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12 November 2014

Mr. Domick Sims, CEO
Mr. Guy Tomberlin, President
Ms. Sara Yerkes, Senior V.P. of Government Relations
c/o
International Code Council
500 New Jersey Avenue, NW
6th Floor, Washington, DC 20001

Re: ICC Roundtable meeting of 31 July 2014
Fires in Buildings Under Construction

Lady and gentlemen:

Thank you for the opportunity to listen in, via telephone, to the ICC Roundtable discussion concerning “Fires in Buildings Under Construction.” We would like to congratulate ICC for taking on this subject as a neutral organizer to listen to, and have invited stakeholders to, communicate concerns and articulate recommendations on this subject. We would further encourage these roundtable discussions in the future.

However, we are writing about what appears to be an omission of subjects discussed during the roundtable discussions which were not shown in the report issued in October 2014. During our attendance we noticed that one or more individuals had brought these subjects forward during the roundtable discussions. We felt these subjects substantive enough to bring to the attention of ICC and the joint partners of this roundtable. The subjects were as follows:

Set-backs. Set-backs from lot lines and neighboring buildings should to be re-evaluated for the potential for damage to other buildings and property. While the codes currently discuss this subject in the tone of a completed building (IBC Chapters 5, 6 and 7), and during construction (IBC Section 3307), discussions took place whereby suggestions were made to reconsider the substance of code provisions for the protection of neighboring buildings and properties. Concerns raised were related to combustible construction, insulations, sidings, lack of passive or active fire protection not being installed and operational or partially operational, etc.

Fire barriers. Review of the provisions concerning the erection of fire barriers during construction be required to be sequenced to limit fire exposure. We heard discussions take place where it was recognized that Chapter 33 does not address this potential protection option, exclusive of the provisions in IBC Sections 3310 through 3313.

Fire department and fire apparatus access. Fire department and fire apparatus access is a critical aspect of fire prevention before permits are issued, and must be monitored during construction. While part of the IFC (IFC Section 3310), additional discussions took place which suggested further study for the creation of a duplicate to IFC Chapter 33 within the IBC as part of a requirement for the submission of a construction safety plan.

Combustible versus non-combustible construction. The report is written addressing all construction types, however the primary discussions during the meeting appeared to be focused on the recent rash of fires to combustible type construction projects and the impact to neighboring buildings and properties. Some attendees cited this as another subject to consider this for further study.

While these subjects may be considered the minority when compared to the overall discussion, we felt it important to bring these subjects to the joint sponsor's attention. It is our belief that these subjects also represent key points of interest which were recommended for further study. Our intent for this letter is to recommend that a revised report be issued which contains these subjects that were discussed at that meeting.

If there are any questions please feel free to contact me. I will look forward to hearing your response or responses. Thank you for your time.

Sincerely,

Jonathan Humble, Regional Director

CC: Steve Orłowski, NAHB
Ronald Nickson, NMHC
Mark Nowak, SFA
Jay Larson, AISI