



STATE OF WASHINGTON
STATE BUILDING CODE COUNCIL

May 2018
Log No. _____

1. State Building Code to be Amended:

- | | |
|---|---|
| <input checked="" type="checkbox"/> International Building Code | <input type="checkbox"/> International Mechanical Code |
| <input type="checkbox"/> ICC ANSI A117.1 Accessibility Code | <input type="checkbox"/> International Fuel Gas Code |
| <input type="checkbox"/> International Existing Building Code | <input type="checkbox"/> NFPA 54 National Fuel Gas Code |
| <input type="checkbox"/> International Residential Code | <input type="checkbox"/> NFPA 58 Liquefied Petroleum Gas Code |
| <input checked="" type="checkbox"/> International Fire Code | <input type="checkbox"/> Wildland Urban Interface Code |
| <input type="checkbox"/> Uniform Plumbing Code | |

For the Washington State Energy Code, please see specialized [energy code forms](#)

Section(s): 903.3.1.2

(e.g.: Section: R403.2)

Title: NFPA 13R sprinkler systems

(e.g: Footings for wood foundations)

2. Proponent Name (Specific local government, organization or individual):

Proponent: Washington Association of Building Officials Technical Code Development Committee
(WABO TCD)

Title:

Date: May 18, 2021

3. Designated Contact Person:

Name: Jonathan Siu

Title: Technical Consultant (WABO TCD)

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4. **Proposed Code Amendment.** Reproduce the section to be amended by underlining all added language, striking through all deleted language. Insert new sections in the appropriate place in the code in order to continue the established numbering system of the code. If more than one section is proposed for amendment or more than one page is needed for reproducing the affected section of the code additional pages may be attached. (Examples on the SBCC [website](#))

Code(s) IFC & IBC Section(s) 903.3.1.2

Enforceable code language must be used; see an example [by clicking here](#).
Amend section to read as follows:

903.3.1.2 NFPA 13R sprinkler systems. *Automatic sprinkler systems* in Group R occupancies up to and including four stories in height in buildings not exceeding 60 feet (18 288 mm) in height above grade plane shall be permitted to be installed throughout in accordance with NFPA 13R, ~~where the Group R occupaney meets all of the following conditions:~~

- ~~1. Four stories or fewer above grade plane.~~
- ~~2. The floor level of the highest story is 30 feet (9144 mm) or less above the lowest level of fire department vehicle access.~~
- ~~3. The floor level of the lowest story is 30 feet (9144 mm) or less below the lowest level of fire department vehicle access.~~

The number of stories of Group R occupancies constructed in accordance with Sections 510.2 and 510.4 shall be measured from grade plane the horizontal assembly creating separate buildings.

5. **Briefly explain your proposed amendment, including the purpose, benefits and problems addressed.** Specifically note any impacts or benefits to business, and specify construction types, industries and services that would be affected. Finally, please note any potential impact on enforcement such as special reporting requirements or additional inspections required.

This proposal undoes a change that was made to the 2021 IFC and IBC (FS117-18), returning the language in the section to the 2018 text, and aligns the code with the scoping provisions of NFPA 13R.

The 2021 change unnecessarily limits the applicability of NFPA 13R systems, particularly for podium buildings, triggering a requirement for a full NFPA 13 system in more buildings. If adopted by the SBCC, the 2021 IFC/IBC requirement would decrease affordability for residential construction, since a full NFPA 13 system would be required in shorter buildings. During the ICC process, this proponent and a representative from the City of Seattle Fire Marshal's Office testified against this change, but were ultimately unsuccessful in defeating the proposal. The proposal, along with our public comments in opposition to the change are attached for reference.

6. **Specify what criteria this proposal meets.** You may select more than one.

- The amendment is needed to address a critical life/safety need.
- The amendment clarifies the intent or application of the code.
- The amendment is needed to address a specific state policy or statute.
- The amendment is needed for consistency with state or federal regulations.
- The amendment is needed to address a unique character of the state.
- The amendment corrects errors and omissions.

7. **Is there an economic impact:** Yes No

Explain:

Adopting this amendment will maintain housing affordability at its current levels, instead of decreasing housing affordability. According to a November 2020 article on the National Fire Sprinkler Association website (<https://nfsa.org/2020/11/17/nfpa-13-vs-nfpa-13r-in-podium-and-mixed-use-construction/>):

- The National Multifamily Housing Council members estimate a NFPA 13 system costs “an average of \$1 to \$2 more per square foot than NFPA 13R—before any markup to the building owner or the potential need for a fire pump.”
- “*NFPA Journal* notes that installing an NFPA 13 system can cost [four to six times](#) more than an NFPA 13R system and include a four to six times greater construction turnaround time.”

If there is an economic impact, use the tool below to estimate the costs and savings of the proposal on construction practices, users and/or the public, the enforcement community, and operation and maintenance. If preferred, you may submit an alternate cost benefit analysis.

Provide your best estimate of the construction cost (or cost savings) of your code change proposal? (See OFM Life Cycle Cost [Analysis tool](#) and [Instructions](#); use these [Inputs](#). [Webinars on the tool can be found \[Here\]\(#\) and \[Here\]\(#\)](#))

\$Click here to enter text./square foot (For residential projects, also provide \$Click here to enter text./dwelling unit)

Show calculations here, and list sources for costs/savings, or attach backup data pages

List any code enforcement time for additional plan review or inspections that your proposal will require, in hours per permit application:

No increase in plan review or inspection time, since there will be no change from the 2015 code.

Please send your completed proposal to: sbcc@des.wa.gov

All questions must be answered to be considered complete. Incomplete proposals will not be accepted.