



24 October 2022

Shahla Layendecker
Chief Building Code Administrator
City of Dallas
shahla.layendecker@dallas.gov

RE: Proposed City of Dallas Amendments to 2021 International Building Code (IBC)

Dear Ms. Layendecker:

I am writing in response to the Proposed Revisions to the 2021 International Building Code. I am an accessibility consultant and a licensed Registered Accessibility Specialist in Dallas. In addition to the state required TAS plan reviews and inspections, our firm also provides consulting services on multifamily projects in the Dallas area as well as across the nation. We have broad knowledge of the IBC and ICC A117.1 as it relates to multifamily and other project types. I have several comments related to the accessibility provisions of the IBC and the proposed amendments.

Item 1: Section 1009.1 Accessible Means of Egress Required, Exception 3

The proposed Dallas amendments have added an exception to this section which states:

3. Accessible means of egress may satisfy this section if designed in accordance with Article 9102, "Architectural Barriers," of Vernon's Texas Civil Statutes and the "Texas Accessibility Standards of the Architectural Barriers Act," adopted by the Texas Commission on Licensing and Regulation and built in accordance with a state certified plan, including any variances or waivers granted by the state."

TDLR has made it very clear (see attached RAS Bulletin 2012-01) that a Registered Accessibility Specialist has no authority to review for compliance with referenced standards in the TAS, including the IBC and Chapter 10 for accessible means of egress. As a RAS, we review individual components of accessible means of egress (doors, stairs, ramps, etc.), but we do not review for the appropriate number and location of such exits. This exception means that in some cases, there may not be an official review for compliance with this section. This is of great concern since it addresses life safety issues. My recommendation is to remove the proposed Exception 3.

Item 2: Use of the term "Type C Unit"

Chapter 2 Definition, page 7, line 241-242:

TYPE C UNIT, FHA. A dwelling unit designed and constructed to be adaptable in accordance with the Fair Housing Act Design Manual – 1996 (updated 1998)

Use of the term "Type C Unit" is very confusing since the 2017 ICC A117.1 contains technical requirements for a Type C unit that are very different than the Dallas amendments use of the term. Per A117.1, a Type C Unit is a "visitable" unit with very minimal accessibility requirements. As recently as this past week, I have witnessed the confusion on the part of architects, designers, and contractors due to the use of this term and its conflict with the provisions in the A117.1. My recommendation is to use a different term (perhaps just "FHA Unit" or similar) that conveys the intent of the amendment but does not cause undue confusion.

This term is used in numerous locations in the proposed amendments:

- 1102.1 Design, Exception 2
- 1108.2 Design
- 1108.2.1 Alternate Design
- 1108.6 Group R

- 1108.6.2 Group R-2
- 1108.6.2.1.1 FHA Type C Units
- 1108.6.2.2 Apartment Houses, Monasteries and Convents
- 1108.6.2.3 Group R-2 Other than Live/Work Units, Apartment Houses, Monasteries and Convents
- 1108.6.3 Group R-3 and Exception 2
- 1108.6.4 Group R-4
- 1108.7.1 Structures without Elevator Service
- 1108.7.1.1 One Story with Type B or FHA Type C Units Required
- 1108.7.1.2 Additional Stories with Type B or FHA Type C Units
- 1108.7.2 Multistory Units
- 1108.7.3 Elevator Service to the Lowest Story with Units
- 1108.7.4 Site Impracticality
- 1108.7.5 Design Flood Elevation
- 1110.1 General, Exception 2

I appreciate your allowing me to provide my suggestions and comments related to the proposed Dallas amendments to the IBC. Thank you for your time.

Respectfully submitted,

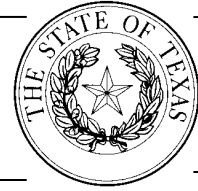


Kimberly J. Goss, RAS 51
President

Enclosure: RAS Bulletin 2012-01

***REGISTERED ACCESSIBILITY
SPECIALIST BULLETIN***

2012



TAS

Texas Department of Licensing and Regulation • Compliance Division • Architectural Barriers

Referenced Standards

RAS 2012-01

Effective Date: April 16, 2012

2012 TAS Reference: 105.2

The Department is not the authority having jurisdiction for ensuring compliance with the International Building Code (IBC) or any of the other referenced standards in section 105.2 of the 2012 TAS.

Consequently a RAS has no authority to verify compliance with IBC or any of the other referenced standards in section 105.2, in the same way that a RAS had no authority to verify compliance with ASME, ANSI/BHMA, or any of the referenced standards in the 1994 TAS.