



August 16, 2023

Dustin Curb  
State Building Code Council  
1500 Jefferson Street S.E.  
Olympia, WA 98504

Via Email: [Dustin.Curb@des.wa.gov](mailto:Dustin.Curb@des.wa.gov)

Re: Washington State Codes Section 1101.12.2 Secondary Drainage

Dear Mr. Curb:

On behalf of the International Institute of Building Enclosure Consultants (IIBEC), we strongly support the State Building Code Council's decision to require secondary drains on commercial buildings capable of handling double the rainfall rate for the local area.

In 2016, the U.S. Environmental Protection Agency (EPA) reported that total annual precipitation has increased in the United States and worldwide at an average rate of 0.08 in. (2 mm) per decade since 1901, and during this same period, precipitation in the contiguous 48 states has increased at a rate of 0.17 in. (4 mm) per decade<sup>1</sup>. The EPA went on to say, "In recent years, a higher percentage of precipitation in the United States has come in the form of intense single-day events. Nationwide, nine of the top 10 years for extreme one-day precipitation events have occurred since 1990." Furthermore, from 1910 to 2015, "the portion of the country experiencing extreme single-day precipitation events increased at a rate of about half a percentage point per decade."

Recognizing that increased rainfall can overburden primary drainage systems, IIBEC has been working for the past few years to reinstate the requirement that secondary drains be required in all instances, to adequately deal with heavy rainfalls and potentially clogged drains, unless a ponding analysis is performed. IIBEC was successful in our efforts to include such a requirement in the code related to secondary drainage and it is now part of the 2024 *International Building Code* (IBC).

This additional language is necessary to ensure public life-safety by reducing the likelihood of catastrophic roof collapses that can occur from uncontrolled ponding or inadequate drainage.

Thank you for including the requirement in the latest draft of the Washington State Codes.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brian'.

Brian Pallasch, CAE  
CEO/EVP

A handwritten signature in blue ink, appearing to read 'Darbi Krumpal'.

Darbi Krumpal  
Vice President, Puget Sound Chapter

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<sup>1</sup> Climate Change Indicators: Weather and Climate. Washington, D.C.: U.S. Environmental Protection Agency, 2016. <<https://www.epa.gov/climate-indicators/weather-climate/>>. Accessed Feb. 1, 2021, 2:16 p.m. A PDF with similar information can be found here: U.S. Environmental Protection Agency. Climate Change Indicators in the United States, 4th ed. EPA 430-R-16-004. 2016. [https://www.epa.gov/sites/production/files/2021-02/documents/climate\\_indicators\\_2016.pdf](https://www.epa.gov/sites/production/files/2021-02/documents/climate_indicators_2016.pdf).