

RE: HB2423 -A; Residential Small Home Specialty Code
Date: May 5, 2019

Senate Businesses and General Government Committee
Chair Chuck Riley and members of Committee

- 1. Is this bill necessary?** Oregon law creating a building codes agency specifically calls for Oregon's building codes to encourage innovation, experimentation and cost effectiveness in the codes administration (ORS 455.015 (1)(b) and 455.040 (1)). Adoption of the REACH code created a clear pathway to this end but this bill dispenses with the REACH code.
- 2. Retain the REACH code:** If HB2423 is going to move forward, the current OBCD administrative rule allowing the REACH code pathway should remain intact until an Oregon Small Home Specialty Code is entirely vetted and adopted. Obtaining the REACH code was a long and involved process and must not be summarily erased while another lengthy process is initiated. The bill should mandate retention of the REACH code until a replacement is adopted.
- 3. Oregon's residential code does not require sprinklers, then why for small homes?:** Forty seven states do not require sprinklers. The -A Engrossed HB2423 text requiring sprinklers are not based on scientific evidence of need, notwithstanding advocacy from some fire safety advocates. The cost of sprinklers is not inconsequential. Sprinkler advocates have overestimate the benefits and underestimate the costs of sprinklers. Please request my prior risk analysis on this bill for elaboration. OBCD's own specialty consultant noted three different times in their seven page report to BCD that they found no evidence of higher fire risk in small homes than conventional dwellings, therefore small dwellings costs should not be penalized for just being small. When life safety risks are given as the rationale for sprinklers, please know that unaffordable safe housing has orders of magnitude higher human safety risk than the marginal additional safety of a sprinkler system, based on statistical evidence.
- 4. Advisory Committee must include small home specialist:** The advisory committee of OBCD on the small home specialty code mandated by this bill has no categorical expertise in small home design and construction. I suggest the current advisory committee include at least one small, preferably two small home specialists. Reflecting concern over how a similar committee recommendation two years ago was ignored by OBCD, legislative language must provide directive to OBCD to be an honest broker of new code rulemaking which reflects actual costs, risks and benefits.

I appreciate your attention on this important topic of affordability and innovation in addressing Oregon's dwelling price burdens, especially recognizing the unique characteristics of small home provisioning. Please contact me for evidence of any statement I have made in this submitted testimony.

Sincerely, Tom Bowerman; designer-builder, advisor to Square One Villages in Eugene, Oregon
33707 McKenzie View
Eugene, Oregon 97401
E-mail: tbowerman001@gmail.com