



September 23, 2020

Commissioner John F. King
Georgia Office of Insurance and Safety Fire Commissioner
2 M.L.K. Jr. Drive SW Suite 716
Atlanta, GA 30334

Interim State Fire Marshal Craig Landolt
2 M.L.K. Jr. Dr. SW Suite 620
Atlanta, GA 30334

Re: New State Interpretation of International Fire Code Appendix D

Commissioner King & Marshal Landolt,

On behalf of the thousands of homebuilder members of the Council for Quality Growth and the Home Builders Association of Georgia, we are writing to ask for your help with a recent code interpretation that will dramatically impact the housing market across our state. It has come to our attention that several local governments are now mandating that every new single-family subdivision with more than 30 lots provide a second entrance for fire department access. This mandate comes from a new interpretation of the state's Minimum Fire Safety Standards, which incorporate the 2018 edition of the International Fire Code (IFC), and specifically the fire access road language in IFC Appendix D. However, the Minimum fire safety standards specifically exempt residential development as referenced in *OCGA 25-2-4*:

The Commissioner shall adopt such rules and regulations as he deems necessary to promote the enforcement of this chapter. Such rules and regulations shall have the force and effect of law and shall have state-wide application as being the state minimum fire safety standards and shall not require adoption by a municipality or county. The governing authority of any municipality or county in this state is authorized to enforce the state minimum fire safety standards on all buildings and structures except one-family and two-family dwellings and those buildings and structures listed in Code Section 25-2-13.

It has always been the practice of the State Fire Marshall to exempt residential development from all aspects of the IFC, including the fire access road language in Appendix D. This new interpretation, if

allowed to stand, will have significant impacts on Georgia's housing market, as well as on property values throughout our state.

Mandating a second entrance for all subdivisions with more than 30 lots will make impossible the development of thousands of small, landlocked parcels of land, particularly in topographically challenged parts of the state. This will dramatically impact housing supply and further accelerate Georgia's housing affordability crisis.

Also, the current interpretation supersedes local land use and transportation planning, where curb cut, and fire department access are traditionally regulated. Thousands of Georgia property owners would see the value of their land drop overnight, and neighbors would gain an effective veto power over developments that now require new easements for secondary access. The net result would be rapidly escalating housing prices that keep millions of Georgia families from attaining the dream of homeownership.

The Council for Quality Growth and the Home Builders Association of Georgia respectfully request a meeting with you both to discuss our concerns with the state's recent interpretation of Appendix D and illustrate how this interpretation is already impacting the progress of numerous previously zoned residential developments.

We look forward to speaking with you.

Sincerely,



Michael E. Paris
President & CEO
Council for Quality Growth
mp@councilforqualitygrowth.org



Kimberly Steele
Senior Policy Analyst
Council for Quality Growth
ks@councilforqualitygrowth.org



Frank Thomas
Executive Vice President
Home Builders Association of Georgia
fthomas@hbag.org