



March 11, 2022

Washington State Building Code Council
1500 Jefferson Street SE
P.O. Box 41449
Olympia, WA 98504

Subject: Code Change 21-GP1-00, Materials Used in Fire Walls, Section 706.3

To: State Building Code Council Members

Thank you for the opportunity to submit written testimony regarding Proposed Change 21-GP1-080, pertaining to materials used in fire walls. My name is Shamim Rashid-Sumar. I am a professional fire protection engineer representing the National Ready Mixed Concrete Association (NRMCA).

I am providing this written testimony regarding fire safety concerns related to the proposed code change, which will allow combustible materials in fire wall construction.

The proposed code change is heavily based on fire resistance of combustible materials such as those used in Type III and Type IV construction. However, a fire wall is not the same as a fire-resistance rated wall. Fire walls must be designed and constructed to allow collapse of the structure on either side without collapse of the wall under fire conditions.

While fire resistance rating walls carry an hourly rating, they are not designed to withstand collapse in the same manner as is required for fire walls. This is critical because a fire wall may function to separate a structure into two separate buildings.

The testing that is referenced in the rationale of the proposed code change was testing for fire-resistance. None of the testing for Type IV construction conducted to date has specifically looked at walls functioning as fire walls; it has only looked at fire-resistance ratings.

The code change rationale also mentions that similar code change proposals were considered as part of the ICC's 2021 code development cycle. However, all four proposals with the similar intent to allow combustible materials in fire walls were not approved at the Committee Action Hearings. They were also voted for disapproval at the Public Action Hearings and the Online Governmental Consensus Vote and will not be included as an amendment to the International Building Code.

It is for these reasons that we request your consideration to disapprove this proposed amendment in the Washington State Building Code.

Please do not hesitate to contact me at 917-484-1960 or ssumar@nrmca.org should you have any questions. Thank you again for the opportunity to submit testimony regarding this proposed code change.

Respectfully,

A handwritten signature in black ink that reads "Shamim Rashid-Sumar".

Shamim Rashid-Sumar
Vice President, Fire Codes and Standards

