



**To: Senate Committee On Housing and Development**

**From: Chief Brian Stewart**  
Clackamas Fire District  
Oregon Fire Chiefs Association

**Chief Ben Stange**  
Polk County Fire District No. 1  
SDAO Fire Districts

**Date: March 10, 2025**

**Re: SB 49 (Dash 1 Amendment – Testimony in Opposition –  
Building Codes Structure Board Membership Changes in 9(3)(f))**

**Chair Pham, Vice-Chair Anderson and Members of the Committee,**

On behalf of the **Oregon Fire Chiefs Association** and the **Special Districts of Oregon Fire Districts**, we express strong concerns regarding provisions in the Dash 1 amendment to SB 49, specifically Section 9(3)(f), which would allow a fire protection engineer to be appointed in place of a fire protection agency representative on the Building Codes Structures Board.

The current provision ensuring a fire protection agency representative on the Board is vital to the fire service community. This position provides a direct voice in the building code adoption process, allowing fire service officials to offer essential insights on fire and life safety issues. The fire service perspective is paramount in these discussions, as fire officials are uniquely positioned to understand the real-world implications of building codes on emergency response, fire prevention, and public safety.

The Building Codes Structures Board plays a critical role in harmonizing building and fire codes, much like the Oregon Fire Code Advisory Board, which appropriately includes a building code official as a member to ensure balanced perspectives. The proposed amendment undermines this established relationship by creating the opportunity for a fire protection agency representative with a fire protection engineer. While fire protection engineers bring technical expertise, they do not serve the same role as fire officials, who are deeply engaged in fire prevention, emergency response, and code enforcement. This substitution would diminish the fire service's ability to provide firsthand knowledge and experience to the Board's deliberations.

Furthermore, this proposed change appears to have been initiated by proponents of single stair exit legislation, aiming to eliminate fire service concerns and remove a voting role from fire officials on the Board. The fire service was not contacted about the proposed change in

board composition. However, if a fire protection engineer were appointed in place of a fire service representative, it would effectively bypass crucial fire safety review by any fire protection agencies' representative. This effort to strategically restructure representation on the Board is a direct threat to the integrity of the fire and life safety considerations that must remain at the forefront of building code discussions.

We urge the Committee to reject this provision of the Dash 1 amendment to SB 49. The fire service's role in the building code process is indispensable. Ensuring that fire service officials maintain their rightful seat on the Building Codes Structures Board is crucial to maintaining a balanced and safety-focused approach to building codes in Oregon.

Thank you for your time and consideration.