



REQUEST FOR INTERPRETATIONS, ALTERNATE METHODS OR MODIFICATIONS

The Building Official has authority under the code to make interpretations, approve equivalent alternate methods (AM) requests, and for existing buildings to allow modifications of the current building code based on practical difficulties for project specific applications. The Building Official *cannot* grant waivers to or variances from the code. All requests must be in writing. The following information shall be provided for each building and each issue in the request, where applicable:

GENERAL REQUIREMENTS

ALL request letters shall include, but not be limited to, the following minimum information:

- Nature of the request (alternate method, interpretation, modification)
- Project address and suite number
- City permit / project number
- Specific use and occupancy group(s)
- IBC defined type of construction
- Total building and when applicable lease square footage
- Pertinent dimensions
- Specific code requirement(s)
- Applicable code section(s)
- Detailed description of the issue/problem
- Details of the proposed solution

SPECIFIC REQUIREMENTS FOR EACH TYPE OF REQUEST

The following specific information should also be included based on the type of request.

1. **Code Interpretations (Section 104.1, 2012 IBC)** - Code interpretations are based on the intent of the code.
 - Describe how the interpretation would apply to the particular set of circumstances, and
 - Describe the alternative interpretations and their consequences
2. **Alternate Methods (Section 104.11, 2012 IBC)** - A request to use an alternate method of construction or design to substitute for code requirements must include details that document the details of the proposed method and show that it is equivalent to that prescribed in the code in terms of quality, strength, effectiveness, fire resistance, durability and safety.
 - Describe the proposed alternate method to be substituted, and
 - Demonstrate how it is equivalent to the prescribed code requirement specified in the Houston adopted code.
3. **Modification to Existing Buildings Due to Practical Difficulties (Section 104.10, 2012 IBC)** - Provided the *building official* first finds that an existing site condition or special individual reason makes the strict letter of the code impractical, a request for a code modification based on practical difficulties in existing buildings may be submitted for consideration.
 - Describe why the code requirement creates a practical difficulty, and
 - Demonstrate that the proposed modification is compliant with the intent and purpose of the code and that such modification does not lessen health, accessibility, life and fire safety, or structural requirements of that specified in the current Houston adopted code.

INFORMATION ABOUT SUBMITTAL REQUIREMENTS

- Plans and plan details required for alternate method or interpretation requests shall be submitted as scalable documents.
- Electronic copies shall be in .pdf format.

REVIEW FEE

Standard Request – Applies to city forms created for specific requests requiring minimal amount of research or consultation... Example: "Form CE-1131 Reduced Occupant Load Request - TEA Educational..... \$75.88

Moderate Request – Limited to a single-floor level and containing a maximum of 30-pages of justification requiring a moderate amount of research or consultation (Typically 2 – 4 hours)..... \$145.93

Extensive Request – Containing engineering evaluations, tests reports, or requests for areas located on multiple floor levels requiring several plan sheets and/or details to clearly document the location and scope of the proposed work which requires more than 30-pages of justification or information requiring extensive research, documentation and data collection. (Up to 4 Hours)..... \$612.93

Plus, each additional hour exceeding 4 hours..... \$145.93

CONTACT INFORMATION

Requests may be submitted via email at HPC-RA@houstontx.gov, or in person at 1002 Washington Avenue, 4th Floor, Houston, TX 77002

Address Letters to: Mark Savasta, Building Official, P. O. Box 2688, Houston, TX 77252-2688



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(Supplemental Information Sheet)

The following are some common types of requests and specific requirements needed in addition to the general requirements previously identified on page 1.

SPECIFIC EXAMPLES

CODE OF RECORD (COR) REQUESTS *(Based on Sections 102.6, 116.1, Ch.34, and Appendix L of the 2012 IBC)*

Alternate Method approval requests may be authorized for use of the COR for an existing building where compliance with the most restrictive provision of *Sections 102.6.1, 116 and Appendix L* of the Houston adopted Building Code (2012) can demonstrate the occupancy classification has not changed and the existing structure was designed to all code requirements under the COR for the proposed use (typically high piled storage) and existing occupancy. All COR requests must include the AM request letter addressed to the *building official* with the project specific information specified on page 1 of this document and shall include, but not be limited to, the following specific documentation:

- One photocopy of the Code of Record submittal package with a COR letter addressed to the Houston Building Official with the following attachments:
 - Harris County Real Property Account Information
 - Copy of the Certificate of Occupancy (CO) or Life-safety Certificate for the building or lease space
 - Site plan drawn to scale showing the building foot print when originally constructed along with subsequent building additions and incorporating the square footage and permit application dates, site access roads, location of fire hydrants, fire department access doors, exits and smoke and heat vents (when required)
 - Appropriate Houston permit archive research summarizing the buildings permit history, including but not limited to, the originally permitted occupancy classification, the square footages of the originally permitted building and any subsequent additions including permit application dates
- One photocopy of the HFD approved and stamped Code of Record letter for the existing building, including all attachments submitted to HFD for consideration.

REDUCED OCCUPANT LOAD (ROL) REQUEST *(Sections 104.11 and 1004.1.2 of the 2012 IBC)*

Educational Occupancies - Regulated by *Texas Education Agency (TEA)* with proposed ROL resulting in a maximum reduction of 33% from the *2012 IBC* calculated design occupant load (DOL) based on OL factors of Table 1004.1.2 may utilize the current edition of Form CE_1131.

- Form CE_1131 Request for Reduced Occupant Load / Educational.

Educational Occupancies

- Alternate method / ROL request that results in greater than 33% reduction from the IBC DOL (TEA regulated).
 - Requires letter on school letterhead signed by the principle of the school detailing all occupant load restrictions and specifically describing the use of all areas identified as NSU areas.
- Alternate method/ROL request for private schools.
 - Requires letter on school letterhead signed by the principle of the school detailing all occupant load restrictions and specifically describing the use of all areas identified as NSU areas.
 - One copy of the published schools' / teacher's manual identifying the class size restrictions and school curriculum

All AM and ROL requests shall include one copy of the following:

- Code analysis sheet – including but not limited to the IBC occupancy group(s) based on use, type of construction, the allowable area, height and number of stories along with the actual building area, the IBC calculated design occupant load and minimum egress requirements.
- Floor Plan – Include a building floor plan layout clearly labeled and identifying any seating plan containing fixed seats, pews, or fixed gaming equipment. (if applicable) The floor plan shall identify the required means of egress.
- ROL Occupant Load Calculations – ROL requests shall show the proposed ROL as well as the OL calculations based on OL factors of Table 1004.1.2 of the IBC 2012.

Daycare Occupancies

- For daycares, if the requested reduction is based on State Law, include related licensing applications showing the occupant loads identified to the state.