



MEMORANDUM

TO: Washington State Building Code Council

FROM: Al Audette, Workforce Development Manager, Building Industry Association of Washington

DATE: July 12, 2019

SUBJECT: IFC 903.2.9

The Building Industry Association of Washington (BIAW) is the voice of the residential housing industry in the state of Washington. On behalf of our over 8200 members we appreciate the opportunity to submit comments regarding the proposal referencing IFC 903.2.9 Group S1 Storage units.

The referenced proposal doesn't affect the residential housing industry, however, we have an issue with this proposal as it relates to the process of submitting a statewide code change proposal. First, we do not agree this proposal addresses a critical life/safety need as fires in these facilities are quite rare. A simple internet search of storage facility fires in our state will confirm that. The most recent facility built in Olympia used steel framing and CMUs which makes it difficult for fire to spread throughout other units. Considering the extremely low rate of a fire in these type of facilities and the high likelihood that a fire would be contained due to recent construction methods, the expense of a fire sprinkler system seems unreasonable.

Secondly, of the two changes in part 6 we would point out the addition of the word "self" to storage. Are self-storage facilities different from other storage facilities? If so, this would be an addition of a new facility to current code and would need to have an economic impact statement to be deemed a complete proposal and be eligible to be considered by the Council. If there is no difference between the two then this is a jurisdictional enforcement issue. The comment included in the proposal that enforcement of the current rules is challenging doesn't justify an amendment to the model code. Thank you for your time.