

September 20, 2019

Doug Orth
State Building Code Council Chair
1500 Jefferson Street SE
PO Box 21499
Olympia, WA 98504

Doug,

On behalf of the Washington Association of Building Officials (WABO), I am submitting a public comment relating to the SBCC recommended code changes in the CR102 document date August 7, 2019. This public comment recommends modifications to item #26 in the CR102 making additional changes to Section R302.2.

This public comment clarifies what is intended to be allowed for protecting the gap at the end of a common wall in townhouse units. We believe this public comment will provide a clear code path with defined terms used throughout the Residential Code.

Thank you for the work the Building Code Council does and the opportunity to present our ideas for modifications.

Sincerely,

Micah Chappell

Technical Code Development Committee Chair,
Washington Association of Building Officials

State Building Code Council

Public Comment

2018 IRC Section R302.2:

Amend section to read as follows:

R302.2 Townhouses. Each *townhouse* shall be considered a separate building and shall be separated by one of the following methods:

1. A common 1-hour fire-resistance-rated wall assembly tested in accordance with ASTM E 119 or UL 263 and a fire sprinkler system in accordance with Section P2904 in both townhouses shall be provided. The cavity of the common wall shall not contain plumbing or mechanical equipment, ducts or vents. The wall shall be rated for fire exposure from both sides and shall extend to and be tight against the inside face of the exterior walls sheathing and the underside of the roof sheathing. Penetrations of electrical outlet boxes shall be in accordance with Section R302.4.
2. A common 2-hour fire-resistance-rated wall assembly tested in accordance with ASTM E 119 or UL 263 shall be provided. The cavity of the common wall shall not contain plumbing or mechanical equipment, ducts or vents. The wall shall be rated for fire exposure from both sides and shall extend to and be tight against the inside face of the exterior walls sheathing and the underside of the roof sheathing. Penetrations of electrical outlet boxes shall be in accordance with Section R302.4.
3. Two wall assemblies meeting the requirements of Section R302.1 for exterior walls shall be provided.

Exception: Common walls are permitted to extend to and be tight against the interior side of the exterior walls where voids in the exterior wall at the end of the common wall are fireblocked. If the cavity between the end of the common wall and the inside face of the exterior sheathing is filled, the full depth of the exterior wall, with a minimum of two, two inch nominal thickness wood studs.

Reason for Public Comment:

We believe the language in the exception caused an unintended interpretation issue. This public comment addresses the interpretation issue of what "filled" means in the exception. WABO members indicated it meant the cavity should be completely blocked starting with a minimum of two, two-inch wood studs. This cavity could be required to be blocked with 4, 5, or 6, wood studs. We do not believe this was the intent of the proposal and believe the language provided in this public comment provides a greater clarity for these areas.

This public comment identifies that the issue the proponent was trying address can be mitigated with fireblocking.

Fireblocking is a defined term in the IRC and is what should be identified to use in these areas. This public comment is only a clarification to the exception language in the approved proposal.

Please review the diagrams to see some examples of how this exception can apply.

