

Testimony of
Pacific Resource Partnership

State of Hawaii
Department of Accounting and General Services
State Building Code Council
Subcommittee of Building Officials Meeting

Proposed Amendments to the Hawaii State Building Code
Monday, October 19, 2020
8:00 a.m.

Aloha Members of the Subcommittee of Building Officials:

Pacific Resource Partnership (PRP) **opposes** the adoption of Section 3113, relating to Relocatable Buildings, of the 2018 International Building Code (IBC) as a part of the State Building Code.

We are concerned that the definition of “Relocatable Buildings” is broad enough to include factory-built housing (FBH), modular housing, and other types of housing built within a factory. The only exception provided in this section states that “This section shall not apply to manufactured housing used as dwellings.” At the last Subcommittee of Building Officials meeting on September 24, 2020, this Subcommittee decided not to adopt Appendix E of the 2018 International Residential Code, relating to manufactured housing. As a part of this discussion, it was recommended that an investigative committee review how to codify FBH independent of the 2018 IBC and IRC. Based on this recommendation, we respectfully request that this Subcommittee delete Section 3113 from the State Building Code or adopt a clarifying amendment stating that this section shall not apply to “manufactured housing, factory-built housing, modular housing, or other types of housing built within a factory.”

Moreover, we are also concerned that the adoption of this section will give an unfair advantage to companies that build FBH, modular housing or other types of homes built within the factory over traditional homebuilders by allowing these types of homes to be inspected by an approved inspection agency during off-site construction. Amendments to the State Building Code should ensure that the inspection requirements for Relocatable Buildings, including but not limited to FBH or modular housing parallel the requirements that traditional homebuilders must follow to maintain a level playing field for all homebuilders—each and every home built within the factory should be inspected by the building official.

Given the above, PRP respectfully request that this Subcommittee delete Section 3113 from the State Building Code or adopt amendments clarifying that this section does not apply to FBH, modular housing or other types of housing built within a factory.

Thank you for this opportunity to provide written comments.

