

May 24, 2017

Senator Lee Beyer, Chair
Senate Committee on Business and Transportation
Oregon State Capitol
900 Court Street NE
Salem, OR 97301

RE: HB 2737-4 (Tiny Homes)

Dear Chair Beyer and Members of the Committee:

On behalf of the Oregon Fire Chiefs Association and Oregon Fire Marshal's Association, thank you for the opportunity to provide testimony regarding House Bill 2737-4 which provides a regulatory framework for "Tiny Houses" in Oregon.

We appreciate the committee modifying the bill to allow the detailed code writing to occur through the normal public process. We believe that will benefit public safety and all stakeholders. However, we want to express strong concerns with two other changes in the -4 amendments.

- **The fire safety study provisions from the -3 amendments were eliminated.** We believe that fire and life safety code provisions should be based on scientific analysis and engineering to the extent practicable. Since these are brand new provisions, yet to be adopted anywhere in the country to our knowledge, it is reasonable to ask that basic fire studies be performed to determine the specific code details. For example, we do not know if standard smoke detector options and placements are effective in Tiny Homes. As one example, we will not know if we are providing a level of notification that will allow occupants time to escape in the event of a fire.
- **The maximum square footage was increased by 50% to 600 square feet, which is in conflict with national codes.** This would allow the lower standard of care in a much larger number and size of structures. Additionally, this creates a conflict with ORS 455.110 which mandates that BCD adopt regulations and amendments conforming "insofar as practicable to model building codes generally accepted and in use throughout the United States." While the national language is only found in an Appendix chapter and therefore is not widely adopted – it is the only existing national consensus language available and -4 would allow structures a 50% larger with no known justification.

In consideration of these two concerns, we respectfully recommend that the Committee consider modifying the bill to reinstate the fire study and maximum 400 square foot size found in HB2737-3.

Thank you for the opportunity to provide input on this bill. We believe a regulatory framework for Tiny Homes is important Oregon, and look forward to help making it a safe and viable option.

Sincerely,



Stephen A. Forster