

Mr. Dominic Sims, CEO
Mr. Guy Tomberlin, President
C/O International Code Council
500 New Jersey Avenue, NW
6th Floor, Washington, DC 20001

November 13, 2014

Subject: Roundtable Report on Fires in Buildings Under Construction.

Gentlemen,

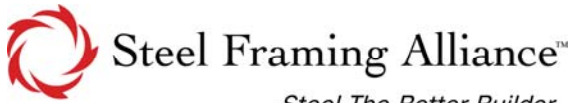
The ICC should be applauded for taking steps to address the increasing incidence of fires in wood-framed buildings under construction and for including stakeholders in the discussion. However, we believe the report on the July 31 roundtable hosted by the ICC did not adequately address some major issues nor capture others raised by the participants. We therefore ask that the ICC revise and reissue the report with those significant additional issues addressed in the report text and conclusions.

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 combustible framing specifically because of the rash of fires in these buildings due to an increase in mid-rise buildings with wood framing. We have no recollection or notes from the roundtable suggesting that a similar risk during construction occurs with non-combustible framing.

The report also fails to address issues raised by the fire service representatives, other industries, and our own representative that require action beyond education and training. Although education and training are helpful, we believe there are other actions raised by participants during the main sessions and specifically the breakout session in which we participated that should be addressed in the report.

Issues not adequately addressed or omitted altogether in the report include the following:

- a. Concerns over the risk in building heights as currently permitted in the code for wood framing. 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. Jurisdictions need better enforcement and power to levy fines. Third party inspections similar to other special inspections should be considered to supervise/enforce hot works procedures, smoking, cooking, and temporary heating.
- c. Set backs from lot lines and other buildings need to be re-evaluated. Damage to other buildings and property (autos on streets for example) should be considered. A review of exposure for nearby critical buildings should be required (such as schools, hospitals, etc.).



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- d. Fire barriers and other fire safety measures during construction need to be sequenced to limit exposure.
- e. Alterations at a later date present a risk and need to be addressed.
- f. Fire department access (paved) to all sides or at least two sides is critical before permits are issued.

Further, participants in the roundtable were not provided the opportunity to comment on the report before it was posted for publication on the ICC website. We request that the report be revised with the input of the participants to reflect the other substantive contributions to the roundtable. As an alternative, we would ask that the ICC publish a minority report from participants who believe their input was not adequately captured.

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.

Sincerely;

A handwritten signature in black ink, appearing to read 'Mark Nowak', written in a cursive style.

Mark Nowak
Steel Framing Alliance