



July 22, 2024

Georgia Department of Community Affairs (DCA)
State Codes Advisory Committee
60 Executive Park South, N.E.
Atlanta, Georgia 30329-2231

Dear Committee Members of the Georgia State Codes Advisory Committee:

The American Wood Council (AWC) appreciates the opportunity to provide comments in opposition to 2024 IRC Task Force proposed item IRC-2024-68, which involves the removal of a note in the International Residential Code (IRC) section R602.10.6. This note is crucial due to the structural engineering implications associated with such construction.

The AWC is the voice of North American wood products manufacturing, an industry that provides over 450,000 family-wage jobs United States, representing 87 percent of the structural wood products industry. Our staff experts develop state-of-the-art engineering data, technology, and standards for wood products to ensure their safe and efficient design, as well as provide information on wood design, green building, and environmental regulations. AWC also advocates for balanced government policies that affect wood products.

While the AWC commends the task force for their work on the state codes, we oppose the proposed removal of the note in section R602.10.6 of the 2024 IRC, discussed nationally under Change Proposal RB203-22 during development of the 2024 IRC. As noted in that reason statement, this note clarifies existing requirements and aligns the prescriptive method of the IRC with testing, which was done for only for single-span configurations.

King stud support at each end of the header on each opening is necessary to appropriately brace the header. Removing king studs to place a continuous header over multiple openings can lead to buckling of the continuous header over the supporting wall. The current note ensures that buildings maintain the structural integrity provided for in the prescriptive design options of the IRC. Removing this note allows for untested construction details, posing potential risks to the structural integrity of homes and safety of their inhabitants.

The AWC urges you to retain this important note in the residential code to reduce potential structural failure.

Thank you for your consideration.

Sincerely,

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