



2018 INTERNATIONAL BUILDING CODE CHANGES

Two proposals are being developed by the International Code Council (ICC) that, if adopted, will affect covered mall properties. These and other building code changes were considered at the ICC hearings September 30-October 5, 2015 in Long Beach, CA.

Building code requirements generally apply to the construction of new buildings and alterations or additions to existing buildings, changes in the use of buildings, and the demolition of buildings or portions of buildings at the ends of their useful or economic lives. (Updated editions of the International Building Code are published on a three-year cycle.)

2018 Revisions: Covered Mall Issues

Specifically, there are two major proposed changes that will affect the design and construction of covered mall buildings in the areas of: Exit Passageway (G77-15 and G78-15) and Property Line (FS27-15).

1. Exit Passageway Revision (G77 and G78):

The Code change G-77 and G-78 proposal alters the Mall Building exit passageway scoping section to state the following: "Where exit passageways provide a secondary means of egress from a tenant space, the exit passageway shall be constructed in accordance with Section 1024."

This code change ignores the unique challenges of a mall building in which access to utilities in a common space is necessary for the functions of a mall building. This code change may result in reduced Gross Leasable Area (GLA) by requiring the incorporation of dual corridor systems in the "back of house" – one corridor for utilities and one for customer exit passageway. Compliant options will also create security concerns and occupant confusion.

Existing shopping malls all around the country have incorporated utility distribution in exit passageways and serviced tenants via exit passageways without any adverse effects, and thus, this code change lacks substantiation.

Outcome: Code Change G77 was rejected and G78 passed in the code hearings. This means the 2018 code will maintain the current covered mall building language regarding exit passageways. There will not be a reference to Section 1024 which could have provided a great deal of negative interpretations and prohibited a number of "back of house" activities in covered mall building projects. However, voting membership did not approve the proposed code change to allow distribution of utilities in exit passageways.

- 2. Property Line FS-15:** This revision addresses an issue that is a constant battle in the mixed-use industry and the shopping center industry: the allowance of a property line between an anchor building and a mall building within a cover/open mall building. Having buildings cross property lines in certain circumstances is a common practice and widely accepted. The code text over the years has slowly began to address this matter and providing this statement allows for clarity in the matter of "internal" lot lines established for the purpose of real estate ownership, responsibility, and tax reasons. The 2015 IBC already recognizes openings in a party wall separating an anchor building and a mall. This new language provides needed clarity to the code user.

Outcome: Code Change FS-27 passed, and the 2018 code will reference dedicated access easements and contractual agreements as an acceptable exception to requiring fire walls. This is very helpful in projects when multiple property lines are established within a single development.

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