



STATE OF WASHINGTON

STATE BUILDING CODE COUNCIL

1500 Jefferson Street SE • P.O. Box 41449 • Olympia, Washington 98504
(360) 407-9277 • fax (360) 586-9088 • e-mail sbcc@des.wa.gov • www.sbcc.wa.gov

Date: April 29, 2019

Compilation of Stakeholder Comments Received

Chapter 51-04 WAC POLICIES AND PROCEDURES FOR CONSIDERATION OF STATEWIDE AND LOCAL AMENDMENTS TO THE STATE BUILDING CODE (Last Update: 1/18/17)

WAC 51-04-010 Declaration of purpose.

The Washington state building code council, hereinafter called the council, is required by chapter 266, Laws of 1988, to adopt and maintain the state building code, hereinafter referred to as the building code, as provided in chapters 19.27, 19.27A, and 70.92 RCW, and the state legislature.

(1) The primary objective of the council is to encourage consistency in the state building code throughout the state of Washington and to adopt and maintain the building code consistent with the state's interest as provided in RCW 19.27.020 and the energy, environmental and housing affordability policies of the state. An objective of the statewide adoption is to minimize modify the International codes to be consistent with state amendments to the model codes.

The state building code shall must be as defined in WAC 51-04-015(8)(7).

(2) The council is also required by RCW 19.27.074 to approve or deny all city and county amendments to the building code that apply to single family or multifamily all buildings as defined in RCW 19.27.015.

(3) The council may issue opinions relating to the state building codes at the request of a local official charged with the duty to enforce the enumerated codes as specified in RCW 19.27.031 and 19.27A.015.

(4) The purpose of this chapter is to establish policies and procedures for:

(a) Submittal and council review and consideration of proposed statewide amendments to the building code;

(b) Submittal and council review and consideration of proposed city and county amendments to the state building code that apply to single family or multifamily buildings as defined in RCW 19.27.015;

(c) Reconsideration of council actions; and

(d) Issuing opinions interpretations to local officials.

WAC 51-04-015 Definitions.

(1) "Council" means the Washington State Building Code Council.

Commented [BR(1)]: WABO and the SBCC have been successful in getting our State's amendments into the model codes so the state amendment can then be deleted upon adoption of the new code. This should become a higher priority as it creates better consistency at the state and national levels. In the past the Council has responded to interpretation requests but only on state amended code sections. Since the Council has limited resources and may not have the technical expertise to respond to questions on non-amended code provisions, I suggest limiting code opinions issued by the SBCC to include only amended sections of the codes.

Commented [BR(2)]: Don't know why this should be a goal. And given state energy goals, this isn't the case in reality. If this needs to be here at all, maybe change it to "An objective of statewide adoption is to maintain consistency with the model codes." This leaves open things like pre-adopting provisions that will appear in future model codes, although this doesn't really address the energy code issue.

Commented [BR(3)]: I have included a couple items that have been an issue for some time. Having the SBCC approve the local amendments to the residential code has been problematic and has not been enforced consistently. When it was, it was usually related to residential fire sprinklers, which required the Council to create a separate exception for that. It would seem prudent that the local jurisdictions would be able to follow the standard process that amendments can be more restrictive, but not less restrictive for residential.

Commented [BR(4)]: In the past the Council has responded to interpretation requests but only on state amended code sections. Since the Council has limited resources and may not have the technical expertise to respond to questions on non-amended code provisions, I suggest limiting code opinions issued by the SBCC to include only amended sections of the codes.

Commented [BR(5)]: SBCC doesn't have authority to review any other amendments?

Commented [BR(6)]: Redundant with #3 above

(2) "Code Official" means the officer or other designated authority charged with the administration and enforcement of the codes adopted under RCW 19.27 and RCW 19.27A ⑦ ②

Commented [BR(7)]: Add new definition and renumber this section.⑥

(2) "Emergency statewide amendment" means any proposed statewide amendment, the adoption of which is necessary immediately in order to protect life, safety or health of building occupants; preserve the structural integrity of buildings built to the state building code; to correct errors and omissions; or by the direction of the Washington sState lLegislature or federal legislation. Emergency statewide amendments to the state building code must be adopted in accordance with the Administrative Procedure Act, chapter 34.05 RCW.

(3) "Local government amendment" means any amendment to the state building code, as adopted by cities or counties for implementation and enforcement in their respective jurisdictions.

(4) "Local government residential amendment" means any amendment to the state building code, as adopted by cities or counties for implementation and enforcement in their respective jurisdictions, that applies to single and multifamily buildings as defined by RCW 19.27.015.

(5) "Model codes" means the codes developed by the model code organizations and adopted by and referenced in chapter 19.27 RCW.

(6) "Model code organization(s)" means the national code-promulgating organizations that develop the model codes (as defined herein), such as, but not limited to ⑩ the International Code Council, International Association of Plumbing and Mechanical Officials, and National Fire Protection Association.

(7) "State building code" means the codes adopted by and referenced in chapter 19.27 RCW; the state energy code; and any other codes so designated by the Washington sState lLegislature as adopted and amended by the council.

(8) "Statewide amendment" means any amendment to the building model ⑩ code(s), initiated through council action or by petition to the council from any agency, city or county, or interested individual or organization, that would have the effect of amending the building code for the entire state of Washington. Statewide amendments to the state building code must be adopted in accordance with the Administrative Procedure Act, chapter 34.05 RCW.

(9) "State building code update cycle" means that period during which the model code and standards referenced in chapter 19.27 RCW are updated and amended by the council in accordance with the Administrative Procedure Act, chapter 34.05 RCW hereinafter referred to as the "adoption period" and those additional periods when code changes are received for review as proposed amendments to the model codes, hereinafter referred to as "submission periods."

(10) "Mandatory adoption date" ⑩

Commented [BR(8)]: There should be a definition to address when the codes are required to be adopted for cities and counties. To allow enough time for code publishers to insert state amendments into the model code documents I suggest the Council consider changing the mandatory adoption date to allow for the time needed for the Council to share state amendments with the publisher so building officials can purchase their code books and get the update training needed prior to adoption. The current SBCC code development process does not allow for enough time for the publisher to have the documents (i.e. Washington Custom Codes) ready for sale in advance of the update training so it may not be economically feasible for code publishers to provide this service which is critical for efficient design and enforcement of the codes. Having national (model), state and local amendments in one document significantly improves the efficiency for all users. This is a goal WABO has established and I encourage the Council to consider the value this would add to all code practitioners in Washington State. ⑩

Commented [BR(9)]: Anyone submitting "statewide" amendments needs to go through the standard code change proposal routine.⑥

Commented [BR(10)]: I have included a couple items that have been an issue for some time. Having the SBCC approve the local amendments to the residential code has been problematic and has not been enforced consistently. When it was, it was usually related to residential fire sprinklers, which required the Council to create a separate exception for that. It would seem prudent that the local jurisdictions would be able to follow the standard process that amendments can be more restrictive, but not less restrictive for residential.⑥

Commented [BR(11)]: Anyone submitting "statewide" amendments needs to go through the standard code change proposal routine.⑥

Commented [BR(12)]: Anyone submitting "statewide" amendments needs to go through the standard code change proposal routine.⑥

WAC 51-04-018 Petition for preliminary review.

An agency, city, or county, or other ⑩ interested individual or organization wishing to submit statewide or local government residential ⑥ ④ amendments to the state ① building code for ⑩ council for consideration, may file with the council a petition for preliminary review of the statewide or local government residential ⑥ ④ amendment, in order to solicit comments from council members and interested parties, prior to council action.

The council may refer a petition for preliminary review to one of the council standing committees for review and comment.

WAC 51-04-020 Policies for the consideration of proposed statewide amendments.

(1) The council will accept and consider petitions for emergency statewide amendments to the building code at any time, in accordance with RCW 19.27.074 and chapter 34.05.328 ~~7~~ RCW including 34.05.328 RCW~~2~~. The council will accept and consider ~~all~~ ~~7~~ petitions that meet the complete application requirements as set by the council, ~~7~~ for statewide amendments in conjunction with the state building code update cycle, in accordance with RCW 19.27.074, and ~~10~~ ~~1~~ chapter 34.05.328 ~~7~~ RCW, and ~~10~~ ~~1~~ WAC 51-04-015 and 51-04-020 as follows:

(a) For the purpose of review and adoption of new model code editions and statewide amendment submission, the state building code shall ~~must~~ ~~9~~ be divided into two groups:

(i) Group 1: International Building Code (IBC); International Existing Building Code (IEBC); International Fire Code (IFC); ~~Washington state energy code-commercial (WSEC-C), Wildland Urban Interface Code (WUI) ~~4~~ ~~7~~ or align with a model code organization's group listing.~~ ~~1~~.

(ii) Group 2: International Residential Code (IRC); International Mechanical Code (IMC); International Fuel Gas Code (IFGC); standards liquefied petroleum gas are National Fire Protection Association (NFPA) standards 58 and 54; Uniform Plumbing Code (UPC); ~~Washington state energy code-residential (WSEC-R) or align with a model code organization's group listing.~~ ~~1~~.

(b) The ~~adoption~~ state building code development ~~10~~ period of new model codes shall ~~must~~ ~~9~~ be on a 6 year cycle which ~~1~~ commences when new editions of the model codes ~~codes that are published 6 or more years after the last adopted edition and~~ ~~1~~ are published and ~~7~~ ~~2~~ available to the public. Within sixty ~~calendar~~ ~~6~~ days, the council shall ~~must~~ ~~9~~ publish a timeline to include a report of significant model code amendments and applicability of existing state amendments, followed by a ~~submission~~ period for new proposed statewide amendments.

(i) The council shall ~~must~~ ~~9~~ review Group 1 ~~model~~ ~~2~~ codes and approve a report on significant changes and applicability of existing state amendments. The Group 1 report shall ~~must~~ ~~9~~ be ~~posted~~ on the council web site and a submission period of at least ~~two months~~ ~~sixty calendar days~~ ~~6~~ shall ~~must~~ ~~9~~ be allowed for new proposed statewide amendments.

(ii) Upon completion ~~and posting~~ ~~4~~ of the Group 1 ~~report~~, public meetings, Council Actions, and posting of the final actions (~~4~~ and provided that ~~4~~ new editions of Group 2 model codes are available to the public, the council shall ~~must~~ ~~9~~ review the Group 2 codes and approve a report on significant changes and applicability of existing state amendments. The Group 2 report shall ~~must~~ ~~9~~ be posted on the council web site and a submission period of at least ~~two months~~ ~~sixty calendar days~~ ~~6~~ shall ~~must~~ ~~9~~ be allowed for new proposed statewide amendments

Commented [BR(13)]: If this is for review of model codes, then it should reference IECC, not WSEC. ~~9~~

Commented [BR(14)]: If this is for review of model codes, then it should reference IECC, not WSEC. ~~9~~

Commented [BR(15)]: The adoption of the codes comes after the codes have been scrutinized, AKA: developed by the TAGs. Using the word "adoption" in this context creates confusion. If "state code development period" is accepted a new definition may need to be created. ~~10~~

Commented [BR(16)]: Rather than the Council having to publish a timeline for accepting code change submittals for every cycle, could the submission period be pre-established such as "120 days following the date that the model codes become available to the public"? ~~10~~

Commented [BR(17)]: If not already provided, the Council should have a "list serve" to better inform the public of code development milestones, emergency rules and off-cycle code adoptions. ~~10~~

Commented [BR(18)]: This should be an established duration. Using words like "at least..." breeds inconsistency. It's better for everyone involved if this could be a consistent duration such as "60 days" ~~10~~

(2) The council or their designees, shall must review proposed new statewide amendments, and approve those meeting the appropriate criteria to file as proposed rules in accordance with chapter 34.05.328 RCW including 34.05.328 RCW. The proposed rules filing shall must include a small business economic impact statement in accordance with chapter 19.85 RCW.

(3) The council shall must conduct at least two public hearings for each group. (one in Western Washington and one in Eastern Washington) following the posting of the Group reports and proposed statewide amendments.

(4) The state code adoption development period shall must conclude with formal adoption of the state building code as amended by the council. As required by RCW 19.27.074, all decisions to adopt or amend the state building code shall must be made prior to December 1st and shall must not take effect before the end of the regular legislative session (or July 1st) in the next year. Group 1 and 2 codes shall must be filed with the code reviser at the same time. Amendments to Group 1 codes during the Group 2 adoption shall must be limited to code correlation, (including correlation with future versions of the model codes), correction of errors, language clarification and updated section references.

(5) State amendments as approved by the council shall must be submitted to the appropriate model code organization, at the direction of the council, except those adopted for consistency with state statutes or regulation and held for further review during the adoption period of those model codes by the council. The effective date of any statewide amendments shall must be the same as the effective date of the new edition of the model codes, except for emergency amendments adopted in accordance with chapter 34.05 RCW and deemed appropriate by the council.

WAC 51-04-025 Procedure for submittal of proposed statewide amendments.

(1) Statewide and emergency statewide amendments to the state building code shall must conform to the purposes, objectives, and standards prescribed in RCW 19.27.020.

All proposed statewide amendments shall must be complete, and include cost impacts of the proposed statewide amendment, and be submitted in writing to the council, on the form provided by the council. The amendment must address existing model code language; a change in the model codes since a previous edition; or an existing state or local amendment to the model code; or a portion of the state code other than the model code. The state building code council shall must consider the action of the model code organizations in their consideration review of these proposals.

Statewide and emergency statewide amendments to the state building code shall must be based on one of the following criteria:

(a) The amendment is needed to address a critical specific life/safety need.

(b) The amendment clarifies the intent or application of the code.

(c) The amendment correlates the state building code with a future edition of the model codes.

Commented [BR(19): Taken literally, only the Council would be reviewing proposed amendments. ①

Commented [BR(20): This is not correct. The council doesn't approve all the proposed amendments, it only approves the ones it approves of. ②

Commented [BR(21): Because the SBCC groups differ from the ICC groups, this should be changed to accommodate the difference. In particular, changes to the structural provisions in the IBC are generally heard in ICC's Group B. However, the timing of the SBCC process is such that those proposals that appear to be on their way to approval in Group B cannot be incorporated into the State code—Group 1 is concluded before Group B starts. This problem is highlighted in the SBCC adoption of the mass timber provisions in Group 1. The changes being proposed and refined in Group B can't be included, according to this section, without some contortions ("interpretations"). ③

Commented [BR(22): Shouldn't this be the State codes? The model codes don't have an effective date. ④

Commented [BR(23): This is not exactly correct. The council has frequently approved entirely new code concepts in areas such as energy, seismic, and accessibility. This language seems to prohibit innovation. ⑤

Commented [BR(24): This legitimizes what's being done in practice—pre-adoption of provisions from the next version of the codes. ⑥ ⑦

(c) The amendment is necessary for consistency with state or federal policies or regulations.

(d) The amendment corrects errors and omissions.

(e) The amendment eliminates an obsolete, conflicting, duplicating or unnecessary regulation.

(f) The amendment incorporates a newer version of a section of the code that is currently adopted or is process of adoption.

(f) The amendment addresses the state's interest as provided in RCW 19.27.020.

(2) Petitions for statewide amendments to the building code shall must be submitted to the council during the submission period and the adoption period in accordance with WAC 51-04-020. Minimum requirements specified on the form for submittals must be included. Incomplete submittals will be held for thirty days and the proponent will be notified with a request for more information. If after thirty days, the applicant has not provided requested information for a complete application, the proponent's proposal will be deemed incomplete and shall must not move forward.

(3) Petitions for emergency statewide amendments to the building code may be submitted at any time, in accordance with RCW 19.27.074 and chapter 34.05 RCW, and WAC 51-04-015 and 51-04-020.

The council may refer a proposed statewide amendment to one of the council standing committees for review and comment prior to council action in accordance with chapter 34.05 RCW.

(4) The council shall must consider and take action on all proposed statewide amendments within the time frames required by chapter 19.27 RCW, RCW 34.05.330, and all other deadlines established by statute.

WAC 51-04-030 Policies for consideration of proposed local government residential amendments.

(1) All amendments to the building code, as adopted by cities and counties for implementation and enforcement in their respective jurisdictions, that apply to single and multifamily all buildings as defined by RCW 19.27.015, shall must be submitted to the council for approval.

(2) The council shall must consider and approve or deny all proposed local government residential amendments to the state building code as presented to the council within ninety calendar days of receipt of a proposal, unless alternative scheduling is agreed to by the council and the proposing entity. Where a proposed local government residential amendment is modified upon adoption by the city or county legislative body, it shall must be resubmitted to the council. Local government residential amendments shall must not be effective until approved by the council and the local governing authority.

(3) All local government residential amendments to the building code that require council approval shall must be submitted in writing to the council, by the authorized local code or elected official, prior to implementation and enforcement of the amendment by the local jurisdiction. All local amendments submitted for review shall must be accompanied by findings of fact justifying the adoption of the local amendment in accordance with the five criteria noted

Commented [BR(25)]: On the bottom of the proposal form it says, "Incomplete proposals will not be accepted" says nothing about this 30 day period. Which is it?@

Commented [BR(26)]: Actually, the council frequently sends amendments directly to the relevant TAG@

below in this section, and shall must not result in weakening of health, safety, or environmental standards of the code.

(4) It is the policy of the council to encourage joint proposals for local government residential amendments from more than one jurisdiction. Local government residential amendments submitted to the council for approval shall must be based on:

- (a) Climatic conditions that are unique to the jurisdiction.
- (b) Geologic or seismic conditions that are unique to the jurisdiction.
- (c) Environmental impacts such as noise, dust, etc., that are unique to the jurisdiction.
- (d) Life, health, or safety conditions that are unique to the local jurisdiction.
- (e) Other local laws, policies, or special conditions that are unique to the jurisdiction.

EXCEPTION: Local government residential amendments to administrative provisions (departmental operational procedures) contained within the state building code need not be submitted to the council for review and approval provided that such amendments do not alter the construction requirements of those chapters.

(5) Appendices to the codes that affect single and multifamily residential all buildings as defined by RCW 19.27.015 that are not adopted by the council shall must be submitted to the council for consideration as local government residential amendments to the building code.

Local government residential amendments shall must conform to the limitations provided in RCW 19.27.040.

Commented [BR(27)]: Omit this section

WAC 51-04-035 Procedure for submittal of proposed local government residential amendments.

All proposed local government residential amendments to the state building code shall must be submitted in writing to the council, on a form provided by the council, along with findings of fact as required in WAC 51-04-030 for the proposed amendment. Local government residential amendments to administrative provisions (departmental operational procedures) contained within the state building code need not be submitted to the council for review and approval provided that such amendment does not affect the construction requirements of those chapters.

The council shall must accept and consider all applications for review of local government residential amendments submitted to the council in a proper manner.

The council may refer a proposed local government residential amendment to one of the council standing committees for review and comment prior to council action in accordance with RCW 19.27.074.

Commented [BR(28)]: Or TAGS?

Commented [BR(29)]: Omit this section

WAC 51-04-037 Preapproved local government residential amendments.

Any local government residential amendment, that the council determines to be appropriate for adoption by other local governments, may be designated as a preapproved local government residential amendment.

A preapproved local government **residential** ⑥ amendment may be adopted by any local government upon notification of the council.

Commented [BR(30)]: Omit this section ⑥

WAC 51-04-040 Reconsideration.

Commented [BR(31)]: This implies that considerations and petitions are done by mail. Could this be done electronically instead or as an alternate path? ⑥

(1) When the council approves, denies or modifies a statewide or local amendment to the building code, any party with written or oral testimony to the council related to the amendment on the record may file a petition for reconsideration. The petition must be received by the Washington State Building Code Council, 1500 Jefferson Avenue S.E., P.O. Box 41449, Olympia, Washington 98504-1449, within twenty calendar days of the date of notification ① of the council action on the amendment. The petition must give specific reasons for why the council should reconsider the amendment for approval or denial.

(2) Within sixty calendar days of receipt of a timely petition for reconsideration, the council **shall must** ⑤ in writing:

(a) Grant the petition for reconsideration and enter rule-making to revise the amendment;

(b) Deny the petition for reconsideration, giving reasons for the denial; or

(c) Request additional information and extend the time period for not more than thirty calendar days to either grant or deny the petition for reconsideration.

(3) The council's denial of a proposed statewide or local government amendment, or the council denial of a petition for reconsideration under this section, is subject to judicial review under chapter [34.05](#) RCW.

WAC 51-04-050 Ex parte communications.

All written communications received by council members during council rule-making proceedings, **shall must** ⑤ be forwarded to staff for inclusion in the public record.

Commented [BR(32)]: This time frame should be made more explicit. Is it intended to cover the time from the formal submittal of the proposal until the final council vote, or from the beginning of council consideration of the TAG recommendations, or from the first time anyone mentions the proposal, or what? ⑥

WAC 51-04-060 Opinions Interpretations ④.

RCW [19.27.031](#) grants the council authority to render **opinions interpretations** ④ relating to the building code at the request of a local code official.

For the purposes of this section, the term "code official" means the local or state official, or their designee, responsible for implementation and enforcement of the specific code provision on which the **opinions interpretations** ④ is requested.

At the request of a code official, the council will issue **opinions interpretations** ④ relating to the codes adopted under chapters [19.27](#), [19.27A](#), and [70.92](#) RCW, ~~including the state energy code, the state ventilation and indoor air quality code, and~~ council amendments to the model codes. At the request of a local code official, the council may issue **opinions interpretations** ④ on the applicability of WAC [51-04-030](#) to a local government ordinance regulating construction.

Commented [BR(33)]: Has not existed for a decade or so. ⑥

Council related **opinions interpretations** ④ may be developed and approved by a standing committee of the council.

~~Opinions Interpretations~~ approved by a standing committee may be reviewed and modified by the council.

WAC 51-04-070 Council mailing address.

All requests for information, documentation, etc., should be submitted to:
Washington State Building Code Council
1500 Jefferson Avenue S.E.
P.O. Box 41449
Olympia, Washington 98504-1449
Phone: 360-407-9280
Fax: 360-586-9088

Commented [BR(34): Verify

Commented [BR(35): Do you have a working fax? Include email?

WAC 51-04-071 Lunch.

The council chair shall must buy lunch upon petition of any council member or interested party.

The following suggestions are broken out for text clarity:

WAC 51-04-015 Definitions.

- (1) "Council" means the Washington state building code council.
- (2) "Emergency statewide amendment" means any proposed statewide amendment, the adoption of which is necessary immediately in order to protect life, safety or health of building occupants; preserve the structural integrity of buildings built to the state building code; to correct errors and omissions; or by the direction of the Washington state legislature or federal legislation. Emergency statewide amendments to the state building code must be adopted in accordance with the Administrative Procedure Act, chapter 34.05 RCW.

These two appear to be a duplicate. Suggest changing "single and multifamily" to ALL buildings.

(3) "Local government amendment" means any amendment to the state building code, as adopted by cities or counties for implementation and enforcement in their respective jurisdictions.

(4) "Local government residential amendment" means any amendment to the state building code, as adopted by cities or counties for implementation and enforcement in their respective jurisdictions, that applies to single and multifamily buildings as defined by RCW 19.27.015.

(5) "Model codes" means the codes developed by the model code organizations and adopted by and referenced in chapter 19.27 RCW.

(6) "Model code organization(s)" means the national code-promulgating organizations that develop the model codes (as defined herein), such as the International Code Council, International Association of Plumbing and Mechanical Officials, and National Fire Protection Association.

(7) "State building code" means the codes adopted by and referenced in chapter 19.27 RCW; the state energy code; and any other codes so designated by the Washington state legislature as adopted and amended by the council.

Suggested modification

(7) "State building code" means the codes adopted by and referenced in chapter 19.27 RCW; the state energy code; and any other codes so designated and amended by the council and as adopted by the Washington state legislature.

(8) "Statewide amendment" means any amendment to the building code, initiated through council action or by petition to the council from any agency, city or county, or interested individual or organization, that would have the effect of amending the building code for the entire state of Washington. Statewide amendments to the state building code must be adopted in accordance with the Administrative Procedure Act, chapter 34.05 RCW.

● **WAC 51-04-010 Declaration of purpose.**

The Washington state building code council, hereinafter called the council, is required by chapter 266, Laws of 1988, to adopt and maintain the state building code, hereinafter referred to as the building code, as provided in chapters 19.27, 19.27A, and 70.92 RCW, and the state legislature.

(1) The primary objective of the council is to encourage consistency in the building code throughout the state of Washington, ~~and to~~ The council can effectuate this goal by:

(a) Adopting and maintaining the building code consistent with the state's interest as provided in RCW 19.27.020-, and the energy, environmental and housing affordability policies of the state.

(b) Developing a uniform set of administrative code requirements for code officials to use in their process of approving performance based designs, innovative solutions, materials, products, methods of construction, design, or systems submitted for approval as proposed alternates to the prescriptive requirements of the adopted state building code. The code official shall make final approval decisions based on objective findings of fact. If not approved, written notification must clearly explain the reasons why the proposal was found insufficient for approval.

(c) An objective of statewide adoption is to minimize state amendments to the model codes.

● **WAC 51-04-010 Declaration of purpose.**

Not sure how those two "state"-related words work in this sentence...
... chapters 19.27, 19.27A, and 70.92 RCW, and the state legislature.

(1) The primary objective of the council is to encourage consistency in the building code throughout the state of Washington and to maintain the building code consistent with the state's interest as provided in RCW19.27.020. An objective of statewide adoption is to minimize state(?) amendments to the model codes.
The building code shall be as defined ...