

From: Morean, Whitney <moreanw@spu.edu>
Sent: Tuesday, July 9, 2019 1:57 PM
To: DES SBCC <sbcc@des.wa.gov>
Cc: Braaksma, Krista (DES) <krista.braaksma@des.wa.gov>
Subject: WAC 51-50-1107 related to IBC 1107.6 and 1107.6.2.2.

To Whom it May Concern:

I have been informed that 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 negatively affect everyone, especially those in 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.”

This is a major step backwards for Washington State and would likely further reduce the ability for individuals who use wheelchairs to find housing.

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

Sincerely,

Whitney Morean

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