



October 20, 2022

State Building Code Council

Attn: Chair Tony Doan & SBCC Members

RE: 2021 ICC Code Implementation

Honorable members of the State Building Code Council:

It has come to our attention that there are efforts being made to extend the implementation date of the adoption of the Washington State amended 2021 Buildings Codes past the July 1, 2023 date.

The Washington State Association of Fire Marshals (WSAFM) does not support this effort.

The 2021 ICC codes have been through a thorough process for amendments and revisions. Public hearings have been held and the Council is on-track to adopt the 2021 under the schedule that it proposed at the start of this Code cycle.

It is our understanding that a delay request is being made to extend the July 1, 2023 implementation date in order to facilitate the ability of getting publications available to include the Washington State amendments into the ICC codes as a separate publication. This is not an adequate reason to consider the delay of the code adoption.

During prior testimony, it was indicated that the publications was a better method to maintain the code changes than the traditionally used insert pages. It is more likely that revisions to the publications would be costly for those jurisdictions that have limited resources and cannot afford the electronic copies as budgets did not include the expense. A significant number of jurisdictions do not have the financing to maintain an electronic version of code. The insert pages are still a viable method to communicate the changes from the State amendments.

A delay in adoption has other impacts including building designs are currently anticipating the new code being in place which would result in a burden to the design industry to have the code implementation date delayed. WSAFM is also planning on conducting 2021 Fire Code updates during the first quarter of 2023 and delaying the adoption would require us to reschedule that effort. A delay in adopting the 2021 Codes for Washington State will also put us further behind the national Code process, of which we provide integral service and efforts to develop.

WSAFM is aware that the Building Code Council is not obligated to provide any documentation of the code changes other than the resulting WAC additions and changes. Our members have benefited from the development of the insert pages from prior code versions and we have heard that the Council can produce those prior to the original scheduled date. We support and encourage that effort.

We respectfully request that the code adoption date remain as it was originally published.

Sincerely,

A handwritten signature in black ink, appearing to read "David F. Kokot". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

David F. Kokot, P.E.

President

Washington State Association of Fire Marshals