

October 14, 2022

Tony Doan  
Washington State Building Code Council Chair  
1500 Jefferson Street SE  
PO Box 21499  
Olympia, WA 98504

Dear Tony,

I am submitting this public comment on behalf of the Washington Association Building Official Technical Code Committee concerning 21-GP2-043R Common Accessory Spaces for two-family dwellings. Since submitting the original proposal to the WSBCC, WABO submitted a similar proposal to ICC for inclusion in the 2024 IRC. During the ICC process we received feedback that we would like to see added to the original WABO code proposal that was submitted to the WSBCC.

Below you will find the changes, in strike out and underline form, that we request be made to the language found in the most recent draft of the CR102 document. The reasons for these changes are as follows:

- The word "common" is eliminated throughout the proposal and replaced with an easily understood, plain language substitute, "shared".
- Language is added to clarify that the shared accessory room must be separated from each individual dwelling unit that shares the room.
- The last sentence of the proposed R302.3.5 is eliminated because it isn't needed and is confusing.
- The phrase "and wall" is eliminated in the third row of the table as it duplicates the requirement in the second row of the table for separation from the dwelling units and attics.
- The last row of TABLE R302.3.2 is being eliminated because the information, originally taken from the garage separation provisions, isn't relevant where the shared accessory room is between the two units which are themselves within the two-family dwelling.
- In R302.3.5.1 we are refining the terminology for fire doors from "fire rated 20-minute door" to "fire door assembly with a 20-minute fire protection rating".
- Two additional sections are added to address penetration issues.

Designers are beginning to incorporate shared accessory rooms such as laundry facilities and storage rooms that are connected to both dwelling units in their design for two-family dwellings. The IRC is currently silent on such rooms, but due to potential storage hazards and the fossil fuel supplied to washer/dryers and other appliances, clear direction is needed to protect the dwelling units from a shared accessory space. The proposal treats these shared rooms in the same way that the separation of shared garages from dwelling units is handled in the code. As a result, much of the proposed language draws from the dwelling-garage provisions of the code.

**R302.3.5 Shared accessory rooms or areas.** Shared accessory rooms shall be separated from each individual dwelling unit in accordance with by Table R302.3.5. Openings between the in a shared accessory room and dwelling unit shall comply with Section R302.3.5.1. Attachment of gypsum board shall comply with Table R702.3.5. ~~Shared accessory rooms or spaces shall not include habitable space.~~

**TABLE R302.3.5 DWELLING-SHARED ACCESSORY ROOM SEPARATION**

| SEPARATION   | MATERIAL   |
|--|--|
| From the dwelling units and attics.  | Not less than 1/2-inch gypsum board or equivalent applied to the accessory room side wall.   |
| From habitable rooms above or below the shared accessory room.                                       | Not less than 5/8-inch Type X gypsum board or equivalent.  |
| Structures supporting floor/ceiling and wall assemblies used for separation required by this section | Not less than 1/2-inch gypsum board or equivalent  |
| <del>Shared accessory rooms located less than 3 feet from a dwelling unit on the same lot.</del>     | <del>Not less than 1/2-inch gypsum board or equivalent applied to the interior side of exterior walls that are within this area.</del> |

**Commented [B5(1):** Can't separate the attic with gypsum board applied to the wall. The attic separation needs to be addressed here.

**R302.3.5.1 Opening protection.** Openings from a shared accessory room or area directly into a room used for sleeping purposes shall not be permitted. Other openings between the shared common accessory room or area shall be equipped with solid wood doors not less than 1 3/8 inches in thickness, solid or honeycomb core steel doors not less than 1 3/8 inches thick, or a fire door assembly with a 20-minute fire-rated doors protection rating, equipped with a self-closing or automatic-closing device.

**R302.3.5.2 Duct penetration.** Ducts penetrating the walls or ceilings separating the dwelling from the shared accessory room shall be constructed of a minimum No. 26 gage (0.48 mm) sheet steel or other approved material and shall not have openings into the shared accessory room.

**R302.3.5.3 Other penetrations.** Penetrations through the walls, ceiling, and floor level separation required in Section R302.3.5 shall be protected as required by Section R302.11, Item 4.

Sincerely,

Jenifer Gilliland, Richard Pelling, and Quyen Thai on behalf of the

WABO Technical Code Development Committee