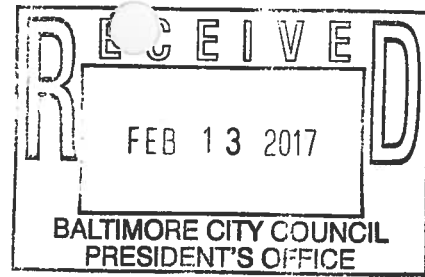




**BALTIMORE
HOUSING**

CATHERINE PUGH
Mayor

MICHAEL BRAVERMAN
Acting Executive Director, HABC
Acting Commissioner, HCD



MEMORANDUM

To: The Honorable President and Members of the Baltimore City Council
c/o Natawna Austin, Executive Secretary

From: Michael Braverman, Acting Commissioner *MBR*

Date: February 8, 2017

Re: **City Council Bill 17-0017 – Building, Fire, And Related Codes –
international Residential Code - Corrections**

The Department of Housing and Community Development (HCD) has reviewed City Council Bill 17-0017 for the purpose of expressly continuing the regulation of solar photovoltaic power systems for all 1- and 2-family dwellings; and expressly reinstating the application of certain regulations governing driveways and other paved surfaces for all 1- and 2-family dwellings.

If enacted, this bill would modify two sections of the City's 2015 Edition of the Building, Fire and Related Codes (BFR). The first change would be to accommodate recent changes to the International Code Council (ICC) governing solar photovoltaic power systems that need to be incorporated into the local code. The second change is to add provisions in the local code that guide the development of parking lots, driveway and other paved surfaces.

The current version of the City's BFR Codes incorporates, by reference, the requirements of the International Residential Codes (IRC) §324.7 for Solar photovoltaic power systems. Recently, the ICC posted an "Errata" that, among other things, "deleted" IRC § 324.7 in its entirety, except for a section that refers to Group R-3 buildings, which states, "These requirements shall not apply to structures designed and constructed in accordance with the IRC". The deletion was to avoid redundancy with like requirements in IFC § 605.11.1.2 but the failure to remove the language pertaining to R-3 building inadvertently removed the requirements of IRC from pertaining to Group R-3 Buildings. The proposed legislation repeals that language, thereby continuing the requirements – and their consequent protections – for all Group R-3 building, including those structures governed by the IRC.

The City first adopted the IRC in its 2007 Edition of the City's BFR Codes. Various local building code provisions not addressed by the IRC, but applicable



to 1 – and 2-family dwellings were amended into the BFR codes. Recently, it was discovered that the local building codes provisions for Parking Lots, Driveways, and Other Paved Surfaces, applicable to 1- and 2-family dwellings, was mistakenly omitted. This section corrects that oversight by expressly incorporating those relevant portions into the appropriate sections of the BFR codes.

The Department of Housing and Community Development encourages the passage of City Council Bill 17-0017.

MB:sd

cc: Ms. Karen Stokes, *Mayor's Office of Government Relations*
Mr. Kyron Banks, *Mayor's Office of Government Relations*