| **From/Date** | **Position** | **Summary** | **Council Response** |
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| Ardel Jala  City of Seattle  10/13/2022  Written Testimony with proposed [modification](https://sbcc.wa.gov/sites/default/files/2022-10/SDCI_IEBC%20Section%20401.4.pdf) | Modify | **Section 401.4 (Proposal 21-GP2-055):** The original intent of proposal 21-GP2-055 was to allow the reuse of existing foundations, where approved by the Code Official. This comment with proposed modification seeks to make the language in Section 401.4 more user friendly.  There is no intended change in regulatory effect, and no change to the preliminary cost benefit analysis. | The Council took into consideration the proposed modification and adopted the modified proposal. |
| Nathalie Boeholt WABO  10/13/2022  Oral and written testimony with proposed [modification](https://sbcc.wa.gov/sites/default/files/2022-10/WABO_IEBC%20Sections%20503.13%20and%20805.4.pdf) | Modify | **Sections 503.13 & 805.4 (Proposal 21-GP2-056):** The public comment clarifies the applicability of this modified proposal and overall improves it. It reflects  comments heard from the ICC committee during the April 2022 Committee Action Hearings in Rochester, NY, and includes another IEBC change (EB68) that is proposed for incorporation in the 2024 IEBC.  There is no intended change in regulatory effect, and no change to the preliminary cost benefit analysis. | The Council took into consideration the proposed modification and adopted the modified proposal. |
| Chris Edmark  Thurston County  10/04/2022  Oral and written testimony with proposed [modification](https://sbcc.wa.gov/sites/default/files/2022-10/Chris%20Edmark_IEBC_21-GP2-029.pdf) | Modify | **Chapter 2, Definitions (Proposal 21-GP2-029):** Proponent proposes modifications to the definitions of “Substantial Damage” and “Substantial Improvement” to provide an option for compliance with the latest FEMA guidance or use the Building Valuation Data.  Since the proposed modifications provide an additional option, there is no intended change in regulatory effect, and no change to the preliminary cost benefit analysis. | The Council took into consideration the proposed modification and adopted the modified proposal. |
| **Important Documents and Links:**  Initial Submittal – [CR-102 with Proposals](https://sbcc.wa.gov/sites/default/files/2022-08/WSR_OTS%20Combined_WAC%2051-50_IBC.pdf)  CR-103: 2021 IEBC as adopted by the SBCC on November 18, 2022  [2021 IEBC Public Testimony Summary](https://sbcc.wa.gov/sites/default/files/2022-10/IEBC%20Testimony%20Summary_0.pdf)  [2021 IBC/IEBC Public Hearing 09/30/2022](https://sbcc.wa.gov/events/2022-09/public-hearing-09302022)  [2021 IBC/IEBC Public Hearing 10/14/2022](https://sbcc.wa.gov/events/2022-10/public-hearing-10142022)  [2021 IEBC Written Testimony](https://sbcc.wa.gov/sites/default/files/2022-10/IEBC_Written_Testimony_Log_10-14-2022_1.pdf)  [2021 IEBC Preliminary Cost Benefit Analysis](https://www.sbcc.wa.gov/sites/default/files/2022-09/2021%20IEBC_Preliminary%20Cost%20Benefit%20Analysis_0.pdf)  [2021 IEBC Final Cost Benefit Analysis](https://www.sbcc.wa.gov/media/5706)  Council Meeting November 18, 2022 – <https://youtu.be/3HvjN23OVvY> | | | |
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**Changes from proposed (CR-102) to adopted (CR-103) version**

| **WAC** | **Section** | **Change** | **Rationale/Discussion** |
| --- | --- | --- | --- |
| WAC 51-50-480200 | IEBC 202 | Modifies the definitions for SUBSTANTIAL DAMAGE and SUBSTANTIAL IMPROVEMENT. | Both definitions are revised to provide an option to comply with the latest FEMA guidance or use of the Building Valuation Data. (See detailed rationale [here](https://sbcc.wa.gov/sites/default/files/2022-10/Chris%20Edmark_IEBC_21-GP2-029.pdf)). |
| WAC 51-50-480306 | IEBC 306.7.1 | Combines Option 1 and Option 2. | Two Options for modified language in Section 306.7.1 were initially proposed and filed with the CR-102. The Council voted to combine both options. |
| WAC 51-50-480401 | IEBC 401.4 | Modifies the language in Section 401.4 (deletes the phrase “or remaining foundation as approved by the code official) and adds a new exception. | The intent of the initial proposal (21-GP2-055) was to allow the reuse of existing foundations, where approved by the Code Official. This modification provides the specific language, so it is clear to the code user on the reuse of existing foundations. |
| WAC 51-50-480503 | IEBC 503.13 | The text is moved out of the exception into paragraph 2, section 2.1, and "where approved" is added to section 2.1. Adds sub-sections 2.1.1 and 2.1.2. | Clarifies the applicability of the proposal and overall improves it, it does not change its original intent. It reflects comments heard from the ICC committee during the April 2022 Committee Action Hearings in Rochester NY and includes another IEBC proposed change (EB68) that is anticipated to be incorporated in the 2024 IEBC. Identical changes are made in Section 805.4. |
| WAC 51-50-480805 | IEBC 805.4 | The text is moved out of the exception into paragraph 2, section 2.1, and "where approved" is added to section 2.1. Adds sub-sections 2.1.1 and 2.1.2. | Clarifies the applicability of the proposal and overall improves it, it does not change its original intent. It reflects comments heard from the ICC committee during the April 2022 Committee Action Hearings in Rochester NY and includes another IEBC proposal change (EB68) that is anticipated to be incorporated in the 2024 IEBC. Identical changes are made in Section 503.13. |
| WAC 51-50-481401 | IEBC 1401.2 | * Deletes references which no longer exists:   51-54 WAC, 51-57 WAC, 51-11WAC,  51-13WAC.   * Adds the correct references: 51-54A WAC,   51-11C WAC, 51-11R WAC. | The modification is intended to correct references to building codes that no longer exist. |