Comments and Responses to proposed MUBEC Chapter 3

Chapter 3: Maine Uniform Building Code and Energy Code – Commercial Building Code of Maine

Comments From:

William J. Nash, Jr.

Senior Regional Manager – Government Relations

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Middletown, RI 02842

Received August 27, 2021

Responses From:

Richard McCarthy, Assistant Fire Marshal

Office of the State Fire Marshal

45 Commerce Drive, Ste. 1

Augusta, Maine 04330

**Comments relative to Chapter 3, The Maine Unform Building and Energy Code – Commercial Building Code of Maine**

* Comment: While the ICC supports the proposed rulemaking we recommend that the MUBEC Board adopt the IECC and IMC without amendment as the I-Codes are correlated to work together without conflicts to eliminate confusion in building design, inconsistent code enforcement, or interpretation among different jurisdictions.
* Response: Mr. Nash thank you for your comments regarding the adoption of Chapter 7, the Maine Uniform Building and Energy Code – Mechanical Code. Within Maine State statute the MUBEC Board is required to review the newest codes and determine what changes if any would be best for the State of Maine. The Board also has to consider what existing codes are in effect and cannot be changed.

Comments From:

Matthew Tonello, P.E.

Project Executive, Director of Operations/Maine

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Received September 3, 2021 @ 9.27 PM

Responses From:

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**Comments relative to Chapter 3, The Maine Unform Building and Energy Code – Commercial Building Code of Maine**

* Comment: The version I printed from the link has some text missing from the end of 602.4.2.1.

 It may just be my print out but the last sentence says “The outside face of exterior walls of mass timber construction shall be” end it doesn’t have any words after the word be

* Response: I believe that was a printer error on your end.
* Comment: All of the tables that indicate the building area for type IV-A, IV-B, IV-C are not published in the full text 602.4..  I did not check to see if there is a table reference in the written text but I don’t see anywhere that it would point me back to the “2021 IBC”.
* Response: I believe that was a printer error on your end.
* Comment: I did not see the provisions for construction sequencing that limits the quantity of floors that can be erected before lower floors are enclosed with non-combustible exterior wall systems.

* Response: This was not specifically voted on by the Board if it is not in the 2021 Code it will have to be added in next rulemaking session.
* Comment: I did not see the requirements for secondary fire water service to serve The taller versions of type IV construction.  Section 403.2.2 high-rise fire protection: there is a change that requires redundant fire service connections to be provided for buildings exceeding 120 feet similar to mega high-rises
* Response: This was not specifically voted on by the Board if it is not in the 2021 Code it will have to be added in next rulemaking session.
* Comment: Section 718.2.1 fire blocking material, I believe there was a change made to include mass timber as classified as a suitable fire block.
* Response: This was not specifically voted on by the Board if it is not in the 2021 Code it will have to be added in next rulemaking session.
* Comment: Section on owners obligations related to inspection
* Response: This was not specifically voted on by the Board if it is not in the 2021 Code it will have to be added in next rulemaking session.
* Comment: Language in the linked Chapter 3 document references other sections of the code, but those other sections aren’t in the doc like the references to section and table 722.7.1
* Response: An agreement could not be reached with ICC to use the exact wording from the Code the best we could do was reference the 2021 edition.
* Comment: And there may be other mass timber changes made in the 2021 IBC that likely provide important guidance in chapters 1, 2, 4, 5, 7, 17, 23, 33, 35.
* Response: We have referenced all mass Timber in the entire 2021 code. However, in an effort to provide clarification and avoid a copyright infringement with ICC, we have amended the final rule by removing section 26 of the proposed rule and adding section 5 (25) which incorporates by reference the copywritten material.

* Comment: As a suggestion, so that you don’t have to go and search out all of the revisions to the 2021, would it be possible to add some language prior to the full text of 602.4 that says:

 “reference shall be made to and include all references to the 2021 IBC relating to mass timber design, life safety, and construction provisions shall be adopted in the MUBEC.  All table references included in the full text of 602.4 shelby found in the 2021 IBC.

 I recall you were cautious of The consequence of referring to a new code and the complaints that will come from having to purchase an additional code book, but I fear yes all of the tables and additional revisions orange referred to people will not have a place to do a complete code analysis if they don’t have the 2021

 I believe the state of Virginia has opted for writing out every single provision from the 2021 IBC.

 [https://codes.iccsafe.org/content/VCC2018P1/supplemental-mass-timber- information#VCC2018P1\_AppSUPPLEMENTAL\_SubCh1](https://codes.iccsafe.org/content/VCC2018P1/supplemental-mass-timber-%09information#VCC2018P1_AppSUPPLEMENTAL_SubCh1)

* Response: The Board will consider this for future rulemaking.