

PIERCE COUNTY FIRE CHIEFS ASSOCIATION  
TREASURER'S REPORT

For the month of: **Sep-07**

PCFCA Beginning Balance **\$8,949.74**

Revenues:

Interest Income **\$0.73**  
Annual Dues  
Annual Banquet Regist.  
Monthly Meeting Lunch  
Fire Forum/Educ. Registrations  
Golf Sponsors/Registrations  
Misc. Reimbursements

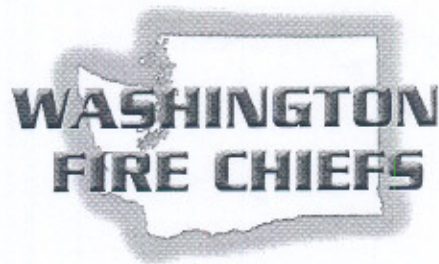
sub-total revenues **\$0.00**

Expenses:

Annual Banquet  
Donations  
Forums/Educational expenses  
Fundraiser : Golf  
Monthly Meeting Lunches  
Gifts Given / Recognitions  
President's Expense  
Secretarial Services  
Secretary of State  
State Chiefs-Insurance  
Bank charge-microfilm, stop pay, etc  
Misc. printing, postage, etc

sub-total expenses **\$0.00**

PCFCA Ending Balance **\$8,950.47**



## POSITION PAPER 21

**Subject:** Proposed Statewide Amendment to  
2006 International Residential Code Section R302  
**Date:** September 12, 2007  
**Amended:**

### Purpose Statement

An amendment to Section R302 to the State adopted 2006 edition of the International Residential Code (IRC) has been proposed. This amendment would revert to the language found in the 2003 edition of the IRC and is less restrictive in its provisions than the currently adopted language, both statewide and nationally. An Emergency Rule has been in place reverting to the less restrictive language since the statewide implementation date of the 2006 edition of the IRC of July 1, 2007.

### Recommendation

The Washington Fire Chiefs (WFC) opposes the proposed amendment to R302 of the IRC and takes the position that the 2006 edition language should stand. The 2006 edition language provides an improved level of fire protection, which still providing flexibility and options needed to meet the requirements of the State's Growth Management Act and the building and development community. The new language was approved as part of the International Code Council's process at the national level, and all subsequent attempts to be less restrictive than the 2006 edition have been soundly rejected.

The WFC recommends that the State Building Code Council NOT APPROVE the proposed amendment, WAC 51-51-0302, and maintain the requirements found in R302 of the 2006 edition of the IRC already adopted by the SBCC.

This position is endorsed by the Washington State Association of Fire Marshals and the Snohomish and Kitsap County Fire Chiefs associations.

September 14, 2007



The Honorable John Neff, Council Chair  
Washington State Building Code Council  
906 Columbia St. SW  
P O. Box 48300  
Olympia, WA 98504-8300

**Re: Section 0302: The provisions related to fire separation distance in Section R302 are amended to retain the requirements from the 2003 edition of the IRC. (Currently an emergency rule under WSR 07-09-103.)**

Dear Chair Neff

On behalf of the more than 4,400 members of the Master Builders Association of King and Snohomish Counties (MBA), I am writing in support of making permanent the 2003 version of IRC Section R302 and Table R302.1 related to a three-foot fire separation distance.

The MBA has reviewed the amendment being considered by the State Building Code Council (SBCC) and fully supports adopting the 2003 version of IRC Section R302 and Table R302.1. The fire separation distance for a standard residential exterior wall is three feet and building at less than three feet requires a "one-hour fire resistance rating with exposure from both sides." As a practical matter, most minimum setbacks are five feet, so the existing IRC dovetails well with most zoning codes.

Should the SBCC not make the emergency rule permanent, the 2006 version of IRC would effectively increase the fire separation distance from three feet to five feet. A wall less than five feet from the lot line would require a rated wall assembly. Projections, typically eaves, which are not fire resistance rated, would also have to be a minimum of five feet from the lot line. In order to project into the five-foot separation zone, the eave would have to have a "minimum fire resistance rating" of "1 hour on the underside."

If the emergency rule is not made permanent, the result would effectively force builders to set back their foundation walls an additional 18 inches on each side, i.e., 6 ½ feet, from the lot line, in order to install standard 18-inch eaves. Accordingly, in order to ensure securing building permits, a builder would be forced to reconfigure either buildings or lots to meet a *de facto* minimum fire separation distance of 6 ½ feet to accommodate standard eaves. It is noteworthy that eaves provide an important level of protection in the Pacific Northwest against water intrusion, which is historically a far bigger problem for single-family structures than fire separation distances.

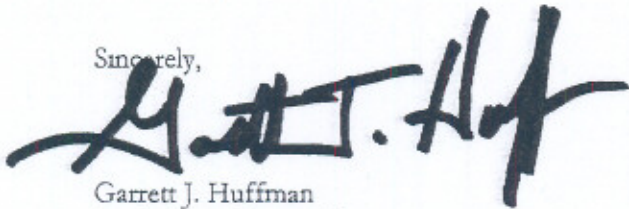
MBA of King and Snohomish Counties  
335 116th Avenue SE  
Bellevue, Washington 98004  
1 425 451 7920 / 800 522 2209  
1 425 646 5985 [www.masterbuildersinfo.com](http://www.masterbuildersinfo.com)

The Association supports adoption of the 2003 version of IRC Section 302 and Table 302.1 as permanent, thereby leaving the fire separation distance from the lot line at three feet. Implementing a *de facto* 6 1/2-foot minimum fire separation distance for residential construction would have an enormous adverse impact on builders statewide.

The MBA believes the circumstances presented justify making the three-foot fire separation distance permanent through adoption of the 2003 IRC Section R302 and Table R302.1.

Thank you for the opportunity to comment, and should you have any questions or concerns, please feel free to contact me at (206) 605-8877 or [ghuffman@mbaks.com](mailto:ghuffman@mbaks.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Garrett J. Huffman". The signature is stylized and written in a cursive-like font.

Garrett J. Huffman  
South King County Manager