in the means of egress in existing buildings only. Existing fire escapes shall be permitted to be repaired or replaced.

(Reason: *To add clarity and help reduce confusion associated with the amendment preventing new fire escapes.*)

**Section* 504.1.3; *delete this section:*

~~**504.1.3 New fire escapes**. New fire escapes for existing buildings shall be permitted only where exterior~~

~~stairways cannot be utilized due to lot lines limiting stairway size or due to the sidewalks, alleys, or roads at grade level. New fire escapes shall not incorporate ladders or access by windows.~~

(Reason: *To generally require a higher level of egress protection and consistent with regional practice.*)

***Section 507.3 Flood Hazard Areas; delete this section.**

(Reason: Flood hazard ordinances may be administered by other departments within the city.)

***Section 701.3 Flood Hazard Areas; delete this section.**

(Reason: Flood hazard ordinances may be administered by other departments within the city.)

***Section 702.7; add a code reference to read as follows:**

702.7 Materials and methods. All new work shall comply with the materials and methods requirements in the *International Building Code*, *International Energy Conservation Code*, *International Mechanical Code*, National Electrical Code, and *International Plumbing Code*, as applicable, that specify material standards, detail of installation and connection, joints, penetrations, and continuity of any element, component, or system in the building.

(Reason: To provide a more complete list of potentially adopted codes.)

***Section 802.5.1;* change to read as follows:**

802.5.1 Minimum requirement. Every portion of ~~a floor, such as a balcony or a loading dock,~~ open-sided walking surfaces, including *mezzanines*, *equipment platforms*, *aisles*, *stairs*, *ramps,* and landings that is more than 30 inches (762 mm) above the floor or grade below and is not provided with guards, or those in which the existing guards are judged to be in danger of collapsing, shall be provided with guards.

(Reason: To be consistent with Building Code requirements for guards and unsafe conditions.)

***Section 803.1 Scope; add sentence to read as follows:**

For the purpose of fire sprinkler protection and fire alarm requirements included in this section, the *work area* shall be extended to include at least the entire tenant space or spaces bounded by walls capable of resisting the passage of smoke containing the subject *work area*, and if the *work area* includes a corridor, hallway, or other exit access, then such corridor, hallway, or other exit access shall be protected in its entirety on that particular floor level.

(Reason: The intent is to avoid work area protection that would result in partial sprinkler or fire alarm protection. Partial sprinkler protection not delineated by walls would be a clear violation of NFPA 13 and would not allow the sprinkler to perform or function as intended. Also, partial fire alarm coverage is a clear violation of the Fire Code, NFPA 72, and ADA.)

***Section 803.3; change section to read as follows:**

803.3 Standpipes. Refer to Section 1103.6 of the Fire Code for retroactive standpipe requirements. {Delete rest of Section 803.3.}

(Reason: The Fire Code already requires standpipes in these buildings (greater than 50 ft.) retroactively in Section 1103.6. This new section would negate/lessen those retroactive provisions already contained in the Fire Code.)

Section 804.2 General; *delete Exception #1 as follows:*

Exceptions: ~~1. Where the work area and the means of egress serving it complies with NFPA101.~~
~~2.~~ [Remain unchanged]

(Reason: NFPA 101 is not a commonly adopted code in the region and enforcement would be problematic, especially due to contradictions with the requirements of the IBC.)

******Section* 804.5.1.2*.; change to read as follows:***

804.5.1.2 Fire Escapes required. For other than Group I-2, where more than one exit is required, an existing ~~or newly constructed~~ fire escape complying with section 805.3.1.2.1 shall be accepted as providing one of the required means of egress.

(Reason: Higher level of safety by not allowing new fire escapes and consistent with regional practice.)

******Section* 804.5.1.2.1*; change to read as follows:***

804.5.1.2.1 Fire Escape access and details - …

1. *[Remain unchanged]*
2. Access to a ~~new~~ fire escape shall be through a door…*[remainder unchanged]*
3. ~~Newly constructed fire escapes shall be permitted only where exterior stairways cannot be utilized because of lot lines limiting the stairway size or because of the sidewalks, alleys, or roads at grade level.~~
4. *[Remain unchanged]*
5. In all buildings of Group E occupancy up to and including the 12th grade, buildings of Group I occupancy, ~~rooming~~ boarding houses, and childcare centers, ladders of any type are prohibited on fire escapes used as a required means of egress.

(Reason: Higher level of safety by not allowing new fire escapes. Consistency with language and defined term in IBC.)

*****Section 804.7.2 Transoms; amend to read as follows:**

804.7.2 Transoms. In all buildings of Group B, E, I-1, I-2, R-1 and R-2 occupancies, ….[Remainder unchanged]

(Reason: Transom windows were historically a common practice in school buildings and each jurisdiction should evaluate the impact on their stakeholders and their community with regards to this section.)

*****Section 904.1 Automatic sprinkler systems; add sentence to read as follows:***

For the purpose of fire sprinkler protection and fire alarm requirements included in this section, the *work area* shall be extended to include at least the entire tenant space or spaces bounded by walls containing the subject *work area*, and if the *work area* includes a corridor, hallway, or other exit access, then such corridor, hallway, or other exit access shall be protected in its entirety on that particular floor level.

(Reason: The intent is to avoid work area protection that would result in partial sprinkler or fire alarm protection. Partial sprinkler protection not delineated by walls would be a clear violation of NFPA 13 and the Fire Code and would not allow the sprinkler system to perform or function as intended. Also, partial fire alarm coverage is a clear violation of the Fire Code, NFPA 72, and ADA.)

*****Section 904.1.1; change to read as follows:***

904.1.1 High-rise buildings. An automatic sprinkler system shall be provided in work areas of ~~where the~~ high-rise buildings. ~~has a sufficient municipal water supply for the design and installation of an automatic sprinkler system at the site~~.

(Reason: Level 3 alterations are affecting more than 50% of the existing high-rise building, and as such, sprinkler protection is more than justifiable, even when fire pumps, etc., are necessary. It is noted that the work area method is one of three different methods available to the designer/owner in the IEBC.)

***Section 1011.2.1: change to read as follows:**

1011.2.1 Automatic Fire sprinkler system. The installation of an automatic sprinkler system shall be required where there is a change of occupancy classification and Chapter 9 of the current International Building Code requires an automatic sprinkler system based on the new occupancy or where there is a change of occupancy within the space where there is a different fire protection system threshold requirement in Chapter 9 of the current International Building Code than exists in the current building or space. The installation of the automatic sprinkler system shall be required within the area of the change of occupancy and areas of the building not separated horizontally and vertically from the change of occupancy by ~~a nonrated permanent partition and horizontal assemblies, fire partition, smoke partition, smoke barrier,~~ fire barrier or fire wall.

(Reason: 2024 IEBC rearranged text. Section was re-written previous items in #1-6 are now in the main charging language of 1011.2.1. Maintains legacy language requiring at least fire barrier separation between a newly sprinklered more hazardous 'change of occupancy' from non-sprinklered existing occupancies, as is required for fire area separation by the IBC.

***Section 1103.3 Flood Hazard Areas; delete this section.**

(Reason: Flood hazard ordinances may be administered by other departments within the city.)

***Section 1201.4 Flood Hazard Areas; delete this section.**

(Reason: Flood hazard ordinances may be administered by other departments within the city.)

***Section 1303.1.2; change to read as follows:**

1301.3.2 Compliance with other codes. Buildings that are evaluated in accordance with this section shall comply with the International Fire Code. ~~and International Property Maintenance Code.~~

(Reason: NCTCOG does not currently recommend, nor review the IPMC for recommended amendments at this time.)

****Section 1303.1.3 Compliance with Flood Hazard Provisions; delete this section.**

(Reason: Flood hazard ordinances may be administered by other departments within the city.)

***Section 1402.6 Flood Hazard Areas; delete this section.**

(Reason: Flood hazard ordinances may be administered by other departments within the city.)

****[F] Section 1502.1 Site safety plan; change to read**
[Existing text remains]
The plan shall be submitted and approved <u>by the Fire Department</u> before a building permit is issued, [Remainder of Existing text remains]

(Reason: Safety plan components require compliance with IFC.)

****[F] Section 1502.3.1 Violations; change to read**
Failure to properly conduct, document and maintain documentation required by this section shall constitute an unlawful act in accordance with Section 113.1 and shall result in the issuance of a notice of violation, <u>by the Fire code official,</u> to the site safety director. ~~in accordance with Section 113.2.~~ Upon the third offense, the <u>Fire code official, based on their findings, shall request a stop work order enforcement be implemented to the code official</u> in accordance with Section 114, and work shall not resume until satisfactory assurances of future compliance have been presented to and approved by the code official.

(Reason: Safety plan components require compliance with IFC.)

******Section 1512.1 When Required; delete Section 1512.1 through 1512.5 and change Section 1512.1 to read as follows:***

1512.1 When required. An approved water supply for fire protection, either temporary or permanent, shall be made available as soon as combustible material arrives on the site or as determined by the code official. The water supply design and the timing of the water supply installation relative to building construction shall comply with the adopted Fire Code.

(Reason: Maintains legacy language for the water supply and ensures adequate water supply as required by the Fire Code for construction that is already well-established. The changes previously published by IEBC drastically reduce the required water supply of the Fire Code without adequate or reasonable justification.)

END