

RESPONSE TO PROPOSED CLASS K CHANGES

Mendocino County Board of Supervisors:

My name is Dan Antonioli and I am a third generation general contractor and developer in California. I have completed a minor subdivision in Laytonville with the intention of creating affordable green housing. At this time it doesn't make financial sense to build spec homes for sale as it is a money losing proposition. But selling an undeveloped parcel that's been approved for development to someone who can use a Class K permit to build a home is a sensible way to create affordable housing. Many of the proposed changes I have read would dramatically increase the cost of development and essentially do away with Class K standards altogether. These changes would also devalue my subdivision, which was a very costly endeavor.

I know a thing or two about building codes but confess that I am ignorant of most of them, as well as the various agencies that regulate them. Adding to this lack of knowledge is the fact that the codes are updated every three years in California.

As such, we are referring to a very large and complex set of building codes, regulations, and government agencies. My discussions with Supervisors Hamburg and Crosky and many people in the community concerned about the proposed changes suggests to me that we are all in need of an education as to what we're talking about and until we are on the same page I think it's prudent to hit the pause button on these proposals so that we can at least make sure we know what it is we want to change, save, and improve upon.

For example, I find it troubling that the "Uniform Building Code" is still being referred to as a "model code" for revisions to Class K. The Uniform Building Code no longer exists. It was changed in 2000 to the "International Building Code" and adopted by the State of California, amended, and is referred to as the "California Building Standards Code," or simply the "California Building Code."

In your documents these codes are referred to interchangeably and this has caused confusion that needs to be clarified.

I agree that Class K needs to be improved. I've seen very well built Class K homes and some that were very poorly built with accidents waiting to happen. For example, I recently inspected a Class K home that had a winding staircase with stairs that were not code compliant. The inside winders had no tread (which is required in the current code) and were very dangerous. Stair accidents are the leading cause of injuries and deaths in buildings and I would support requiring that they be built to the current code. (Over 1 Million injuries occur each year as the result of stairway falls. Staircase and stairway accidents constitute the second leading cause of accidental injury, second only to motor vehicle accidents. Each year, there are 12,000 stairway accident deaths. *National Safety Council*)

Many people are upset with the fire sprinkler proposal. Most jurisdictions don't require them in homes. The City of Oakland does not require them for secondary units and you might ask yourself if the laws of physics operate any differently in a primary residence or a secondary residence.

As has been noted in the press, rural off-grid homes with limited water supplies could have major challenges to get fire sprinklers to work as intended. Short of requiring expensive water and power back-up supplies it's likely that they simply won't work. What if the plumbing freezes as many homes are now experiencing in our frigid cold winter?

As a sensible alternative, I support mandating another fire code in California, which is to install hard-wired smoke and CO detectors with battery back-up. These can be installed for approximately \$200 to \$500 depending on the size of the house and number of bedrooms. As long as the batteries don't die these will work under any condition. If the plumbing freezes and the power goes out they will still work, unlike fire sprinklers, and are more likely to save lives.

While you work through the issues associated with the other proposals I would like to also propose that you develop a handbook with the basic code requirements that the next generation of Class K permitting will have. This would be very useful if it's formatted in plain English with references to codes and utilizing diagrams showing how some of the codes are applied.

Replacing Class K with the California Building Code would completely nullify the current Class K standards and there are dozens of changes that would be required that have yet to be discussed. For example, the requirement of using graded lumber would be a huge expensive burden on owner-builders wanting to use milled lumber from trees that they removed in order to build roads, create building footprints, etc.

I want to re-emphasize the need to slow down and take more time to really get these proposals fleshed out. Let's get this right! Let's create affordable housing for Mendocino County. The Friday February 23rd issue of the Ukiah Daily Journal had two articles specifically addressing the need for affordable housing and most of the content was just talk (aside from the condominium example). You have an opportunity to improve Class K so that it protects people, creates more durable housing, and allows the county to have a solid permitting process that can assist in the urgent need for affordable housing.

Thank you for your time.

Sincerely,

Dan Antonioli