

The Building Official has authority under the code to make interpretations, approve requests for equivalent alternative materials, design, and methods of construction, and to allow modifications of the current building code for existing buildings based on practical difficulties for project specific applications. The Building Official is not authorized to grant waivers to or variances from the requirements of the Houston adopted Construction Code. All requests must be in writing and shall include the following information for each building and each issue in the request, where applicable.

### **SUBMITTAL REQUIREMENTS**

All requests must be submitted in the form of a request letter addressed to the current Building Official. The letter shall include details on the type of request and any project specific information as noted below, as well as any request specific documentation needed to justify the request. Plans and documentation required for alternate method or code interpretation review shall be fully dimensioned, scalable documents submitted in PDF format.

**ADDRESS LETTERS TO:** Christopher Shannahan, CBO, FM  
Building Official, P.O. Box 2688, Houston, TX 77252

Request letters and their associated documentation can be submitted via email to: [amcd@houstontx.gov](mailto:amcd@houstontx.gov)

### **GENERAL REQUIREMENTS FOR EACH TYPE OF REQUEST**

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

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

### **SPECIFIC REQUIREMENTS FOR EACH TYPE OF REQUEST**

Depending on the type of request the following specific information shall be included.

- 1. Code Interpretations (CI)** (*Section 104.1, 2021 IBC*) – Based on the intent of the applicable code(s).
  - Describe how the common CI applies to the field application of the intended design; and,
  - Describe the quality, strength, effectiveness, fire resistance, durability, and safety of the alternative CI.
- 2. Alternate Methods (AM)** (*Section 104.11, 2021 IBC*) – Proposed alternate methods of construction requests shall include details showing how the proposed design is equivalent to that prescribed in the applicable code based on quality, strength, effectiveness, fire resistance, durability and safety.
  - Describe the substituted alternate method design; and,
  - Demonstrate how it is equivalent to the prescribed code required design.
- 3. Modification to Existing Buildings Due to Practical Difficulties** (*Section 104.10, 2021 IBC*) – Provided the Building Official first finds that an existing buildings site condition or project specific circumstance makes the construction associated with the strict letter of the code impractical, a request for a code modification based on practical difficulties may be submitted for consideration.
  - The submittal package shall describe how the existing construction creates a practical difficulty; and,
  - Demonstrate how the modification is compliant with the intent and purpose of the current code, and how such modification does not lessen the health, accessibility, life- and fire-safety, or structural requirements.

# INTERPRETATIONS, ALTERNATE METHODS OR MODIFICATIONS

## CODE OF RECORD (COR) REQUEST *(Sections 102.6 & 116.1 of the 2021 IBC and Appendix D of the 2021 IEBC)*

Alternate method requests may be authorized for the use of a COR for existing buildings where documentation demonstrates the occupancy classification has not changed, the existing structure was designed to all code requirements under the COR for the existing use and occupancy, and the structure complies with the most restrictive provision of Sections 102.6.1 and 116 of the 2021 Houston IBC and Appendix D of the 2021 Houston IEBC.

All COR requests must include an alternate method request letter addressed to the Building Official. The letter shall include, but not be limited to, the project specific information listed above as well as the following additional specific documentation:

- The Harris County Real Property Account Information.
- The current Certification of Occupancy (CO) for the building or lease space.
- A dimensioned site plan drawn to scale showing the building footprint in relation to all property lines or other structures. The extent of any subsequent building additions. Labels incorporating the square footage, permit number, and application dates for the primary structure and each addition into the footprint and additions. Location of access roads, fire hydrants, HFD access doors, exits, and smoke and heat vents.
- Appropriate Houston permit archive research with summarized building permit history, including but not limited to; the originally permitted use and occupancy classification, the square footages of the originally permitted building, and subsequent additions including permit numbers and application dates.

## REVIEW FEES

**Standard Request** – Applies to minor requests requiring minimal research..... \$53.71

**Moderate Request** – Limited to construction on a single-floor level containing a maximum of 30-pages of justification or information requiring moderate amounts of research or consultation (*< 4 hours*) ..... \$134.28

**Extensive Request** – Contains engineering evaluations, tests reports, or requests for construction located on multiple floor levels requiring several plan sheets and/or details to clearly document the location and scope of the proposed work. Includes submittals containing more than 30-pages of justification or information, or requires extensive research, documentation, and data collection. (*4-hour base charge*) ..... \$671.40

*Plus, each additional hour exceeding 4 hours..... \$167.84*

## CONTACT INFORMATION

For questions or additional information contact the Code Development Group at: [amcd@houstontx.gov](mailto:amcd@houstontx.gov)