

From: Clerk of the Board Office
To: COBSupport@mendocinocounty.org
Date: 2/26/2018 2:22 PM
Subject: Fwd: Class K standards Agenda Item 5d

>>> Kathy Bailey <kb@pacific.net> 02/26/18 14:22 >>>

[I also sent this message to BOS@mendocinocounty.org but am sending it here in hope of enhancing the likelihood that Board members see it prior to tomorrow's meeting. Thanks. KB]

Hi Members of the Board of Supervisors -

I apologize for providing this comment on the proposed Class K revisions at the last minute.

Although I am unlikely to myself be building any time soon, a review of the Class K proposal raises concerns about how families will be able to provide affordable housing for themselves in the future. The two items I find the most onerous are related to fire safety:

Requiring indoor sprinklers in homes that are on the larger end of the spectrum for what would otherwise qualify as Class K under the rule revision is not a cost-effective strategy in a rural environment. Could there not be some trade-off that would allow enhanced landscaping fire resistance in lieu of indoor fire sprinklers? Extra strong requirements for smoke alarms could also be part of this trade-off. **It seems particularly odd that manufactured homes are exempt from the sprinkler requirement. As far as I know, there is no reason to think that manufactured homes are any more fire resistant than conventionally constructed homes.** Thus, it seems likely that this exemption was the result of a successful lobbying effort on the part of the manufactured home industry. In Mendocino County, do we really want to preferentially promote manufactured homes, which generally have a shorter effective lifespan than conventionally built homes? This seems very short-sighted.

The other requirement that seems to be over-the-top is requiring tempered glass in all windows. How many lives is this really going to save in Mendocino County? What kind of homes are we going to have if owner-builders cannot afford to have a reasonable number of windows?

Finally, I am saying the following with all due respect to the Board of Forestry and Fire Protection and the processes they go through to adopt regulations. Some of you will know that I spent all too many years regularly attending Board of Forestry meetings and sub-committee meetings where, at the time, I represented CA Sierra Club regarding state-regulated forestry. Environmental advocates were generally out-numbered literally by 30-1 or more in most months. Although I did not participate in the hearings that resulted in the fire-related building regulations, **it is highly likely that any affordable housing advocates that were participating in the rule-making process were also heavily outnumbered by advocates for those urging adoption of their particular product, be it tempered glass windows or indoor fire sprinklers.** Numbers count in an advocacy situation, and it is hard to make your voice heard when you are so outnumbered.

It is your responsibility as members of the Board of Supervisors to take the whole picture into consideration.

We all want fire-safe communities and fire-safe homes. However, Mendocino County must balance fire-safe needs against the critical local need for affordable housing. I urge you to modify the proposal you have on the agenda and find a better balance.

Best regards,
Kathy Bailey