

# Hawai'i Construction Alliance

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November 17, 2020

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

## **RE: Comments to the State Building Code Council**

Dear Chair and members of the State Building Code Council:

The Hawai'i Construction Alliance is comprised of the Hawai'i Regional Council of Carpenters; the Operative Plasterers' and Cement Masons' Union, Local 630; International Union of Bricklayers & Allied Craftworkers, Local 1; the Laborers' International Union of North America, Local 368; and the Operating Engineers, Local Union No. 3. Together, the member unions of the Hawai'i Construction Alliance represent 15,000 working men and women in the basic crafts of Hawai'i's construction industry.

We would like to submit comments regarding the adoption of provisions in the state building code related to factory built and or modular construction prior to the formation of an investigative committee.

At the October 20, 2020 meeting Chair Haigh recommended that an investigative committee be formed to investigate the adoption of provisions of the state code that pertain to FBH and modular construction and to send that committee's findings to the SBCC.

To date, the investigative committee has not been convened, or invitations sent out to industry stakeholders who are interested in attending these meetings.

The Subcommittee of Building Officials has also been proposing to adopt provisions of the International Building Code that pertain to FBH and modular construction, even after we have provided testimony that any matter regarding FBH and modular construction should be reserved for the investigative committee.

The Alliance is asking that the Subcommittee of Building Officials cease proposing amendments to the state building code, and that the State Building Code Council convene the investigative committee regarding FBH and Modular construction, so that stakeholders within the building industry have a chance to discuss these issues in the proper forum.

Mahalo,

A handwritten signature in black ink, appearing to read "Nathaniel Kinney". The signature is fluid and cursive, with the first name being more prominent than the last.

Nathaniel Kinney  
Executive Director  
Hawai'i Construction Alliance  
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