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Comment on Occupancy Subchapter Organization in the Restructured Standard

I have reviewed the restructured standard and would like to express my appreciation for the new organization and clarity it brings. Overall, the revised structure is a meaningful improvement and makes the document easier to navigate and understand.

One aspect I respectfully suggest reconsidering is the ordering of occupancy-based subchapters within each chapter. Under the current structure, Subchapter 1 applies to all occupancies, Subchapter 2 to nonresidential occupancies, Subchapter 3 to single-family residential, and the final subchapter to multifamily residential.

I strongly recommend moving multifamily to Subchapter 3, ahead of single-family residential. From a technical and implementation perspective, the requirements for multifamily common areas are largely identical to those for nonresidential spaces, whereas single-family requirements are more distinct. Grouping nonresidential and multifamily together would improve logical flow, reduce repetition, and make it easier for practitioners to interpret and apply the requirements consistently.

This ordering would also better align with the Approved Compliance Manuals (ACMs), which currently follow the sequence of nonresidential, multifamily, then single-family. Maintaining consistency between the standards and the ACMs would reduce confusion for users who regularly navigate between the two and streamline compliance work.

Thank you for your continued efforts to improve the usability and clarity of the standards, and for considering this suggested refinement.