



Inconsistent Regulations

U.S. Peer Comparisons to St. Louis County

March 2022



Executive Summary

This report is supplemental to **Inconsistent Regulations: Building Codes in St. Louis County**, published by St. Louis REALTORS® in October 2021.

Upon learning that 42 building code books across six code areas are in use across St. Louis County's 89 municipal governing authorities, researchers reviewed operations from other metropolitan regions to identify best practices for potential adoption with the goal of providing more consistent building regulations across St. Louis County.

Missouri is one of only seven states that pushes responsibility for building codes to local governing authorities. This peculiarity may often be locally overlooked, given that Kansas City and St. Louis border states that also place the burden of building code adoption at the local level instead of the state level.

However, when assessing metropolitan areas with local code adoption policies, **research still found a substantially higher level of consistency in building codes than currently exists in St. Louis County.**

The research team identified three key drivers of the inconsistency in building codes, inspections, and permitting in St. Louis County. In St. Louis County, we find a confusing and inconsistent approach to building codes that is a burden on municipalities, residents, and professionals doing work in the county. **Research found this unique combination of three factors led to unparalleled complexity and inconsistency in only one place other than St. Louis County when compared to anywhere else in the country.**

- Missouri is one of just seven states with no statewide building codes, which puts all responsibility for building codes on local governments.
- St. Louis County is fragmented, with 89 governments responsible for building codes across the county, in addition to all the other local governments in the bi-state region.
- In Missouri, local governments have full responsibility for enacting and enforcing building codes. Many of St. Louis County's 88 municipalities are small communities without the capacity to properly develop, update, and enforce consistent building codes.

Across the nation, states and localities enact uniform and safe building codes that provide constituents with clarity, consistency, and process transparency. St. Louis County should be no different. Pursuing any of these pathways to consistent regulations is an important step in achieving a safer, simpler St. Louis County.



Introduction

In October 2021, St. Louis REALTORS® released **Inconsistent Regulations: Building Codes in St. Louis County**, identifying the range of codes and code years in use among its 89 municipal governing authorities (88 municipalities plus St. Louis County).

That research found 42 code books across six code areas adopted throughout St. Louis County, with publication dates ranging from the International Plumbing Code (IPC) in 1995 to a number of 2018 code books. These code books total 16,786 pages in 809 chapters. (By comparison, the Internal Revenue Service tax code is only 9,000 pages.)

If St. Louis County had consistent regulations county-wide, those same six codes would total 3,136 pages across 128 chapters – reducing the code page count by 80%.

This report provides an overview of building code policies across the 50 states and offers a look at the code book consistency of St. Louis County's metropolitan peers across the country. This report was developed to illuminate potential best practices and possible solutions to St. Louis County's code complexity.

State Code Comparison

This research began with the assumption that peer cities would be identified and building codes for each would be tracked down at the local level. It quickly became apparent that 43 states have consistent building codes because codes are adopted at the state level. Most of the peer regions to St. Louis have safer and more uniform building codes because the larger state government bears primary responsibility for code adoption.

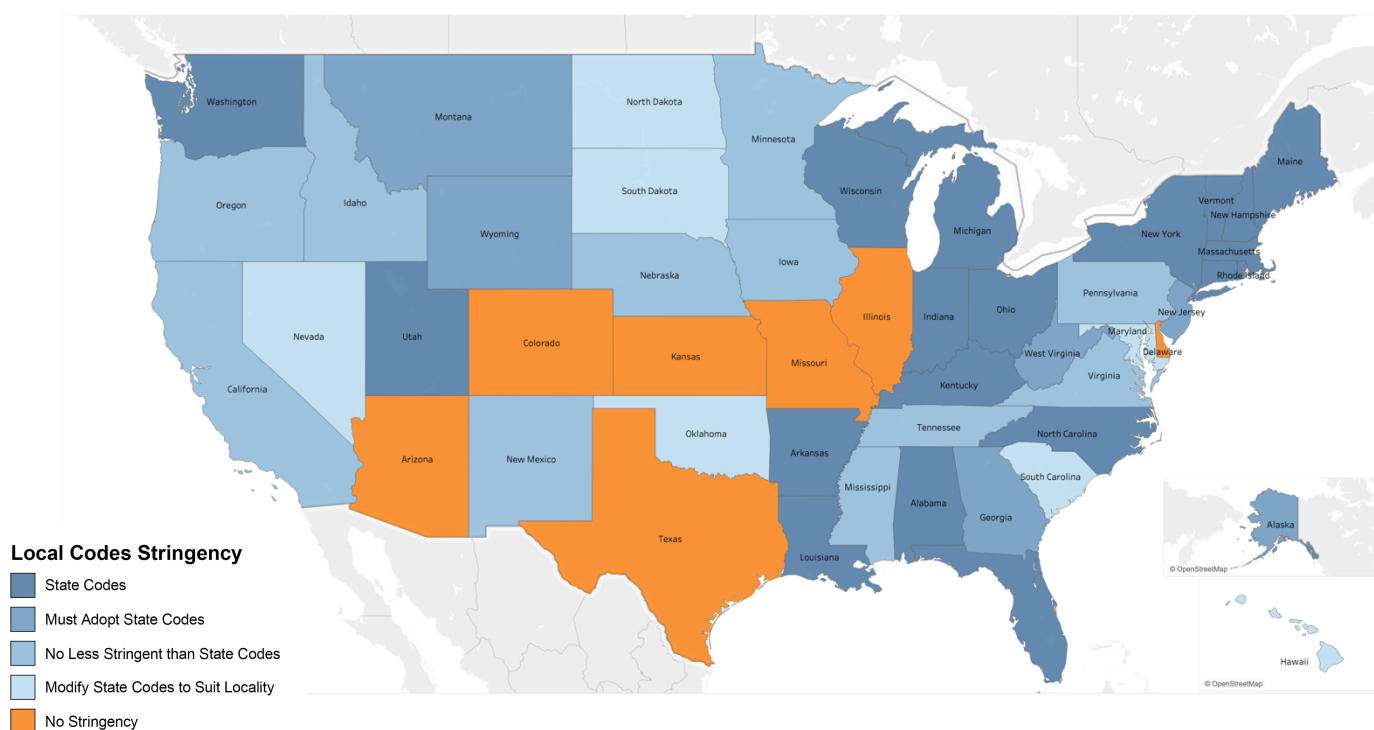
Missouri is one of only seven states that places the burden on local governing authorities to adopt building codes, creating a cumbersome system that many professionals, such as HVAC technicians, electricians, and plumbers, must navigate to provide service to homes and commercial properties across St. Louis County. Missouri's code peculiarity may be often overlooked because Kansas City and St. Louis share a border with states that don't have statewide building codes and similarly put that responsibility on local governments.

Appendix 1 is produced with information provided by the International Code Council (ICC).¹ As detailed, 31 states allow code adoption at the local level. Twenty-four states have statewide codes and allow for local code adoption to give flexibility to local governments when applying the state codes. Across those 31 states, when local code adoption is allowed, the adoption falls within one of the following stringency categories:

¹ International Code Council: I-Codes by State, <https://codes.iccsafe.org/codes/i-codes>



States	Stringency
Alabama, Arkansas, Connecticut, Florida, Indiana, Kentucky, Louisiana, Maine, Massachusetts, Michigan, New Hampshire, New York, North Carolina, Ohio, Rhode Island, Utah, Vermont, Washington, Wisconsin	Statewide building codes.
Alaska, Georgia, Montana, New Jersey ² , West Virginia, Wyoming	Statewide building codes. Localities must adopt the state codes, primarily done for the purposes of local enforcement authority.
California, Idaho, Iowa, Minnesota, Mississippi ³ , Nebraska, New Mexico, Oregon, Pennsylvania ⁴ , Tennessee, Virginia	Statewide building codes. Localities may adopt their own codes, but the adopted codes must be no less stringent than the state codes.
Hawaii, Maryland, Nevada, North Dakota, Oklahoma ⁵ , South Carolina, South Dakota	Statewide building codes. Localities may modify state codes to suit local conditions.
Arizona, Colorado, Delaware, Illinois, Kansas, Missouri, Texas	No statewide building codes. Localities bear the responsibility to adopt their own codes if they want to regulate building safety.



² Adopted state codes, but can locally adopt property maintenance and zoning codes

³ Upon approval of state council

⁴ Upon approval of state council

⁵ Upon approval of state council



Peer Communities

When combined with the lack of uniform building standards in Missouri, the fragmented structure of St. Louis County's 88 municipalities creates a confusing and inconsistent environment for architects, engineers, and contractors striving to navigate each set of rules and each bureaucracy.

Other Midwestern metropolitan areas adopt code books set forth by their respective states. Appendix 2 shows this approach results in a far simpler and more consistent building environment with little room for the wide disparities in safety and building standards found in St. Louis County.

Peer Midwestern cities such as Cincinnati, OH; Indianapolis, IN; Louisville, KY; Nashville, TN; and Oklahoma City, OK, all have consistent and modern building codes because they all have statewide codes. For example, these cities use the International Building Codes (IBC), ranging from 2012 to 2018, which are newer than many codes in use across St. Louis County.

Three of the most fragmented regions in the United States are Chicago, Pittsburgh, and St. Louis. Pittsburgh has consistent building codes thanks to the statewide codes in Pennsylvania, so the municipal fragmentation does not impact the codes. The Chicago region has similar jurisdictional issues as the St. Louis region, although St. Louis County's more extensive fragmentation into small-population municipalities compounds the shortcomings. The St. Louis County-Cook County comparisons are covered more specifically later in this study.

While some states allow local amendments, these amendments are tailored to enable local enforcement and must be no less stringent than the state-level standards. This local amendment process also means that each jurisdiction uses the same codes and code editions. Further, these local measures often solely address items such as property maintenance or zoning.

Local-Level Code Adoption

Finally, this research sought to assess metropolitan areas located in states like Missouri that allow code adoption at the local level with few, if any, state-mandated stringency measures. A substantially higher level of consistency was discovered in building codes for such cities, each with populations of similar size or far larger when compared to St. Louis County.

Like Missouri, Texas puts the responsibility of building code adoption on local governments. Unlike St. Louis County, whose population growth was stagnant over the last decade, Austin, Texas, experienced more than 20% population growth over that same time. Austin and St. Louis County are both home to roughly one million residents. Austin is a single government and has consistent and up-to-date building code books.

Phoenix, Arizona, has a population 1.6 times larger than St. Louis County. Like Austin, it is a city and operates with a single set of up-to-date building codes set forth by international bodies.



Peer City	Building Code	Residential Code	Electrical Code	Mechanical Code	Plumbing Code
Austin, TX	International Building Code (2021)	International Residential Code (2021)	National Electrical Code (2020)	Uniform Mechanical Code (2021)	Uniform Plumbing Code (2021)
	The City of Austin's Building Technical Codes contains regulations for Building, Electric, Fire, Property Maintenance, Mechanical, Plumbing, Residential, and Solar Energy. The City of Austin follows the 2021 IBC.				
Phoenix, AZ	International Building Code (2018)	International Residential Code (2018)	National Electrical Code (2017)	International Mechanical Code (2018)	International Plumbing Code (2018)
	The adoption of the 2018 Phoenix Building Construction Code (PBCC) follows those of the IBC and is updated on a cycle of six years, with local amendments.				
Denver, CO <i>Consolidated City-County</i>	International Building Code (2018)	International Residential Code (2018)	National Electrical Code (2020)	International Mechanical Code (2018)	International Plumbing Code (2018)
	Denver adopts building codes and the applicable codes for building standards are updated by international bodies on a periodic basis, with local supplements.				
Chicago, IL	Chicago Building Code (2019) modeled on International Building Code (2018)	Chicago Residential Code (2019) modeled on International Residential Code (2018)	Chicago Electrical Code (2018) modeled on National Electrical Code (2017)	Chicago Mechanical Code (2019) modeled on International Mechanical Code (2018)	Chicago Plumbing Code (2019) modeled on International Plumbing Code (2018)
	The Chicago Construction Codes include provisions of the Municipal Code of Chicago related to construction and rehabilitation, plumbing, heating, electrical, fire prevention, sanitation, zoning, and other health and safety standards relating to buildings and structures, except provisions enforced exclusively by a city department other than the Department of Buildings.				

Denver, Colorado, is a consolidated city-county with a rapidly growing population of 715,000. Denver follows a single set of code books.

Chicago, Illinois, is the largest city we assessed and is one of 130 local governments in Cook County, IL. Cook County, however, is home to approximately 5.15 million residents (one million less than the entire state of Missouri), and Chicago adopted the ICC 2021 code books.⁶

Cook County is the only county in the United States that this research found as a close parallel to St. Louis County as it is similar in three key factors: 1) Like Missouri, Illinois has no statewide building codes. 2) Like St. Louis County, Cook County is fragmented with many municipalities, and 3) each with broad responsibility for building codes. The major difference, however, is the size and capacity of municipal governments in Cook County compared to St. Louis County. Cook County has far more large municipalities than St. Louis County, as well as fewer tiny municipalities.

⁶ <https://www.cookcountyil.gov/content/ordinances-and-codes>

As demonstrated in Appendix 3, Cook County cities tend to be much larger and have greater capacity than those in St. Louis County. There are 14 Cook County municipalities that are larger than Florissant, the biggest city in St. Louis County. Sixty-four percent of Cook County municipalities are over 10,000 residents compared to just 24% of St. Louis County municipalities. Excluding Chicago, Cook County's median municipality population is more than four times larger than the median St. Louis County municipality.

St. Louis County has far more tiny local governments when compared to Cook County. There are 22 municipalities in St. Louis County with less than 1,000 residents, while Cook County only has four under 1,000 population. St. Louis County has 11 municipalities with less than 500 residents, while Cook County has only one municipality with less than 500 people. The smallest municipality in St. Louis County is Champ, with a population of 10 people. The smallest municipality in Cook County is 25 times larger than the smallest in St. Louis County.

Pathways to Consistent Regulations

Through this report and the 2021 report **Inconsistent Regulations: Building Codes in St. Louis County**, it is clear that building codes in St. Louis County are highly inconsistent and an anomaly in the United States. In comparing our region to others, the research first identified that the lack of statewide building codes is the first key driver. Second, St. Louis County is one of the very few places in the U.S. with this degree of fragmentation and a large number of municipalities. A third and final factor is that those municipalities, many of which are very small, have a large amount of responsibility and power over building codes, inspections, permitting, and more.

- Missouri and Illinois are two of just seven states with no statewide building codes, which puts all responsibility for building codes on local governments.
- St. Louis County is fragmented, with 89 governments responsible for building codes across the county, in addition to all the other local governments in the bi-state region.
- In Missouri and Illinois, local governments have full responsibility for enacting and enforcing building codes.
 - Many of St. Louis County's 88 municipalities are small communities without the capacity to properly develop, update, and enforce consistent building codes.

Complexity and confusion for residents, professionals, and municipal officials are products of a lack of statewide building codes and a fragmented region marked by local authorities with broad responsibility. Achieving building code consistency and efficiency in St. Louis County can be accomplished by addressing any of those three factors.

Across the nation, states and localities enact safe building codes that provide constituents with clarity, consistency, and process transparency. St. Louis County should be no different, and leaders should consider these paths rather than falling further behind peers across the nation.

Pursuing a path to consistent, updated regulations is an important step in achieving a safer, simpler St. Louis County.

Hidden barriers hinder St. Louis economy

Join the coalition today to collectively seek solutions to the issues identified in this report.



Safer + Simpler

St. Louis County

We want your input to achieve consistency in safe codes and quality inspections across St. Louis County. Share your story at stlrealtors.com/codes!

Contact Charlie Hinderliter at chinderliter@stlrealtors.com to get involved today.

FOUNDING COALITION PARTNERS





State	Building Codes Policy	Local Code Eligibility	Local Code Stringency
Alabama (AL)	Alabama Building Commission adopts codes for state-funded buildings, hotels, motels, movie theaters, and schools. Alabama Fire Marshal adopts fire codes, and the Alabama Residential and Energy Codes Commission adopts statewide residential and energy codes.	No	
Alaska (AK)	Codes in Alaska are adopted by administrative rulemaking by either the Alaska State Fire Marshal or the Department of Labor. The adopted codes by state agencies are mandatory and fall under state inspection programs unless a local jurisdiction has been delegated the code program as a “deferred jurisdiction.” When this occurs, the local jurisdiction administers and enforces their local program of the adopted state codes.	Yes	Adopted state codes
Arizona (AZ)	Codes are adopted locally in Arizona and are now predominantly the I-Codes with few exceptions.	Yes	None
Arkansas (AR)	The Arkansas State Fire Marshal's office, Arkansas Department of Health, and Arkansas Energy Office, a division of the Arkansas Department of Environmental Quality, adopts Arkansas' codes.	No	
California (CA)	Codes are adopted at the state level and are enforced by local jurisdictions except for public schools and hospitals. Each local building and fire jurisdiction may amend these state codes providing their amendments are more stringent based on findings justified by climatic, geographic, topographical, or environmental conditions of the jurisdiction.	Yes	No less stringent than state codes
Colorado (CO)	Codes are adopted first at the local level in Colorado under “home rule,” with state agencies adopting building and safety codes which apply to projects under state purview. The IPC has been adopted as the state plumbing code (Local jurisdictions required to adopt and enforce the IPC).	Yes	None
Connecticut (CT)	The codes are adopted at the state level and cannot be amended locally. The Codes and Standards Committee is responsible for reviewing new editions of the codes for adoption and for state amendments. A 2015 law to expedite code adoption process now requires update within 18 months.	No	
Delaware (DE)	Building codes are adopted at the county and municipal level, and smaller towns generally defer to the counties for code enforcement.	Yes	None
Florida (FL)	The Florida Building Code is administered by the Department of Business and Professional Registration and are the applicable codes for building standards updated by international bodies on a periodic basis.	No	

⁷ International Code Council: I-Codes by State, <https://codes.iccsafe.org/codes/i-codes> - Information is

taken directly from the International Code Council and reflects the ICC reporting at the time of publication.



Georgia (GA)	Codes are adopted at the state level through the GA Department of Community Affairs Building Codes Division and the GA State Codes Advisory Committee (GSCAC). Although adopted at the state level, the choice of enforcement is left up to local authority having jurisdiction. If local jurisdictions adopt codes, they must be the same codes as adopted by the state.	Yes	Adopted state codes
Hawaii (HI)	The agency has the authority to adopt any code(s) statewide. However, the statute names the minimum codes to be adopted within 24 months of their publication. The four county jurisdictions have two years following the state adoption to adopt and amend the state code with local amendments. If the county jurisdictions do not comply within the two-year timeline, then the state code becomes the county's code until such time the county passes an adopting ordinance.	Yes	Modification of state code to suit local conditions
Idaho (ID)	Building codes in Idaho are adopted by state statute, but rules adopting new editions must be passed by the legislature. Local governments have the option to adopt additional codes in addition to those codes named in the statute. Local amendments to state codes must be no less than the requirements as adopted by the state.	Yes	No less stringent than state codes
Illinois (IL)	Currently, State Board of Education (ISBE) enforces building codes for their own structures. All other codes in state are adopted by local municipalities, fire protection districts, & counties. The IL Energy Conservation Act requires State to adopt the current International Energy Conservation Code (IECC) for all commercial & residential occupancies. The residential portion of the state's adoption is a mini-max code statewide. IL adopts its own statewide plumbing code.	Yes	None
Indiana (IN)	The Indiana Fire Prevention and Building Safety Commission is responsible for all building, fire safety and building efficiency code adoptions in the state.	No	
Iowa (IA)	The State of Iowa imposes a combination of state-required codes and locally adopted codes. When municipalities update their codes, they are required to update to the codes adopted by the state. The Iowa Building Code Bureau adopts the International Residential Code (IRC), International Mechanical Code (IMC), International Existing Building Code (IEBC), IBC, and the IECC. The State Fire Marshal adopts the IFC. The Iowa Plumbing and Mechanical Code Advisory Council is responsible for the adoption of the state plumbing code. The state-adopted versions of the International Fire Code (IFC) and IECC are required to be enforced for all occupancies statewide by state and local government enforcement agencies. Local jurisdictions have the option of adopting the remaining state-adopted codes or a stricter code as determined by the jurisdiction. Consequently, many local jurisdictions have adopted the IPC.	Yes	No less stringent than state codes



Kansas (KS)	The State of Kansas does not enforce a statewide building code (other than for their own structures) but authorizes local jurisdictions to adopt local building codes. State Fire Marshal enforces building codes for state-owned buildings.	Yes	None
Kentucky (KY)	<p>There is no statute or rule mandating code updates. Any changes to the code by the Commonwealth of Kentucky are submitted to the Department of Housing, Buildings, and Construction (HBC) for review by the HBC Advisory Committee. The changes are approved in this forum and are forwarded to the Legislative Rulemaking Committee for public comment, further review, and final approval.</p> <p>During the three-year cycle, proposed changes to the Kentucky Building Code (KBC) & Kentucky Residential Code (KRC) may be submitted for consideration and voted upon by the Advisory Committee. The Division of Building Codes and Enforcement is responsible for complying with code changes and amendments. Once changes and amendments are adopted and entered as part of the state requirements, they become state law by the state statute.</p>	No	
Louisiana (LA)	Louisiana has a statewide adoption with mandatory enforcement of the Louisiana State Uniform Construction Code (LSUCC). The Louisiana State Uniform Construction Code Council (LSUCCC) is the promulgating authority of the LSUCC. Fire codes are adopted by the Office of the State Fire Marshal (OSFM). Public pool codes are promulgated by the Louisiana Department of Health and Hospitals (LDHH).	No	
Maine (ME)	Maine adopts the Maine Uniform Building and Energy Code. Enforcement of the code is required for all communities with a population greater than 4000. The Technical Building Codes and Standards Board, which is appointed by the Governor, resolves conflicts between state building and fire codes.	No	
Maryland (MD)	<p>Maryland's law related to building codes is called the Maryland Building Performance Standards (MBPS). It requires each jurisdiction in Maryland to use the same edition of the same building codes.</p> <p>State adoption authority falls under the Department of Labor, Licensing and Regulation and, by statute, adoption must occur 18 months after a new code edition is issued. Local jurisdictions have an additional 12 months to make local amendments and enforce the most current version of the state-adopted codes.</p> <p>Each local jurisdiction in Maryland may modify these codes to suit local conditions with exception to the IECC and the Maryland Accessibility Code (MAC). The Energy Code and the Accessibility Code can be made more stringent but not less by local jurisdictions.</p>	Yes	Modification of state code to suit local conditions



Massachusetts (MA)	The Massachusetts Building Code is approved and administered by the Board of Building Regulations and Standards (BBRS). The BBRS is responsible for reviewing and recommending which building codes are adopted in Massachusetts.	No	
Michigan (MI)	<p>The Michigan Construction and Fire Codes are promulgated by the Construction Code Commission and State Fire Safety Board and are evaluated for revisions or modifications every three years (statutorily mandated) except for the residential code, which is on a flexible cycle of every three to six years. Once codes have been passed by those bodies, the regulations must be approved by the State Legislature.</p> <p>The code adoption process follows the I-Code three-year cycle (except for the IRC, which is a three-to-six year flex cycle), with a target effective date in January one year following the release of the new I-Codes. Codes are updated as needed every year.</p>	No	
Minnesota (MN)	The adopting authority for the Minnesota State Building Code is the Minnesota Department of Labor and Industry (DLI), Construction Codes & Licensing Division (CCLD). Jurisdictions that adopt building codes must adopt the Minnesota State Building Code or remain at their present level.	Yes	No less stringent than state codes
Mississippi (MS)	Mississippi State Codes Council adopts codes statewide. Local jurisdictions are not mandated to adopt codes, however, if they choose to adopt the codes, they must be the codes approved by the State Building Code Council.	Yes	Upon approval of State Council
Missouri (MO)	Although most relevant building codes are adopted locally, the state adopts codes for state-owned buildings. The Architecture Practice Act in Missouri directs architects to design to the 2018 or newer International Building Code. There is no legislation in place, but many locals typically adopt on a six-year cycle.	Yes	None



Montana (MT)	<p>Construction regulation codes are adopted by the Bureau of Building and Standards within the Department of Labor and Industry except for the fire code which is adopted by the Montana State Fire Marshal, which is housed within the Department of Justice (Attorney General's Office).</p> <p>Local jurisdictions adopt building codes by local ordinance or resolution by statutory authority under 50-60-301. Local adopted codes must be only those codes as adopted by the state. If a local jurisdiction chooses not to adopt codes locally, the state codes still apply. The significance of this is that state laws do not apply to residential buildings with less than five dwelling units. A local jurisdiction must adopt codes locally, and the scope of the adoption must include dwelling units with less than five units specifically for codes (like the IRC) to be enforceable locally.</p>	Yes	Adopted state codes, plus codes pertaining to residential dwellings of five or fewer units
Nebraska (NE)	The Nebraska Legislature updates the state codes, which affect all state properties. Local jurisdictions may adopt codes if they are the same edition as the state codes. They may also adopt codes that are more restrictive than state codes.	Yes	No less stringent than state codes
Nevada (NV)	Nevada has statewide adoption of codes for all state-owned/funded buildings through the Nevada Public Works Board. "Blended" codes are adopted locally in Nevada after regional adoption committees prepare suggested regional amendments. Nevada state law also requires statewide local adoption of the latest edition of the IECC.	Yes	Modification of state code to suit local conditions
New Hampshire (NH)	The New Hampshire State Building Code Review Board is charged with the coordination and adoption of the state building code. 2015 law now requires approval by legislative act prior to adoption.	No	
New Jersey (NJ)	<p>New Jersey's Uniform Construction Code (UCC) adopts codes by regulation. The codes are administered by the Department of Community Affairs (DCA) Division of Codes & Standards. They are uniform statewide, and local jurisdictions are not permitted to amend.</p> <p>Localities, however, can adopt their own property maintenance codes and zoning codes.</p>	Yes	Adopted state codes, but can locally adopt property maintenance and zoning codes
New Mexico (NM)	New Mexico adopts "blended" codes statewide. State code adoptions are facilitated by the New Mexico Construction Industries Division (CID). Current state law allows local adoptions of codes that are as restrictive as the state codes.	Yes	No less stringent than state codes



New York (NY)	The State Fire Prevention and Building Code Council (Code Council) is the statutory body charged with making any changes to the Uniform Code or Energy Code. The Code Council is chaired by the Secretary of State (or delegate) and is comprised of 17 members representing all affected construction constituencies as well as local and state governmental representatives. The Department of State is responsible for the oversight of the code enforcement community.	No	
North Carolina (NC)	North Carolina has mandatory statewide code enforcement. The North Carolina Building Code Council is the authority that oversees the code process. The Residential Code is on a six-year adoption cycle by statute. The Council has also adopted a policy that all other codes except the National Electrical Code (NEC) on a six-year cycle to match the residential code.	No	
North Dakota (ND)	The North Dakota Division of Community Services Governmental and Technical Assistance Department is responsible for updating and amending the state building code. Local jurisdictions in North Dakota that adopt a building code must adopt the North Dakota State Building Code or remain at their present level. Jurisdictions are permitted to amend the state building code for their own ordinances.	Yes	Modification of state code to suit local conditions
Ohio (OH)	Changes to the Ohio Building Code are promulgated by the Board of Building Standards, the primary state agency authorized to protect the public's safety and welfare in building design and construction. Rules proposed by the Board are filed with the Secretary of State, the Legislative Service Commission, and a committee of the General Assembly known as the Joint Committee on Agency Rule Review (JCARR) at least 60 days prior to adoption.	No	
Oklahoma (OK)	In 2009, the Oklahoma Legislature created the Oklahoma Uniform Building Code Commission (OUBCC). The OUBCC is responsible for the adoption of all codes and standards for the construction industry, including: building, residential, energy conservation, existing buildings, plumbing, mechanical, fuel gas, and fire codes. Local governments are not mandated to adopt and enforce codes but if they do, they must adopt the codes of the OUBCC and any local amendments must be approved by the OUBCC. Some I-Codes are adopted by local governments that are not named in legislation or by the OUBCC.	Yes	Adopted state codes and any local amendments must be approved by the OUBCC



Oregon (OR)	Codes in Oregon are adopted as statewide codes. Statutory authority is granted to the Oregon Building Codes Division to adopt building codes by administrative rule-making. Building codes in the state are adopted as the "state program," and all local jurisdictions must enforce the state code to the state agency's specified level of enforcement. Fire code adoption is an administrative responsibility of the State Fire Marshal. The state-adopted fire code is considered the "minimum" standard statewide. Local jurisdictions may adopt a fire code provided it is at least as restrictive as the code adopted by the State Fire Marshal.	Yes	No less stringent than state code
Pennsylvania (PA)	The state adopts, by law, the IBC and all codes referenced by the IBC except for Property Maintenance. Local jurisdictions can amend the state code to be more restrictive, but these ordinances can be appealed to the Secretary of Labor & Industry, who then holds a hearing and determines whether the local amendment will be allowed, which is rare.	Yes	No less stringent than state code, upon approval of state
Rhode Island (RI)	The Rhode Island Building Code is approved and administered by the Building Code Standards Committee. Under state law, this committee is responsible for maintaining currency of state building codes such as mechanical, plumbing, electrical, conservation, accessibility and minimum housing codes. The committee also acts as a Board of Appeals to hear requests for variances or appeals from the State Building Code Commission or from local Boards of Appeals.	No	
South Carolina (SC)	The SC Building Code Council adopts the codes at the state level and submits regulations for legislative review. Local governments are mandated to enforce the codes, but there is also a provision that allows jurisdictions to opt-out if the governmental entity can't support the effort through permit fees. This provision has not been widely used. Local governments may also propose to amend the code locally for climatological or physical reasons only, and the Building Code Council must approve.	Yes	Modification of state code to suit local conditions
South Dakota (SD)	South Dakota adopts the IBC and the International Property Maintenance Code (IPMC) which become the prevailing codes where jurisdictions have no adopted codes. The state also adopts the IFC and IMC, which are administered by the State Fire Marshal. The state authorizes counties and local governments to adopt model building codes, with the restriction that they adopt the IBC. Jurisdictions are permitted to amend the state codes to conform to local needs.	Yes	Modification of state code to suit local conditions



Tennessee (TN)	The Office of the State Fire Marshal (OSFM) is responsible for the enforcement of codes in the built environment which includes building (both commercial and residential), plumbing, mechanical, electrical, life safety, and energy conservation. Municipal jurisdictions in Tennessee are either classified as exempt or non-exempt regarding the adoption of local codes. A municipal jurisdiction may be classified as exempt from state enforcement if they have an approved code enforcement department with certified inspectors. An exempt jurisdiction can adopt any code if it is at least as strong as the state code and gets OSFM approval. There are now provisions that allow for a lessening of seismic provisions provided the proposed reduction is approved by the OSFM.	Yes	No less stringent than state code
Texas (TX)	There is no statewide mandated building or residential code in Texas. Municipalities can choose to adopt codes, excluding most unincorporated areas, except for the IECC. The building and residential code is promulgated through legislation and currently cites the 2003 IBC and 2000 IRC. The energy conservation code is promulgated through the State Energy Conservation Office (SECO) by Administrative Rule. Municipalities can make local amendments and adopt newer editions of the IBC and IRC at will and make amendments to make the code more or less restrictive. Adopting municipalities have a choice of adopting either the ICC Plumbing, Mechanical, Gas (PMG) codes or the International Association of Plumbing & Mechanical Officials (IAPMO).	Yes	None
Utah (UT)	For the past several years, Utah State Statute 58-56-4 required statewide adoption of a building code, residential code, plumbing code, mechanical code, and fuel gas code promulgated by a nationally recognized code authority. The 2009 passage of SB211 moved the adoption authority to the state legislature. The Uniform Building Code Commission is now required to make adoption recommendations to the interim Senate Business and Labor Committee. A law was passed in 2016 that restricted the IRC to a six-year adoption cycle.	No	
Vermont (VT)	Since 1972, Vermont has adopted and enforced national codes for commercial building safety. These codes are adopted by regulation and enforced through the Vermont State Fire Marshal's Office.	No	
Virginia (VA)	Under Virginia law, the Department of Housing and Community Development (DHCD) has authority to promulgate building regulations and a regulatory process for development and adoption of a statewide mandatory mini/maxi construction code that all 167 units of local government (counties and incorporated cities) must adopt and implement.	Yes	Mandatory minimum/maximum codes localities must adopt and implement



Washington (WA)	Building codes are adopted in Washington by statute. The Washington State Building Code Council has authority to adopt amendments to these codes for statewide application.	No	
West Virginia (WV)	<p>The West Virginia State Fire Commission is responsible for adopting, promulgating, and amending statewide construction codes.</p> <p>If counties choose to enforce a code, they must follow what the state prescribes, though they are not forced to administer the state code or any code at all. Some counties are home rule in WV. Even if they choose to administer a code, home rule counties need not use the state code.</p>	Yes	Adopted state codes, with exception of home rule counties
Wisconsin (WI)	The Wisconsin Department of Safety and Professional Services (DPS) is responsible for the adoption of Wisconsin's building, fire safety and energy efficiency codes. They recently adopted the 2015 I-Codes, effective May 1, 2018. Although WI uses their "own" codes, they base them on the I-Codes. Wisconsin does use its own hybrid residential code (UDC) and plumbing code. They will remain using the 2009 IECC for residential and the 2015 IECC for commercial.	No	
Wyoming (WY)	Wyoming statute 35-9-106 assigns authority to the Wyoming State Fire Marshal to establish minimum electrical safety and fire standards that are not to exceed the standards of the NEC and I-Codes for all new and existing buildings. Other Wyoming departments also have the latitude to adopt codes as they pertain to the scope regulated within their department. Qualified local jurisdictions adopt and enforce these state codes under delegated authority from the State Fire Marshal. The State Fire Marshal does not adopt the IPC or IECC, which are adopted locally.	Yes	Adopted state codes, solely for enforcement authority



APPENDIX 2

Peer Community	Building Code	Residential Code	Electrical Code	Mechanical Code	Plumbing Code
Cincinnati, OH	Ohio Building Code (2017)	Residential Code of Ohio (2019)	National Electrical Code (2017)	Ohio Mechanical Code (2017)	Ohio Plumbing Code (2017)
	Cincinnati Building Code (CBC) is a collection of 19 local regulations, laws and ordinances that supplements the Residential Code of Ohio, the Ohio Building Code, the Ohio Mechanical Code, and the Ohio Plumbing Code.				
Indianapolis, IN <i>Consolidated City-County</i>	Indiana Building Code (2014) adopts International Building Code (2012)	Indiana Residential Code (2020) adopts International Residential Code (2020)	Indiana Electrical Code (2009) adopts National Electrical Code (2008)	Indiana Mechanical Code (2014) adopts International Mechanical Code (2012)	Indiana Plumbing Code (2012) adopts International Plumbing Code (2006)
	The consolidated city and county of Indianapolis/Marion County, Indiana, adopts building codes set forth by the State of Indiana.				
Louisville, KY <i>Consolidated City-County</i>	Kentucky Building Code (2018) adopts International Building Code (2015)	Kentucky Residential Code (2018) adopts International Residential Code (2015)	Kentucky Building Code (2018) adopts National Electrical Code (2017)	Kentucky Mechanical Code (2018) adopts International Mechanical Code (2015)	Kentucky Plumbing Code (2020)
	The building code of Louisville/Jefferson County, as well as the rest of Kentucky, is regulated by the Kentucky Building Code produced and promulgated by the state Department of Housing, Buildings, & Construction. The Kentucky Building/Residential Code has two components: the 2015 International Building/Residential Code and the Kentucky Amendments.				
Nashville, TN <i>Consolidated City-County</i>	International Building Codes (2018)	International Residential Code (2018)	National Electrical Code (2017)	International Mechanical Code (2018)	International Plumbing Code (2018)
	Adopted building codes of Metro Nashville are the applicable codes for building standards updated by international bodies on a periodic basis, and such updates are adopted by the Metropolitan Council.				
Oklahoma City, OK	International Building Code (2015)	International Residential Code (2015)	National Electrical Code (2017)	International Mechanical Code (2015)	International Plumbing Code (2015)
	Oklahoma City adopts building codes that are the applicable codes for building standards updated by international bodies on a periodic basis, with local supplements.				



APPENDIX 3

Cook County - Municipality	Population (2020)	St. Louis County - Municipality	Population (2020)
Range (- Chicago)	249 - 85,268	Range	10 - 52,533
Average (- Chicago)	20,083	Average	7,828
Median (- Chicago)	13,463	Median	3,183
Municipalities <1000	4	Municipalities <1000	22
Municipalities <5000	22	Municipalities <5000	52
Municipalities <10000	43	Municipalities <10000	67
Cook County - Municipality	Population (2020)	St. Louis County - Municipality	Population (2020)
McCook	249	Champ	10
Golf	514	Country Life Acres	72
Bedford Park	602	Glen Echo Park	122
Forest View	792	Bellerive Acres	191
East Hazel Crest	1,297	Kinloch	263
Hodgkins	1,500	Uplands Park	312
Phoenix	1,708	Westwood	316
Ford Heights	1,813	Huntleigh	361
Merrionette Park	1,969	Pasadena Park	435
Thornton	2,386	Wilbur Park	439
Kenilworth	2,514	Beverly Hills	475
Dixmoor	2,973	Crystal Lake Park	508
Rosemont	3,952	Sycamore Hills	561
South Chicago Heights	4,026	Twin Oaks	605
Burnham	4,046	Greendale	642
Indian Head Park	4,065	Flordell Hills	724
Barrington Hills	4,114	Bella Villa	757
Hometown	4,343	Edmundson	860
Stone Park	4,576	Velda Village Hills	881
Robbins	4,629	Norwood Court	890
Olympia Fields	4,718	Pasadena Hills	912
Palos Park	4,899	Grantwood Village	941
South Barrington	5,077	Country Club Hills	1,014
Berkeley	5,338	Cool Valley	1,039
Posen	5,632	Calverton Park	1,143
Northfield	5,751	Velda City	1,188
Willow Springs	5,857	Hillsdale	1,216
Countryside	6,420	Charlack	1,304
Orland Hills	6,893	Oakland	1,390
Calumet Park	7,025	Bel-Nor	1,399
Stickney	7,110	Winchester	1,447



North Riverside	7,426	Wellston	1,537
Inverness	7,616	Lakeshire	1,554
Broadview	7,998	Vinita Park	1,970
Hillside	8,320	Hanley Hills	2,009
Glenwood	8,662	Warson Woods	2,018
Glencoe	8,849	Bel-Ridge	2,132
Harwood Heights	9,065	Moline Acres	2,156
Lynwood	9,116	Marlborough	2,221
Riverside	9,298	Riverview	2,397
Steger	9,584	Pagedale	2,554
Flossmoor	9,704	Clarkson Valley	2,609
Sauk Village	9,921	Green Park	2,705
River Grove	10,612	Pine Lawn	2,754
Riverdale	10,663	Frontenac	3,612
Lyons	10,817	Northwoods	3,687
Crestwood	10,826	Woodson Terrace	3,950
Worth	10,970	Fenton	3,989
Summit	11,161	Normandy	4,287
Markham	11,661	Breckenridge Hills	4,458
Schiller Park	11,709	Rock Hill	4,750
River Forest	11,717	Dellwood	4,914
Palos Heights	12,068	Glendale	6,176
Justice	12,600	Shrewsbury	6,406
Winnetka	12,744	Black Jack	6,634
Richton Park	12,775	St. John	6,643
Northlake	12,840	Valley Park	6,885
Hazel Crest	13,382	Pacific	7,414
Lincolnwood	13,463	Berkeley	8,228
La Grange Park	13,475	Brentwood	8,233
Western Springs	13,629	Maplewood	8,269
Midlothian	14,325	Olivette	8,504
Forest Park	14,339	Ladue	8,989
Chicago Ridge	14,433	Des Peres	9,193
Hickory Hills	14,505	Sunset Hills	9,198
Norridge	15,251	Richmond Heights	9,286
Prospect Heights	16,058	Ellisville	9,985
La Grange	16,321	Bellefontaine Neighbors	10,740
Country Club Hills	16,775	Bridgeton	11,445
Westchester	16,892	Town & Country	11,640
Bridgeview	17,027	Eureka	11,646
Lemont	17,629	Crestwood	12,404
Franklin Park	18,467	Jennings	12,895
Palos Hills	18,530	St. Ann	13,019
Bellwood	18,789	Overland	15,955



Alsip	19,063	Clayton	17,355
Matteson	19,073	Manchester	18,333
Homewood	19,463	Ferguson	18,527
Brookfield	19,476	Creve Coeur	18,834
Evergreen Park	19,943	Webster Groves	24,010
Harvey	20,324	Hazelwood	25,458
Dolton	21,426	Maryland Heights	28,284
South Holland	21,465	Kirkwood	29,461
Park Forest	21,687	Ballwin	31,103
Blue Island	22,558	University City	35,065
Maywood	23,512	Wildwood	35,417
Rolling Meadows	24,200	Chesterfield	49,999
Elmwood Park	24,521	Florissant	52,533
Melrose Park	24,796		
Morton Grove	25,297		
Oak Forest	27,478		
Chicago Heights	27,480		
Wilmette	28,170		
Lansing	29,076		
Burbank	29,439		
Niles	30,912		
Elk Grove Village	32,812		
Northbrook	35,222		
Calumet City	36,033		
Wheeling	39,137		
Streamwood	39,577		
Park Ridge	39,656		
Glenview	48,705		
Hoffman Estates	52,530		
Oak Park	54,583		
Tinley Park	55,971		
Mount Prospect	56,852		
Berwyn	57,250		
Oak Lawn	58,362		
Orland Park	58,703		
Des Plaines	60,675		
Skokie	67,824		
Palatine	67,908		
Arlington Heights	77,676		
Evanston	78,110		
Schaumburg	78,723		
Cicero	85,268		
Chicago	2,746,388		



Safer + Simpler

St. Louis County

FOUNDING COALITION PARTNERS



About the Coalition:

Across the nation, states and localities enact safe and simple building codes that provide constituents with clarity, consistency, and process transparency. St. Louis County should be no different. Safer + Simpler St. Louis County seeks to simplify building codes, inspections, and permitting to make doing business easier, facilitate economic development, and improve residents' health and safety. Our goals are to pursue and deliver consistency in codes, quality inspections, and permitting services to ensure residents and professionals have equal access to healthy and safe buildings. Through these efforts, we hope to improve economic development opportunities by modernizing the process of building and investing in St. Louis County. We will do this by engaging in good-faith conversations about these issues with stakeholders in professional sectors, associated organizations, and government officials. Join us in the pursuit of consistent regulations and a Safer + Simpler St. Louis County.