



STATE OF WASHINGTON
STATE BUILDING CODE COUNCIL

May 2018
Log No. _____

1. State Building Code to be Amended:

International Building Code
ICC ANSI A117.1 Accessibility Code
International Existing Building Code
International Residential Code
International Fire Code
Uniform Plumbing Code

International Mechanical Code
International Fuel Gas Code
NFPA 54 National Fuel Gas Code
NFPA 58 Liquefied Petroleum Gas Code
Wildland Urban Interface Code
For the Washington State Energy Code, please see
specialized [energy code forms](#)

Section(s): **IBC 3103.1, 3103.6.1**
(e.g.: Section: R403.2)

Title: **Temporary Structure Scope**
(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**
(Micah Chappell, chair; Jonathan Siu, technical consultant)

Title:

Date: **9/10/2024**

3. Designated Contact Person:

Name: **Jonathan Siu**
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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.

Clearly state if the proposal modifies an existing amendment or if a new amendment is needed. If the proposal modifies an **existing amendment**, show the modifications to the existing amendment by underlining all added language and striking through all deleted language. If a new amendment is needed, show the modifications to the **model code** by underlining all added language and striking through all deleted language.

Code(s) IBC Section(s) 3103.1

Enforceable code language must be used.

Amend section to read as follows:

3103.1 General. The provisions of Sections 3103.1 through 3103.8 shall apply to *structures* erected for a period of less than 180 days. Temporary *special event structures, tents, umbrella structures* and other membrane *structures* erected for a period of less than 180 days shall also comply with the *International Fire Code*. *Temporary structures* erected for a longer period of time ~~and public-occupancy temporary structures~~ shall comply with applicable sections of this code.

Exceptions:

1. *Public-occupancy temporary structures* complying with Section 3103.1.1 shall be permitted to remain in service for 180 days or more but not more than 1 year where *approved by the building official*.
2. ~~*Public-occupancy temporary structures* within the confines of an *existing structure* are not required to comply with Section 3103.6~~
2. *Tents used as temporary structures that cover an area of 400 square feet (37.16 m²) or less.*
3. *Tents used exclusively for recreational camping purposes.*

3103.6.1 Structural loads. ~~*Public-occupancy temporary*~~ *Temporary structures* shall be designed in accordance with Chapter 16, except as modified by Sections 3103.6.1.1 through 3103.6.1.6.

Exception: *Temporary structures erected within the confines of an enclosed existing structure need only be designed for dead and live loads in accordance with Chapter 16.*

- 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 amendment aligns the exceptions for temporary structures in the IBC with the exceptions in the IFC. It also cleans up a potential life safety issue regarding temporary structures erected within other buildings.

1. The change to Section 3103.1 deletes unnecessary text which could cause confusion. Public-occupancy temporary structures are included in temporary structures, so there is no need to list them separately. It is also possible that by listing them separately and using the “and,” code users

may be misled to think that public-occupancy temporary structures are not included in the definition of temporary structures.

2. As currently written, Section 3103.6 requires all temporary structures except public occupancy temporary structures to be designed for full loads. Section 3103.1, Exception 2 was written to exempt public occupancy temporary structures from being designed for environmental loads (snow, wind, seismic, etc.) if they were erected within another building. For example, a house constructed within a convention center for a home and garden show would be exempt, since it is protected by the convention center structure. However, there are buildings or portions of buildings that are not enclosed, where a public occupancy temporary structure would be exposed to snow/ice/wind loads.
 - a. The amendment to Section 3103.1 moves Exception 2 to Section 3103.6.1. Based on the other revisions (below), this is a location where it is less likely to be missed by designers and regulators. This will also clarify that the intent is to only exempt design for environmental loads, and not exempt these structures from other fire/life safety requirements in the code, such as means of egress or fire propagation index.
 - b. The first revision to Section 3103.6.1 allows all temporary structures to utilize the load reductions in the subsequent subsections. Protecting the public in a public-occupancy temporary structure is generally viewed as more important than protecting the contents in other temporary structures. It follows that if a “more important” structure is allowed to be designed to lower loads, a “less important” structure should also be allowed to use those lower loads.
 - c. The exception to Section 3103.6.1 will expand the scope of the former 3103.1 Exception 2 to apply to all temporary structures, not just public-occupancy temporary structures. All temporary structures would be equally protected by the existing structure.
 - d. A second change in Section 3103.6.1, Exception will limit the scope of the exception to those temporary structures that are erected inside of an enclosed building, where they are protected from the environmental loads.
 - e. The third change in Section 3103.6.1, Exception clarifies that while these temporary structures don’t have to be designed for environmental loads (snow, wind, etc.), they still have to support dead and live loads per Chapter 16.
3. New Exceptions 2 and 3 to Section 3103.1 are based on exceptions in IFC Section 105.5.51 for operational permits and therefore, construction permits per IFC Section 105.6.25. These exceptions will improve consistency between the two codes.

Currently, the IBC only exempts temporary structures up to 120 square feet in area from permits (IBC Section 3103.1.3). The implication is that all other structures, including temporary structures, must obtain building permits and, for the purposes of this item, must comply with the structural loading provisions in IBC Chapter 16 and Section 3103.6.

- a. Small temporary tents (Exception 3) should not pose a hazard to the public and shouldn’t need to be designed for structural loads. 400 square feet would translate to a concentrated assembly occupant load of 57, using an occupant load factor of 7 square feet per person. If and occupant load factor of 15 is used (tables and chairs), 400 square feet translates to 27 occupants. The 400 square feet aligns with the charging language in IFC Section 105.5.51.
- b. The code does not exempt recreational camping tents but requiring them to comply with the code would be over-regulation and it is doubtful that anyone actually enforces the code for them. Exception 4 recognizes standard practice.

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: No

If no, state reason:

Although this amendment technically reduces regulation and therefore costs compared to the 2024 model code, actual practice or application of the code should not change.

If yes, provide economic impact, costs and benefits as noted below in items a – f.

- a. **Life Cycle Cost.** Use the OFM Life Cycle Cost [Analysis tool](#) to estimate the life cycle cost of the proposal using one or more typical examples. Reference these [Instructions](#); use these [Inputs](#). Webinars on the tool can be found [Here](#) and [Here](#)). If the tool is used, submit a copy of the excel file with your proposal submission. If preferred, you may submit an alternate life cycle cost analysis.
- b. **Construction Cost.** Provide your best estimate of the construction cost (or cost savings) of your code change proposal.

\$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
- c. **Code Enforcement.** List any code enforcement time for additional plan review or inspections that your proposal will require, in hours per permit application:
- d. **Small Business Impact.** Describe economic impacts to small businesses:
- e. **Housing Affordability.** Describe economic impacts on housing affordability:
- f. **Other.** Describe other qualitative cost and benefits to owners, to occupants, to the public, to the environment, and to other stakeholders that have not yet been discussed:

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.