



Alliance for Regulatory Coordination

March 15, 2019

Dawn B. Crim, Secretary-Designee
Department of Safety and Professional Services
dsps@wisconsin.gov

Dear Secretary-Designee Crim:

The Alliance for Regulatory Coordination believes Wisconsin citizens, businesses and visitors are best served and protected when Wisconsin utilizes the most contemporary model codes and standards dealing with energy conservation, building safety and fire prevention.

We hereby request that the Department of Safety and Professional Services review the 2018 edition of the International Energy Conservation Code (IECC) and submit to the legislature proposed rules changing Chapter SPS 363, the Wisconsin Energy Conservation Code. We make this particular request due to Wisconsin Statute Section 101.027, which requires periodic review of the IECC for the purpose of updating Chapter SPS 363, Wis. Administrative Code.

The DSPS has fallen behind in its responsibility to review the IECC and submit proposed rule changes to the legislature. Under Wis. Statute Sections 101.027(3)(a)1., and (3)(b)1., the DSPS should have submitted proposed rules to the legislature by February 28, 2019, based on a review of the 2018 edition of the IECC, which had its first printing on August 31, 2017.

We also request that the DSPS promulgate administrative rules, as soon as possible, to update the entire Wisconsin Commercial Building Code and Wisconsin Fire Prevention Code, Chapters SPS 361-366 and Chapter SPS 314, respectively; by adopting the 2018 editions of the International Building Code, developed by the International Code Council, and NFPA 1, Fire Prevention, developed by the National Fire Protection Association. Because the Wisconsin Commercial Building Code and Fire Prevention Code are significantly interrelated in their impact on the owners of commercial buildings, we ask that they be reviewed and updated in conjunction with one another. Such coordinated updates were successfully implemented by the Department of Commerce in 2002, 2008 and 2011.



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Because energy conservation aspects of building design are intertwined with many other building design considerations, it makes sense to update the entire Wisconsin Commercial Building Code along with the Energy Conservation portion of that code. Relative to the Wisconsin Fire Prevention Code, Chapter SPS 314 is currently based on the 2012 NFPA 1. Even if code development were to start today, an updated Wisconsin Fire Prevention Code would not become effective until 2020, at the earliest, leaving Wisconsin significantly behind contemporary fire prevention methods and strategies developed by national experts.

Furthermore, we urge the DSPS to establish a schedule of updating every DSPS building and safety code on a three-year cycle, reflecting the update cycle of most national model codes and standards. We encourage you to fully utilize advisory code councils and committees, as well as the expertise of department staff professionals during all code development projects.

We also urge you to establish the staff resources necessary to keep DSPS codes up to date and to provide guidance and training to municipal inspectors, building designers, contractors and workers who help make Wisconsin a safe and vibrant place to live and visit. The ARC would support additional DSPS position authority dedicated to keeping codes and training up to date.

Your attention to these matters will be greatly appreciated.

Sincerely,

Robert G. DuPont, Founder
Alliance for Regulatory Coordination
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The Alliance for Regulatory Coordination is a consortium of 17 organizations involved in building design, construction and regulatory services in Wisconsin. Members of the Alliance are very interested in promoting safety in constructed environments across Wisconsin, through the coordinated efforts of state and municipal building-regulatory programs and services.



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Classic Members

International Association of Electrical Inspectors, Wisconsin Chapter
International Brotherhood of Electrical Workers, Wis. State Conf.
National Electrical Contractors Association, Wisconsin Chapter
Northwest Wisconsin Building Inspectors Association
Plumbers Union Local 75
Plumbing-Heating-Cooling Contractors, Wisconsin Association
Water Quality Association of Wisconsin
Wisconsin Code Officials Alliance
Wisconsin Electrical Trades Council
Wisconsin Fire Protection Coalition
Wisconsin State Fire Chief's Association
Wisconsin State Fire Inspectors Association

Associate Members

Professional Fire Fighters of Wisconsin
Southwestern Wisconsin Building Inspectors Association
Wisconsin Electric Cooperative Association
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International Code Council