

2021 International Fire Code Concise Explanatory Statement

From/Date	Position	Summary	Council Response
Randall M. King Kitsap Building Association (KBA) 02/09/2021 Written Testimony	Support	Section 903.3.1.2: KBA supports Section 903.3.1.2 in an effort to preserve affordability of residential buildings by ensuring applicability of NFPA 13R systems are preserved. Lower density multi-family buildings otherwise would have been subjected to a full NFPA 13 system, which would drastically increase the construction cost. We commend this effort.	The Council adopted Section 903.3.1.2 as proposed in the CR102.
Miriam J. Villiard Heritage Builders NW, LLC 02/09/2021 Written Testimony	Support	Section 903.3.1.2: Heritage Builders supports Section 903.3.1.2. in an effort to preserve affordability of residential buildings by ensuring applicability of NFPA 13R systems are preserved. Lower density multi-family buildings otherwise would have been subjected to a full NFPA 13 system which would drastically increase the cost of construction. We commend this effort to keep housing affordability at the forefront of the code development conversation.	The Council adopted Section 903.3.1.2 as proposed in the CR102.
Shamim Rashid-Sumar – NRMCA 02/11/2021 Oral Testimony	Oppose	Section 903.3.1.2.3. The proposed amendment will roll back previous changes that were made to the IFC and the IBC to limit the use of NFPA 13R sprinkler systems to buildings where the highest level is 30 feet or less above the level of the Fire Department vehicle access. The intent of these changes was to address more recent fire history in residential occupancies. Particularly, podium style developments all over the country. There have been similar fires here in the State of Washington in multi-family residential structures in Bothell, Lynnwood, and Olympia. The proponent offers an alternate proposal that was approved as part of the 2024 code development cycle.	The BFP Standing Committee discussed the testimony and recommended the Council adopts the initial proposal as submitted with the CR-102. In addition to all technical concerns, the proposed alternative was not proposed on time (the time allowed for statewide proposals), and if considered, will violate the Council procedure. The Council agreed with the BFP recommendations and adopted Section 903.3.1.2.3 as proposed in the CR102.
Stephen V. Skalko - Northwest Cement Council 02/11/2021 Oral/Written Testimony	Oppose	Section 903.3.1.2: 21-GP1-021 loosens the height limit allowed for the residential building by increasing the allowable height from 30-feet above fire department vehicle access (typically at ground level) to be 60-feet above grade plane (average height of the ground around the building). That can result doubling of the present code permitted height of a building depending on the physical configuration of the land surrounding the building. In some cases, the height can be more than doubled if a sloped roof is used for the residential building because the building height gets measured to the average roof height based on slope and not to the peak of the roof.	The BFP Standing Committee discussed the testimony and recommended the Council adopts the initial proposal as submitted with the CR-102. In addition to all technical concerns, the proposed alternative was not proposed on time (the time allowed for statewide proposals), and if considered, will violate the Council procedure. The Council agreed with the TAGs and the BFP recommendations and adopted Section 903.3.1.2.3 as proposed in the CR102.

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Ken Brouillette Supporting Documents 02/11/2021 Oral/Written Testimony	Modify	Table 315.7.6 (1): looking at adding a footnote (a). There is some confusion regarding how much fire rated glazing you could have in these opening. Adds a pointer to section 716 of the International Building Code.	The BFP Standing Committee discussed the testimony and recommended adoption of the proposed modification. This will be considered in a separate rulemaking after the CR-103 is filed.
	Modify	Section 405.2: This section was missed in the TAG meetings. Exception 4 references R-4 occupancies; however, R-4 is not adopted in Washington. Exception 4 should be deleted.	WAC 51-54A-0405 is not part of the CR-102. This is a new proposal which did not go through the standard process – TAG review, comment period/testimony, public hearing. A new section cannot be added if it was not originally submitted with the CR-102. This proposal for modification may be considered at future rulemaking.
	Modify	403.3.1.1 Add safety and care recipients to keep language the same as the charging language.	The proposed modification to the existing amendment matches the model code language. The BFP Standing Committee recommended adoption of the model code section instead of modified state amendment. The Council agreed with the BFP recommendation and voted to delete the existing amendment and adopt the model code Section 403.3.1.1.
	Modify	Section 404.2.3 Lockdown Plans: The City of Seattle is proposing to enact the same modification to the model code. The proposal is to put locked down drills into the state code, with the fire code official being able to review them. 404.2.3 Lockdown plans. <u>When required by the fire code official, Lockdown plans shall only be submitted for review to permitted where such plans are approved by the fire code official and are shall be</u> in compliance with Sections 404.2.3.1 and 404.2.3.2.	WAC 51-54A-0405 is not part of the CR-102. This is a new proposal which did not go through the standard process – TAG review, comment period/testimony, public hearing. A new section cannot be added if it was not originally submitted with the CR-102. This proposal for modification may be considered at future rulemaking.
	Modify	918.0 Alerting Systems. There is no need for this existing amendment. Section 918.1 states that an approved alerting system shall be provided in buildings and structures as required in Chapter 4 and this section. However, neither Chapter 4 nor Section 918 require approved alerting system. There is no reason for adopting technical requirements without scoping.	The BFP Standing Committee discussed the testimony and recommended deletion of the existing amendment. The Council agreed with the BFP recommendation and voted to delete Section 918.0.

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	Modify	<p>308.1.9 Decorative open flame tables. The proponent proposes to delete “fireplaces” from this section because the term “fireplace” is not in the title. The proponent also proposes to add language that says “The protective device shall be not lower than the maximum height of the proposed flame. (See Supporting Documents for the complete proposal).</p>	<p>The Council staff recommended that adding “fireplaces” to the title is the better option. Deleting “fireplaces” from the text changes the regulatory effect. This is a new proposal, which did not go through the standard process – TAG review, comment period/testimony, public hearing. If adopted, this proposal may be considered substantially different from the proposal in the CR-102. The BFP Committee discussed the staff recommendation, and recommended the Council adopt Section 308.1.9 as proposed in the CR102. The Council agreed with this recommendation.</p>

Important Documents and Links:

Initial Submittal – [CR-102 with Proposals](#)
[2021 IFC Proposed Modifications to CR-102](#) (Approved by the SBCC as proposed on April 22, 2022)
[CR-103: 2021 IBC as adopted by the SBCC on April 22, 2022](#)
[2021 IFC Public Testimony Summary](#)
[IBC/IFC Public Hearing 2/11/2022](#)
[IBC/IFC/WSEC Public Hearing 3/11/2022](#)
[IFC Written Testimony](#)
[2021 IFC Preliminary Cost Benefit Analysis](#)
[2021 IFC Final Cost Benefit Analysis](#)
 Council Meeting April 22, 2022 – [Recording Link](#)

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Concise Explanatory Statement

Changes from proposed (CR-102) to adopted (CR-103) version

WAC	Section	Change	Rationale/Discussion
WAC 51-54A-0403	403.3.1	Delete the existing amendment.	The model code section 403.3.1 matches the language in the existing amendment. There is no need for the existing amendment to be re-adopted.
WAC 51-54A-0918	918.1 through 918.6	Delete the existing amendment.	There is no need for this existing amendment. Section 918.1 states that an approved alerting system shall be provided in buildings and structures as required in Chapter 4 and this section. However, neither Chapter 4 nor Section 918 require approved alerting system. There is no reason for adopting technical requirements without scoping.