



May 9, 2023

New Mexico Construction Industries Division
Regulation and Licensing Department
5500 San Antonio Drive NE
Albuquerque, NM 87109
Attention: Public Comments

Submitted via email: Eliza Casados, eliza.casados@rld.nm.gov

To Whom It May Concern:

The International Code Council (Code Council) stands in support of the New Mexico Construction Industries Division's efforts to update its 2015 New Mexico Commercial Building Code, 2015 New Mexico Residential Building Code, and 2015 New Mexico Existing Building Code with the 2021 International Building Code, 2021 International Residential Code, and 2021 International Existing Building Code.

The Code Council is a member-focused non-profit association dedicated to building safety and sustainability. The Code Council develops model building codes, known as the I-Codes, used in the design, build and compliance process to construct safe, sustainable, affordable, and resilient structures. The I-Codes – including the International Building Code (IBC), International Residential Code (IRC), and International Existing Building Code (IEBC) – are the most widely used and adopted set of building codes in the U.S. Developed through a consensus-based process, the I-Codes incorporate the latest technology and provide the safest, most resilient structures for our families and communities. The I-Codes provide a coherent system of construction standards through extensive cross-referencing and correlation between the codes.

In upgrading codes, the state can improve the safety and health of New Mexicans from natural hazards and risks associated with the built environment. Numerous studies confirm that the adoption and implementation of current model building codes is one of the best mitigation strategies from natural hazards. The requirements in the most recent edition of the code reflect the best-known science and lessons learned from the most recent natural disasters and the building response to these events from leading technical experts and engineers. It has been reported that every dollar spent complying with the I-Codes returns \$11 saved in recovery and reconstruction efforts. There is increasing interest and initiatives for code modernization to improve resiliency and adapt to the increased frequency and intensity of climatic events.

The current I-Codes address other hazards associated with the built environment and include new technologies and systems that have been introduced since the previous code adoption. The I-Codes represent the current national consensus regarding the level of safety necessary for the built environment. Buildings designed, constructed, and maintained in accordance with current code requirements ensure a higher level of health and safety. Staying current with the model codes helps the citizens of New Mexico protect their businesses, providing increased safety and greater economic security.

Since New Mexico's last code adoption, the Code Council's code development process included several important and significant changes that will improve construction and building safety and for the improvement-built environment. A few of the more significant items noted in each of the codes are listed below.

New Mexico Construction Industries Division
2023 Code Update Process
May 9, 2023

Highlights of the International Building Code since the 2015 edition:

- Revised requirement for metal composite materials (MCM) exterior wall systems
- Use of intermodal shipping containers as buildings, supplementing existing requirements
- The 2017 ICC/ANSI A117.1 Accessibility Standard
- Risk Category III clarification of mixed occupancy buildings with assembly spaces
- Mass Timber Buildings and three new types of construction recognized in the code
- Business occupant load factors updated for both general office and call centers

Highlights of the International Residential Code since the 2015 edition:

- Emergency escape and rescue opening requirements are updated for a pathway to the public way
- Habitable attics are limited to one-half the area of the story below, addressing story limits in the IRC
- Updated wind speed maps
- Townhouse separations include compliance options for the fire-resistant-rated construction between units.
- New tables address alternative wood stud heights in high wind areas
- Requirements for Energy Storage Systems (ESS) in one- and two-family dwellings to facilitate implementation of this technology while addressing thermal runaway risk
- Appendices address new construction methods including tiny homes and 3-D printing

Highlights of the International Existing Building Code since the 2015 edition:

- Clarification where a building's exterior wall coverings or envelope must comply to the IBC
- Sprinkler requirements for Level 2 and 3 alterations are revised for higher hazard areas
- Building undergoing a change of occupancy shall have live and wind loads verified

As the model code organization that promulgates the I-Codes, we applaud and encourage the state of New Mexico to continue the path to adoption of these codes. This bold step will improve construction in the state, ease the transition of new material and methods of construction, recognize the latest building sciences, and improve the level of safety for the citizens. Code Council staff are available to assist if there are questions or assistance needed as the state moves towards adoption.



Rick Bluntzer
Regional Manager, Government Relations
International Code Council
rbluntzer@iccsafe.org