

Portland Cement Association  
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Mr. Dominic 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

November 14, 2014

Subject: Roundtable Report on Fires in Buildings Under Construction.

Dear Lady and Gentlemen:

The ICC should be applauded for its actions in taking steps to address the increasing incidence of fires in wood-framed buildings under construction. However, the report on the July 2014 Roundtable sponsored by the ICC and others is misleading in the fact that it implies all attendees were in mutual agreement. The report fails to address or report the issues raised by PCA, and others that require action beyond education and training. Although education and training are helpful, we believe there are other actions raised by participants during the roundtable that should be taken.

1. Among the issues raised during the roundtable but not adequately addressed or omitted altogether in the report were concerns raised by the fire service including:
  - a. The risk in buildings heights as currently permitted in the code for wood framing. The combustible nature of wood and the potential for large uncontrolled fire is part of the problem and needs to be looked at closer. Some claddings and insulation products may exasperate the risk.
  - b. There are not enough resources to conduct reviews and inspections. Some solutions are already in the code but there are not enough resources to enforce them. Jurisdictions need better enforcement and power to levy fines. This creates a need for an onsite enforcer to supervise/enforce hot works procedures, smoking, cooking, and heating, perhaps by an third party similar to other special inspections.
  - c. Set backs from lot lines and other buildings need to be re-evaluated as do area increases based on 30 feet of open perimeter. Damage to other buildings and

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- property (autos on street for example) should be considered. A review of exposure for nearby critical buildings should be required (such as schools, hospitals, etc.)
- d. Fire barriers during construction need to be sequenced to limit exposure.
  - e. Alterations at a later date are a risk and need to be addressed.
  - f. Fire department access (substantial) to all sides or at least two sides is critical before permits are issued. There are some conflicts with fall protection mesh hindering access.
  - g. Barriers need to be constructed to keep outsiders from accessing the site.
  - h. A fire plan is necessary before a permit is issued. Similarly, insurers should require a fire safety plan before issuing a policy. Jurisdictions should be given the authority to refuse inspections if no plan is in place.
2. The report implies that there is an equivalent risk when non-combustible construction is used for framing. The roundtable was convened to address fires in buildings using wood framed construction specifically because of the rash of fires in these buildings due to an increase in taller buildings with wood framing. There was no evidence submitted that the same or similar risk occurs with non-combustible construction.
3. PCA was not provided an opportunity to comment on the report before it was posted for publication on the ICC website. Common practice would allow for a review stage by participants when dealing with a report that would include the participants as contributors.

As a participant in the roundtable discussion, we request that the report be submitted to all of the participants, revised based on comments from the participants, and republished. As an alternative, the ICC should publish a minority report to address concerns and opinions not reflected in the report. As a minimum, PCA requests that its name be removed from the current report citing "general consensus."

Thank you for the opportunity to be part of addressing a critical fire-safety issue with constructed buildings. We look forward to a response from you and to helping develop a report that improves the safety of our buildings for occupants, fire-fighters, nearby property owners, and others who live and work in our neighborhoods as buildings are being constructed nearby.



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Sincerely;

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CC: Steve Orlowski, NAHB  
Ronald Nickson, NMHC  
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Alan Perdue, Safer Buildings Coalition