



NADRA attended the Public Comment Hearings on October 4th, 2013 to serve and protect the decking industry in the development of the 2015 IRC. I'm happy to say that we did that job well, and have little to fear in the new provisions now decided. Here's a review of the topics we spoke on:

RB6: Approved at first hearing and turned to disapproved at final hearing.

Approved in the first hearing, this proposal would have removed the maximum 200 square foot area for low-level decks to not require a permit, as well as allow them to be attached to houses. With deck codes so rapidly changing, this is not the time to reduce verification and put an economic gap between decks built correctly by professionals and those built by others. More importantly, the larger the deck, the more probable hazards there can be and the more our industry will be tarnished with "horror story" projects. We spoke against this deregulation that was approved in the first hearings and a 2/3 majority overturned it. We started the hearings out showing that we aren't just in it for ourselves, but for our industry.

RB61: Disapproved at first hearing and remained disapproved at final hearing.

This proposal suggested deflection limits for guards that would not have been feasible to verify in construction. Without testing or engineering, custom-built guards could have had problems being approved. We spoke that there indeed should be more guidance for guard construction in the code, as this is a known safety issue with poorly built decks, but that this proposal wasn't it. Guards are an area of standardization that we must be willing to explore and address, while retaining broad architectural freedoms.

RB66, RB74, and RB75: Disapproved at first hearing and remained disapproved at final hearing.

Fire separation distance is the concept in the IRC whereby structures must be separated from adjacent structures in order to minimize the likelihood of fire spread across property lines. Decks have never been addressed in these sections of the code, and these proposals intended to do so. However, they would have outright prohibited decks and stairs from within 5 feet of any property line. This would have been regardless of if they were ground level or second story or whether they were built out of non-combustible or fire-rated materials, putting our industry at an unjust disadvantage under the paver industry. We spoke to disapprove these proposals and that's what we got. This subject certainly needs to be addressed in the code for decks, so we've got some work to do to figure it out. We moved the ball to our court, so let's be sure we continue to dribble it.



RB102: Disapproved at first hearing and turned to approved at final hearing.

This proposal rewrote the section on stairway lighting...a section that is currently very, very confusing. There were some problems with the original proposal, so we spoke against it at the first hearing and it was disapproved. The proponent brought back a revised version that was much better. We spoke in favor at the hearings to support the proposal and it was approved as modified with a minimum 2/3 majority. This section is now much more clear by separating the provisions for interior and exterior stairways, and specifying that a light is only required near the top landing of exterior stairways. This section might be able to use a little tweaking in the next edition, but it's far better than what was there. The more clear code is, the more consistently it can be enforced from jurisdiction to jurisdiction and inspector to inspector. Thanks, Association of Minnesota Building Officials for this great proposal!

RB133: Disapproved at first hearing and turned approved at final hearing.

This proposal from the Stair Manufacturer's Association (SMA) intended to clarify the requirement for opening limitations at open risers on stairways. The first proposal had some issues and was disapproved. The proponent brought back a modified version at the final hearings and we testified in support. A 2/3 majority agreed, and this section will now be much more clear and understandable. Code that's easy to read and uniformly understandable helps everyone. Thanks SMA for this great work!

RB187 and 192: Disapproved at the first hearing and remained disapproved at the final hearing.

The IRC currently has no provisions for decks located in flood zones, and that's what these proposals aimed to accomplish. Addressing both stairs and decks in various flood zones, these proposals were disapproved in the first hearing. The proponents (FEMA and DHS) brought back modifications, but without clear guidance. The provisions included some challenging and vague requirements that would be contradictory in nature. Expecting decks to be frangible and break into small pieces, but not providing any answers to what that means. How small do the pieces have to be, and how do you build something to stay together under normal loading, but then dismantle under flood. We asked for more collaboration with the industry and to disapprove the modified proposals. The membership agreed. The next step here is to work with these organizations and prepare understandable code for the future. We certainly don't want our decks and railings to negatively affect flood events.

RB262 Approved at the first hearing, and modified by our proposal at the final hearing.

The recent testing from Washington State University revealed that ledgers attached to band joists according to IRC provisions do just fine even without lateral hold-down anchoring devices. However, it also revealed that perhaps the connection of joists to ledgers with only nailed hangers is the actual problem. Though we still don't have real research on this subject, it was enough to draw concern against our public comment asking too removing the



current lateral load anchor provisions from the IRC. It was felt that at least they connect two deck joists to the house better than hangers do. With this realization, it made sense to speak in favor of RB262 that provides a second “permitted” method for lateral load attachment. Though still a train heading down an unproven track, it made sense at this time for us to embrace the second detail and provide more options for the decking industry. The new detail connects four joists, better addressing the weak link discovered in the research than the current detail connecting only two. It can be installed from the outside and does not penetrate the thermal envelope of the building. Though still based on fear, not facts, it will be some temporary relief to the industry until thorough lateral load design methodology can be developed. This proposal was brought forth by the Washington Association of Building Officials, but had some technical issues that would have precluded certain flashing products, in appropriately referenced interior span tables and eliminated the use of naturally decay resistant ledger materials. With our expertise in the decking industry we suggested modifications to their proposal regarding these issues and won a 2/3-majority vote for approval.

RB263 Approved at the first hearing and turned to disapproved at the final hearing.

This proposal suggested an exception to the lateral load anchor detail and lateral load design for decks that do not have guards. While this may have helped in cases where inspectors blindly require lateral load anchors on even small ground level decks, it was just downright poor code language. An exception for something merely “permitted” could only imply that when you don’t meet the exception it is indeed required. Besides connections for lateral loads, this detail would have allowed decks to be built with no bracing and be left swaying in the wind. Knowing decks better than any other professionals at the hearings, we clearly stood against this deregulation, as did SMA and NOMMA. How can we accept a construction standard for our industry that would allow a deck to have no lateral design consideration...and prohibit a code administrator from requiring one? We couldn’t. We did what was right and we spoke to the truth. We earned agreement in the vote and steered our industry in the right direction. These kinds of stances for our industry earned something even more important: Respect as a good contributor to the code development process...one worth listening to.

RB265: Disapproved at the first hearing and turned to approved at the final hearing.

This NADRA proposal reorganized the ledger fastening table and provisions that came into the 2009 IRC so they would be more easily understood and consistently interpreted. Disapproved at the first hearing, we brought back modifications to the final hearing. The only significant change to intent in this proposal was to allow any type of ½ inch sheathing between the ledger and band joist for both lag screw and bolted connections. Currently the code provides no guidance on sheathing for two of the three attachment methods. With our experience in deck construction we were confident that a small ½ inch of foam between the ledger and band joist was not a significant concern to deck stability, but some proponents disagreed. Without testing to point to, this portion of our modification was over-ridden by a proposed modification from Simpson Strong Tie that would only allow wood structural panels or lumber sheathing for lag screwed connections. While we thank SST for their efforts and support on this much-needed reorganization of the ledger connection

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provisions, we lament that their approved modifications create an environment of uncertainty in construction processes. Until the exterior cladding is removed, neither the builder, plans examiner, or inspector will know if lag screws can be used or what the fastening spacing for bolts must be. If foam, gypsum board, black cellotex or even 1/8" thick thermoply is discovered during construction, it will need to be removed and replaced with wood structural panel (OSB) or you'll have to hire an engineer. The other option would be to use bolts, but that may require removing a ceiling from inside the house. The best code is code that works in application, and we will continue to work toward that goal. However, we are obviously going to need some research to back it up and some funding to pay for it. At this time, however, we made a positive move forward in this proposal, and again we earned a 2/3-majority agreement for almost all of it.

RB264 and RB268: Both were disapproved at the first hearing and RB264 was approved at the final hearing.

The tremendous work by many professionals and organization was the last topic at 10 pm on Friday night. The 13-page proposal of deck codes introduced to us and discussed in a meeting in Virginia last year was the basis for the work on RB264 and RB268. 264 represented the code that could be compromised and agreed upon and provides design assistance for the structural system of a deck: decking to joist to beam to post to foundation was provided for. 268 went further, with provisions for stairs, guards, freestanding decks and other topics. These provisions could not gain wide support or our support. At the end of the night on Friday, we ended our contributions to the code development process with earning a 2/3-majority approval for our expanded modifications to RB264 while RB268 was disapproved. There are a lot of details to share with you regarding the provisions in 264 and how they will help our industry, and I will be sharing that with the industry at Deck Expo and afterward.

Our work and attendance this year in code development was an unbelievable success. Beyond the code itself, we drove home the message that we are here. We will serve and protect our industry respectfully. We revealed to many that decks are not as "simply" as they may have once believed. We repeatedly encouraged collaboration prior to future hearings from anyone wishing to develop deck codes. We made it clear that if we are not invited to the discussion prior...you will hear from us at the hearings. We proved our knowledge of our industry and our place at the table.

The future of code development is looking very good for the decking and railing industry. NADRA is indeed "the voice of the decking and railing industry" and we sing a pretty good song. However...we will always be happy to have a choir with other professionals for a more harmonic sound. That is the only way quality code can be developed.

Get involved today! Contact us: Info@NADRA.org

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