



STAFF REPORT

Retooling Our Code – 2023 Batch

Ordinance No.	To be determined
Application No.	WLD-2023-001
Issue Date	August 14, 2023
Applicant	City of Woodland
Location	This is a non-project action that could impact all property within the city.
Published	N/A, Notice will be provided for required Public Hearing(s)
Workshop Date	August 17th, 2023. 7 p.m. Woodland City Council Chambers 200 East Scott Ave

I. DESCRIPTION OF PROPOSAL

The City's Retooling Our Code (ROC) project is designed to identify and correct issues and problems with the code.

This batch of code amendments involves simple, non-policy changes including correction of spelling errors and cross-reference errors and clarification of responsibilities, as well as a number of minor policy changes. Subsequent batches, however, may include updates that involve policy changes.

This is a non-project action that could impact all property owners and tenants citywide.

II. REVIEW AUTHORITY

Per WMC 19.08.030, Zoning Text Amendments shall be approved, approved with conditions, or denied by the City Council after consideration of the Planning Commission and Staff recommendation. The criteria used are outlined in WMC 3.40.

III. FINDINGS OF FACT

The existing Woodland Municipal Code section is shown in BLACK ink.
BLUE ink indicates recommended staff edits or corrections.
RED font indicates new code language recommendations.

17.16.080 Performance standards.

The following special performance standards shall apply to properties located in the LDR district:

- I. Fences, Walls and Hedges. Except as regulated under subsection **(JK)** of this section, fences and walls constructed shall not exceed a maximum height above the adjacent grade as set forth herein:
 - 1. **Fences, walls and hedges located within the required front yard or within a fifteen-foot setback from the street side property line shall not exceed a height of three feet** where fences, walls and hedges would provide less than fifty percent visibility. Fences, walls, and hedges providing at least fifty percent visibility shall not exceed a height of four feet within the required front yard or within a fifteen-foot setback from the street side property line. Examples of fences that could meet the fifty percent visibility include spaced rail fences, spaced picket fences, and chain link fences.
 - 2. Fences and walls located within the rear yard or interior side yard shall not exceed a total height of six feet.
 - 3. On every lot where the adjoining lot is used for nonresidential purposes, then a fence of not to exceed six feet may be constructed along the side of the lot separating a residential lot from the lot being used for nonresidential purposes; provided, that when and if the adjoining lot is converted to a residential use, then the fence shall be altered to conform.
 - 4. Fences utilized to enclose drainage detention ponds or other drainage facilities shall meet the above regulations, as well as any other applicable regulations of this code.
 - 5. **(NEW) Fences in street side yards and reverse-lot yards. The responsible official may approve a six (6) foot fence on a lot line if the lot has multiple lot lines fronting on a street. Such fences must meet sight distance requirements, is not located in the front yard, and may only be approved if the fence fronts one of the following streets:**
 - State Route – 503 (aka SR-503 and Lewis River Road)
 - 5th Street south of Davidson Avenue
 - South Pekin from 5th Street to the South City Limits
 - North Goerig Street from East Scott Avenue to SR-503
 - East Scott Avenue from Interstate Five (I-5) to Old Pacific Highway

POSSIBLY???

Hillshire Drive

Insel Road

Gun Club Road

Finding 1: There are a large number lots in the LDR zoning district that front on more than one street. Those lots often front on local access or neighborhood access roads with their other frontage on busier collector or arterial streets.

Finding 2: Streets with higher classifications like collectors and arterials, have a higher amount of traffic on them and consequently result in more noise impacts on adjacent uses.

Finding 3: Staff has received several complaints about road noise and the desire for allowing fences to be six (6) feet in height when located along lot lines abutting busier streets.

Finding 4: Staff discussed this with the Council and the council supported adding language that could allow for taller fences along busier streets but not if they created unappealing conditions. (Like long stretches of uninterrupted fences.)

Finding 5: Staff identified the city's collector and arterial streets which have significant amounts of traffic and that are likely to cause significant street noise. Staff drove these streets and noted that there is already a significant number of six-foot fences in existence along the frontage. Those existing fences are all street side yards, rear yards on through lots, or "rear yards" on reverse-lot yards.

Finding 6: Current code limits fences to three (3) feet in height on those lot lines as written

Finding 7: Staff proposes the addition of a new section (WMC 17.16.080(I)(5)) that aligns with existing conditions and would allow for residents to build six (6) foot fences under certain circumstances. (i.e., it meets sight distance standards

Finding 8: There is a cross-reference error in the first sentence of section WMC 17.16.080(I). Staff has corrected the error by referencing subsection (J) not (K).

Subsection (J) discusses "Sight Distance Requirements" for fences.

Subsection (K) talks about "School and Church Height Exceptions".

Staff believes this to be a cross reference error that existed since the code section was adopted in November 2000 when Ordinance 939 was adopted.

Finding 9: Allowing a six (6) foot fence will improve privacy in side and/or rear yards that are adjacent to a street.

Conclusion:

- The proposed code amendment improves privacy for property owners by allowing them to build six (6) foot fences on lot lines in certain circumstances.

17.16.080 Performance standards.

The following special performance standards shall apply to properties located in the LDR district:

- E. Yard Projections. Every required front, rear and side yard shall be open and unobstructed from the ground to the sky unless otherwise provided:

1. Fences and walls as specified and limited under this section may project into front, rear and side yards.
2. Cornices, sills, eave projections, and awnings without enclosing walls or screening may project into a required yard by not more than thirty inches; provided, that the width of any required interior side yard is not reduced to less than two feet, six inches and any yard abutting a street is not reduced to less than five feet.
3. Open, unenclosed, unroofed decks, providing, however, that said decks are constructed at grade elevations, or in no event, exceed thirty inches above grade and not over any basement or story below.
4. Bay windows and garden windows which do not require a foundation may project into a required front, rear, or street side yard by not more than thirty inches; provided, that the width of any required interior side yard is not reduced to less than two feet, six inches and any yard abutting a street is not reduced to less than five feet.
5. Additions of accessory structures in a required front or rear yard, such as stairs, balconies, covered or uncovered porches which have no more than one hundred twenty square feet, provided lot coverage is not exceeded.
6. (NEW) Ramps for ADA access to existing residences, when in a required front, side or rear setback. Such exempt ramp structures must meet building code, fire code, and required lot coverage standard is not exceeded.

Finding 10: As our population ages, more homes will need to have better access for elderly citizens and those with disabilities.

Finding 11: Much of the existing housing stock does not have adequate ADA access to the living space of the structure. This means that there will be more demand for permits to build ADA ramps.

Finding 12: Much of the residential housing stock in the city is built up to, or close to the setback lines for their lot. This means that there is no room for ADA ramps to be built within the building envelope. To build ADA ramps, each homeowner would need to apply for a major variance to their setback.

Finding 13: Staff foresees that such a large number of homeowners will need to apply for such variances. Such efforts seem an unnecessary and bureaucratic waste of time and money for those homeowners if each has to apply for their own individual variance.

Finding 14: Staff initiated the code change to allow ADA access ramps to be placed in required setbacks as an exception to the required setback. This exception will streamline the process for senior or disabled citizens who are in need of such improvements.

Finding 15: The construction of these structures is governed by the building code and will be reviewed for structural design through the building permit process. Fire code issues like separation and/or fire rating will be reviewed as part of that process.

Finding 16: The impact of ADA ramps in setbacks will have a minor or “de minimis” impact to the character of a neighborhood.

Conclusion:

- The proposed code amendment improves the opportunity for older citizens to remain in their homes for longer by reducing the cost and bureaucracy to build ADA access to their homes.
 - Staff concludes this code change will benefit the community.
-

Subdivisions, Short Plats, Boundary Line Adjustments | WMC Title 16

Existing: WMC 16.10.020 - Supplementary materials.

The original hard copy drawing of the final plat shall be accompanied by:

- A. At least two copies of the final plat on mylar material;
- B. A minimum of ten paper copies of the final plat;

Proposed: 16.10.020 - Supplementary materials.

The original hard copy drawing of the final plat shall be accompanied by:

- A. ~~At least two copies~~ An electronic copy of the final plat ~~on mylar material~~ provided to the City in PDF format;
- B. A minimum of ~~ten~~three paper 24-inch by 36-inch copies of the final plat;

Finding 17: ‘Mylar’ is a material that was traditionally used for surveying and platting new subdivisions, however, is not readily available to applicants and has been replaced by electronic format documents.

Finding 18: Mylar is no longer required for the filing of subdivision plats, and with the advancement of electronic records, is not required to ensure that the plat(s) do not deteriorate in archives.

Finding 19: Removing the requirement that the final plat be provided on mylar from WMC 16.10.020(A) will better streamline the final platting process by no longer requiring the applicant to seek out and pay for the reproduction of their proposed plat in a rare and less accessible format.

Finding 20: WMC 16.10.020(B) requires the submission of ten copies of the final plat so that the city can route the documents for review to each department.

Finding 21: The City has transitioned to primarily accepting and routing applications via electronic transfer of files, and has not been delivering physical copies of all plans to reviewers since March of 2020.

Finding 22: Amending subsection A to require an electronic, PDF copy of the final plat will improve the City's ability to route the final plat for review without requiring scanning the document, as well as ensure the City's current practices meet the municipal code's guidelines.

Finding 23: Amending subsection B to require only three paper copies of the final plat rather than ten will allow the city to minimize waste without impacting the final plat process.

Conclusion:

- The proposed code amendment in Finding 6 reduces unnecessary barriers for applicants wishing to move forward with the final platting process.
- The proposed code amendment brings current submission and routing practices into compliance with the WMC and generally modernizes our application process.
- The proposed code amendment will minimize the accumulation of multiple copies that will not be required to route the final plat to all reviewers.

Existing: WMC 16.18.070 – Final Plat

The final plat shall be drawn in india ink on a sheet of mylar having dimensions of eighteen inches by twenty-four inches, or approved substitute, and on a standard recorder's plat sheet eighteen inches by twenty-five inches, with a three-inch-wide hinged binding on the left border. If more than one sheet is required, the sheets shall be numbered and indexed. The scale may range from fifty feet to the inch to two hundred feet to the inch. All signatures on the mylar and recorder's plat sheet shall be originals. The final plat shall show the following information:

P. Dedication, Acknowledgment and Endorsement. The following information shall appear on the final plat, mylar and recorder's plat sheet, lettered and signed in India ink:

Proposed: WMC 16.18.070 - Final plat.

The final plat shall be drawn ~~in india ink~~ on a sheet ~~of mylar~~ having dimensions of eighteen inches by twenty-four inches, or approved substitute, and on a standard recorder's plat sheet eighteen inches by twenty-five inches, with a three-inch-wide hinged binding on the left border. If more than one sheet is required, the sheets shall be numbered and indexed. The scale may range from fifty feet to the inch to two hundred feet to the inch. All signatures on the mylar and recorder's plat the final plat sheet shall be originals. The final plat shall show the following information:

P. Dedication, Acknowledgment and Endorsement. The following information shall appear on the final plat, ~~mylar and recorder's plat sheet~~ **and all provided copies**, lettered and signed in ~~India ink~~:

Finding 24: India ink is a specific ink known for its use in drawing and outlining in a variety of mediums.

Finding 25: There are a variety of acceptable types of ink utilized to print a final plat, and requiring the use of India Ink on final plats may be problematic as staff does not have access to the required supplies and tools to ensure compliance with this standard requirement.

Finding 26: Staff has proposed the elimination of the requirement that the submitted final plat be drawn in India ink, as well as removal the reference to 'mylar' in WMC 16.18.070 and WMC 16.18.070(P) to ensure consistency with previous proposed amendments.

Conclusion:

- The proposed code amendment addresses limitations in staff's ability to determine the exact type of ink utilized to print a final plat, as well as ensuring consistency with other proposed code amendments.

Existing: WMC 16.32.040 - Application—Contents.

G. The short subdivision shall be drawn in indelible ink on a sheet of mylar not to exceed a size of twenty-two inches by thirty inches;

Proposed: WMC 16.32.040 - Application—Contents.

G. The short subdivision shall be drawn in indelible ink on a sheet ~~of mylar~~ not to exceed a size of twenty-two inches by thirty inches;

Finding 27: The findings above propose code amendments that would rescind the requirement for subdivision final plats to be drawn on a sheet of mylar.

Finding 28: Subsection G of WMC 16.32.040 requires the plat of every short subdivision to be provided on a sheet of mylar, which is inconsistent with the proposed amendments to WMC chapter 16.10.

Finding 29: Staff has proposed the elimination of the requirement that short subdivision plats be provided on a sheet of mylar to encourage consistency within WMC Title 16 and minimize unnecessary requirements.

Conclusion:

- The proposed code amendment ensures consistency with the proposed code amendments listing for subdivision final plats.

Existing: WMC 16.32.010 - Applicability.

Every subdivision of land for the purposes of lease, rent, sale or transfer into four or less parcels less than five acres in area within the city shall comply with this chapter and such subdivision shall be referred to as a short subdivision; provided, that the lots or parcels in short subdivisions approved pursuant to this chapter may not be further divided in any manner within a period of five years without the filing of a final subdivision pursuant to this title. A short subdivision approved pursuant to this chapter shall not require approval

pursuant to this title. All permits for the development of segregated lots less than five acres in size shall be withheld until the provisions of this chapter are met.

Proposed: WMC 16.32.010 - Applicability.

Every subdivision of land for the purposes of lease, rent, sale or transfer into four or less parcels less than five acres in area within the city shall comply with this chapter and such subdivision shall be referred to as a short subdivision; provided, that the lots or parcels in short subdivisions approved pursuant to this chapter may not be further divided in any manner within a period of five years without the filing of a final subdivision pursuant to this title. ~~A short subdivision approved pursuant to this chapter shall not require approval pursuant to this title.~~ All permits for the development of segregated lots less than five acres in size shall be withheld until the provisions of this chapter are met.

Finding 30: A short subdivision approved pursuant to WMC Chapter 16.32 would also have been approved pursuant to WMC Title 16 so long as it met the applicability standards expressed within WMC 16.32.010.

Finding 31: There would be no reason for a short subdivision approved pursuant to WMC Chapter 16.32 be required to be approved pursuant to WMC Title 16.

Finding 32: Staff proposed the removal of the following sentence within WMC 16.32.010 in order to ensure that WMC 16.32.010 remains clear and concise and ensure readers can understand and interpret the applicability of the section:

- A short subdivision approved pursuant to this chapter shall not require approval pursuant to this title.

Conclusion:

- The proposed code amendment in Finding 23 will clarify the interpretation and intent of WMC 16.32.010 and ensure the section better reflects the applicability of the Chapter.

Existing: WMC 16.32.030 - Administrator duties.

The city council appoints the supervisor of the department of public works to be the administrator of this chapter. The administrator is vested with the duty of administering the provisions of this regulation and is authorized to summarily approve or disapprove short subdivision. The administrator may prepare and require the use of such application forms as he deems essential to assure compliance to this chapter. If the administrator deems it to be in the public interest, he may require that the short subdivision be placed before the planning commission to be approved or denied by them pursuant to this title.

Proposed: WMC 16.32.030 - Administrator duties.

The city council appoints ~~the supervisor of the department of public works~~ **director of community development** to be the administrator of this chapter. The administrator is vested with the duty of administering the provisions of this regulation and is authorized to summarily approve or disapprove short subdivision. The administrator may prepare and

require the use of such application forms as he deems essential to assure compliance to this chapter. If the administrator deems it to be in the public interest, he may require that the short subdivision be placed before the planning commission to be approved or denied by them pursuant to this title.

Finding 33: The City of Woodland Currently has a Department of Community Development with a full-time director and other full-time staff, however. previously the tasks typically assigned to the Department of Community Development were managed by the Department of Public Works.

Finding 34: With the Creation of the Department of Community Development, the director of community development has typically administered the duties outlined within WMC Chapter 16.32, not the public works supervisor.

Finding 35: Staff has proposed the amendment of WMC 16.32.030 in order to clarify the department and position responsible for the administration of the city's short subdivision regulation.

Conclusion:

- The proposed code amendment in Finding 26 will further clarify the roles of the Community Development and Public Works department(s) when reviewing all proposed short subdivisions.

Existing: WMC 16.32.040 - Application—Contents.

Any person desiring to subdivide land within the city into four or less parcels for the purpose of sale, rent transfer, or lease shall submit an application for short subdivision approval to the administrator. Applications for approval of short subdivision shall include a map to the scale of not less than two hundred feet but not more than fifty feet to the inch. The map shall include but not be limited to the following items:

(...)

A. The signatures of the owner or owners and surveyor of the land to be subdivided;

(...)

Proposed: WMC 16.32.040 - Application—Contents.

Any person desiring to subdivide land within the city into four or less parcels for the purpose of sale, rent transfer, or lease shall submit an application for short subdivision approval to the administrator. Applications for approval of short subdivision shall include a map to the scale of not less than two hundred feet but not more than fifty feet to the inch. The map shall include but not be limited to the following items:

(...)

B. The signatures of the ~~owner or~~ owner(s) or an authorized representative of the owners and surveyor of the land to be subdivided;

(...)

Finding 36: Based on review of past applications, many owners have historically chosen to be represented by an engineer, surveyor, and/or other authorized representative that has the expertise to better navigate the subdivision/short subdivision process.

Finding 37: Other requirements for a complete short subdivision application include the furnishing of a title report as well as an owner authorization form per WMC 16.32.040(I).

Finding 38: Staff has proposed the amendment of WMC 16.32.040(D) to ensure that it is clear that an authorized representative can sign the plat.

Finding 39: So long as the surveyor has provided his appropriate stamp demonstrating their credentials as required by WMC 16.32.040(E), there is no legal requirement that the survey be signed by the surveyor, on a separate signature block beyond the signed stamp on the survey.

Finding 40: Staff has proposed that the requirement for the surveyor of the land being subdivided be removed from this code section at the time of application.

Conclusion:

- The proposed code change in code better reflects current practices and permits the applicant to better utilize the professional services available to them.
- The proposed code change removes unnecessary redundancy.

Administration and Personnel | WMC Title 2

WMC 2.04 – CITY COUNCIL

Existing: WMC 2.04.050 – Regular council meetings.

- A. The city council shall meet in regular session at the City Hall, 100 Davidson Avenue, Woodland, Cowlitz County, Washington, or such other location as the city council deems appropriate, at seven p.m., on the first and third Monday of each and every month, and if, at any time, the date of such meeting falls on a legal holiday, the council shall meet in regular session on the next day following such legal holiday.

Proposed: WMC 2.04.050 – Regular council meetings.

- C. The city council shall meet in regular session at the ~~City Hall, 100 Davidson Avenue, Council Chambers, at 200 E. Scott Avenue~~, Woodland, Cowlitz County, Washington, or such other location as the city council deems appropriate, at seven p.m., on the first and third Monday of each and every month, and if, at any time, the date of such meeting falls on a legal holiday, the council shall meet in regular session on the next day following such legal holiday.

Finding 41: This code section was written when City Hall was located at 100 Davidson Avenue. This building no longer functions as City Hall and the City Council Chambers is now located at the police station located at 200 E. Scott Avenue. While the section does state the council may

deem locations other than 100 Davidson as “appropriate” for meetings, correcting this section will reflect the permanent changes made to the council’s meeting location.

Conclusion:

- The proposed code amendment in will have no impact on the application of code.
-

MINOR CORRECTIONS

Architectural and site design standards. | WMC 17.36.130

Existing: WMC 17.36.130(J) – Sidewalks and Street Trees.

- J. Sidewalks and Street Trees. Intent: to maintain a continuous, safe **an** consistent street frontage and character throughout the site and the abutting public right-of-way.

Proposed: WMC 17.36.130(J) – Sidewalks and Street Trees.

- J. Sidewalks and Street Trees. Intent: to maintain a continuous, safe ~~an~~ **and** consistent street frontage and character throughout the site and the abutting public right-of-way.

Finding 42: The proposed code change makes a minor correction to a spelling and/or grammatical error.

Conclusion:

- The proposed code amendment in will have no impact on the application of code.
-

Light Industrial District (I-1) – Industrial off-site improvement standards – Use of existing wells | WMC 17.44

Existing: The first sentence of WMC 17.44.240 reads:

All roads and accesses required for all proposed developments listed WMC 17.44.210 shall be dedicated and constructed in accordance with the applicable city plans and standards...

Proposed: The first sentence should be amended to read:

All roads and accesses required for all proposed developments listed **in** WMC 17.44.210 shall be dedicated and constructed in accordance with the applicable city plans and standards...

Finding 43: The proposed code change makes a minor correction to a spelling and/or grammatical error.

Conclusion:

- The proposed code amendment will have no impact on the application of code.
-

The city is dealing with a number of instances where the public has been parking at restricted curbs. The police department is not able to cite these vehicles without a clear WMC to enforce. The city is considering language that would authorize citations, while requiring that the curbs be identified and approved by the Public Works Director, and maintained in proper order by either the Public Works Department or the property owner responsible for the curb.

Parking at restricted curbs | WMC Title 10.56

Proposed: **WMC 10.56.045 – Parking restricted curbs - Safety Zones.**

- A. The Public Works Director or authorized designee is authorized to identify and designate portions of street curb to be restricted from on-street parking.
- B. The Public Works Department shall be responsible for painting such restricted parking curbs, within the city limits.
- C. Restricted curb sections shall be painted either yellow or red paint, and follow WSDOT paint standards specifications or as approved by the Public Works Director.
- D. There is no parking allowed in these designated yellow or red curb zones. No Parking Zone Ticketing, Towing and other fines may be incurred at full expense of the violator.
- E. RCW 46.55, as presently enacted or hereafter amended, as well as any applicable rules published as part of the Washington Administrative Code, are adopted by reference and authorize both the posting of restrictions on on-street public parking and the towing and/or impounding of unlawfully parked vehicles. Posting shall comply with RCW 46.61.570.

Finding 44: The Public Works Director supports this this language as a means for the city to maintain clear access to curbs that are critical for access or sight distance.

Finding 44a: The Police Department has reviewed the language and supports this language.

Finding 44b: The Community Development staff supports this language.

Conclusion:

- The proposed code amendment will allow the Woodland Police Department to start writing citations for vehicles that park in or block a section of curb that is painted as restricted at the direction of the Public Works Director.

Fire Code | WMC 14.32.620 – Section 903 – Automatic sprinkler systems.

(Please note: This language is still being reviewed by Clark-Cowlitz Fire Rescue and Townzen & Associates. Additional comment is expected at the hearing.)

Existing: WMC 14.32.620

Section 903—Automatic sprinkler systems.

Subsection 903.2 Where Required is hereby amended by revising the text, as follows:

903.2 Where required. In all new buildings and structures described in Sections 903.2.1 through 903.2.2; and all new buildings containing a total floor area, above or below grade, exceeding 5,000 square feet; and additions that result in a total building area of 5,000 square feet or greater; and in all conversions when the occupancy class of the converted building moves to a higher classification based on the adopted edition of the Washington State Building Code. This requirement shall not apply to covered play areas or similar open structures where no equipment is stored.

Proposed changes: WMC 14.32.620

Section 903—Automatic sprinkler systems.

Subsection 903.2 Where Required is hereby amended by revising the text, as follows:

903.2 Where required. In all new buildings and structures described in Sections 903.2.1 through 903.2.2; and all new buildings containing a total floor area, above or below grade, exceeding 5,000 square feet; and additions that result in a total building area of 5,000 square feet or greater; and in all conversions when the occupancy class of the converted building moves to a higher classification based on the adopted edition of the Washington State Building Code. This requirement shall not apply to covered play areas or similar open structures where no equipment is stored, and to building classified as F-2 or S-2 of noncombustable construction materials and otherwise compliant with Washington building and fire code.

Citizen comment: This change was requested by an existing company in Woodland that processes non-combustible materials. Their comments were:

2018 Washington State Building Code allows the addition of an unlimited amount of one story non-sprinklered building for F-2 occupancy as long as you are surrounded by a 60-foot clear yard. [IBC 507.3].

The International Building Code (IBC) requires sprinklers for many reasons but in general there are two major drivers, first if the building is over a certain size limit (based on building construction type) or of a configuration that is likely to result in a fire (chapter 5). And second if the particular use of a building is likely to result in a fire (chapter 9).

CRC's current project and previous construction is classified as F-2, / S-2 which is low hazard factory and low hazard storage and is / will be construction type 2-B which is unprotected non-combustible (a very common construction type).

IBC section 507.3 states that the area of a non-sprinklered, one-story building of a group F-2 or S-2 no more than one story in height shall not be limited where the building is surrounded and adjoined by a public way or yard of not less than 60'-0" in width.

Finding 45: The proposed code language makes sense for Columbia River Carbonates because they process noncombustible construction materials. However, F-2 and S-2 occupancies need

additional information for the Planning Commission and eventually the council to understand and consider the request. Therefore:

Occupancy Classification and Use

Buildings are classified for “occupancy” and “use” and each can have a hierarchy of risks and hazards.

Occupancy is a formal designation of the primary purpose of a building

F = Factory

S = Storage

And some occupancies have a hierarchy of hazards and risks

F-1 = Moderate-hazard FACTORY industrial (IBC 306.2)

F-2 = Low-hazard FACTORY industrial (IBC 306.3)

S-1 = Moderate-hazard STORAGE (IBC 311.2)

S-2 = Low-hazard STORAGE (IBC 311.3)

(High-hazard occupancies are designated as H occupancy regardless of their use because whether they are making, storing, or using hazardous material the risk and hazard isn't about the use...it's about the hazardous material.) (IBC 307)

A copy of these IBC code sections is attached to the staff report below and shows how a wide variety of products can be processed in a building with an F occupancy and/or stored in a building with an S occupancy.

Finding 46: The concern raised by Chief Jackson at the July workshop centered on the fact that the F-2 has a narrow list of products that qualify as “low-hazard factory industrial” while the S-2 list of materials for storage is much larger. The concern being that the building could change hands, or the product being processed in the structure could change.

Finding 47: There is also a concern that changing the code, would limit the city's ability to apply the best professional judgement of its staff experts.

In this case, the city already worked out a deal with CRC that allowed them to put sprinklers in the office spaces, but allowing them to postpone putting sprinklers into the processing areas of the buildings until such time as the Building Official or Fire Marshal deem it necessary. So, in effect, CRC has already expanded their operations without having to strictly meet the code as written. Changing the code might make it more difficult for the city to apply its best professional judgement on a case-by-case basis. This could have safety and liability implications.

Recognizing that it might be a significant challenge for businesses to have to repeatedly “negotiate” compromises with the Fire Marshal and Building Official every time they want to build an addition or new building, the alternative could be reduced fire and life safety protection to employees, customers, and or the public.

Conclusion:

- Clark Cowlitz Fire Rescue does not support the proposed code amendment for section WMC 14.32.620 – Section 903 – Automatic sprinkler systems as a blanket rule.

- Community Development staff recommends caution before changing the code. Fire and life safety concerns must be weighed against the cost and delays that are created in the permitting process, and suggests that better communication could be a better solution given that CRC has successfully justified relaxation of the code section in question. Early and open discussion about facility expansion could be a better solution than a code change.

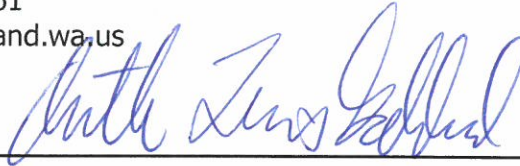
IV. RECOMMENDATION

Staff recommends that the Planning Commission refer the code changes listed above to Woodland City Council with a recommendation of approval. Approval of these code changes will improve clarity and usability of the Woodland Municipal Code for staff and citizens.

Responsible Official: Travis Goddard, Director
City of Woodland
PO Box 9
230 Davidson Ave
Woodland, WA 98661
goddardt@ci.woodland.wa.us

Date: 8/15/2023

Signature: _____



cc: Applicant
Parties of Record
File
Website
Mayor
City Administrator

ATTACHMENT

- A. Building Code Sections 306 and 311

F

H

305.2.3 Five or fewer children in a dwelling unit. A facility such as the above within a *dwelling unit* and having five or fewer children receiving such day care shall be classified as a Group R-3 occupancy or shall comply with the *International Residential Code*.

305.2.4 Family home child care. Family home child care licensed by Washington State for the care of twelve or fewer children shall be classified as Group R-3 or shall comply with the *International Residential Code*.

SECTION 306 FACTORY GROUP F

306.1 Factory Industrial Group F. Factory Industrial Group F occupancy includes, among others, the use of a building or structure, or a portion thereof, for assembling, disassembling, fabricating, finishing, manufacturing, packaging, repair or processing operations that are not classified as a Group H hazardous or Group S storage occupancy.

306.2 Moderate-hazard factory industrial, Group F-1. Factory industrial uses that are not classified as Factory Industrial F-2 Low Hazard shall be classified as F-1 Moderate Hazard and shall include, but not be limited to, the following:

- Aircraft (manufacturing, not to include repair)
- Appliances
- Athletic equipment
- Automobiles and other motor vehicles
- Bakeries
- Beverages: over 16-percent alcohol content
- Bicycles
- Boats
- Brooms or brushes
- Business machines
- Cameras and photo equipment
- Canvas or similar fabric
- Carpets and rugs (includes cleaning)
- Clothing
- Construction and agricultural machinery
- Disinfectants
- Dry cleaning and dyeing
- Electric generation plants
- Electronics
- Engines (including rebuilding)
- Food processing establishments and commercial kitchens not associated with restaurants, cafeterias and similar dining facilities more than 2,500 square feet (232 m²) in area.
- Furniture
- Hemp products
- Jute products
- Laundries
- Leather products
- Machinery
- Metals
- Millwork (sash and door)
- Motion pictures and television filming (without spectators)
- Musical instruments

- Optical goods
- Paper mills or products
- Photographic film
- Plastic products
- Printing or publishing
- Recreational vehicles
- Refuse incineration
- Shoes
- Soaps and detergents
- Textiles
- Tobacco
- Trailers
- Upholstering
- Wood; distillation
- Woodworking (cabinet)

306.3 Low-hazard factory industrial, Group F-2. Factory industrial uses that involve the fabrication or manufacturing of noncombustible materials that during finishing, packing or processing do not involve a significant fire hazard shall be classified as F-2 occupancies and shall include, but not be limited to, the following:

- Beverages: up to and including 16-percent alcohol content
- Brick and masonry
- Ceramic products
- Foundries
- Glass products
- Gypsum
- Ice
- Metal products (fabrication and assembly)

SECTION 307 HIGH-HAZARD GROUP H

[F] 307.1 High-hazard Group H. High-hazard Group H occupancy includes, among others, the use of a building or structure, or a portion thereof, that involves the manufacturing, processing, generation or storage of materials that constitute a physical or health hazard in quantities in excess of those allowed in *control areas* complying with Section 414, based on the maximum allowable quantity limits for *control areas* set forth in Tables 307.1(1) and 307.1(2). Hazardous occupancies are classified in Groups H-1, H-2, H-3, H-4 and H-5 and shall be in accordance with this section, the requirements of Section 415 and the *International Fire Code*. Hazardous materials stored, or used on top of roofs or canopies, shall be classified as outdoor storage or use and shall comply with the *International Fire Code*.

[F] 307.1.1 Uses other than Group H. An occupancy that stores, uses or handles hazardous materials as described in one or more of the following items shall not be classified as Group H, but shall be classified as the occupancy that it most nearly resembles.

1. Buildings and structures occupied for the application of flammable finishes, provided that such buildings or areas conform to the requirements of Section 416 and the *International Fire Code*.
2. Wholesale and retail sales and storage of flammable and combustible liquids in mercantile occu-

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portion thereof, for storage that is not classified as a hazardous occupancy.

311.1.1 Accessory storage spaces. A room or space used for storage purposes that is accessory to another occupancy shall be classified as part of that occupancy.

311.2 Moderate-hazard storage, Group S-1. Storage Group S-1 occupancies are buildings occupied for storage uses that are not classified as Group S-2, including, but not limited to, storage of the following:

- Aerosol products, Levels 2 and 3
- Aircraft hangar (storage and repair)
- Bags: cloth, burlap and paper
- Bamboos and rattan
- Baskets
- Belting: canvas and leather
- Books and paper in rolls or packs
- Boots and shoes
- Buttons, including cloth covered, pearl or bone
- Cardboard and cardboard boxes
- Clothing, woolen wearing apparel
- Cordage
- Dry boat storage (indoor)
- Furniture
- Furs
- Glues, mucilage, pastes and size
- Grains
- Horns and combs, other than celluloid
- Leather
- Linoleum
- Lumber
- Motor vehicle repair garages complying with the maximum allowable quantities of hazardous materials listed in Table 307.1(1) (see Section 406.8)
- Photo engravings
- Resilient flooring
- Self-service storage facility (mini-storage)
- Silks
- Soaps
- Sugar
- Tires, bulk storage of
- Tobacco, cigars, cigarettes and snuff
- Upholstery and mattresses
- Wax candles

311.3 Low-hazard storage, Group S-2. Storage Group S-2 occupancies include, among others, buildings used for the storage of noncombustible materials such as products on wood pallets or in paper cartons with or without single thickness divisions; or in paper wrappings. Such products are permitted to have a negligible amount of plastic *trim*, such as knobs, handles or film wrapping. Group S-2 storage uses shall include, but not be limited to, storage of the following:

- Asbestos
- Beverages up to and including 16-percent alcohol in metal, glass or ceramic containers
- Cement in bags

- Chalk and crayons
- Dairy products in nonwaxed coated paper containers
- Dry cell batteries
- Electrical coils
- Electrical motors
- Empty cans
- Food products
- Foods in noncombustible containers
- Fresh fruits and vegetables in nonplastic trays or containers
- Frozen foods
- Glass
- Glass bottles, empty or filled with noncombustible liquids
- Gypsum board
- Inert pigments
- Ivory
- Meats
- Metal cabinets
- Metal desks with plastic tops and *trim*
- Metal parts
- Metals
- Mirrors
- Oil-filled and other types of distribution transformers
- Parking garages, open or enclosed
- Porcelain and pottery
- Stoves
- Talc and soapstones
- Washers and dryers

SECTION 312 UTILITY AND MISCELLANEOUS GROUP U

312.1 General. Buildings and structures of an accessory character and miscellaneous structures not classified in any specific occupancy shall be constructed, equipped and maintained to conform to the requirements of this code commensurate with the fire and life hazard incidental to their occupancy. Group U shall include, but not be limited to, the following:

- Agricultural buildings
- Aircraft hangars, accessory to a one- or two-family residence (see Section 412.4)
- Barns
- Carports
- Communication equipment structures with a *gross floor area* of less than 1,500 square feet (139 m²)
- Fences more than 6 feet (1829 mm) in height
- Grain silos, accessory to a residential occupancy
- Livestock shelters
- Private garages
- Retaining walls
- Sheds
- Stables
- Tanks
- Towers

312.1.1 Greenhouses. Greenhouses not classified as another occupancy shall be classified as Use Group U.