

OKLAHOMA UNIFORM BUILDING CODE COMMISSION

AFFORDABLE HOUSING CONSOLIDATED DWELLINGS TECHNICAL REVIEW COMMITTEE

MEETING MINUTES

UNIFORM BUILDING CODE COMMISSION CONFERENCE ROOM

2401 NW 23RD STREET, SUITE 82

OKLAHOMA CITY, OK 73107

WEDNESDAY, FEBRUARY 4, 2026 – 1:30 P.M.

COMMITTEE MEMBERS PRESENT:

Todd Booze, Bradley Flatt, Roger Goes (arrived 1:35 p.m.), Mitchell Hort, Amber Armstrong, Chad Denson, Anthony Faddis, Matt Hayes, Kyle Melson, Tyler Parette, Matthew Peacock, Chad Williams, Mike Willson, and Mark Zitzow

ALTERNATE COMMITTEE MEMBERS PRESENT:

Darryl Beebe and Sam Day

COMMITTEE MEMBERS ABSENT

None

ALTERNATE COMMITTEE MEMBERS ABSENT:

Adan Chapa

OTHERS PRESENT:

David Adcock (OUBCC Staff), Kathy Hehnly (OUBCC Staff), and Caitlin Redding Taylor (OUBCC Staff), Cody Banks (Tulsa Fire Department), Jeffrey D Bacon (Tulsa Fire Department), John Moore (City of Piedmont), John Treadwell (City of Edmond), Anthony Reed (Oklahoma State Fire Marshal's Office), Jesse Bene (Edmond Fire Department), Coletta Peyton (L.P. Gas Administration), Nicholas Nadean (L.P. Gas Administration) and Keith Bryant (Oklahoma State Fire Marshal)

CALL TO ORDER:

Ms. Amber Armstrong called the meeting to order at 1:30 p.m. Mr. Adcock thanked everyone for being there and noted that it was the first meeting that was being live streamed to the public.

CONFIRMATION OF ALTERNATES

Ms. Hehnly confirmed all the primary members were present so alternates could take part in discussions but could not motion or vote.

ACTION AND DISCUSSION ITEMS:

Discussion and possible approval of the January 6, 2026, technical review committee meeting minutes

MR. CHAD DENSON MADE A MOTION WITH A SECOND BY MR. TODD BOOZE TO APPROVE THE JANUARY 6, 2026, TECHNICAL REVIEW COMMITTEE MEETING MINUTES

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|-------------|---|--|
| VOTING AYE: | Amber Armstrong Todd Booze Chad Denson Anthony Faddis Bradley Flatt Roger Goes Matt Hayes | Mitchell Hort Kyle Melson Tyler Parette Matthew Peacock Chad Williams Mike Willson Mark Zitzow |
| VOTING NAY: | None | |
| ABSTAIN: | None | |
| ABSENT: | None | |

Discussion and possible action on setting future meeting dates and times:

The committee discussed the dates the meeting room was available and determined which dates and times would work best for everyone. They determined the meetings should be set for 3 hours and begin at 1:30 p.m. The following dates were selected:

- Monday, March 2, 2026;
- Monday, April 6, 2026;
- Tuesday, May 12, 2026;
- Tuesday, June 9, 2026;
- Monday, July 13, 2026; and
- Thursday, August 13, 2026.

There was some discussion on what would occur if there was a need for more time and the other committees were still meeting. Ms. Armstrong requested an item on the July agenda if there was a need for more meetings to be scheduled.

Discussion and possible action on Chapter 3 of the 2024 International Building Code® (IBC) and Chapter 2 of the International Fire Code® (IFC)

Discussion and possible action on Proposed Code Change Form AHCDTC-2 on Section 310.4 Residential Group R-3 in the IBC and Section [BG] 203.9.3 Residential Group R-3 in the IFC

Mr. Day discussed his proposed change, noting it changed the R-3 category under the IBC expanding it from two dwelling units to 12 units. He noted there was a lot of discussion nationally on how to provide more two- to 12-unit apartment buildings as a lot of the larger lots for large-scale apartment buildings were now gone. He added there was a regulatory cliff as the code went from two units, where there was almost no money spent on fire suppression with a death rate of nine people per million with fires, to three units and spending about \$40,000 on fire suppression, but life safety has been upped about ten times. He stated with the regulatory cliff, building a building with 10 to 12 units was difficult to do. He added his proposal provided that up to 12 units could be classified as an R-3 designation, would still be required to be sprinkled, and would allow for the use of a NFPA 13D system which allowed for the mix of domestic water and fire suppression. He stated all the other safety requirements in the IBC would be needed. He added he didn't want to see apartments up to 12 units put in the IRC as he didn't feel that code

had all the language needed to take care of those safety concerns. He noted his change was a middle ground that would keep sprinklers, use a less expensive system and keep all the safety and accessibility provisions in the IBC.

There was discussion between Mr. Day, the committee, and several members of the audience over the following topics related to his proposal:

- The Proposal:

How Mr. Day arrived at maximum of 12 units; that it was based on single stair use and that he had a separate proposal to raise the single stair to four floors; that it was reasonable to cap it at 12 units as it was the largest building to build without having longer shared egress travel and that it was probably the maximum building that would fit on any standard infill lot; that the change was only for three stories max; if a single stair exit change was approved for four floors, would this section need to be revisited, that it would not because the R-3 occupancy was capped at three stories; and if the structure went to four stories it would require a NFPA 13R system.

- Cost

Fixed costs between the number of units in the building and how that cost was more when there were less units; cost breakdowns provided and the difference in costs between the 13R and 13D systems; that the change would add more units into the market; and if that would help reduce rental costs. Impact fees related to the size of the domestic service, as they would be part of the calculations; cost effectiveness of having two lines; if there should be an exception that created an alternative to allow a 13R or 13D; and that a 13R was already required for a 12-unit structure.

If the 13D system had to have a mixed tap or if it could have a separate tap; that it was not required to be combined but was more cost effective and didn't have to calculate fixture loss, but if it went to 12 units was there a need to calculate the fixture loss or the cut off valve that will shut down the domestic flow; the cost of a cutoff valve; if there was a need to add additional water lines inside the apartment if the system was split; looped combo systems; if there was a maximum number of units or fixtures that could be utilized on a 13D system; and if anyone had built a 13D system with more than two units and how it was operating.

Concern that the committee was supposed to be addressing affordable housing, and if they required putting in 2-hour separation between units, they would be back in the range of costs that would have been required to put in a NFPA 13 system; concern with trying to combine the IRC and IBC requirements; that the change kept the requirements in the IBC and did not request 2-hour separation between units as it would make for more complex pathways; that the purpose of the committee was affordable housing and the easiest way to achieve that was to increase density and that was what everyone was trying to do in a way that still kept building safe.

What the definition of affordable was - affordable to the builder, affordable to the owner or affordable to the renter; that affordable housing was defined nationally as the people making the median income for the area that could afford a middle class home; that Oklahoma was far from that right now; and the density under discussion would bring down the per foot construction costs; the number they were talking about was probably somewhere between \$200,000 to \$225,000 in unit sales price.

Habitat for Humanity neighborhoods and how dollars counted there; trying to coordinate between designers, fire, and building departments to find the most efficient ways to build the most number of units; zoning issues; that the neighborhood was 60 to 80 percent of the area median income (AMI) which was somewhere between \$45,000 to \$200,000; how they looked at every difference between the 13R and 13D systems and any way they could to save money, but that while looking at affordability, safety was the main thing, as every life was important, as they were families and there was no dollar amount that could be put on a person. That builders needed to be persistent on the contractors to make sure things were built properly; have good relationships with the fire suppression installers; fire departments and inspectors and that it required everyone together to make everything work; that there were huge costs so they were looking at nickels and dimes to try and make sure they could get a single mother and her two kids into a home; amenities such as laminate countertops within the units but the neighborhood was mixed income so the next unit interior may have granite countertops and nicer fixtures but from the outside looked exactly the same.

That affordable housing should be 30 percent of income; the average income for Oklahoma City and the average rent which was lower and that there was affordable housing available; that the committee shouldn't be sacrificing safety when there was already a good, affordable housing market; concern with doing away with one of the most significant life safety features in multifamily housing and the cost not getting passed onto the people living in the units; that it wasn't the per-project cost savings the committee should be looking at, it was allowing more housing of all types to be built and the supply and demand numbers of units would bring down the overall costs in the long term; that saving \$7000 for one unit was the goal of allowing more housing; that costs had continued to rise and since COVID, average cost of rent had increased 20 percent; and in Minneapolis where changes were made on the zoning side – not the building side, rent went up only 1 percent; that there wasn't any one thing that would fix everything and no one wanted to make things less safe.

That while Oklahoma was an affordable state from a rent perspective there was an inordinate amount of residents that were paying more than 30 percent of their income for rent; that for the lowest income earners almost 80 percent of people earning 30 percent in AMI were paying more than 50 percent just to keep a roof over their heads; the number of units built in the last ten years that were sprinkled and the need for the number to be higher; concern was expressed that costs were increasing for everyone and were going to continue to increase but that wages weren't and the solution seemed to be to cut life safety rather than pay people living wages to solve the problem; and that given the people on the committee, they should be able to find a way to make building more affordable but still maintain a level a safety.

- Sprinkler Systems

The differences between the 13D and 13R systems to include calculations, water hydraulics, the number of sprinkler heads required for each system, if the system would run off of the domestic water lines or have separate water lines. water pressure requirements, sprinkler duration run times; and requirements for the 13R system which didn't require a full-on fire alarm system;

NFPA 13D system design; that original design requirements were utilized in multi-level townhomes; that they required pressure tests and fire separation; that the 13D system was meant for one- and two-family homes and townhomes; that there wasn't a limit on the number of townhomes; and that each townhome had a 2-hour separation and their own independent egress.

Concerns with maintenance and upkeep of the systems and lack of monitoring or inspection requirements for the 13D systems. That requiring inspections would be a regulatory burden.

The time duration for the systems and that the 13D system had a 10-minute sprinkler requirement while the 13R had a 20-minute requirement; time requirements for fire departments to respond for life-safety but there was also a requirement for safeguarding property; if there was a situation where there was a fire in one unit, could the sprinkler system suppress it and allow enough time for the fire department to get there to protect the property and life and if there was a need to go to a higher requirement because a fire in a higher density situation and if there were issues with the equipment needed to fight the fire that was not able to reach the fire area easily.

- Single Stair Exits and Fire Separation

Single stair exits and if the 13D system would be able to work in multi-home/level apartments; and that they were allowed in Dallas so someone somewhere must have figured out how to make them work in that capacity.

Fire separation and concern with mixed use buildings and providing appropriate separation between the decks; crossover requirements in the IFC, that mixed use may require full NFPA 13 or 13R systems depending on the mixed use facility; options for fire separation; that they were called a suppression system as they were supposed to suppress the fire until the fire department could arrive to put it out.

- Zoning and Building Outside the Large Metro Areas

Issues with zoning requirements and how that affected building such structures; and looking at things from a state level, not just the big city level.

Building in smaller more rural environments like a downtown corridor in small town Oklahoma where a 13D system would be more viable; water supply issues in rural areas and

if booster pumps would be required in those areas to meet the water demand of the sprinkler system; concerns that smaller cities and towns may not have the infrastructure or maintenance ability to keep the 13D system going; if the rural water department would allow for the multi-unit facility on their water system; that a lot of the structures would be built in urbanized rural areas, in the core of those small towns, that in the past had a lot more people than they do now and would probably not have issues with water or sewer capacity as the number of people in the town had decreased; the town of Perry was cited as an example; and that the change would not negate the designer or consultant from meeting the necessary flow requirements.

Requirements currently in the IBC; what the Oklahoma City Planning Committee and Council had allowed for multi-unit structures in the middle of blocks with street access only as townhouse style units; concern with multi-units on the same floor instead of townhome style units; and zoning issues in other jurisdictions to allow multiple dwellings on a single lot.

- Life Safety

Reducing the life safety of the sprinklers in allowing time for people to get out of a fire; response times for volunteer fire departments and that most small towns such as a Cushing or Perry and other towns like them, had regular fire departments in the middle of their towns who would be able to respond quickly. That there were more hazards there were as there were more things like space heaters or candles that could start fires and it could spread more easily. offsetting factors as there were fewer older people in multifamily housing and there were fewer children who were starting fires; pre 1980's data fire data; and that apartments didn't have gas so cooking temperatures were not as hot. There was discussion that the data referenced was coming from a Pew document entitled "Modern-multi-family-buildings-provide-the-most-fire-protection" and an NFPA document entitled "US Experience with Sprinklers."

That the committee's objective was affordability, to save money, pass those savings down, but maintain a level of safety; that they were discussing both passive and active fire protection and that one of the biggest issues in the field was passive fire protection being installed correctly and maintaining continuity from the foundation to underneath the deck without it being penetrated; concern with removing active fire protection and lowering life safety to save costs even though they were not yet certain what those costs would be; the number of people allowed to utilize a single exit in the commercial code; if those savings were worth the changes in the level of safety provided; and that comparing residential one- and two-family home fires to fires in multi-family structures was comparing apples to oranges.

That the codes were not always 100 percent accurate and the committee was there to see if there were other ways to find things that met the intent of the code while changing it to fit Oklahoma; that the code could be taken to an extreme way to keep all fire deaths down to almost zero, such as requiring all homes to be have a commercial sprinkler system, but that was not the way the code was written, it was based on the different groups that lobbied for their particular changes at the national level; that smoke alarms saved lives; statistics related

to fire deaths and smoke alarms in single-family homes; the committee's job was to find the balance between being too strict and too lenient in the code; life safety, fire deaths and lowering costs for building.

- Insurance

If insurance ramifications had been considered as increasing the possibility for a fire to be more severe may make the loss of the structure become a very serious concern; discounts from insurance for fire suppression systems; if insurance companies would be just as concerned with a fire suppression system going off accidentally and creating water damage; if the suppression system was installed correctly in the beginning it didn't go off accidentally; and what insurance companies felt about lowering the minimum requirements for the state.

- Accessibility

Accessibility requirements related to Type B units and elevators; the exceptions for elevators if a NFPA 13 or 13R system was installed if other certain criteria was met; and making only the first floor have accessible unit; and that the elevator requirements would only kick in when it was a five-story building as it was four stories above the level of exit discharge.

- Amending the Proposal

Requiring inspections and if a 13D system was not monitored how long it could be running and cause damage before it was caught; if an inspection should or should not be required at some point either at a specific interval or when ownership changed hands; if inspections were overburdensome; and lack of inspection requirements for the 13D system;

Options for design of the structures utilizing the 13D system to include having very short travel distances; if the structure was three stories if it would be required to have rated exits; and that some jurisdictions were only allowing three or four units with a 13D sprinkler system but not 12 units.

- History and Statistics

The history behind the original submission to the 2024 RBTC; discussion during that committee that there were some municipalities that allowed them up to eight units so that might be something that could be explored; if there was established information on a 13D system working on six, eight or twelve units and if there was some history of any problems with it; if Oklahoma was just jumping on the bandwagon; and how long 13D system had been around. That the proposal was still significantly safer than what would have been built in the late 1990's; that there would not be a ton of buildings as there were still zoning requirements to be met; that older multifamily buildings were in the garden style mostly at that time and had shorter exits and were not seeing a much higher rate of fire deaths than single-family detached dwellings; and grandfathered in apartments that were older and too expensive to retrofit with sprinklers. That it was safer to provide a sprinkler system; that they would be built in urban environments with minimal setbacks with exterior rated walls between

adjacent properties which would reduce fire spreading; and that there were not a lot of deaths from fire spreading between buildings in sprinkled buildings except in wildfire situations, although there could be property damage.

The change to the 2024 IRC that removed the requirement for townhouses to be sprinkled.

The percentages of living units available in Oklahoma that were one- and two-family homes versus three or more unit facilities; where that data was from; if the concerns were lessened if the number of units under the 13D system were less than 12 and what that number could be; that fewer units would be better as there would not be as many people doing things that affected their neighbors in one building; and if the proposal should be capped at two stories instead of three.

That these structures would be built on more expensive lots where more middle-class people would live in prime locations; that they would need parking; trash and other things on site; and it would be harder to deal with the zoning code; and with of those factors involved building just two stories didn't make it economically feasible.

- Current Building Practices

That builders were mostly building duplexes to not have to meet sprinkler requirements; that 12-plex structures were not being built as they currently would require a full NFPA 13 system in them; that there was not a huge shortage of units; lulls in interest rates when a lot of multi-family construction took place; and that 80 percent of the housing in Oklahoma was single-family. That Tulsa was seeing a lot of townhomes built with 13D systems.

That the safety conversation was lost as people sidestepped complications and were frustrated with the 13R requirement so instead of building multifamily buildings, they were opting for duplexes where there was no sprinkler requirement; if a sprinkled 4-unit building was safer than a duplex that was not sprinkled; that most deaths in homes were from non-working smoke alarms; that the sprinkler systems were only egress systems; if the 13R system extended too far down the market if people were opting not to build a 4-unit structure; and if there was room for a 13D building up to a specific number of units.

That in Oklahoma City there was not an issue with existing apartments utilizing the 13R systems when rehabbed; that there were companies that gave savings for sprinklered buildings; building permit data for the City of Oklahoma City and if it was available by year and type and the federal reporting that had that information; and the differences between investing in an existing building that is owned to ensure it it's functional versus building a completely new building where the 13R system costs might hamstring a project.

- Actions

Mr. Adcock asked the committee members to reach out to their connections to the sprinkler companies and get some comparison on the cost of utilizing 2-hour separations and no

sprinklers and a comparison or cost difference between the 13R and 13D systems would be. He added that was part of why the commission put the committee together and he appreciated everyone's input and the purpose of the open discussion was to get more facts and numbers to look at.

Researching how many units could utilize a 13D system and who would be responsible for that; costs for 2-hour rated fire walls and a number per floor through research that other municipalities had implemented long enough to have a track record of systems failing

Mr. Day noted he was going to research the accessibility questions.

Other topics the committee discussed that needed research were costs for insurance; having Housing Forward come in with a presentation; having someone from the Fire Marshal's Association provide a presentation to provide more data. There was further discussion on what the presentation from Housing Forward would entail; that everyone still had different definitions of what affordability meant; and that the committee should figure out what the problem actually was before amending the code.

There was further discussion on next steps for the committee; they discussed legislation created at the state level for other states and the ad-hoc technical committee created by the International Code Council to look at the issue. At the end of the discussion the committee determined they should table the amendment pending more data to be provided.

Discussion and call for any further discussion on Chapter 3 of the IBC and Chapter 2 of the IFC

There was no further discussion on Chapter 3.

Discussion and possible approval of Chapter 3 of the IBC and Chapter 2 of the IFC

No action was taken.

Discussion and possible action on Chapter 10 of the 2024 International Building Code®, International Fire Code®, and Chapter 8 of the 2024 International Existing Building Code®

Discussion and possible action on Proposed Code Change Form AHCDTC-1 on Table 1006.3.4(1) – Stories and Occupiable Roofs With One Exit or Access to One Exit for R-2 Occupancies in the IBC and IFC and Table R804.5.1.1(1) - Stories With One Exit or Access to One Exit for R-2 Occupancies in the IEBC

No action was taken.

Discussion on language in HB 3913

Mr. Adcock reviewed HB 3913 by Representative Dollens, noting he appreciated Mr. Parette's support in the interim study for the agency and the committee review process; noting he preferred to not have code in legislation as it made it much harder to change when the codes updated; he encouraged the committee to review the requirements in the bill and talk with their representatives regarding it; he reviewed the history of the OUBCC and what it was for, which was the very thing the committee was doing; that what he needed was the ability to go to the

capitol and tell them the committee was working on the issue and ask them to allow the process to happen. He stated he was encouraged by the discussion during the meeting and hoped for more of this at every code review. He reminded the members they were on the committee because they were all experts in their industries.

Mr. Cody Banks, Fire Marshal with the City of Tulsa and legislative chair for the State Fire Marshal's Association, addressed the committee. He stated he was an advocate of the committee and was impressed by what he had been seeing. He discussed why the State Fire Marshal legislative committee was created and why he appreciated everyone taking the time to serve on the committee. He added he would like to plant a quick seed regarding the single stair issue from the operational aspect of firefighting; as it didn't take into effect the responding agencies and when they were operating on a fire scene and someone was trying to come down the same staircase they were trying to ascend. He added his other concern was that it would leave city councils up to saying they would take it on, not understanding the fire service was not a cookie cutter approach and what Tulsa or Oklahoma City may be able to handle Owasso may not be and each entity would be different. He stated going back to the affordable piece of the issue they were looking at 2-hour fire walls and smoke control systems and increasing density up to six stories his concern was that if someone ran out of their apartment and left their door open, and if the fire is on a lower floor and the sprinkler system doesn't put out the fire, smoke has now been introduced into the entry and people on the higher floors may die from smoke inhalation. He added that was pieces of a bad scenario coming together but he was a realist and there will be situations where the systems will not be upkept properly. He stated the systems were expensive to put in place, but if they were not inspected appropriately they could fail later on and added it could cause issues in active shooter situations and how the single-stair situation could affect law enforcement responses; he noted lack of funding for many first responder agencies and noted that was an issue as well. He added he was happy to be a resource for the committee and thanked them again for their service.

Discussion and call for any further discussion on Chapter 10 of the IBC and IFC and Chapter 8 of the IEBC

No action was taken.

Discussion and possible approval of Chapter 10 of the IBC and IFC and Chapter 8 of the IEBC

No action was taken.

Discussion on modifications made by other states related to consolidated dwellings

Discussion on article – Beyond Zoning – Hidden Code Barriers to Middle-Scale Housing

The item was not addressed at the meeting.

Discussion on article – Dallas Code

The item was not addressed at the meeting.

Discussion on article – NFSA Applying the IRC to 3- and 4- Unit Residential Buildings

The item was not addressed at the meeting.

PUBLIC COMMENT:

There were no public comments.

ADJOURNMENT: (3:33 P.M.)

MR. CHAD WILLIAMS MADE A MOTION WITH A SECOND BY MR. MATTHEW PEACOCK TO ADJOURN

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|-------------|-----------------|-----------------|
| VOTING AYE: | Amber Armstrong | Mitchell Hort |
| | Todd Booze | Kyle Melson |
| | Chad Denson | Tyler Parette |
| | Anthony Faddis | Matthew Peacock |
| | Bradley Flatt | Chad Williams |
| | Roger Goes | Mike Willson |
| | Matt Hayes | Mark Zitzow |

VOTING NAY: None

ABSTAIN: None

ABSENT: None

Minutes approved in the regular meeting on the 2nd day of March, 2026.

AMBER ARMSTRONG

Amber Armstrong, Chair
Affordable Housing Consolidated Dwellings Technical
Code Review Committee

PREPARED BY: KATHY HEHNLY

Kathy Hehny, Affordable Housing Consolidated Dwellings Technical Code Review Committee
Secretary

Official Copy: Original with signatures in agency file.