



# IDAHO ASSOCIATION OF BUILDING OFFICIALS

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July 2, 2009

Kelly Pearce, Administrator, Idaho Division of Building Safety  
Edward Wagner, Chairman, Idaho Building Code Board

RE: IDABO Position of proposed code amendments

Dear Sirs;

Subsequent to the Building Code Board's meeting on June 10 of this year, the IDABO Board has met and has formally taken a position on the proposed submitted amendments to the IBC and IRC. We generally support adopting the codes as published, however you will note we do support some state amendments.

The IDABO positions are as follows:

## Comment 01 – Snake River Chapter of ICC

No formal position – We acknowledge this proposal has merit, however Flood Plain Ordinances are controlled by local ordinance under FEMA's criteria and are often administered by others than the Building Official which would make this change non-applicable

## Comment 02 – Building Contractors Association of Southwest Idaho

These are a series of changes from the National Association of Home Builders submitted by the contractors' association.

- IBC Section 1005.1 – Table 1005.1 – Oppose

This reduction of exiting width has little or no impact on residential occupancies but would have a large impact on high occupancy buildings such as Assembly and Educational occupancies. Further, the reduction is for buildings that are fully sprinkled, and there are many emergencies and panic situations that require the need of exiting other than fire.

- IBC Section 1013.1 – Oppose

Removing this wording and referring to grade in some incidents will make it more restrictive and it also will not deal with some other conditions such as severe changes in elevation near the deck or applicable floor surface.

- IBC Section 406.1.4 – Oppose

This is a provision that had been in the UBC for many code cycles and has been proven to be a valuable component in the garage fire-resistive construction assembly. In addition, this only applies to the situations where the residential use is constructed under the IBC and not the IRC.

- IBC Section 1704.1 – Oppose

Generally special inspections are not required for structures constructed in accordance with conventional construction provisions. However, this prohibition could run in conflict with other aspects of when special inspections are required such as spray on fire-proofing and geotechnical due to special soils or site characteristics.

- IRC Section R301.2.1.1 – Oppose

No part of Idaho is within a Hurricane-Prone Region, therefore the proposal is completely irrelevant.

- IRC Table R302.1 – Support

This proposal basically takes the setback requirement from property lines back to the UBC standards that worked for us for many decades. Generally this is controlled by local zoning ordinances that generally are more restrictive but might allow these situations for higher density with other special considerations.

- IRC Section R311.7.4.1 and R311.7.2 – Oppose

This proposal is actually less restrictive than the former UBC requirements for rise and run of stairs and the current requirement is slightly less restrictive than the former CABO One & Two Dwelling Code. It has been determined that this stair geometry can be very dangerous and steeper stairs shouldn't be considered strictly to save floor area. On the national level a proposal to change the rise and run to 7 and 11 was narrowly defeated in an earlier code cycle, so the national trend is to decrease not increase the rise of stair geometry.

- IRC Section R313 – Oppose

IDABO is opposed to this proposal primarily because we feel that our submittal and that of Carol Alexander are preferred. Carol's proposal deals with the special issue of townhouses and the IDABO submittal eliminates the requirement for sprinkling one and two family dwellings. Further this proposal deletes the reference for design and installation standards that would be needed for a system that is installed on a voluntary basis.

- IRC Section R403.1.6 – Oppose

This proposal was withdrawn by the proponent

- IRC Section R612.2 – Oppose

The IDABO Board was actually divided on this proposal, but in consideration that it is not new requirement, it has been in effect for three years without creating too big of a problem, we voted to oppose the proposal in favor of the general concept of adopting the codes as published.

- IRC Sections R903.5 – Oppose

This proposal was withdrawn by the proponent because there are no applicable hail exposure zones in Idaho.

- IRC Sections M1502.4.4.1, G2415.4 and F2418.2 – Oppose

These are HVAC and fuel gas issues that are beyond the scope of authority of the Building Board.

- IECC Table 402.1.1, Table 402.1.3 and Section 402.2.2 – Oppose

These proposals would all lessen the code and energy conservation. It could put the State's certification with DOE in question with many wide reaching ramifications.

#### Comment 03 IRC R302.2, R313.1 & R313.1.1 – Carol Alexander, City of Moscow-Support

At this point in time IDABO could support sprinklers in townhouses. However, if we are to amend sprinklers out of townhouses we need to restore the requirement for a two hour fire rated assembly between the units that was reduced to one hour when the code requirement for sprinklers was added to the townhouses. This proposal would basically give the builder/owner the option of the two hour construction between units or install sprinklers.

#### Comment 04 IBC 903.2.8– Idaho Fire Chiefs Association-Support

IDABO supports the Fire Chiefs proposal to adopt the published codes with the exception of the one and two family dwellings fire sprinkler exemption that was generated by recent HB218.

#### Comment 05 – Jimmie Brown, City of Nampa--- Acknowledge

IDABO acknowledges the brief time frame to review these proposals and the difficulty it has created, but further recognizes that process could now be started much sooner. It would be IDABO's proposal to start the process at the earliest possible date in future code cycles.

#### Comment 06 – duplication of Comment 03

Comment 07 – IRC R313.2 Idaho Association of Building Officials – Support

IDABO submitted this proposal to be consistent with HB218 and its prohibition to sprinkle one and two family dwellings.

Comment 08 – Idaho Building Contractors Association – Oppose

This proposal was not properly submitted. Three and four plexes are governed under the IBC and not the IRC. Further, a large portion of Idaho jurisdictions have adopted the 2006 codes as published which set the threshold for residential sprinklers at three and more and this would be further erosion of the local authority.

These positions generally correspond with the testimony presented by myself and other code officials at the June 10<sup>th</sup> hearings. We will be represented at the next hearing in August and will be glad answer any questions or address additional issues. Would you distribute this position paper to the Board members, any applicable members of your staff and any other interested parties? We appreciate your time and consideration on these issues

Sincerely,

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IDABO Board of Directors

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