
Code Adoption (Comments)

From Jacob Neves <jneves@smithfieldri.gov>

Date Mon 6/30/2025 10:17 AM

To DBR State Building Office <DBR.StateBuildingOffice@dbr.ri.gov>

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- RISBC-2 R310.1 Emergency escape and rescue openings amendments removed. I see this creating issues for individuals looking to create habitable space without sleeping rooms and covering the exception to not require an EERO.
Exception: Basements with habitable space not used for bedrooms shall not require an emergency escape under any one of the following two conditions:
 1. Residential sprinkler systems conforming to NFPA 13D or RP 2904 latest edition shall be installed throughout all areas of the basement or cellar, or
 2. Fuel-fired equipment shall be separated from the habitable room and means of egress with one (1) hour rated construction and twenty (20) minute rated opening protectivesICC model code will require either option if the building is not sprinklered for all basements and habitable attics.
1.One [1.one] means of egress complying with [Section R311 \[codes.iccsafe.org\]](#) and one emergency escape and rescue opening.
2.Two means of egress complying with [Section R311 \[codes.iccsafe.org\]](#).
This would remove the option that many applicants utilize for converting lower levels into an at home office, exercise room, or entertainment room without substantial alterations if an egress well is to be installed to accommodate EERO. In my experience with these type applications, I do stipulate that the proposed area is not to be used for sleeping purposes.
- RISBC-11 adding ICC B1 to what use to be option 1 for commercial building inspector (legislative option). In my opinion just the ICC B2 should be required not both if the individual meets the criteria to be a residential building inspector based on experience and successfully completes the State building academy. This will allow the certification sub-committee to approve combination inspectors in under a year of service time (which many municipalities will need for functioning their departments).
- RISBC-2 105.2 Building (1) Shed's requiring permits back down to 64 sq. ft. I believe this creates confusion to go back after changing to the 200 Sq.ft. in the previous cycle. The town shifted procedures around permitting of these types of accessory structures. Maybe language including that the structures if exempt are for storage purposes only (not to be used for habitable space).



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Code Errors

From Joe Warner <jwarner@CharlestownRI.gov>

Date Wed 7/2/2025 10:53 AM

To Cambio, James (DBR) <James.Cambio@dbr.ri.gov>

 1 attachment (165 KB)

R322 Code errors.pdf;

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Jim,

Looking at the codes up for public comment I noticed the current RI Amendment error followed through to the new codes. See attached, R322.1 should be as written in the 2019 Code. The amendment as shown in the new code should be to replace R322.2.1 #1. However, ICC finally corrected the error in R322.2.1 #1 in the 2021 Code.

Joseph L. Warner Jr., CBO, CFM
Building/Zoning Official

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R322.1 RI amendment 2019

Delete IRC section R322.1 Add and substitute the following new section:

____ R322.1 General.

Building and structures in flood hazard areas, not designated as coastal A zones or coastal high hazard areas, shall have the lowest floors elevated to or above the base flood elevation, plus one foot (1') (305 mm), or the design flood elevation, whichever is higher.

should be R322.2.1 #1 To correct ICC error

~~R322.3.11 Add the following new section:~~

~~_____ The following certifications shall be submitted to the building official:~~

~~1. _____ For construction in flood hazard areas not subject to high-velocity wave action:~~

~~_____ 1.1 _____ As part of the lowest floor elevation requirements of section R324.2.1, certification of the elevation of the lowest floor, including basement.~~

~~_____ 1.2 _____ For fully enclosed areas below the design flood elevation where provisions to allow for the automatic entry and exit of floodwaters do not meet the minimum requirements in section 2.6.1.1, ASCE 24-14, certification by a registered design professional that the design will provide for equalization of hydrostatic flood forces in accordance with section 2.6.1.2, ASCE 24-14.~~

~~2. _____ For construction in flood hazard areas subject to high-velocity wave action:~~

~~2.1 _____ As part of the lowest floor elevation requirements section R323.3.2, a certification of the elevation of the lowest horizontal structural member.~~

~~_____ 2.2 _____ A certificate prepared by a registered design professional that the building is designed in accordance with ASCE 24-14, including that the pile or column foundation and building or structure to be attached thereto is designed to be anchored to resist flotation, collapse and lateral movement due to the effects of wind and flood loads acting simultaneously on all building components, and other load requirements of section R324.3.3.~~

~~_____ 2.3 _____ For breakaway walls designed to resist a nominal load of less than ten (10) pounds per square foot (0.48 kN/m²) or more than twenty (20) pounds per square foot~~

Comment on Proposed RISBC-2

From Mike Guertin <mikeguertin.com@gmail.com>

Date Wed 7/16/2025 2:22 PM

To DBR State Building Office <DBR.StateBuildingOffice@dbr.ri.gov>

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I'd like to submit a comment on the proposed changes to RI SBC-2:

The proposed code deletes the current Table R301.2(1) and note 3 "Requirements for frost depth footings for accessory attached and detached structures are as follows:

b. "... Exterior stairs and steps off decks, balconies and platforms greater than thirty inches above grade shall have stringer supports extending to twelve inches below grade and shall be supported and secured to prevent lateral displacement or vertical collapse due to grade changes.""

It looks like note 3 is not included in the proposed "Rhode Island Snow Load, Wind Speed and Frost Depth Table."

The 2021 IRC is silent on specific requirements regarding frost protection for exterior stair stringer supports so it looks like section R403.1.4.1 [403.1.4.1] Frost Protection would govern footing depth at the bottom of deck stair stringers. I think this would mean deck stair stringers would need frost depth footings beneath them (40 in. mainland and 30 in. Block Island).

I'd like to see the current note 3b of table R301.2(1) included in the proposed code change so that deck stair stringers would continue to be 12 in. below grade and not frost depth.

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Mike Guertin
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International Code Council
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July 24, 2025

James Cambio, Commissioner
Building Code Commission
State Building Office
560 Jefferson Blvd, Suite 100
Warwick, RI 02886

Re: Proposed Amendments to the following: **RISBC-1**(Rhode Island Building Code) including the **Rhode Island Existing Building Code**(510-RICR-00-00-7) and **RISRC-1**(State Rehabilitation Building and Fire Code for Existing Structures(510-RICR-00-00-20), **RISBC-2**(Rhode Island One and Two Family Code, **RISBC-3**(Rhode Island Plumbing Code), **RISBC-4**(Rhode Island Mechanical Code), **RISBC-6**(Rhode Island Property Maintenance Code), **RISBC-8**(Rhode Island Energy Conservation Code), **RISBC-14**(Swimming Pool and Spa Code), **RISBC-19**(Fuel and Gas Code), all based on the International Code Council(Code Council) 2021 family of codes.

Dear Mr. Cambio,

I am William Nash, the Code Council Senior Regional Manager for Governmental Relations in Massachusetts and your liaison to the Code Council. I am writing to provide comments on updating the existing Rhode Island Building Codes, based on the 2018 Code Council family of the model International Codes (I-Codes), to the above-noted codes, based on the 2021 I-Codes.

The Code Council is a member-focused association dedicated to helping the building safety community and the construction industry provide safe and sustainable construction by developing codes and standards for design, building, and compliance. Most US states and communities, Federal agencies, and many global markets choose the I-Codes to set the standards for regulating on and off-site building, plumbing, mechanical, and fuel gas construction, sanitation, fire prevention, and energy conservation in the built environment. The Code Council is proud to count many Rhode Island Building Officials, Inspectors, and other industry professionals among its 64,000+ governmental members.

The I-Codes comprise 15 different model codes and include the eight I-Codes that Rhode Island currently adopts, and one new I-Code (the International Existing Building Code – IEBC), which are updated and revised every three years through national consensus and standards processes that strike a balance between the latest technology, new building products, installation techniques, economics, and cost while incorporating the most recent advances in public and first responder safety. These processes are open and inclusive, encouraging input from all individuals and groups and allowing Code Council Governmental Members, including many Rhode Island code officials, to determine the final code provisions. Due to the processes as mentioned above, several beneficial changes to the model I-Codes are under consideration for Rhode Island's update.



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Although the Code Council respectfully recommends that Rhode Island update its codes to the most updated version of the model codes (2021 versions) *without* amendment, we recognize that Rhode Island's unique character and needs necessitate amendments to these model codes. The I-Codes are correlated to work together without conflicts, eliminating confusion in building design, inconsistent code enforcement, or interpretation among different jurisdictions. Jurisdictions that utilize the most current Edition of the I-Codes ensure the highest standards for safety, energy efficiency, sustainability, economic incentive, and long-term resiliency of their built environment.

The Code Council would like to commend the State of Rhode Island for its consistently outstanding work in reviewing and now proposing to update the RI State Building Code. We recognize the significant efforts that leaders in Rhode Island have made, along with their commitment to a safe built environment, via up-to-date codes for their visitors and citizens. The proposed update of this code will ensure that the RI Building Code remains technically viable, promote consistency in code application and enforcement, facilitate economic investment in building construction, and prioritize the greatest safety of the public and emergency responders while embracing modern technology and building practices.

General support, technical assistance and training from the Code Council are always available to groups that include, but are not limited to, RI Department of Business Regulation, RI Building Code Commission, RI Building Officials Association, RI Builders Association, RI Office of the State Fire Marshal, RI Design Professionals, State and Local plan review, permit, and inspection staff, and other critical RI stakeholders. In addition, they will continue to have access to the following, including but not limited to, Code Council training programs and materials, product Evaluation Reports, certification programs, and Code Council technical staff, who will assist with code opinions and interpretations based on the I-Codes.

Thank you for the opportunity to submit these comments. The Code Council is honored to partner with the State of Rhode Island to support the adoption, update, and administration of the RI State Building Code based on the 2021 I-Codes, and we look forward to continuing to serve your needs for many more years. Please do not hesitate to contact me via email or cell phone (information provided below) if you have any questions, concerns, or comments regarding the 2021 I-Codes adoption/update or any other Code Council-related matter.

Sincerely,

A handwritten signature in blue ink that reads "William J. Nash, Jr.".

William J. Nash, Jr.
Senior Regional Manager – Government Relations
International Code Council
wnash@iccsafe.org
401-265-0003

Comments on adoption of proposed new codes

From George Whalen <georgewhalenri@gmail.com>

Date Fri 7/25/2025 12:44 PM

To DBR State Building Office <DBR.StateBuildingOffice@dbr.ri.gov>

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1. Adoption of 2021 vs. 2024 Codes

In reviewing the suggested 2021 ICC codes to be adopted by RI, it does not seem feasible or cost effective to adopt these codes now, when the ICC 2024 codes have already been published and can be adopted. Understanding the time and energy that goes into the development of codes and all the work the subcommittees produce to ensure our codes are the best to protect the safety and welfare of those using them. However, in the best interest of contractors, builders, general public as well as building officials and inspectors, the adoption of the most updated code will provide users a dramatic savings in the cost of their insurance, as well as being educated on all the latest industry developments and guidance to build the safest and most technologically advanced structures.

Having just implemented the IECC code in November 2024. legislatively with no changes to that code, it shows that skipping a code cycle can be done and in the long run will save the state as well as consumers a substantial amount of money. Common sense should prevail to adopt the most recent code now and make it easier on everyone. Because all of the new 2024 codes are already in compliance with the 2024 IECC code, no additional changes would need to be infused, unlike the need to do this with the 2021 codes. Thus, it would be more efficient to adopt the 2024 code.

A thorough review of those providing scrutiny to the code and how costly they are to implement, it is apparent that implementing the 2024 code will have significant financial savings in training as well as the time and energy it takes to adopt a new code. An analysis of all the cost factors that go into the code development will show that the insurance aspect is one of the most important cost factors/benefits that must be considered on how it impacts Rhode Islanders.

2. Notice and opportunity

In the interest of transparency, all of the suggested modifications should have been provided to the public via a notice on the RI Building Commission and RICRLB websites. It is the input of those using the codes that is so beneficial to the process. Without any knowledge of any potential changes to the code, only a few certain people would be aware of the potential changes. It would not be until the code is implemented and enforced, that others would gain that knowledge.

In the future, please remember, communication is critical for a well educated construction industry.

3. One and two family dwelling codes

Why a change back to 64 sq.ft. in R-105.2 for work requiring permits when it was just changed 200 sq.ft in the last code cycle? This appears to be a move to increase revenue rather than a health/safety issue, and should be reviewed.

George W. Whalen
(401) 497-7451



July 21, 2025

Commissioner James Cambio
Building Code Commission
560 Jefferson Boulevard, Suite 100
Warwick, RI 02886
DBR.StateBuildingOffice@dbri.gov

Subject: RIHousing Comments on 510-RICR-00-00-2

Dear Commissioner Cambio,

RIHousing appreciates the opportunity to provide comments on the state Building Code Commission's proposed updates to the state building code. We understand these regulations were designed to update the version of the ICC residential code that the state of Rhode Island currently operates under. However, we would like to bring to your attention [House Bill 5804/Senate Bill 1089](#) that passed during the 2025 Rhode Island General Assembly session. These bills expand the state's residential code to include 3- and 4-unit properties (previously only 1- and 2-unit properties were included in the state's residential code). We believe adding 3- and 4-unit properties to the residential code will make it easier and less expensive to develop housing in our state at a time when we are facing a severe housing shortage.

This bill took effect upon passage and included language requiring expedited adoption of these changes. Specifically, the bill states that *"the regulatory analysis for any amendments to the state fire safety code or the state building code, or the state rehabilitation building and fire code for existing buildings and structures including those amendments which incorporate and adopt by reference all or parts of a nationally recognized model code shall be completed within 150 days of the recommendation of the passage of such amendments by the state official, agency, or board responsible for hearing and review of such amendments."*

We strongly encourage the Building Code Commission to incorporate this change (adding 3- and 4- units properties to the residential code) into these proposed regulations or, if that is not possible, to put forth recommendations to incorporate these changes as expeditiously as possible.

Thank you for your consideration. If you have any questions, please feel free to contact Amy Rainone at 401-457-1256 or by email at arainone@rihousing.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Carol Ventura".

Carol Ventura
Executive Director

Comment on proposed RISBC-2 (Chapter 4 Table R401.4.1)

From Mike Guertin <mikeguertin.com@gmail.com>

Date Thu 7/24/2025 12:06 PM

To DBR State Building Office <DBR.StateBuildingOffice@dbr.ri.gov>

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The proposed one and two family dwelling code would adopt Chapter 4 of the 2021 IRC without changes. There is a RI amendment to Table R401.4.1 "Presumptive Load Bearing Values of Foundation Materials" in the current code (2-2022) that values "Loose Fine Sand, Silty Sand, organic soils, clay and areas suspected at being filled" at 1,000 psf .

I encourage the Building Code Standards Committee to include the 1,000 psf soils line in Table R401.4.1 to make it simpler for contractors and building officials to grade soil bearing values of these types without a soil test by a third party.

Thank you

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[https://urldefense.com/v3/_http://mikeguertin.com_!!KKphUJtCzQ!PmOhNOMs4CjPPINsD8T63LEygA-MqytHSrHbc94S1At_hjURjiNqtgK4QAUD5WSXUEDYkcgKPdC8Vld84FJLbU8WI1Ge0ypImHOeAxr1\\$\[mikeguertin\[.\]com\]](https://urldefense.com/v3/_http://mikeguertin.com_!!KKphUJtCzQ!PmOhNOMs4CjPPINsD8T63LEygA-MqytHSrHbc94S1At_hjURjiNqtgK4QAUD5WSXUEDYkcgKPdC8Vld84FJLbU8WI1Ge0ypImHOeAxr1$[mikeguertin[.]com])

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