



# ICC CODES - PUBLIC COMMENT FORM

FOR PUBLIC COMMENTS ON THE "2008 REPORT OF THE PUBLIC HEARINGS"

PLEASE SEE BACK OF FORM FOR PROCEDURES ON SUBMITTING PUBLIC COMMENTS. ALL SUBMITTALS MUST COMPLY WITH THESE PROCEDURES.

**CLOSING DATE: All Comments Must Be Received by June 9, 2008. The 2008 Final Action Hearings will be held September 17-23, 2008 in Minneapolis, Minnesota**

1) Please type or print clearly: Public comments will be returned if they contain unreadable information.

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2) Copyright Release: In accordance with Council Policy #28 Code Development, all Code Change Proposals, Floor Modifications and Public Comments are required to include a copyright release. A copy of the copyright release form is included at the end of this form. Please follow the directions on the form. This form as well as an alternative release form can also be downloaded from the ICC website at [www.iccsafe.org](http://www.iccsafe.org). If you have previously executed the copyright release, please check the box below:

2007/2008 Cycle copyright release on file

3) Code Change Proposal Number:

Indicate the Code Change Proposal Number that is being addressed by this Public Comment: PM13-07/08

4) Public Comment: The Final Action requested on this Code Change Proposal is: (Check Box)

Approved as Submitted (AS):
  Approved as Modified by this Public Comment (AMPC):
  Approved as Modified by the Code Committee as Published in the ROH (AM):
  Approved as Modified by Assembly Floor Action as Published in the ROH (AMF):
  Disapproved (D):

5) Proposed Modification (AMPC only):

**503.4 Floor surface.** In other than single family dwelling units, every bathroom and toilet room floor shall be maintained to be a smooth, hard, nonabsorbent surface to permit such floor to be easily kept in a clean and sanitary condition.

Exception: Non-permanent bathroom mats.

Modification Continued (Attach additional sheets as necessary)

6) Reason (State the reason and justification to support the Public Comment. Include a bibliography of any substantiating material. It is the responsibility of the commenter to make the material available at the Final Action Hearing):

See next page.

Reason Continued (Attach additional sheets as necessary)

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 SUBMITTAL AS A DOCUMENT ATTACHED TO AN EMAIL IS PREFERRED  
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## **Reasons for Proposed Modification**

The committee gave the following reasons for the disapproval: “Extending these floor surface requirements to dwelling units would not be appropriate and as the proposal is written would prohibit the use of typical non-permanent carpeted bathroom mats in dwelling units, other than single family dwelling units.”

The proposed modification addresses the Committee’s reason for disapproval by exempting non-permanent bathroom mats from the provision.

The proposal expands the requirement for smooth, hard, nonabsorbent surfaces in two ways. First, it extends the requirement to dwelling units. Sanitation concerns are present and significant in dwellings since human waste can fall and accumulate on the floor surface. If the floor is not easily cleanable, the waste material will pose a serious health hazard. Installed carpeting is especially difficult to consistently maintain in a sanitary state. In addition, rooms with plumbing fixtures are likely to have water on the floor either from condensation or equipment failures. On a non-absorbent surface, water is difficult to remove in a timely and effective manner and may result in mold growth. The moisture may attract insects and rodents. It may also rot the underlying floor.

Second, the proposal extends the requirements to bathrooms that have a shower or bathtub but no toilet. In this circumstance, sanitation concerns are still significant. If the floor surface is not smooth and cleanable, bacteria and fungus will not be removed. On a nonabsorbent surface, water is difficult to remove in a timely and effective manner and may result in mold growth. The moisture may attract insects and rodents. It may also rot the underlying floor.

Surfaces that are difficult to clean are especially problematic for residential rental properties since tenants may lack the resources and equipment to maintain a carpeted floor in a bathroom or toilet room or lack the authority to replace it.

For these reasons, the International Property Maintenance Code (IPMC) should address the issue of floor surfaces require smooth, hard, nonabsorbent surfaces in bathrooms and toilet rooms.

This type of provision is common for existing housing codes in communities across the country as a basic requirement for public health and sanitation. The IPMC should be a model for jurisdictions to consider and adapt as they deem appropriate for their needs.