



March 25, 2019

Senator Chuck Riley, Chair
Committee on Business and General Government
900 Court St. NE
Salem, Oregon 97301

RE: Support of SB 410-Relating to excluding RV from state building code regulation.

Chair Riley and Members of the Committee:

The City of Eugene supports SB 410 and the -2 amendments, which would effectively remove the requirement for Department of Consumer and Business Services (DCBS) and the Building Codes Division (BCD) from regulating the construction, inspection, and permitting of recreational vehicles and mobile dwellings including the Tiny Homes on Wheels classification.

Under rules adopted by BCD in the fall of 2018 related to the state's Reach Code, local jurisdictions are required to inspect the manufacture of the Tiny Homes on Wheels products, if the product is manufactured within the city's jurisdiction. Additionally, if one of these products comes into the community, again local governments must inspect for adherence to standards adopted by BCD. During the rule making process, the City of Eugene and 15 other jurisdictions commented in opposition to the inclusion of the mobile unit permitting and inspection requirements being adopted by BCD, due to the departure of traditional permitting services and organizational capacity issues.

These issues still remain for cities and counties across the state. SB 410 would remove the requirement under the Reach Code and focus local building departments on the review and inspection of permanent housing structures, not mobile units-including the Tiny Homes on Wheels category. Additionally, as these products are mobile and can move from one jurisdiction to another, or one state to another, there is no consistency for a mobile standard. SB 410 would clarify the recreational vehicles standards that would apply consistently across state lines, linking with the federal HUD standards.

We believe that removing the regulatory oversight of BCD on recreational vehicles, including the Tiny Homes on Wheels included within the 2018 Reach Code updates is the right step and ask that you give SB 410 a 'Do Pass' recommendation.

Sincerely,

Submitted electronically

Ethan Nelson
Intergovernmental Relations Manager