

May 17, 2021

State Building Code Council Kalimoku Building 1151 Punchbowl Street Honolulu, Hawaii 96813

Dear Mr. Wiig, SBCC Chair

I am a member of SEAOH and do not agree with SBCC code amendments related to Tsunami design and Wind-Borne Debris Regions that establish local standards that are in excess if the National Standard (ASCE 7-16). The studies and data used to justify increasing wind and tsunami requirements for the 2018 SBCC should be reviewed by independent experts/engineers prior to implementation. Additionally, the impact to our community in relation of the additional construction costs, insurance cost and overall structure insurability involved in implementing these more stringent requirements need to be weighted with our political leaders.

As far as we are aware, there was no voting or membership consensus garnished prior to the submittal of these amendments.

- The Wind-Borne debris requirements have been modified to include areas of lower risk to be included in these requirements. This is a higher standard than is provided by both the national standards and wind-borne debris regions established by the City & County of Honolulu Building Department in the 2006 amendments.
- The Tsunami requirements were modified to mandate lower Risk Category buildings to be designed to an Essential Building 2,500 year event. It is our understanding that this has been removed from the 2018 SBCC but if there is some testimony to amend this back in, we would not support that.

We do not agree with these amendments and have found them to add substantial cost to the construction. Of particular concern is their impact on affordable housing where cost increases have made some projects financially unfeasible to build.

Sincerely,

Ken K. Hayashida, President KAI Hawaii, Inc.