

**From:** Stacy White <stacyw@ankrommoisan.com>  
**Sent:** Thursday, July 11, 2019 1:25 PM  
**To:** DES SBCC <sbcc@des.wa.gov>  
**Cc:** Braaksma, Krista (DES) <krista.braaksma@des.wa.gov>  
**Subject:** Proposed Building Code changes affecting Accessibility

To Whom it May Concern:

It has recently been brought to my attention that proposed amendments to WAC 51-50-1107 related to IBC 1107.6 and 1107.6.2.2.1, will change language relating to multi-family dwellings and 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 impact of these errors is catastrophic 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.

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

Sincerely,

**Stacy White** LEED AP ID+C, NCIDQ, CDT  
SENIOR ASSOCIATE / INTERIOR DESIGNER  
D) +1 (206) 876 3058

**Ankrom Moisan Architects, Inc.**  
**ARCHITECTURE INTERIORS URBAN DESIGN BRAND**  
1505 5th Ave. Suite 300 / Seattle, WA 98101  
Offices In Portland / Seattle / San Francisco

ankrommoisan.com