



Building Industry Association of Washington  
300 Deschutes Way SW, Ste. 300  
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September 2, 2025

Chair Roger Heeringa  
BFRW Committee  
State Building Code Council  
PO Box 41449  
Olympia, WA 98504

RE: WSAFM Emergency Petition for IFC 504

Dear Chair Heeringa and members of the committee,

We write to provide feedback for the committee to consider as they work on the Washington State Association of Fire Marshal's (WSAFM) emergency petition for IFC 504. The Building Industry Association of Washington (BIAW) is a non-profit trade association that represents more than 8,300 member companies, employing approximately 265,000 people, within the residential construction industry in Washington state.

Our members are dedicated to providing safe and affordable market-based housing to Washingtonians. We appreciate the mission of building codes to ensure life and fire safety. However, we also believe it is important to ensure building codes do not create negative consequences that hinder the ability to build affordable market-based housing that Washingtonians need. Especially those that would undermine recent positive changes made by the state legislature to expand the use of Accessory Dwelling Units (ADUs) and lot splitting.

To assist the committee in their work, BIAW held a town hall with our members who are concerned with code development. The emergency petition and topic were discussed, and the following concerns were raised:

1. In regard to the need for more room for emergency stretchers and access, the current minimum width requirement for egress doors, hallways, and stairways are 3 feet or less and have generally been consistent for decades. These have been fine not only in Washington state, but around the country. Why is 3 feet sufficient to navigate a stretcher inside of building, but once outside 5 feet is needed?



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2. The proposed petition may in effect override local ordinances for zoning, setbacks, and other requirements that currently dictate the minimum allowable distance between structures, buildings, and property lines.
3. The IRC already has requirements for minimum fire separation distance in Table R302.1(1) Exterior Walls. Which if walls have a 1-hour fire-resistance the minimum is 0 feet. The new section should not effectively override this.
4. The 2023 changes to local ADU requirements in [HB 1337](#), only apply to counties fully planning under the Growth Management Act and only to Urban Growth Areas within those counties. While ADU construction has expanded, these are occurring in concentrated areas of the state. Section 504.1 currently allows local fire officials to require access walkways. Between 504.1 and local zoning and setback requirements, these should be sufficient for local jurisdictions to address emergency access.
  - a. Subsidiary to this point, the statewide changes to ADU requirements are in urban areas but if the emergency petition is adopted it will affect rural buildings as well.
5. Because of the lasting impact this petition could have on long-standing requirements, our members felt this would be better suited to the regular code cycle and not an emergency adoption.

Ultimately our members expressed the sentiment that “if it’s not broke, don’t fix it”. BIAW is strongly opposed to the adoption of the emergency petition as it currently stands. Our members do not feel it is necessary for an emergency statewide amendment.

If the committee chooses to move forward with the adoption of the emergency petition, we recommend using the attached code language as the basis for the committee’s work.

**Key:**

~~Stricken from original emergency petition.~~

[Proposed new language.](#)

Current code language for reference (no change).

**504.1 Required access.**



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Exterior doors and openings required by this code or the International Building Code shall be maintained readily accessible for emergency access by the fire department. An *approved* access walkway leading from fire apparatus access roads to exterior openings shall be provided where required by the *fire code official*.

New Section – 504.1.1

**504.1.1 ~~Width~~ Required access for residential dwelling units.** ~~For jurisdictions that do not specify a minimum width, a minimum of 5 feet clear width is required for access to building entrances that~~ New dwelling units built under the International Residential Code shall be provided with an *approved* access walkway leading from fire apparatus access roads to the exterior egress door required by R311.1, where the exterior egress door does not face the street, alley, a public way or parking lot. The access walkway shall have a minimum 4-foot clear width.

**Exceptions:**

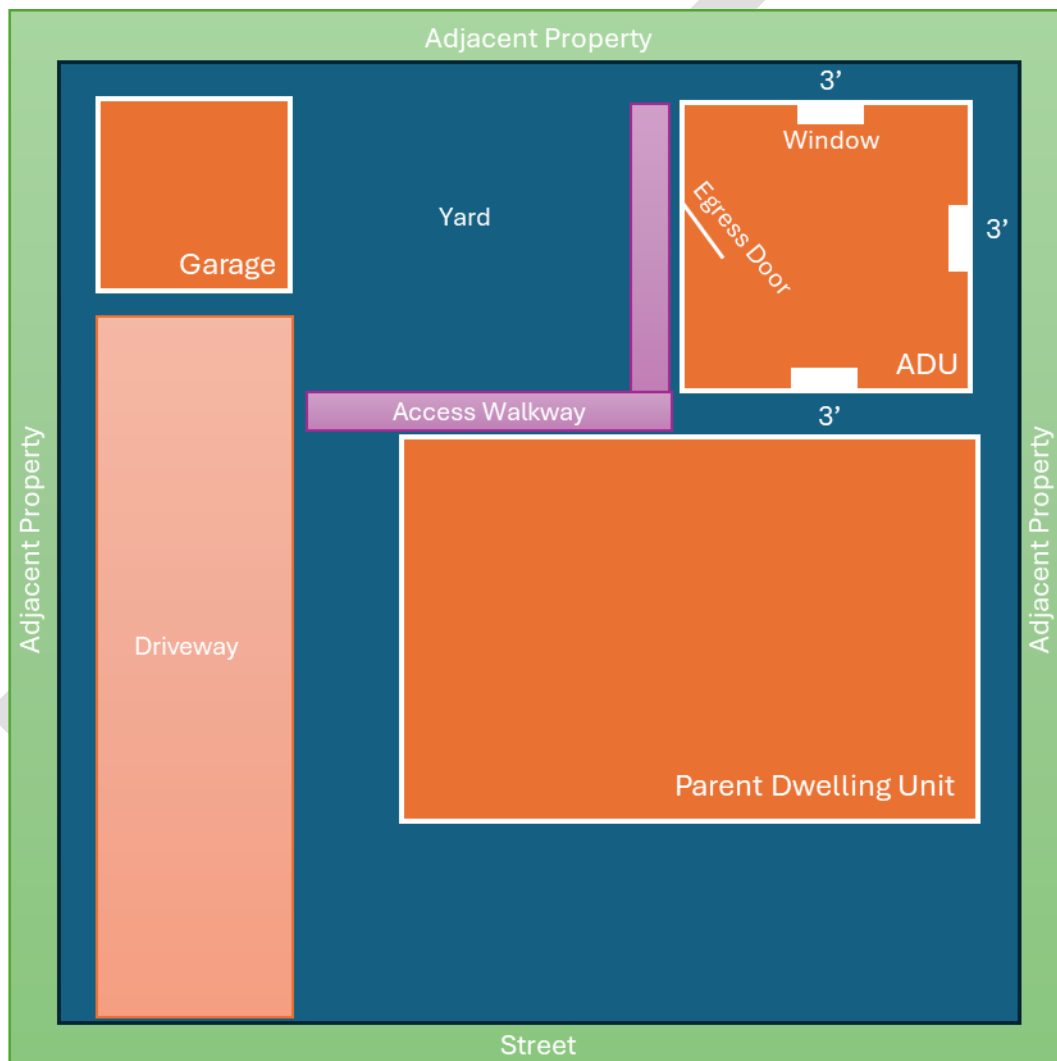
- ~~1. Buildings provided with an approved automatic fire sprinkler system can be reduced to a 4 foot clear width.~~
2. The fire code official or local authority having jurisdiction does not require an *approved* access walkway or requires a minimum clear width less than 4 feet.
3. Shared access ~~path~~walkways between buildings on adjacent lots with a minimum 4-foot clear width shall meet the requirements of this section.
4. Where the building is one story above grade plane.

**Description of revision:**

- Changing the title to better match the section.
- Specifying that this new section only applies to new dwelling units built under the IRC. The original petition language could be applied to all structures both commercial and residential.
- Changing the new section to clarify it only applies to minimum egress door as required by the IRC. This will allow the other sides of a dwelling unit to be closer to adjacent property lines or other buildings.
- Simplifying the language to use public way (defined term) which should include streets and alleys. Public way is used in R311 as well.
- Removing the exception for different minimum requirements if buildings have fire sprinklers and using that minimum for the primary requirement.
- Adding a new exception to maintain the ability for local fire code officials to not require an access walkway or to use a minimum less than 4 feet.

- Clarifying the shared access walkway exception so it meets the intent of the minimum requirements.
- Adding an exception for one-story buildings as they shouldn't need a ladder to reach a second story window.

Below is a rough diagram to visualize a potential instance of where this section may apply.



We are grateful the State Building Code Council sent this to the committee for further consideration and review. Likewise, we appreciate the committee taking the time to hear



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the concerns of the Washington builders and residential construction industry professionals.

Sincerely,

Patrick Hanks  
Codes & Policy Manager  
Building Industry Association of Washington

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