

July 12, 2019

Washington State Building Code Council  
1500 Jefferson Street SE  
Olympia, WA 98501

Dear Council Representative,

I have been told that 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 that will serve to reduce standards for accessible units and cause confusion by being out of sync with other requirements such as under Section 504 of the Rehab Act.

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*.”

This proposed change simply doesn't make sense and, if included, will serve to reduce standards that are currently in place that are of value to Washington citizens. Thank you for reviewing this issue.

Sincerely,

Mark Leeper  
1420 NW Orion Dr.  
Pullman, WA 99163