



January 5, 2015

Mitch Nickolds, Inspection Manager
City of Portland
1900 SW Fourth Avenue, Suite 5000
Portland, OR 97201

RE: Special Inspections of Fire Caulking

Dear Mr. Nickolds:

We understand that the City of Portland is considering the adoption of a requirement for special inspections of fire caulking installation that would apply to all construction projects. While we recognize that this requirement is part of the 2009 International Building Code, we would encourage the City to exempt tenant improvement work and similar nonstructural projects in existing buildings from the fire caulking inspection requirement.

As you know, on new construction projects the owner will have a designated city approved special inspector engaged to review structural work. Therefore, this new requirement is not unduly burdensome on new construction projects, since a city inspector will generally be available.

Traditionally, however, on nonstructural tenant improvement projects, inspection is performed by a trained city building inspector and/or the architect of record. Those inspectors and architects are of course fully aware that the fire caulking needs to be applied correctly, not only for safety reasons, but also to maintain applicable manufacturers' warranties. This process works well, providing professional oversight, while also facilitating the efficient and timely completion of projects.

With sprinkler systems in most buildings, there are very few rated partitions and most wall penetrations in those buildings were installed during initial construction. Therefore, the volume of fire caulking in existing buildings is relatively low. As a result, in the Portland area, the individual construction trades are typically responsible to caulk any penetration through a rated surface and a trained architect/city inspector can visually confirm the installation has occurred properly, which is how this process has worked in practice for many years. If special inspections are required on such projects, a special inspector could be called to a jobsite by 3 to 5 construction trades to inspect only a small number of penetrations. Clearly, this is not an efficient use of Owner resources.

Building Owners and Managers Association of Oregon

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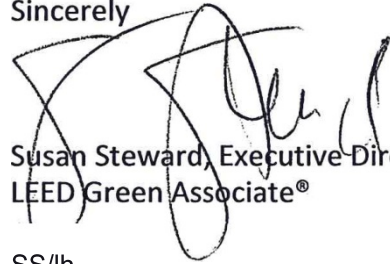
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Mr. Mitch Nickolds
Special Inspections of Fire Caulking
December 17, 2014
Page 2

The current system is working. The City's already busy inspectors should not be stretched further when the tasks involved can be competently performed by other trained professionals, as they have been for many years.

For these reasons, we encourage the City to exempt tenant improvement projects and similar nonstructural projects in existing buildings from this new fire caulking inspection requirement.

Sincerely



Susan Steward, Executive Director
LEED Green Associate®

SS/lh

cc: The Honorable Charles Hales
Commissioner Nick Fish
Commissioner Amanda Fritz
Commissioner Steve Novick
Commissioner Dan Saltzman
Paul Scarlett, Director BDS
Fred Deis, BDS Manager
Jay Ponce, Special Inspections