



STATE OF WASHINGTON
STATE BUILDING CODE COUNCIL

May 2018
Log No. _____

1. State Building Code to be Amended:

- | | |
|---|---|
| <input checked="" type="checkbox"/> International Building Code | <input type="checkbox"/> International Mechanical Code |
| <input type="checkbox"/> ICC ANSI A117.1 Accessibility Code | <input type="checkbox"/> International Fuel Gas Code |
| <input type="checkbox"/> International Existing Building Code | <input type="checkbox"/> NFPA 54 National Fuel Gas Code |
| <input type="checkbox"/> International Residential Code | <input type="checkbox"/> NFPA 58 Liquefied Petroleum Gas Code |
| <input type="checkbox"/> International Fire Code | <input type="checkbox"/> Wildland Urban Interface Code |
| <input type="checkbox"/> Uniform Plumbing Code | |

For the Washington State Energy Code, please see specialized [energy code forms](#)

Section(s): 1208.3, 1208.4, 1208.5
(e.g.: Section: R403.2)

Title: Interior Space Dimensions
(e.g: Footings for wood foundations)

2. Proponent Name (Specific local government, organization or individual):

Proponent: David Neiman
Title: Partner, Neiman Taber Architects
Date: 4/18/2025

3. Designated Contact Person:

Name: David Neiman
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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) 1208.3, 1208.4, 1208.5

Enforceable code language must be used.

Amend section to read as follows:

1208.3 Dwelling Unit Size

Dwelling units shall have a minimum of 70 ~~190~~ square feet (6.50 ~~17.7~~ m²) of habitable space.

1208.4 Room Area

Every dwelling unit shall have not less than one room that shall have not less than 70 ~~120~~ square feet (6.5 ~~11.2~~ m²) of net floor area. Sleeping units and other habitable rooms of a dwelling unit shall have a net floor area of not less than 70 square feet (6.5 m²).

EXCEPTION: Kitchens are not required to be of a minimum floor area.

1208.5 ~~Efficiency~~ Dwelling Units

~~Efficiency dwelling units shall conform to the requirements of the code except as modified herein:~~

The unit's habitable space shall comply with Sections 1208.1 through 1208.4.

The unit shall be provided with a separate closet for general storage, and enclosed cabinets for food and utensil storage.

For other than accessible, Type A and Type B dwelling units, the unit shall be provided with a kitchen sink with hot and cold water, ~~cooking appliance with~~ an oven and cooktop, freezer, and refrigerator, each having a clear working space of not less than 30 inches (762 mm) in front. Light and ventilation conforming to this code shall be provided. The kitchen countertop shall provide not less than 6 square feet of work area.

The unit shall be provided with a separate bathroom containing a water closet, lavatory, and bathtub or shower.

The kitchen floor shall be a sealed, water resistant, cleanable surface.

Wall surfaces adjacent to the range shall be covered with an impervious surface.

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.

The Uniform Building Code, the predecessor to the IBC we use today, was first published in 1927. About two decades later in 1946, the UBC introduced minimum room sizes, [including an 80-square-foot living room](#). In 1964 the requirement [grew to 90 square feet](#). In 1973, the requirement suddenly [more than doubled to 220 square feet](#). The square footage minimum we use today does not stem from a long tradition nor any particular health or safety principle. It arrived in the early 1970s, reflecting the urban politics of that time, when most American cities were in decline, losing their population, tax base, and struggling with high crimes rates. In reaction, many cities enacted policies aimed at getting rid of small, low-cost housing types where poor people lived, and the UBC responded in kind.

The current International Building Code Section 1208 outlines minimum interior space dimensions for dwelling units and efficiency dwelling units. The minimum dimensional standards in Section 1208 are based on traditions and assumptions that have little to do with protecting life, health, or safety and have little empirical basis. The National Healthy Housing Standard (NHHS) was developed to bridge the gap between the housing and public health sectors, offering an evidence-based standard of care for those working to improve housing conditions. This proposal draws from the dimensional standards and functional requirements outlined in the 2014 NHHS to revise the provisions of IBC Chapter 12.

The proposed changes would allow builders to construct smaller, more efficient, and less expensive housing options, while ensuring that the minimum size requirements have an empirical basis. Specifically, the proposal adopts the NHHS recommendation of a 70-square-foot minimum habitable area for efficiency units—smaller than what is allowed under the current code—to support the development of housing that is more affordable and more plentiful than would otherwise be possible under today’s standards.

The NHHS also identifies areas where the existing IBC may lack important provisions that ensure new housing is nominally usable for basic domestic tasks. As a result, new requirements have been proposed to raise the minimum standards for a kitchen design to require storage areas, work surfaces, cleanable surfaces, and a more complete suite of appliances.

This proposal does not modify the required standards for Type A or Type B dwelling units.

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:** ☒ Yes ☐ No

If no, state reason:

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.

The proposal anticipates no life cycle cost impacts.

- b. **Construction Cost.** Provide your best estimate of the construction cost (or cost savings) of your code change proposal.

\$100/square foot additional cost

(For residential projects, also provide \$68,000/ dwelling unit cost savings)

Show calculations here, and list sources for costs/savings, or attach backup data pages.

Building Cost Changes Relative to Apartment Size						
	Avg Unit Size	Cost per Unit	Cost increase	Cost per unit decrease	Seattle Monthly Rent	Rent decrease
IBC Compliant Small Units	386	201,002	--	--	1,603	--
300sf Units	300	169,625	8%	16%	1,343	16%
250sf units	250	151,196	16%	25%	1,194	26%
200sf units	200	133,028	27%	34%	1,045	35%
Source: STS Construction. Actual costs to build new multifamily in 2025. Keystone Apartments - 9201 Delridge Way S - Seattle WA						

The attached spreadsheet shows the costs for a recently constructed apartment building in Seattle. The units in this building average approximately 386 square feet, which is a typical result for a new development attempting to build as small as is allowed under the IBC. The spreadsheet includes a schedule of values that breaks down construction costs by trade. These costs are then categorized into those that scale with overall project size (e.g., general conditions, concrete, framing) and those that increase in proportion to the number of dwelling units (e.g., plumbing, cabinets, countertops).

This analysis yielded a baseline construction cost of \$257 per square foot, plus a \$59,000 per-unit premium. These figures are used to evaluate how changes in unit size and unit count affect both total project cost and per-unit cost.

As the unit count increases, the overall cost of the building and cost per square foot rise, but the cost per dwelling unit decreases. A 70-square-foot living room size allows for studios as small as 200 square feet. These units will cost roughly one-third less to build than conventional units. When we compare this with market rent data for studios, SEDUs, and congregate units in Seattle, we see a similar trend: rent levels align closely with the cost reductions predicted by this model.

- c. **Code Enforcement.** List any code enforcement time for additional plan review or inspections that your proposal will require, in hours per permit application:

The proposal anticipates no impacts for code enforcement or permit application reviews.

d. **Small Business Impact.** Describe economic impacts to small businesses:

The proposal anticipates no economic impacts to small businesses.

e. **Housing Affordability.** Describe economic impacts on housing affordability:

In Seattle, a typical new studio apartment rents for about \$1600/mo. A Small Efficiency Dwelling Unit (SEDU) rents for about \$1340/mo. Congregate micro-housing rents for about \$1045/mo. There is a clear relationship between housing affordability and unit size. If adopted, this proposal will allow for studio apartments of around 200 square feet, which would be expected to rent at prices comparable to similarly sized congregate housing.

Studio Apartment Rent vs. Size			
Unit Type	Average Size (SF)	Monthly Rent	Rent/SF
Congregate Micro-Housing	206	\$1,045	\$5.07
Small Efficiency Dwelling Unit	305	\$1,343	\$4.40
IBC Compliant Studio Apartment	400	\$1,603	\$4.01
Source: 2024 Micro-Housing Study - Kidder Matthews. See Page 7			

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:

In addition to being an essential tool for addressing affordability and housing supply, small-unit housing delivers a wide range of qualitative benefits—to owners, to occupants, to the broader public, and to the environment.

For Owners

Smaller units allow for more homes to be built on the same parcel of land, which spreads out the cost of land, utilities, and infrastructure. That efficiency makes projects more financially feasible, especially on infill sites where land is scarce or irregular. By reducing unit size, owners can offer a lower price point without lowering overall quality. On a civic level, micro-housing gives mission-driven developers and small builders an opportunity to do meaningful work—delivering attainable housing in places where it’s desperately needed.

For Occupants

Small-unit housing opens the door to living in walkable, well-connected neighborhoods that would otherwise be financially out of reach. For many people, especially students, service workers, single adults, and seniors—living small is a better fit than living far away. Smaller units also mean lower utility bills, less maintenance, and fewer material possessions to manage. These homes often come with shared amenities that build community and social connection, which is especially valuable for people living alone. In short, small-unit housing provides a dignified, efficient, and urban lifestyle for people who might otherwise be pushed to the margins.

For the Public

Dense, affordable, plentiful housing supports the vitality of neighborhoods. It brings more people closer to transit, shops, and services, which boosts foot traffic, supports local businesses, and makes better use of public infrastructure. It helps counteract displacement pressures that come with exclusionary zoning and rising land

values. When more people can live near their jobs, schools, and families, it reduces the strain on transportation systems and contributes to more equitable and integrated communities.

For the Environment

The environmental impact of a home scales with its size. Smaller units use less energy to heat, cool, and light. They take fewer materials to build, and generate less waste when eventually remodeled or replaced. When paired with infill development and good transit access, small units significantly reduce per capita carbon emissions. Building small is one of the most straightforward and scalable climate strategies we have in the built environment.

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.

See also the following attachments:

- STS Construction - Cost Data for Keystone Apts.xlsx. The source of our cost analysis data.
- 2024 Kidder Matthews Micro Housing Study.pdf. The source of our market rent data. See page 7.
- 2014 National Healthy Housing Standard.pdf. The standard referenced in HB 2071. See pages 7-8