

From: Andrea Kovich <andreak@studiopacificaseattle.com>
Sent: Tuesday, July 9, 2019 12:00 PM
To: DES SBCC <sbcc@des.wa.gov>
Cc: Braaksma, Krista (DES) <krista.braaksma@des.wa.gov>
Subject: Proposed Bldg. code change for Type A units

July 9, 2019

Washington State Building Code Council
1500 Jefferson Street SE
Olympia, WA 98501

Via: sbcc@des.wa.gov, krista.braaksma@des.wa.gov

To Whom it May Concern:

I'm writing this email to strongly oppose proposed building code changes that would reduce the minimum percentage of Type A accessible dwelling units in multi-family housing projects built in WA state. The proposed change I'm referring to is specifically the proposed amendments to WAC 51-50-1107 related to IBC 1107.6 and 1107.6.2.2.1. Those changes will adversely affect our citizens, especially the disability community.

Section 1107.6 – Dwelling units and sleeping units - WAC 51-50-1107 strikes language that states “Type A units and Type B units shall be provided in Group R Occupancies in accordance with Sections 1107.6.1 through 1107.6.4. Accessible and Type A units **shall be apportioned among efficiency dwelling units, single bedroom units and multiple bedroom units, in proportion to the numbers of such units in the building.**” It's imperative this language remains in the 2018 IBC code so that people who need wheelchair friendly housing have the same choices as non-disabled renters.

The **2015 IBC, 1107.6.2.2.1 Type A units**, states, “In Group R-2 occupancies containing more than 10 *dwelling units* or *sleeping units*, at least 5 percent, but not less than one, of the units shall be a *Type A unit*.” The **2018 IBC, 1107.3.2.2.1 type A units**, as proposed, states, “In Group R-2 occupancies containing more than 20 *dwelling units* or *sleeping units*, at least 2 percent, but not less than one, of the units shall be a *Type A unit*.” It is my understanding that the intent of this change was to change the number of “containing more than” units from 10 to 20 and that the percentage of type A units was to remain unchanged. This is not a small oversight and I want to bring it to your attention so I can ensure that it will be corrected. We request that the proposed language for **2018 IBC, 1107.3.2.2.1 type A units** be “In Group R-2 occupancies containing

more than 20 *dwelling units* or *sleeping units*, at least 5 percent, but not less than one, of the units shall be a *Type A unit*.”

The severity of the negative impact of these errors would be devastating and a huge step backward for the citizens of Washington. Washington State has been a leader in providing Type A/wheelchair friendly multi-family housing since 1978 and we expect it to remain so. Even at 5 percent, Type A/wheelchair friendly housing is extremely hard to find so any changes to the building code should increase the percentage, not decrease it. Considering the statistics regarding the increases in the aging population in the U.S., it would not be a wise and forward-looking decision to decrease housing that could potentially help meet this need.

I strongly encourage you to correct these errors before these code sections are adopted.

Sincerely,

Andrea Kovich

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