

Date: 11 September 2025

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

RE: WASFM Emergency petition for Proposed New IFC Section 504.1.1 – Minimum 5-Foot Sidewalk Width.

Dear Committee Members,

We are writing in rebuttal to the proposed new Section 504.1.1, added to the 2024 IFC, which would establish a minimum 5-foot clear width for access pathways to building entrances not facing the street, alley, or parking lot. While we recognize the importance of ensuring safe emergency access for first responders, this amendment presents significant challenges in its application.

1. Developers Would Be Unaware Until Pre-Permit Stage

The proposed requirement is not currently reflected in zoning, subdivision, or planning standards. Developers and designers would likely advance their projects through preliminary site planning and entitlement processes without knowledge of the 5-foot sidewalk mandate. Only at the building permit stage would they be informed of this requirement. At that point, site layouts may already be locked in, leading to costly redesigns, delays, and potential conflicts with approved land use approvals.

2. Plan Revisions and Project Delays

Requiring revisions at the post platting stage undermines efficiency and predictability in the development process. Developers would be forced to alter building footprints, landscaping, fencing, or drainage plans to meet the 5-foot width. This creates ripple effects through engineering, site utility design, and even stormwater management plans—causing delays that could affect housing delivery timelines.

3. Housing Affordability Concerns

In today's environment, where housing affordability is already under pressure, introducing new mid-process requirements increases costs. Even seemingly small dimensional changes can

translate into substantial land consumption and construction adjustments, which ultimately increase costs for homebuyers and renters.

4. Alternative Approaches Already Exist

The IFC (Section 504.1) already requires that access walkways be provided where necessary, with the fire code official having authority to determine adequacy. Local conditions can therefore be addressed through administrative authority without imposing a one-size-fits-all statewide amendment that disrupts the development process.

Conclusion

We share the commitment to responder access and public safety, but respectfully oppose the proposed 5-foot sidewalk width amendment as drafted. By introducing this requirement only at the building permit stage, developers are left unaware until late in the process, forcing costly redesigns and undermining housing efficiency and affordability. A more effective approach would be to coordinate such requirements through the planning and subdivision process, where site design decisions are first made and can be adjusted without costly redesigns.

Respectfully submitted,

Dermott Murphy, Building Official,

Spencer Gardner, Director of Planning

Steve MacDonald, Director of Community and Economic Development Division

CITY OF SPOKANE