

June 18, 2019

Washington State Building Code Council  
1500 Jefferson Street SE  
Olympia, WA 98501  
Via: [sbcc@des.wa.gov](mailto:sbcc@des.wa.gov), [krista.braaksma@des.wa.gov](mailto:krista.braaksma@des.wa.gov)

Re: Amendments to WAC 51-50-1107

To Whom it May Concern:

It has recently been brought to my attention that proposed amendments to WAC 51-50-1107 related to IBC 1107.6 and 1107.6.2.2.1, will change language relating to multi-family dwellings and those changes will adversely affect our citizens, especially the disability community.

Section 1107.6 – Dwelling units and sleeping units - WAC 51-50-1107 strikes language that states “Type A units and Type B units shall be provided in Group R Occupancies in accordance with Sections 1107.6.1 through 1107.6.4. Accessible and Type A units shall be apportioned among efficiency dwelling units, single bedroom units and multiple bedroom units, in proportion to the numbers of such units in the building.” It’s imperative this language remains in the 2018 IBC code so that people who need wheelchair friendly housing have the same choices as non-disabled renters.

The 2015 IBC, 1107.6.2.2.1 Type A units, states, “In Group R-2 occupancies containing more than 10 dwelling units or sleeping units, at least 5 percent, but not less than one, of the units shall be a Type A unit.’ The 2018 IBC, 1107.3.2.2.1 type A units, as proposed, states, “In Group R-2 occupancies containing more than 20 dwelling units or sleeping units, at least 2 percent, but not less than one, of the units shall be a Type A unit.’ It is my understanding that the intent of this change was to change the number of “containing more than” units from 10 to 20 and that the percentage of type A units was to remain unchanged. This is not a small oversight and I want to bring it to your attention so I can ensure that it will be corrected. We request that the proposed language for 2018 IBC, 1107.3.2.2.1 type A units be “In Group R-2 occupancies containing more than 20 dwelling units or sleeping units, at least 5 percent, but not less than one, of the units shall be a Type A unit.”

The impact of these proposed changes is catastrophic and a huge step backward for the citizens of Washington. Washington State has been a leader in providing Type A/wheelchair friendly multi-family housing since 1978 and we expect it to remain so. Even at 5 percent, Type A/wheelchair friendly housing is extremely hard to find so any changes to the building code should increase the percentage, not decrease it.



I strongly encourage you to correct these errors before these code sections are adopted.

Sincerely,

A handwritten signature in blue ink, reading 'Karen L. Braitmayer' in a cursive script.

Karen L. Braitmayer, FAIA