

From: Robby Oylear <robbyoylear@gmail.com>
Sent: Monday, June 17, 2019 12:11 PM
To: DES SBCC <sbcc@des.wa.gov>
Subject: Testimony on the adoption of the 2018 WSEC-Commercial

I believe there are two issues with the proposed changes to C406.1.1.

Issue 1. The last sentence of C406.1.1 allows for tenant spaces within buildings that comply with C406.5, C406.10, or C406.11 to be considered fully compliant with the Code (which should mean 3 credits) but these sections each have different values attributed by building type. Recommendation is to revise the wording as follows (my changes are highlighted in yellow):

C406.1.1 Tenant spaces. ~~Tenant spaces~~Initial tenant improvement shall comply with sufficient packages from Table C406.1 so as to achieve a minimum number of three credits from Section C406.2, C406.3, C406.4, C406.6, or C406.7, C406.8 or C406.10, where applicable. In buildings with multiple tenant spaces, each tenant space is permitted to comply individually. Where an entire building complies with Section C406.5, ~~C406.8~~C406.10 or ~~C406.9~~C406.11, tenant spaces within the building shall be deemed to comply with this sectionqualify for the equivalent amount of credits associated with the applicable Section and Commercial Building Occupancy type.
Exception: Previously occupied tenant spaces in existing buildings that comply with this code in accordance with Section C501.

Issue 2. Shell & Core buildings that comply with Section C407 Total Building Performance have already demonstrated that the whole building complies without consideration of the tenant improvement spaces for the purposes of C406. Thus, an exception should be added for buildings that achieved Code compliance through Section C407 under the 2018 WSEC.

C406.1.1 Tenant spaces. ~~Tenant spaces~~Initial tenant improvement shall comply with sufficient packages from Table C406.1 so as to achieve a minimum number of three credits from Section C406.2, C406.3, C406.4, C406.6, or C406.7, C406.8 or C406.10, where applicable. In buildings with multiple tenant spaces, each tenant space is permitted to comply individually. Where an entire building complies with Section C406.5, ~~C406.8~~C406.10 or ~~C406.9~~C406.11, tenant spaces within the building shall be deemed to comply with this section.

Exceptions:

1. Previously occupied tenant spaces in existing buildings that comply with this code in accordance with Section C501.
2. Tenant spaces in existing buildings that complied with this Code in accordance with Section C407.

Thank you,
Robby Oylear