



Letter of Support Regarding The Houseplex Code Amendment

February 16 2026

Dear Mayor Watson and Council Members,

On behalf of AIA Austin, I write to express our strong support for the proposed Houseplex Technical Code Amendment.

This effort represents an important step toward increasing Austin's housing capacity by removing regulatory barriers to small scale, multifamily development. The proposed amendments are practical and well considered adjustments that align Austin's building code with the City's broader housing goals.

Under the current code framework, three and four unit dwellings are required to comply with the International Building Code. While the IBC is appropriate for larger scale multifamily and commercial buildings, it imposes layers of engineering, review, and construction requirements that are disproportionate to the scale and risk profile of smaller housing types. These requirements often render small infill projects financially infeasible, limiting the very housing types our city is working to encourage.

The Houseplex amendment addresses this misalignment by extending and recombining existing International Residential Code provisions to create a clearly defined pathway for buildings of up to four units. Importantly, this proposal does not weaken life safety protections. Instead, it reduces unnecessary complexity while maintaining strong safety standards appropriate to residential scale construction.

By enabling gentle density at a neighborhood scale, the Houseplex amendment empowers local builders to deliver attainable housing options using familiar residential construction methods.

Adopting this amendment will unlock opportunities for more diverse, small scale housing that fits seamlessly within Austin's neighborhoods, supporting affordability while upholding life-safety standards. I respectfully urge your support for the Houseplex Technical Code Amendment.

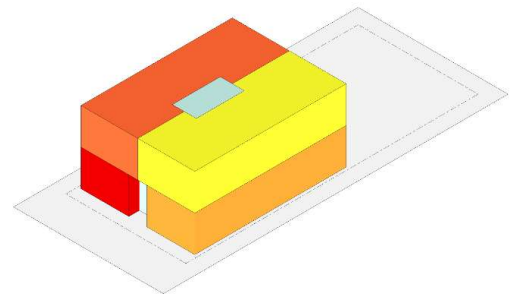
Sincerely,
Nkiru Gelles, 2026 President, AIA Austin

A handwritten signature in black ink that reads "NGelles".

January 15th, 2026
International Residential Code 2024

Houseplex Code Amendment

Provide a simpler code for developing smaller ‘middle housing’ typologies, more in-line with what is required for single-family homes. These Houseplexes, small multifamily buildings of up to four units built using residential construction methods, can provide more housing options, at a more affordable rate. Lowering the cost of development for this typology will encourage their construction, while maintaining a safe built environment.



Problem

The International Residential Code (IRC) is written specifically for one- and two-family homes and townhouses, is developed with substantial input from the National Association of Home Builders to ensure safety, constructability, and affordability all remain in balance. By contrast, the International Building Code (IBC) governs all other building types, including multifamily buildings of three units or more and is developed without the same participation from small-scale homebuilders. Over time, the IBC has accumulated layers of requirements designed for more hazardous industrial and commercial buildings. Because the code applies broadly, those same requirements now apply to much smaller residential projects, making them increasingly difficult and costly to construct. This mismatch has gone largely unnoticed because zoning in the United States has historically prohibited this type of small-scale multifamily housing altogether.

Solution

Expand the IRC scope to include Houseplexes, a defined class of small multifamily projects of up to four units, utilizing enhanced life-safety provisions already found within the IRC, which preserve residential-scale construction methods while meeting appropriate life-safety performance.

- 2-hr between units and common space, and supporting construction, *or*
- 1-hr between units and common space, and supporting construction with the inclusion of sprinklers (NFPA 13D)
- 45-min doors with closers between units and common space
- Restrictions on outlets in common space
- Penetration protection, draft-stopping, other fire protections found in the IRC

Four units harmonize well with existing City of Austin land development requirements, such as Site Plan Lite 1, which allows up to four units to be permitted without a site plan; city utilities like Austin Water and Austin Resource Recovery, each of which have provisions for up to four units; residential driveway requirements; and national policy like FHA loans, which go up to four units. Aligning to this natural inflection point would allow for a homebuilder to build residential scale multi-family using a familiar workforce without the need for costly civil or MEP engineers.

These provisions incorporate details of Policy Memo PM2024-0002 [\[Link\]](#) issued by the Development Services Department relating to Modification Criteria for Review of Triplexes Under the International Residential Code, issued April 29th, 2024, providing compliance for stacked triplexes, while providing for life safety concerns not addressed in the memo.

Additional Considerations

- **Houseplex** – This new term would apply to a building with two or more attached units, with an upward limit currently set at four. Absorbing the requirements found elsewhere in the IRC for duplex and townhouse construction, and mirroring the requirements of Austin’s three-unit policy memo, the new Houseplex offers a streamlined path to expanding the IRC, without building out additional sections of code. Exceptions are provided for buildings with only two units matching existing policy, and if further inflection points are identified, it is easy to adjust the upward limit.
- **Sprinklers** – IRC buildings with three or more units should utilize NFPA 13D sprinklers, the domestic system found in townhouses and larger single-family homes, following Texas state law. In drafting our proposed language, AIA Austin’s Housing Advocacy Committee mirrored the existing provisions for townhouses, providing an alternate path to compliance through enhanced passive fire protection.
- **Height and Area** – The scope of the IRC includes a limit of *not more than three stories above grade plane* [\[Link\]](#), which would still apply. For this reason, we opted not to include an additional story cap and suggest that the overall height be limited by zoning as it is currently. Similarly, the IRC does not set a limit on allowable area, and we suggest the area also be limited by zoning.
- **Accessibility** – under the Fair Housing Act, buildings with four or more units must incorporate basic accessibility features. These requirements are far less burdensome than full ADA and TAS requirements and are easily achievable in small residential buildings. By enabling fourplexes under the IRC, the city will actually *increase* the number of homes that include accessible features, expanding housing options for all.
- **Zoning** – The city’s planning department has been awarded a national PRO Homes grant to study new ‘middle housing’ zoning categories and is due to share their work in the spring of 2026. This presents a good opportunity to align city policies, by concurrently updating the building codes to encourage this typology.

Case Study

The Peace Family Housing Project, a four-unit home for families experiencing homelessness, provides an excellent case study, as it is within the general scale and scope of a similar single-family IRC house of the same size. Originally quoted at below \$1M by a residential builder, the increased requirements of the IBC resulted in higher-cost subcontractors, additional engineering and design costs, a required City Council vote, site work, and price escalation during the longer multi-year permitting and review process, nearly doubled the cost.

Precedent

Shelby County, TN (Memphis) – Memphis had an existing building type classification called the Multifamily Large Home, that allowed up to six units and was subject to less intensive development standards than larger apartment buildings. Their expanded IRC was built around this threshold, by expanding to cover up to six units. [\[Link\]](#)

Dallas, TX – Dallas recently expanded their IRC to cover up to eight units with no required sprinklers but instead opted to add an extensive list of additional requirements. The committee reviewed these provisions and concluded that although they allowed for a much larger project size than we are proposing, the additional requirements offset any potential savings. We were also unable to find an 8-unit inflection point in existing city of Dallas land development. [\[Link\]](#)

California – Statewide legislation introduced early in 2026 would direct the Department of Housing and Community Development to study and recommend an amendment to state building standards that would allow up to 10 units to be built under the IRC. There is little information currently available, however, it is clear that there is a national goal of breaking down the barriers to smaller multifamily housing. [\[Link\]](#)

Our takeaway is that a more modest increase in scope, which aligns with existing city policy and limits additional requirements, will result in a more meaningful amendment.

Austin Expanded IRC Proposed Amendment (Houseplex)					
jjph DRAFT 09 January 2026					
	CURRENT	CURRENT	PROPOSED	PROPOSED	COMMENTARY
R101.2	Scope.	The provisions of this code shall apply to the construction, <i>alteration</i> , movement, enlargement, replacement, <i>repair</i> , equipment, use and occupancy, location, removal and demolition of detached one- and two-family <i>dwelling</i> s and <i>townhouses</i> not more than three <i>stories</i> above grade plane in height.	Scope.	The provisions of this code shall apply to the construction, <i>alteration</i> , movement, enlargement, replacement, <i>repair</i> , equipment, use and occupancy, location, removal and demolition of detached <i>dwelling</i> s, <i>detached houseplexes up to four units</i> and <i>townhouses</i> not more than three <i>stories</i> above grade plane in height.	replace two-family with houseplex not more than 2 units, allowing for the exception below
		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:		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:	no change, included here for reference only
		1. Live/work units located in <i>townhouses</i> and complying with the requirements of Section 508.5 of the <i>International Building Code</i> .		1. Live/work units located in <i>townhouses</i> and complying with the requirements of Section 508.5 of the <i>International Building Code</i> .	no change, included here for reference only
		2. <i>Owner-occupied lodging houses</i> with five or fewer <i>guestrooms</i> .		2. <i>Owner-occupied lodging houses</i> with five or fewer <i>guestrooms</i> .	no change, included here for reference only
		3. A care facility with five or fewer <i>persons</i> receiving custodial care within a <i>dwelling unit</i> .		3. A care facility with five or fewer <i>persons</i> receiving custodial care within a <i>dwelling unit</i> .	no change, included here for reference only
		4. A care facility with five or fewer <i>persons</i> receiving medical care within a <i>dwelling unit</i> .		4. A care facility with five or fewer <i>persons</i> receiving medical care within a <i>dwelling unit</i> .	no change, included here for reference only
		5. A day care facility for five or fewer <i>persons</i> of any age receiving care within a <i>dwelling unit</i> .		5. A day care facility for five or fewer <i>persons</i> of any age receiving care within a <i>dwelling unit</i> .	no change, included here for reference only
				6. <i>A houseplex with two dwelling units.</i>	Added to maintain current two-unit option of 1 hour no sprinklers
R202	Definitions.	[MP] BUILDING. Any one- or two-family <i>dwelling</i> or <i>townhouse</i> , or portion thereof, used or intended to be used for human habitation, for living, sleeping, cooking or eating purposes, or any combination thereof or any <i>accessory strucutre</i> . For the definition applicable in Chapter 11, see Seciton N1101.6.	Definitions.	[MP] BUILDING. Any <i>dwelling</i> , <i>houseplex</i> or <i>townhouse</i> , or portion thereof, used or intended to be used for human habitation, for living, sleeping, cooking or eating purposes, or any combination thereof or any <i>accessory strucutre</i> . For the definition applicable in Chapter 11, see Seciton N1101.6.	change two-family to houseplex
				[RB] ACCESSORY ROOM. An enclosed portion of a <i>houseplex</i> not within a <i>dwelling unit</i> that is not used, intended or designed for sleeping, eating or cooking and accessible to occupants of more than one <i>dwelling units</i> . Includes hallways, foyers, and other components of a shared means of egress in a houseplex.	Accessory room is not currently a defined term, but it is already used by R302.3.6 in the base code...
		[RB] DWELLING. Any <i>building</i> that contains one or two <i>dwelling units</i> used, intended, or designed to be built, used, rented, leased, let or hired out to be occupied, or that are occupied for living purposes.		[RB] DWELLING. Any <i>building</i> that contains one <i>dwelling unit</i> used, intended, or designed to be built, used, rented, leased, let or hired out to be occupied, or that are occupied for living purposes.	no change necessary
				[RB] HOUSEPLEX. Any <i>building</i> that contains multiple attached <i>dwelling units</i> used, intended or designed to be built, used, rented, leased, let or hired out to be occupied, or that are occupied for living purposes. <i>Dwelling units</i> in a <i>houseplex</i> may be separated by horizontal assemblies, vertical assemblies, or a combination thereof.	The definition of houseplex does not need to specify a unit limit, as the scoping section alone is sufficient to limit the size of houseplexes allowed. Could include language that includes some of the intent, such as Shelby County's "The building looks like a conventional single-family house with a functions street facing primary entrance." But this is subjective and excessive, out of character with the purpose and tone of the rest of the code
R302.3	Two-family dwellings.	Dwelling units in two-family dwellings 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 dwellings	Houseplexes.	<i>Dwelling units</i> in <i>houseplexes</i> 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 <i>dwellings</i> .	Converts the section on two-family dwellings to cover the houseplex, using the exisiting logic an structure of the section. Avoids introducing new sections and makes it easier to maintain these amendments in subsequent base code editions but retaining current numbering.
R302.3.1	Dwelling unit separation.	The two <i>dwelling units</i> shall be separated by fire-resistance rated assemblies that are vertical, horizontal, or a combination thereof.	Dwelling unit separation.	<i>Dwelling units</i> shall be separated from <i>other dwelling units</i> and <i>any common space</i> by fire-resistance rated assemblies that are vertical, horizontal, or a combination thereof.	adds requirement for common space

R302.3.2	Fire-resistance rating.	Vertical and horizontal assemblies separating <i>dwelling units</i> shall have a fire-resistance rating of 1 hour, or a fire-resistance rating of one-half hour in buildings equipped throughout with an automatic sprinkler system installed in accordance with Section P2904. Fire-resistance ratings shall be based on testing in accordance with ASTM E119 or UL 263, or an analytical method in accordance with Section 703.2.2 of the <i>International Building Code</i> .	Fire-resistance rating.	Vertical and horizontal assemblies separating <i>dwelling units</i> shall have a fire-resistance rating of 2 hours. Fire-resistance ratings shall be based on testing in accordance with ASTM E119 or UL 263, or an analytical method in accordance with Section 703.2.2 of the <i>International Building Code</i> . Exceptions: 1. Vertical and horizontal assemblies separating <i>dwelling units</i> in a <i>houseplex</i> with more than two <i>dwelling units</i> shall have a fire-resistance rating of 1 hour in buildings equipped throughout with an automatic sprinkler system installed in accordance with Section P2904. 2. Vertical and horizontal assemblies separating <i>dwelling units</i> in a <i>houseplex</i> with two <i>dwelling units</i> shall have a fire-resistance rating of one-half hour in buildings equipped throughout with an automatic sprinkler system installed in accordance with Section P2904.	Keeps two-unit buildings the same (but moved to an exception), gives the options of 2-hour or 1-hour + 13D in three or more units. This could be a chart? Does NOT allow for 1/2 hour + sprinklers in more than two units, providing additional protection appropriate to the increase in units. Note that this retains the requirement in the base code for sprinklers in duplexes that Texas state law makes unenforceable. This is in the interest of maintaining base code language. However, in the interest of clarity and equity of access (since ASD/AFD attempt to enforce unless applicants are aware of the state law exception), it may be preferable to remove the reference to sprinklers in duplexes.
			Fire-resistance rating.	Vertical and horizontal assemblies separating <i>dwelling units</i> shall have a fire-resistance rating of 1 hour in buildings equipped throughout with an automatic sprinkler system installed in accordance with Section P2904. Fire-resistance ratings shall be based on testing in accordance with ASTM E119 or UL 263, or an analytical method in accordance with Section 703.2.2 of the <i>International Building Code</i> . Exceptions: 1. Vertical and horizontal assemblies separating <i>dwelling units</i> in a <i>houseplex</i> with two <i>dwelling units</i> shall have a fire-resistance rating of 1 hour in buildings, or one-half hour in buildings equipped throughout with an automatic sprinkler system installed in accordance with Section P2904.	Alternate version without an option for 2-hour passive protection (if superior safety performance is not acceptable the need to appease sprinkler lobby overrides common sense)
R302.3.3	Continuity.	Vertical and horizontal assemblies separating <i>dwelling units</i> shall be constructed in a manner that provides continuity of the fire-resistance rating between the <i>dwelling units</i> .	Continuity.	Vertical and horizontal assemblies separating <i>dwelling units</i> shall be constructed in a manner that provides continuity of the fire-resistance rating between the <i>dwelling units</i> .	no change (assuming this covers separating dwelling units and common spaces)
R302.3.3.1	Horizontal assemblies.	Horizontal assemblies separating <i>dwelling units</i> shall extend to and be tight against exterior walls or vertical separation assemblies complying with Section 302.3.2.	Horizontal assemblies.	Horizontal assemblies separating <i>dwelling units</i> shall extend to and be tight against exterior walls or vertical separation assemblies complying with Section 302.3.2.	no change (assuming this covers separating dwelling units and common spaces)
R302.3.3.2	Vertical Assemblies.	Vertical assemblies separating <i>dwelling units</i> shall extend to and be tight against any combination of the following: 1. The foundation. 2. A horizontal assembly complying with Section R302.3.3. 3. The underside of roof sheathing. 4. The ceiling underneath an uninhabitable <i>attic</i> , provided that the ceiling is constructed using not less than 5/8-inch (15.9 mm) <i>Type X gypsum board</i> , an <i>attic draft stop</i> constructed as specified in Section R302.12.1 is provided above and along the vertical assembly terminating at the ceiling, and the structural framing supporting the ceiling is protected by not less than 1/2-inch (12.7 mm) gypsum board or equivalent.	Vertical Assemblies.	Vertical assemblies separating <i>dwelling units</i> shall extend to and be tight against any combination of the following: 1. The foundation. 2. A horizontal assembly complying with Section R302.3.3. 3. The underside of roof sheathing. 4. The ceiling underneath an uninhabitable <i>attic</i> , provided that the ceiling is constructed using not less than 5/8-inch (15.9 mm) <i>Type X gypsum board</i> , an <i>attic draft stop</i> constructed as specified in Section R302.12.1 is provided above and along the vertical assembly terminating at the ceiling, and the structural framing supporting the ceiling is protected by not less than 1/2-inch (12.7 mm) gypsum board or equivalent.	no change (assuming this covers separating dwelling units and common spaces)
R302.3.3.2.1			Opening protection.	Openings in exterior walls required to be constructed according to this section shall be protected in accordance with IBC Section 716.	New section to cover the exterior separation case of stepped buildings. This section is invoked only in the case of item 3 of R302.3.5.
R302.3.4	Supporting construction.	Vertical and horizontal assemblies separating <i>dwelling units</i> shall be supported by construction having an equal or greater fire-resistance rating.	Supporting construction.	Vertical and horizontal assemblies separating <i>dwelling units</i> shall be supported by construction having an equal or greater fire-resistance rating.	no change (assuming this covers separating dwelling units and common spaces)

R302.3.5	Vertically stacked dwelling units.	Where one <i>dwelling unit</i> in a two-family dwelling is located above the other and an automatic sprinkler system complying with Section P2904 is not provided in both <i>dwelling units</i> , both of the following shall apply: 1. Horizontal and vertical assemblies separating the <i>dwelling units</i> , including an interior <i>stairway</i> serving as the means of egress for the upper <i>dwelling unit</i> , shall be constructed in a manner that limits the transfer of smoke. 2. A notification appliance connected to smoke alarms in the other <i>dwelling unit</i> shall be provided in each <i>dwelling unit</i> .	Vertically stacked dwelling units.	Where one <i>dwelling unit</i> in a <i>houseplex</i> is located above <i>another</i> , both of the following shall apply: 1. Horizontal and vertical assemblies separating the <i>dwelling units</i> , including an interior <i>stairway</i> serving as the means of egress for an upper <i>dwelling unit</i> , shall be constructed in a manner that limits the transfer of smoke. 2. A notification appliance connected to smoke alarms in the other <i>dwelling units</i> shall be provided in each other <i>dwelling unit</i> . 3. Where the <i>building</i> has different roof levels, any exterior wall separating a <i>dwelling unit</i> from the roof or another <i>dwelling unit</i> or from the space above the roof of another <i>dwelling unit</i> shall be constructed as a vertical assembly complying with Section 302.3.3.2 and Section 302.3.4.	This is technically very slightly more stringent for a stacked duplex compared to current code; however, condition 1 would almost always be met anyway, and condition 2 seems extremely prudent. Adding #3 covers the concern about stepped buildings. Lacks opening protection, but there's no provision I can find in IRC to incorporate. Instead reference IBC (see above).
R302.3.6	Shared accessory rooms.	Shared accessory rooms shall be sepated from each individual <i>dwelling unit</i> in accordance with Table R302.3.6. Openings between the shared accessory room and <i>dwelling unit</i> shall comply with Section R302.3.6.1. Attachment of <i>gypsum board</i> shall comply with Tables R702.3.5.	Shared accessory rooms.	Shared <i>accessory rooms</i> shall be separated from each individual <i>dwelling unit</i> by fire-resistance rated assemblies that are vertical, horizontal, or a combination thereof in accordance with Section 302.3.2 and Section 302.3.3. Openings between the shared accessory room and <i>dwelling unit</i> shall comply with Section R302.3.6.1. [Table R302.3.6 is deleted]	Upgrades all separations to the same 1-hour. Shelby county prohibited these
R302.3.6.1	Opening protection.	Openings from a shared accessory room or area directly into a room used for sleeping purposes shall not be permitted. Other openings between the shared accessory room or area and dwelling units shall be equipped with solid wood doors not less than 1 3/8 inches (35 mm) in thickness, solid or honeycomb core steel doors not less than 1 3/8 inches (35 mm) in thickness, or a fire door assembly with a 20-minute fire-protection rating, equipped with a self-closing or automatic-closing device.	Opening protection.	Openings from a shared <i>accessory room</i> or area directly into a room used for sleeping purposes shall not be permitted. Other openings between the shared <i>accessory room</i> or area and <i>dwelling units</i> shall be equipped with a fire door assembly with a 45-minute fire-protection rating and equipped with a self-closing or automatic-closing device.	Who writes these codes??? Do all these door types need closers, or just the rated door??? For fuck's sake use oxford commas and new sentences!!!
R302.3.6.2	Duct penetration.	Ducts penetrating the walls or ceilings separating the <i>dwelling</i> from the shared accessory room shall be constructed of sheets steel not less than No. 26 gage (0.48 mm) or other approved material and shall not have openings into the shared accessory room.	Duct penetration.	Ducts penetrating the walls or ceilings separating the <i>dwelling</i> from the shared accessory room shall be constructed of sheets steel not less than No. 26 gage (0.48 mm) or other approved material and shall not have openings into the shared accessory room.	no change, included here for reference only
R302.3.6.3	Other penetrations.	Penetrations through the walls, ceiling and floor-level separation required in Section R302.3.6 shall be protected as required by Section R302.11, Item 4.	Other penetrations.	Penetrations through the walls, ceiling and floor-level separation required in Section R302.3.6 shall be protected as required by Section R302.11, Item 4.	no change, included here for reference only
R309.2	One and two-family dwellings automatic fire system.	An automatic sprinkler system shall be installed in one- or two-family dwellings. Exception: An automatic sprinkler system shall not be required for <i>additions</i> or <i>alterations</i> to <i>existing buildings</i> that are not already provided with a sprinkler system.	One-family dwellings and houseplexes automatic fire system.	An automatic sprinkler system shall be installed in <i>one-family dwellings</i> and <i>houseplexes</i> . Exception: An automatic sprinkler system shall not be required for <i>additions</i> or <i>alterations</i> to <i>existing one-family dwellings</i> and <i>houseplexes</i> with not more than two <i>dwellings units</i> that are not already provided with a sprinkler system.	change to reference one-family and houseplexes. Modify exception only apply to one- and two-unit buildings to match existing code AND not extend to the newly-allowed three-unit and larger buildings
R309.2.1	Design and installation.	Automatic sprinkler systems shall be designed and installed in accordance with Section P2904 or NFPA 13D.	Design and installation.	Automatic sprinkler systems shall be designed and installed in accordance with Section P2904 or NFPA 13D.	no change, included here for reference only
R318.9			Shared means of egress in houseplexes.	Spaces and <i>dwelling units</i> on a story above the first story above grade plane of a <i>houseplex</i> may share a common means of egress comprising hallways, foyers, landings, stairs, and ramps. A shared means of egress shall be considered an <i>accessory room</i> and separated from <i>dwellings units</i> and other <i>accessory rooms</i> according to Section R302.3.6. A shared means of egress may serve no more than three <i>dwelling units</i> per story. Electrical receptacles shall not be permitted in a shared means of egress in a houseplex.	New section patterned on language from IBC but largely relying on IRC definitions. Egress from a stacked duplex is unclear under current code; the intent of this is to clarify without making more complicated but also allowing multiple units on a story to share egress. This follows the existing triplex ASD memo's logic. A limit to two or three per floor here is to provide a step down from the four allowed under IBC with 13R, though that would be only really applicable if increased above four units, don't mind future-proofing though (or if council gets ambitious and says 6 or 8!) Saying three instead of 2 does allow for a 2-story four plex with a large ground floor and three apartments... Receptacles should be excluded from egress Also need to prevent lithium ion battery charging and other electrical fire hazards.

R318.9.1			Egress doors accessing a shared means of egress.	A door between a <i>dwelling unit</i> or <i>accessory room</i> and the shared means of egress shall comply with Section R302.3.6.1 and Section R318.2	This may be slightly redundant, but confirming the applicability of both R302.3.6.1 and Section R318.2 will avoid confusion and ambiguity in review
R318.9.2			Shared means of egress discharge.	The exit discharge of a shared means of egress shall be provided as a door or opening meeting the dimensional requirements of Section R318.2. Openings serving as the exit discharge of a shared means of egress shall meet the requirements of Section R318.3.	This is intended to accommodate open egress stairs. No exterior enclosure requirements are included, only separation, so as long as proximity does not require separation, and exterior stair would meet the requirements of a shared means of egress and not require a door at the end
E3901.10	Hallways	Hallways of 10 feet (3048 mm) or more in length shall have at least one receptacle outlet. The hall length shall be considered the length measured along the centerline of the hall without passing through a doorway.	Hallways	Hallways of 10 feet (3048 mm) or more in length shall have at least one receptacle outlet. The hall length shall be considered the length measured along the centerline of the hall without passing through a doorway. Exception: Receptacles shall not be permitted in a hallway that is part of a shared means of egress in a houseplex.	Base code likely primarily envisions hallways in occupied spaces, not in shared egress components. Technically covered in R318.9, but needs to be stated here because of potential conflict/ambiguity.
E3901.11	Foyers	Foyers that are not part of a hallway in accordance with Section E3901.10 and that have an area that is greater than 60 square feet (5.57 m2) shall have a receptacle(s) located in each wall space that is 3 feet (914 mm) or more in width. Doorways, door-side windows that extend to the floor, and similar openings shall not be considered as wall space. [210.52(l)]	Foyers	Foyers that are not part of a hallway in accordance with Section E3901.10 and that have an area that is greater than 60 square feet (5.57 m2) shall have a receptacle(s) located in each wall space that is 3 feet (914 mm) or more in width. Doorways, door-side windows that extend to the floor, and similar openings shall not be considered as wall space. [210.52(l)] Exception: Receptacles shall not be permitted in a hallway that is part of a shared means of egress in a houseplex.	Base code likely primarily envisions foyers in occupied spaces, not in shared egress components. Technically covered in R318.9, but needs to be stated here because of potential conflict/ambiguity.