

UNIFORM BUILDING CODE COMMISSION AFFORDABLE HOUSING CONSOLIDATED DWELLINGS TECHNICAL CODE REVIEW COMMITTEE (AHCDTC) PRESENTATION

Recommendations for modifications to the 2024 Editions of the International Building Code®, International Fire Code®, International Existing Building Code® and International Residential Code®

Presented By: Amber Armstrong

Date: August 18, 2026



OKLAHOMA

Committee Members:

Commission Liaisons:

Todd Booze (General Contractor – Residential Construction)
Bradley Flatt (Insurance Industry Representative)
Mitchell Hort (Local Level Regulator / Inspector)

Committee Volunteers:

Amber Armstrong (At large stakeholder – Chairman)
Chad Denson (Building Code Official)
Anthony Faddis (Residential Home Designer)
Roger Goes (Residential Home Builder)
Matt Hayes (Architect/Engineer)
Tyler Parette (At large stakeholder)
Matthew Peacock (Architect)
Chad Williams (Engineer – Vice Chairman)
Mike Willson (Fire Code Official)
Mark Zitzow (At large stakeholder)
Darryl Beebe (Alternate Code Official)
Adan Chapa (Alternate Builder)
Sam Day (Alternate Architect/Home Designer/Engineer)



General Summary:

The AHCDTC conducted a thorough, formal review of the code change proposals received related to their task assignment – exploring options for affordable housing and consolidated dwellings. They reviewed multiple studies on a range of subjects related to the issues and had two guest presentations related to sprinkler systems.

9 proposals were received that addressed the 2024 editions of the International Building Code® (IBC®), International Existing Building Code® (IEBC®), International Fire Code® (IFC®), and International Residential Code® (IRC®).

- 2 proposals were withdrawn

- 2 proposals were revised

- 4 proposals were approved

- 3 proposals were denied



IBC[®], IEBC[®], and IFC[®] Proposals



Proposed Code Change AHCDTC-2 R1 – modifying Section 310.4 Residential Group R-3 in the 2024 IBC® and Section 203.9.3 of the 2024 IFC®

310.4 Residential Group R-3.

Residential Group R-3 occupancies where the occupants are primarily permanent in nature and not classified as Group R-1, R-2, R-4 or I, including:

Buildings that do not contain more than ~~two~~ 8 dwelling units, 3 stories, or a Fire Area greater than 9,000 square feet

Care facilities that provide accommodations for five or fewer persons receiving care

Congregate living facilities (nontransient) with 16 or fewer occupants

- Boarding houses (nontransient)

- Convents

- Dormitories

- Emergency services living quarters

- Fraternities and sororities

- Monasteries

Congregate living facilities (transient) with 10 or fewer occupants

- Boarding houses (transient)

Lodging houses with **four** or fewer guestrooms **and not more than two persons per room**

Hotels (nontransient) with five or fewer guestrooms

Motels (nontransient) with five or fewer guestrooms



Summary of Proposed Change:

The submitter noted fire sprinklers were not required for one- and two-family dwellings and townhomes but were required for any multi-family homes with three or more dwellings. He discussed the regulatory burden the requirement that a NFPA 13R system had on small multifamily structures in terms of cost including additional taps, the continuous remote monitoring and annual inspections, noting the consequences of the expensive system was that small multifamily structures were not built as it was hard to justify when a one- or two-family dwellings could be built without a sprinkler system. He mentioned sites for larger multifamily developments where the cost could be spread out were limited by zoning constraints, minimum lot-size requirements and neighborhood opposition.

He explained his proposal would allow 3- to 12-unit Group R-3 buildings to utilize NFPA 13D fire sprinkler systems in lieu of the 13R system. He noted the NFPA 13D system was developed to provide a cost-effective residential sprinkler option while maintaining a high level of life safety. He explained some of the cost saving features of the 13D system and how it could reduce costs by an estimated \$30,000 to \$40,000 per project and how it would improve the feasibility of "missing middle" housing types – such as triplexes, fourplexes and small apartment buildings. He noted that such structures would provide better life safety than the un-sprinklered single-family homes that currently dominated construction in Oklahoma and by lowering the regulatory barrier to these housing types, the amendment would result in more Oklahomans living in sprinklered buildings overall, with a corresponding reduction in fire-related injuries and fatalities.



Summary of Proposed Change Continued:

The submitter added the amendment would make it easier to replace or rehabilitate existing un-sprinklered small apartment buildings which posed a disproportionately high fire risk. He concluded that allowing the reduction in suppression standards for the category would not meaningfully reduce overall life safety as the state would make substantial gains in both affordability and fire safety by enabling these building types to capture a greater share of new housing construction relative to un-sprinklered single-family homes and aging un-sprinklered apartment stock. After review of the original proposal a revised version was submitted dropping the number of units from 12 to 8.

Committee Commentary (AHCDTC-2):

The committee first discussed AHCDTC-2 at the February 4, 2026, meeting. They reviewed how the submitter arrived at a total of 12-unit cap; different costs associated with sprinkler systems and how that could affect the ability to provide multi-family housing; that utilizing 2-hour fire walls was still an expensive requirement and could be a higher cost than providing sprinklers in the units; that achieving density would allow for more affordable housing; what the definition of affordable meant in the context for the committee members; median income for Oklahoma; and concerns with removing life safety to achieve cost savings in multifamily housing when those savings would not get passed on to the people ultimately living in the units.

There was further discussion on the differences between the different types of sprinkler systems to include calculations, water hydraulics, and the number of sprinkler heads and locations



Committee Commentary Continued (AHCDTC-2 – page 2):

required for each system; concerns with the lack of upkeep and maintenance with the NFPA 13D systems; if requiring inspections would be regulatory burden; and sprinkler water release time duration requirements for each system. The committee discussed single-stair exits and fire separation; zoning issues; and building outside of the large metro areas in Oklahoma. They discussed life safety and how reducing sprinkler requirements reduced the time for occupants to get out of a fire; the ability of smaller towns to respond to fires; and that most of the changes the committee would be making would be in the urban areas of towns where fire departments were generally located. There was discussion on how the changes could impact insurance and how the costs for it could be increased to the building owner due to the decreased coverage of fire suppression; accessibility requirements and how to meet them; and if any amendments should be made to the proposal. They discussed the history behind the original proposal made to the 2024 residential building technical committee and creating the current review committee; fire death statistics; and current building practices. At the end of the discussion the proposal was tabled for amendment.

At the March 2, 2026, meeting a presentation was made by Housing Forward that touched on the proposal and addressed costs differences in square foot for an average single-family home and multi-family housing in the US and around the world; that the IBC made multi-family housing 30% to 50% more expensive per square foot and was one of the reasons for the housing crisis. The presentation touched on reasons for sprinkler system failures; possible options for modifying sprinkler system requirements; and the issue with people hearing audible alarms and seeing



Committee Commentary Continued (AHCDTC-2 – page 3):

strobes but not associating them with a fire or issue with a sprinkler head failure if it was not in their unit or if they were outside of a building. After the presentation, the committee discussed if utilizing NFPA 13D system in that type of housing would violate the standard; differences in requirements for sprinkler heads in NFPA 13R and 13D; the history and statics of home fires; who was qualified to redefine the scope of the IRC and make it align with the other codes; available research data on the safety of the different sprinkler systems; and the regulatory cost differences between a duplex and triplex.

The committee reviewed the proposal and discussed electrical disconnects and where they were required to be located; requiring sprinklers in garages where the pipes and heads may be subject to freezing conditions; issues with two-hour fire walls with holes in them that do not maintain the two-hour separation; how the change could affect means of egress; what changes other states had made; and a pathway of expanding the IRC up to four units and augmenting the IBC up to 12 units. They discussed concerns that the IRC did not have provisions to address mixed use structures; other items that could not be modified in urban infill lots; prescriptive framing; that any modification to the IRC would need to address more than just changing the number of units allowed; differences between R2 and R3 occupancies; structure caps; and differences between a fire wall and fire barrier. They discussed how the water would need to be distributed to the units for the sprinkler systems in a combined system and how one unit may be able to turn the water off to all of the units without the occupants of the other units knowing; and concerns with owners not maintaining the NFPA 13 D systems. At the end of the discussion the form was tabled for revision.



Committee Commentary Continued (AHCDTC-2 R1 – revision 1):

The committee reviewed AHCDTC-2 R1 at the June 18, 2026, meeting. The submitter noted he had reduced the number of units from 12 to 8 at the request of another committee member.

Committee Action Taken

A motion was passed to approve Code Change Proposal AHCDTC-2 R1 (revision 1) with a vote of 7 "Ayes," 2 "Nays," and 2 "Abstains." (6/18/2026)



Proposed Code Change AHCDTC-8 – requesting stronger building codes for multifamily housing.

Require tornado-resistant standards: continuous load path, hurricane clips/straps, enhanced roof sheathing, braced walls, 135+ mph wind resistance, ICC 500 safe rooms and concrete floors instead of wood for balconies and walkways

Summary of Proposed Change:

The submitter urged for stronger statewide building codes for multifamily housing noting their all-wood apartment, including wood-floor balconies and walkways, felt unsafe in Oklahoma's storms and tornados. Adding the proposed changes would provide superior wind/debris resistance, durability, moisture/rot/mold/fire-resistance, and lower maintenance.

Committee Commentary:

The committee reviewed the proposal at the May 12, 2026, meeting. And felt the wholesale change was beyond the scope of their assignment. Staff noted it was related to multifamily housing which was why it was placed before the committee. The committee discussed if it should be brought to the Commission; what changes had been made to the 2024 residential code related to storm shelters; what the City of Moore required to provide some levels safety while mitigating costs, and that Moore did not mandate a shelter; and the need for a specific code change to be submitted.

Committee Action Taken

A motion to deny Code Change Proposal AHCDTC-8 passed with a vote of 10 "Ayes" and 1 "Nay" (5/12/2026)



Proposed Code Change AHCDTC-9 – modifying Table 1006.3.4(1) and adding a new Section 1006.3.4.2 in the IBC and IFC and modifying Table 804.5.1.1 and adding a new Section 804.5.1.1.1 in the IEBC.

Table 1006.3.4(1) and 804.5.1.1(1) – STORIES AND OCCUPIABLE ROOFS WITH ONE EXIT OR ACCESS TO ONE EXIT FOR R-2 OCCUPANCIES

STORY	OCCUPANCY	MAXIMUM NUMBER OF DWELLING UNITS	MAXIMUM EXIT ACCESS TRAVEL DISTANCE
Basement, first, second, or third, or fourth story above grade plane and occupiable roofs over the first, or second, or third story above grade plane	R-2 ^{a,b,c,d}	4 dwelling units	125 feet
Fourth <u>Fifth</u> story above grade plane and higher	NP	NA	NA

For SI: 1 foot = 304.8 mm.

NP = Not Permitted

NA = Not Applicable

- a. Buildings classified as Group R-2 equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1 or 903.3.1.2 and provided with emergency escape and rescue openings in accordance with Section 1031.
- b. This table is used for Group R-2 occupancies consisting of dwelling units. For Group R-2 occupancies consisting of sleeping units, use Table 1006.3.4 (2).
- c. This table is for occupiable roofs accessed through and serving individual dwellings units in Group R-2 occupancies. For Group R-2 occupancies with occupiable roofs that are not accessed through and serving individual units, use Table 1006.3.4.(2).
- d. 4-story buildings and 3-story buildings with an occupiable roof above the third story shall also comply with Section 1006.3.4.2.



Proposed Code Change AHCDTC-9 – Continued

1006.3.4.2 Single exit ~~four story buildings with~~ Group R-2 buildings with dwelling units. ~~Four story buildings with a single exit for Group R-2 dwelling units~~ Group R-2 buildings with a single exit and that are either four stories or three stories and an occupied roof shall comply with Table 1006.3.4(1) and all of the following:

1. The net floor area of each floor shall not exceed 4,000 square feet (418.5 square meters).
2. Openings to the interior exit stairway enclosure shall be limited to those required for exit access into the enclosure from normally occupied spaces, those required for egress from the enclosure, and openings to the exterior. Elevators shall not open into the interior exit stairway enclosure.
3. A manual fire alarm system and automatic smoke detection system that activates the occupant notification system in accordance with Section 907.5 shall be provided. Smoke detectors shall be located in common spaces outside dwellings units, including but not limited to gathering areas, laundry rooms, mechanical equipment rooms, storage rooms, interior corridors, interior exit stairways an exit passageways.
4. Regardless of the stairway construction type, automatic sprinkler locations in interior exit stairways shall comply with the requirements of NFPA 13 for combustible stairways.
5. Electrical receptacles shall be prohibited in an interior exit stairway.



Summary of Proposed Change:

The submitter noted affordable and “connected” housing—whether constructed above, below, or adjacent to other dwelling units—presented unique life-safety challenges due to increased occupant density and varied occupant behaviors, noting those conditions elevated risk and demand proven, reliable life-safety strategies. They stated their proposal represented newly approved IBC language that permitted the use of Single Stairways in R-2 occupancies while incorporating best-practice safety measures, including:

- Automatic fire sprinkler systems
- Enhanced fire alarm and notification systems
- Two-hour fire-rated exit enclosures

Adding the coordinated protections significantly enhanced occupant safety while supporting innovative and cost-effective housing solutions. Adding adoption of the provisions would allow Oklahoma to align with the latest national safety standards while advancing the development of safe, affordable housing statewide.

A supplemental proposed change was submitted by the chairman of the committee with a change to the section heading and first line of the section. The change was made to clarify the section applied not only to four story buildings but to three story buildings with an occupied roof.



Committee Commentary:

The committee reviewed the proposed language noting it was approved by the ICC committee and was before all ICC members for voting through May 22, 2026. The submitter of the supplemental language explained the change came from a proposal made to that ICC committee and was subsequently withdrawn due to concerns that it would keep the proposal from passing, clarifying it only addressed editorial issues. The concern from the original submitter of the amendment at the national level was the language in the change could be interpreted to only apply to four-story structures when the intent was for four-story structures or three-story structures with an occupiable roof.

The committee discussed that ICC's correlation committee would probably pick up the change and address it administratively but there was a chance that the Oklahoma change would not match the 2027 code based on what actions were taken by both the Oklahoma and national committees. They agreed the supplemental language made the change clearer and discussed if the change would affect AHCDTC-1 which was also on the agenda to discuss; what action options could be taken on AHCDTC-1; the differences in square footage requirements between the two proposals; and the sprinkler location requirements within the AHCDTC-9 language. The submitter of AHCDTC-1 noted he would withdraw his proposal.

Committee Action Taken

Unanimous vote to approve Code Change Proposal AHCDTC-9 as amended with the supplemental language change (5/12/2026)



Proposed Code Change AHCDTC-5 – adding a new Section R309.1.1 entitled "Small buildings and tenant spaces" in the IBC and adding a new Section [BG] 203.8.1 entitled "Small buildings and tenant spaces" in the IFC and moving Sections [BG]203.8.1 and [BG]203.8.2 to [BG]203.8.2 and [BG]203.8.3, respectively

309.1.1 Small buildings and tenant spaces. A building or tenant space used for Mercantile purposes with an occupant load of less than 20 persons shall be classified as a Group B occupancy.

Summary of Proposed Change:

The submitter noted the change would lower costs to build two-story mixed-use buildings with small ground floor retail components, by allowing the buildings to be Type VB sprinkled to NFPA 13R or 13D, rather than requiring them to be Type VA construction sprinkled to NFPA 13 standards. He noted mercantile occupancies were traditionally classified as higher risk due to the potential presence of significantly higher quantities of combustible materials, but very small-scale retail – often referred to as "micro retail" – presented a materially lower fire risk and has become increasingly common in recent years.

He noted under the change the small retail spaces could be accommodated in two-story Type VB buildings without fire suppression, with an additional story allowed when equipped with an NFPA 13R or 13D fire suppression system-compared to the current limits of one- and two-stories, respectively, under Group M. In addition, exterior walls with a fire separation distance of less



Summary of Proposed Change Continued:

than 10 feet could be reduced to a 1-hour fire-resistance rating, rather than the 2-hour rating required for Group M occupancies. He noted the use of the Group B occupancy allowed exterior walls with less than 10 feet of fire separation distance to be reduced to a 1-hour fire-resistance rating, rather than the 2-hour rating required for Group M occupancies. Taken together, the changes better aligned code requirements with the scale and risk of micro retail, while supporting more flexible, small-scale mixed-use development.

Committee Commentary:

The committee discussed that some members felt the proposed change was outside the scope of their charge; while others felt that while it did not directly pertain to residential structures it would be within the same kind of walkable context as a lot of affordable multifamily areas the committee was reviewing that they could make a recommendation to the commission. There was discussion that if the floors above were residential structures, it would then be within the context of the committee's charge. There was a recommendation to submit the proposed change to the committee charged with reviewing the 2027 International Building Code as a more appropriate committee; that when everyone wanted the same lot, it was not affordable to build a one-story structure and, in some areas, people did not want to live on the first floor; and reasons why mercantile classifications were a more restrictive category, which had to do with the potential hazards stored within the structure; and that there was no technical justification for the change. The committee discussed there were no studies or analysis of any kind that proved the



Committee Commentary Continued:

change was safe; that it was hard to build a mixed-use structure with a mercantile as it was so restrictive; the number of floors that could be built with or without sprinklers; separation requirements; and that the national code would probably address the scenario within the next 10 years.

The committee discussed the advantages of moving the requirements to Group B; and the differences between Group B and M requirements for things like building heights, sprinkler, fire separation, and exit discharge distance requirements. They discussed the different types of structures that could be allowed to have a residence over them if the change was approved such as motor fuel dispensing facility; accessory occupancies; using the most restrictive requirement path in the code when there was more than one occupancy in a building related to fire separation requirements; and the types of occupancies the submitter intended the change for were things like a grocery store or laundromat. They discussed mercantile stores and the many different things that could be stored in them that could cause hazards such as mattresses; protection of the occupants; and the types of structures that exist that the change would be utilized within.

Committee Action Taken:

A motion to approve Code Change Proposal AHCDTC-5 failed with a vote of 2 "Ayes," and 7 "Nays," and 2 "Abstains" (6/18/2026)



Proposed Code Change AHCDTC-6 R1 – modifying footnote Table 705.9 Maximum Area of Wall Openings Based on Fire Separation distance and Degree of Opening Protection

TABLE 705.9 MAXIMUM AREA OF WALL OPENINGS BASED ON FIRE SEPARATION DISTANCE AND DEGREE OF OPENING PROTECTION

FIRE SEPARATION DISTANCE (feet)	DEGREE OF OPENING PROTECTION	ALLOWABLE AREA^a
0 to less than 3^{b, c, k}	Unprotected, Nonsprinklered (UP, NS)	Not Permitted ^k
	Unprotected, Sprinklered (UP, S) ⁱ	Not Permitted ^k
	Protected (P)	Not Permitted ^k
3 to less than 5^{d, e}	Unprotected, Nonsprinklered (UP, NS)	Not Permitted
	Unprotected, Sprinklered (UP, S) ⁱ	15%
	Protected (P)	15%
5 to less than 10^{e, f, j}	Unprotected, Nonsprinklered (UP, NS)	10% ^h
	Unprotected, Sprinklered (UP, S) ⁱ	25%
	Protected (P)	25%
10 to less than 15^{e, f, g, j}	Unprotected, Nonsprinklered (UP, NS)	15% ^h
	Unprotected, Sprinklered (UP, S) ⁱ	45%
	Protected (P)	45%
15 to less than 20^{f, g, j}	Unprotected, Nonsprinklered (UP, NS)	25%
	Unprotected, Sprinklered (UP, S) ⁱ	75%
	Protected (P)	75%
20 to less than 25^{f, g, j}	Unprotected, Nonsprinklered (UP, NS)	45%
	Unprotected, Sprinklered (UP, S) ⁱ	No Limit
	Protected (P)	No Limit
25 to less than 30^{f, g, j}	Unprotected, Nonsprinklered (UP, NS)	70%
	Unprotected, Sprinklered (UP, S) ⁱ	No Limit
	Protected (P)	No Limit
30 or greater	Unprotected, Nonsprinklered (UP, NS)	No Limit
	Unprotected, Sprinklered (UP, S) ⁱ	No Limit
	Protected (P)	No Limit



Proposed Code Change AHCDTC-6 R1 continued

For SI: 1 foot = 304.8 mm.

UP, NS = Unprotected openings in buildings not equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1.

UP, S = Unprotected openings in buildings equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1 or 903.3.1.2, provided that rooms or spaces containing the openings are equipped with sprinkler systems.

P = Openings protected with an opening protective assembly in accordance with Section 705.9.2.

- a. Values indicated are the percentage of the area of the exterior wall, per story.
- b. For the requirements for fire walls of buildings with differing heights, see Section 706.6.1.
- c. For openings in a fire wall for buildings on the same lot, see Section 706.8.
- d. The maximum percentage of unprotected and protected openings shall be 25 percent for Group R-3 occupancies.
- e. Unprotected openings shall not be permitted for openings with a fire separation distance of less than 15 feet for Group H-2 and H-3 occupancies.
- f. The area of unprotected and protected openings shall not be limited for Group R-3 occupancies, with a fire separation distance of 5 feet or greater.
- g. The area of openings in an open parking garage in accordance with Section 406.5 with a fire separation distance of 10 feet or greater shall not be limited.
- h. Includes buildings accessory to Group R-3.
- i. Not applicable to Group H-1, H-2 and H-3 occupancies.
- j. The area of openings in a building containing only a Group U occupancy private garage or carport with a fire separation distance of 5 feet or greater shall not be limited.
- k. For openings between S-2 parking garage and Group R-2 building, see Section 705.3, Exception 2.



Summary of Proposed Change:

The submitter noted the proposal would allow more windows on multifamily buildings sprinkled to NFPA 13R requirements and would have little impact on costs. He noted it would allow the building equipped with a NFPA 13R fire suppression system to be classified as "protected" for the purpose of calculating allowable exterior wall openings as under the current code, openings in exterior walls of R-2 multifamily buildings were limited to 10% when located within 10 feet of a property line or the centerline of a right-of-way and 15% when within 15 feet. The proposal would increase the limits to 25% and 40% respectively, enabling more window openings and significant improving daylight, livability and overall design quality in urban apartment buildings.

He noted available fire data indicated the risk of fire spread between buildings was already very low in sprinklered construction and that the code was heavily regulating a relatively rare hazard. Adding of 26,675 residential structure fires in sprinklered buildings only 46 were not contained to the building of origin and that by comparison 3% of fires in non-sprinklered buildings spread beyond the structure. He noted most multifamily buildings affected by the proposal were typically located in urban environments with limited wildfire exposure unlike many single-family homes, which often faced greater external fire risk yet were not subject to sprinkler requirements, exterior wall rating mandates, or limitations on unprotected openings. He noted the change would increase allowable exterior openings in sprinklered multifamily buildings with minimal impact on life safety, while producing meaningful improvements in housing quality and urban form.



Committee Commentary:

The committee first reviewed AHCDTC-6 during the April 6, 2024, meeting and discussed issues with increased construction costs due to more windows, but that livability would be improved by encouraging a shift away from one- and two-family homes to smaller multifamily housing; intended classifications of sprinkler systems; life safety concerns; and current building practices. There was discussion on structure design and how adding more windows allowed for more options in placement for bedrooms as typically they had to be placed at the front or back of the space due to smaller infill lot lines; and ventilation requirements. Concern was expressed with the way the proposal was worded, someone could game the system to have a lot of little openings and still meet the intent of the change. At the end of the discussion the proposal was tabled for modification.

The committee reviewed AHCDTC-6 R1 (revision 1) at the May 12, 2026, meeting. The submitter explained his revised language, clarifying the change meant that if the room had an opening, then a sprinkler was required. They discussed if Section 705.9.2 needed to be amended but determined it did not; other ways to protect window openings; and other types of structures that could be affected by the change.

Committee Action Taken

A motion to approve Code Change Proposal AHCDTC-6 R1 (revision 1) passed with a vote of 7 "Ayes," and 4 "Nays" (5/12/2026)



Proposed Code Change AHCDTC-7 – modifying Section 1027.5 Location in the IBC® and IFC®

1027.5 Location. Exterior exit stairways and ramps shall have a minimum fire separation distance of 10 feet (3048 mm) measured at right angles from the exterior edge of the stairway or ramps, including landings, to:

1. Adjacent lot lines.
2. Other portions of the building.
3. Other buildings on the same lot unless the adjacent building exterior walls and openings are protected in accordance with Section 705 based on fire separation distance.

For the purposes of this section, other portions of the building shall be treated as separate buildings. ~~Exception~~ **Exceptions:**

1. Exterior exit stairways and ramps serving individual dwelling units of Group R-3 shall have a minimum fire separation distance of 5 feet (1525 mm).
2. Exterior exit stairways which extend no higher than 15 feet above the level of exit discharge may have a minimum fire separation distance of 2 feet.
3. Exterior exit stairs for buildings sprinkled according to 903.3.1.1 or 903.3.1.2 may have a minimum fire separation of 5 feet.



Summary of Proposed Change:

The submitter noted tenants and landlords would be impacted by the change as it would allow more exterior exit stairs on small sites which would increase life safety, lower costs and improve sociability in small multifamily buildings. He noted that exterior exit stairs offer both economic and social advantages in small buildings and typically require lower upfront costs and reduced long-term maintenance compared to conditioned interior exit stairs. He noted they could enhance sociability by creating more opportunities for incidental interaction among residents.

But despite the benefits, exterior exit stairs were often difficult to incorporate into small infill sites due to current setback requirements. The submitter noted while setbacks were intended to reduce the risk of a fire in an adjacent building could compromise egress, available fire data suggested that the risk was relatively limited. He noted exposure fires originating off-site only accounted for about 1% of fire-related deaths in the United States and by contrast most fire fatalities result from smoke inhalation. He noted exterior exit stairs, being open to the outdoors, effectively eliminated the risk of smoke accumulation that could occur in non-pressurized interior exit stairs and while exterior stairs may be more exposed to adjacent fires, they significantly reduced the primary cause of fire-related deaths. In this context, exterior exit stairs could offer a higher level of life safety than non-pressurized interior stairs, even when located at relatively small separation distances.



Committee Commentary:

The committee reviewed the proposal on June 9, 2026, and discussed safety concerns related to the proposal as it would allow exterior stairways on the sides of buildings that did not open to a public way. Concern was expressed that occupants of a building with exterior stairways could become trapped in a narrow corridor due to the adjacent building being on fire, as heat, flames or the space being occupied by fire fighters could prevent evacuation. It was also suggested that the buildings that met this proposal could also meet the requirements for a single staircase which could further inhibit the occupants from exiting the structure. In discussing exception 3 it was noted that it didn't matter if the structure with the exterior staircase was sprinkled, it mattered if the building adjacent to the exterior stairway was sprinkled as what was happening in the adjacent building would impact the exterior stairway.

The committee discussed if the structure was built in the last 60 years, to the property line, it was built without openings with a 2-hour fire rated wall; that a lot of structures were older and grandfathered in without those safety features; and that buildings with the exterior stairway would still be required to have other emergency egress windows. They discussed how to handle a situation where the exterior outside of the adjacent building catches fire; if the proposal should be amended to clarify it could not be the only stair for the building; that exception 3 was not needed if the structure only had one staircase; that the fire separation in the section was not the same fire separation requirements for exterior walls; and the commentary for the section that addressed that separation.



Committee Commentary Continued:

The committee discussed exit discharge requirements; the distance to the public way; specific scenarios involving an R-2 building with a stoop with four steps that ended 2 feet off the property line and if by definition, that would be considered an exit stairway. There was discussion on exit access distance and the difference between that and exit discharge; the definition of an exterior exit stairway; if a stoop would be apart of the exit discharge; and that there would always be scenarios in which there would be exceptions to the code.

The committee discussed the exit stairway would need to be made of non-combustible materials as part of the exit system; different occupant groups and how the change could affect them; and if specific occupancies should be excluded from the exceptions. There was discussion on the limitations for exterior exit stairways in the code; that the intent of the change seemed to be for R occupancy buildings, but the unintended consequence of the change was that it could be utilized for any building other than an I-2 as presented, which fell outside the scope of the committee. The committee discussed if mixed-use buildings fell within the scope of the committee; the need to rework the language in the proposal; and what occupancy groups should be included. The proposal was tabled for revision during a meeting break.

The committee reviewed revised language later during the same meeting. They discussed if the R-3 occupancy should be included in exception 2; that doing so would create a conflict with the first exception as required the fire separation distance to be "5 feet" and the second exception then took the R-3 fire separation distance down to "2 feet." They discussed modifying the first



Committee Commentary:

exception to 2 feet; removing Group R-3 from the 2nd exception; discussion on the differences between the wording "shall" and the proposed "may" in exceptions 2 and 3 and changing them to "shall." Concern was expressed that 2 feet was not a wide enough distance and a recommendation was made to change the minimum width to 3 feet. There was further discussion on the spacing requirements; the number of steps that made a stoop a stairway; and exit discharge requirements. They discussed the need for space between the sides of buildings for occupants to evacuate and the ability of fire fighters to access the fire as well as various scenarios for exit discharge. They reviewed the code commentary for the section; the need for technical justification or studies that could show life safety impacts for the change; and exiting to the public way. At the end of the discussion the proposal was tabled for further modification.

The committee reviewed AHCDTC-7 at the July 13, 2026, meeting. They discussed concerns with the proposal related to the amount of distance between the buildings; that there was no study on the safety of the change.

Committee Action Taken

A unanimous vote to deny AHCDTC-7 passed. (7/13/2026).



IRC® Proposals



Proposed Code Change AHCDTC-4 – modifying Chapter 1, Section R101.2 Scope, and Chapter 3, Sections R302.3 Two-Family Dwellings, R302.3.1, Dwelling unit separation and adding Sections R309.3 Three- and Four-Unit Dwelling Automatic Fire Sprinkler Systems and R309.3.1 Design and Installation

R101.2 Scope. The provisions of this code shall apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, removal and demolition detached ~~one- and two-family dwellings~~ buildings containing not more than four dwelling units, and townhouses not more than three stories above grade plane in height with a separate means of egress and their accessory structures not more than three stories above grade plane in height. Exception: The following shall be permitted to be constructed in accordance with this code where provided with an automatic sprinkler system complying with Section P2904:

1. Live/work units located in townhouses and complying with the requirements of Section 508.5 of the International Building Code.
2. Owner-occupied lodging housed with **four** or fewer guest rooms **and not more than two persons per room, provided that the facilities are protected with an automatic fire sprinkler system in accordance with Section P2904.**
3. A care facility with five or fewer persons receiving custodial care within a dwelling unit.
4. A care facility with five or fewer persons receiving medical care within a dwelling unit.
5. A day care facility for **Occupancy Groups other than E or I with** five or fewer persons of any age receiving care within a dwelling unit.
6. **A day care facility for Occupancy Groups E or I with eight to twelve children receiving such**



daycare within a dwelling unit. The number shall include children two and one-half years or less of age.

7. Buildings containing three or four dwelling units.

R302.3 ~~Two-family dwellings~~ Multiple-family dwellings (two, three, and four units). Dwelling units in ~~two-family dwellings~~ buildings containing two, three or four dwelling units shall be separated from each other in accordance with Sections 302.3.1 through 302.3.5, regardless of whether a lot line exists between two dwelling units.

R302.3.1 Dwelling unit separation. The ~~two~~ dwelling units shall be separated by fire-resistance rated assemblies which are vertical, horizontal, or a combination thereof.

R309.3 Three- and four-unit dwelling automatic fire sprinkler systems. An automatic fire sprinkler system shall be installed in all buildings regulated under this code that contain three or four dwelling units. For townhomes see Section R309.1.

R309.3.1 Design and installation. Automatic fire sprinkler systems required by Section R309.3 shall be designed and installed in accordance with Section P2904.

Correlating Change to IBC and IEBC:

101.2. Scope. The provisions of this code shall apply to the construction, alteration, relocation, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal and demolition of every building or structure or any appurtenances connected or attached to such buildings or structures.



Correlating Change to IBC and IEBC continued:

Exception: Detached one- and two-family dwellings, ~~and~~ townhouses, and buildings containing not more than four dwelling units not more than three stories above grade plane in height with a separate means egress, and their accessory structures not more than three stories above grade plane in height, shall comply with this code or the International Residential Code.

Summary of Proposed Change:

The submitter stated Oklahoma's housing shortage required increasing the supply of small-scale multifamily housing and that currently three- and four-unit buildings had to comply with the International Building Code which was a commercial standard that imposed engineering, permitting, and system requirements disproportionate to the building type, which drove up costs and limited the pool of builders capable of taking on the work. They noted the proposed changes extended the IRC applicability to buildings containing up to four dwelling units with a mandatory NFPA 13D automatic fire sprinkler requirement for all new construction and substantial rehabilitation. The submitter stated the sprinkler condition directly addressed the life-safety considerations associated with the expanded IRC scope and was consistent with approaches adopted in North Carolina, Utah, and Alaska. They noted Oklahoma municipalities including Tulsa and Claremore were actively developing pre-approved plans programs to accelerate infill housing production and IRC alignment for four-unit buildings was a necessary complement to those efforts. Adding the change allowed fourplexes to be designed, permitted, and built under the same framework as the rest of residential housing stock.



Committee Commentary:

The committee first looked at the proposal on April 6, 2026. They discussed the change required 2-hour fire separation between units; smoke alarms; current building practices and the changes in the 2024 residential code and when they would go into effect. They discussed the change was limited to four units, but they could be built in a vertical formation rather than horizontal; and other states that had made similar changes. Concern was expressed the IRC did not address mixed use structures; that there was language in the IRC that pointed to the IBC for mixed use; requiring monitoring of some kind; and if putting the change in the IRC was the correct approach as it didn't have language similar to the IBC in Section 1027, Type A, B, and C units and when those requirements would kick in. Further concerns were expressed that the IRC did not address common use areas and that it allowed for a change in riser heights at the top and bottom of a staircase. They discussed possible modifications for accessibility requirements; that cellular communication requirements added to the code for monitoring would be difficult to enforce; what entity would be notified in the case of a fire if there was monitoring; if there was a way to clarify the change was only for urbanized areas where it was serviced for a municipal water supply; and that it required approval by the code official. At the end of the discussion the form was tabled for revision.

The committee reviewed the form again at the May 12, 2026, meeting. The submitter noted while the proposal had been tabled for revision to address accessibility concerns, after further review they felt those requirements were addressed in Section R322.1 and would be redundant



Committee Commentary Continued:

in the change. The committee discussed the need to amend Section 101.2 in the proposal related to the word "detached" and what it meant in the context of the code; firewalls, two-hour fire separation; what was allowed within the City of Oklahoma City versus the base code; and that the language provided a choice to use the IBC or IRC. At the end of the discussion the committee determined the word "detached" should remain but the words "one and" following it should be removed.

On July 13, 2026, concern was expressed that there could be confusion between the sprinkler requirements between three- and four-plexes and townhomes so a sentence was added to section R309.3 to reference back to Section R309.1 for townhomes.

Committee Action Taken

Vote to approve AHCDTC-4 as amended to remove the words "one- and" from Section 101.2 passed with 10 "Ayes" and 1 "Nay" (5/12/2026)

