

rwaa

June 27, 2023

Stoyan Bumbalov, Managing Director
Washington State Building Code Council
Washington State Department of Enterprise Services
1500 Jefferson St SE
Olympia, WA 98501

RE: Adoption of the R-4 Group Occupancy Code

Dear Stoyan,

This letter is provided in support of the adoption of the R-4 Group Occupancy, as stipulated within the CR-102 notification.

Every day there are news stories about fentanyl overdoses, lack of behavioral health facilities, a crisis in delivery of mental health services, and in general, problems exasperated by the lack of inadequate treatment services available in the State of Washington.

There is a desperate need for more treatment facilities. However, in the State of Washington the current building stipulates that all treatment facilities be constructed the same, with no provision for the size or treatment services provided. This leads to smaller facilities being required to be designed to unnecessarily accommodate the needs of larger facilities. This adds significant expenses to the development of facilities.

The Washington State Building Code is adopted by all local jurisdictions and is based upon the International Building Code (IBC). The IBC establishes types of occupancy classifications for buildings based upon the use of the buildings, and the number of individuals in building. The higher the amount of life-safety risk there is associated with a type of use, the more stringent the life-safety code requirements are.

Most licensed residential treatment facilities in the State of Washington are for 16 individuals or less. This number is based upon Medicaid reimbursement requirements.

The IBC establishes three separate types of occupancy classifications for facilities that provide residential care and treatment services: R-3, R-4, and I-1. The classifications are based upon the number of individuals being served at the facility:

The R-3 Group Occupancy is for 5 or fewer individuals receiving care,
the R-4 Group Occupancy is for 6 to 16 individuals receiving care,
and the I-1 Group Occupancy is for the care of more than 16 individuals.

Each provides an appropriate environment for the supervised care and treatment of the individuals being served, based upon the total number of individuals being served.

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However as noted, the R-4 Group Occupancy is not currently adopted in Washington State.
Washington State is the only state in the county that does not adopt the R-4 Occupancy Group.

In not adopting the R-4 Group Occupancy, Washington State is missing the critical middle range category. The current default occupancy for facilities with more than six individuals receiving care is the I-1 Group Occupancy, which is an institutional occupancy more suitable for large facilities that provide care for large numbers of individuals who are physically or mentally compromised.

The I-1 institutional occupancy is simply not appropriate for 16-bed facilities. Building these smaller-sized facilities using the institutional code provisions creates a large amount of additional expense that is not justified for the number of individuals being served. These additional costly measures include added fire and smoke partitions, added life safety systems appropriate for larger institutional buildings, and enhanced mechanical and energy code requirements applicable to larger commercial buildings. It has been demonstrated that using the I-1 occupancy for 16-bed facilities instead of the R-4 occupancy results in more than 30% of additional unnecessary construction costs.

The R-4 Group Occupancy is a residential occupancy that provides an appropriately safe environment for the number of individuals being served.

We are therefore expressing our support for the adoption of the R-4 Group Occupancy code provisions stipulated.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Ron Wright', with a large, stylized flourish extending to the right.

Ron Wright, AIA
Principal