

Kathy Hehnly

Public Comment #2

From: Willson, Michael R <mike.willson@okc.gov>
Sent: Wednesday, September 09, 2020 11:05 AM
To: Kathy Hehnly
Subject: [EXTERNAL] 2018 codes

Follow Up Flag: Follow up
Flag Status: Flagged

I want to be sure and address the proposed rules for the 2018 IBF and IFC concerning the changes to daycare facilities from what we have now in the 2015 rules where we coordinate it with the DHS and the proposed 2018 where we go back to not being consistent. I think that this is a real mistake to do and if you think I will go ahead and propose the changes again so the board can decide. Hope you have survived the Covid 2020 event well. Thanks for any info.

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Oklahoma Uniform Building Code Commission
Building, Existing Building, and Fire Technical Committee (BEBF)
Review of the 2018 Editions of the IBC®, IEBC®, and IFC®
Committee Comment Form

Committee Contact Information:

Submitter's Name: Michael Willson

Date: August 16, 2019

Email: mike.willson@okc.gov

Phone: 405-297-2178

Is form for the same Committee?: [X] Yes [] No

If no, what committee should the form be submitted to? _____

Will this proposed change increase the cost of construction? [] Yes [X] No

Which area of the code needs to be revised?

Section: IBC Section 305.2

Table: NA

Figure: N/A

Page Number: 46

Please check the action to be taken for this proposed change:

[X] Revise as follows [] Delete as follows [] Add new text as follows [X] Delete with substitution

Show the proposed NEW, REVISED, OR DELETED TEXT in legislative format. Line through text to be deleted and underline text to be added or revised.

Section 305.2 is amended to add subsections 305.2.4 and 305.2.5 to read as follows:
Section 305.2.4 Seven or fewer children in a detached dwelling. A facility such as the above within a detached dwelling and having seven or fewer children receiving such day care shall be permitted to comply with the International Residential Code® (IRC®). This number shall include children two and one-half years or less of age.
Section 305.2.5 Eight to 12 children in a detached dwelling. A facility such as the above within a detached dwelling and having eight to 12 children receiving such day care shall comply with the IRC® provided an automatic sprinkler system is installed in accordance with Section 903.3.1.3 or Section P2904 of the IRC®. This number shall include children two and one-half years or less of age.

Supporting information: State purpose and reason for the change and provide substantiation to support the proposed change.

This change will clarify the regulations as well as coordinate them with the current DHS standards This change also leaves 305.2.2 alone in case any changes may occur to this in the future.

Signature: MIKE WILLSON

Official Copy - original with signature in office file.

Handwritten signature of Mike Willson

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Will this proposed change increase the cost of construction? [] Yes [X] No

Which area of the code needs to be revised?

Section: IBC Section 308.5

Table: NA

Figure: N/A

Page Number: 52

Please check the action to be taken for this proposed change:

[X] Revise as follows [] Delete as follows [] Add new text as follows [X] Delete with substitution

Show the proposed NEW, REVISED, OR DELETED TEXT in legislative format. Line through text to be deleted and underline text to be added or revised.

Section 308.5 is amended to add subsections 308.6.5 and 308.6.6 to read as follows:
Section 308.5.5 Seven or fewer children in a detached dwelling. A facility such as the above within a detached dwelling and having seven or fewer children receiving such day care shall be permitted to comply with the International Residential Code® (IRC®). This number shall include children two and one-half years or less of age.
Section 308.5.6 Eight to 12 children in a detached dwelling. A facility such as the above within a detached dwelling and having eight to 12 children receiving such day care shall comply with the IRC® provided an automatic sprinkler system is installed in accordance with Section 903.3.1.3 or Section P2904 of the IRC®. This number shall include children two and one-half years or less of age.

Supporting information: State purpose and reason for the change and provide substantiation to support the proposed change.

This change will clarify the regulations as well as coordinate them with the current DHS standards This change also leaves 308.5.4 alone in case any changes may occur to this in the future.

Signature: MIKE WILLSON

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Is form for the same Committee?: [X] Yes [] No

If no, what committee should the form be submitted to? _____

Will this proposed change increase the cost of construction? [] Yes [X] No

Which area of the code needs to be revised?

Section: IFC Section 202

Table: NA

Figure: N/A

Page Number: 36

Please check the action to be taken for this proposed change:

[X] Revise as follows [] Delete as follows [] Add new text as follows [X] Delete with substitution

Show the proposed NEW, REVISED, OR DELETED TEXT in legislative format. Line through text to be deleted and underline text to be added or revised.

Section 202 Definitions is amended to add the following under the Group E, day care facilities definition to read as follows:

Seven or fewer children in a detached dwelling. A facility such as the above within a detached dwelling and having seven or fewer children receiving such day care shall be permitted to comply with the International Residential Code® (IRC®). This number shall include children two and one-half years or less of age.

Eight to 12 children in a detached dwelling. A facility such as the above within a detached dwelling and having eight to 12 children receiving such day care shall comply with the IRC® provided an automatic sprinkler system is installed in accordance with Section 903.3.1.3 or Section P2904 of the IRC®. This number shall include children two and one-half years or less of age.

Supporting information: State purpose and reason for the change and provide substantiation to support the proposed change.

This change will clarify the regulations as well as coordinate them with the current DHS standards. This change also leaves the existing definition alone in case any changes may occur to this in the future. This will also coordinate with the proposed change to the IBC 2018.

Signature: MIKE WILLSON

[Handwritten signature of Mike Willson]

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Is form for the same Committee?: [X] Yes [] No

If no, what committee should the form be submitted to? _____

Will this proposed change increase the cost of construction? [] Yes [X] No

Which area of the code needs to be revised?

Section: IFC Section 202

Table: NA

Figure: N/A

Page Number: 39-40

Please check the action to be taken for this proposed change:

[X] Revise as follows [] Delete as follows [] Add new text as follows [X] Delete with substitution

Show the proposed NEW, REVISED, OR DELETED TEXT in legislative format. Line through text to be deleted and underline text to be added or revised.

Section 202 Definitions is amended to add the following under the Institutional Group I-4, day care facilities definition to read as follows:

Seven or fewer children in a detached dwelling. A facility such as the above within a detached dwelling and having seven or fewer children receiving such day care shall be permitted to comply with the International Residential Code® (IRC®). This number shall include children two and one-half years or less of age.

Eight to 12 children in a detached dwelling. A facility such as the above within a detached dwelling and having eight to 12 children receiving such day care shall comply with the IRC® provided an automatic sprinkler system is installed in accordance with Section 903.3.1.3 or Section P2904 of the IRC®. This number shall include children two and one-half years or less of age. 308.6 is amended to add subsections 308.6.5 and 308.6.6 to read as follows:

Supporting information: State purpose and reason for the change and provide substantiation to support the proposed change.

This change will clarify the regulations as well as coordinate them with the current DHS standards. This change also leaves the existing definition in case any changes may occur to this in the future. This will also coordinate with the proposed change to the IBC 2018.

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OUBCC

STATE amendments to the 2015 IBC are already adopted by the State. OKC included this wording in the OKC amendments adopted in September of 2019. The 2018 edition proposed rules do not include these changes and would take a step backwards in the coordination of the codes with the existing regulations that the DHS uses in their licensing. Unchanged the code will require daycares with more than 5 children under 2.5 years to be sprinkled. This is never discovered as no building permit is generally needed to open a daycare in your house. Just the DHS approval. We changed this in the previous edition so it would be coordinated with the DHS and what we felt was a more reasonable approach. Home daycares with up to 7 children could be in a house, compliant with the IRC adopted and then large family daycares (8-12 children) could be in a house complying with the IRC provided it was sprinkled (residential NFPA 13D system)

748:20-1-8. IBC® 2015 Chapter 3 Use and Occupancy Classification

Chapter 3 of the IBC® 2015 is adopted with the following modifications:

(1) Section 305.2.4 Seven or fewer children in a detached dwelling. This section has been added to align the code with the Oklahoma Department of Human Services regulations for a licensed daycare facility in the home and the change clarifies the total number of children includes both those under and above two and one half years of age. This section has been added to read:

305.2.4 Seven or fewer children in a detached dwelling. A facility such as the above within a detached dwelling and having seven or fewer children receiving such day care shall be permitted to comply with the International Residential Code® (IRC®). This number shall include children two and one half years or less of age.

(2) Section 305.2.5 Eight to twelve children in a detached dwelling. This section has been added to align the code with the Oklahoma Department of Human Services regulations for a licensed daycare facility with eight to twelve children within a detached dwelling, allowing the licensed daycare facility to comply with the requirements of the IRC® so long as the structure is fire-sprinklered, and clarifies the total number of children includes both those under and above two and one-half years of age. This section has been added to read:

305.2.5 Eight to 12 children in a detached dwelling. A facility such as the above within a detached dwelling and having eight to 12 children receiving such day care shall comply with the IRC® provided an automatic sprinkler system is installed in accordance with Section 903.3.1.3 or Section P2904 of the IRC®. This number shall include children two and one-half years or less of age.