HOME BUILDERS association

Mayor Robert McDavid
Office of the Mayor
City Hall P.O. Box 6015
Columbia, Mo 65205

Dear Mayor McDavid and Members of the City Council:

We are writing today on behalf of the Home Builders Association of Columbia (HBA) and our Building Codes Committee. We hope to address the proposed changes to the building codes and more specifically a couple of areas where we find ourselves in disagreement with proposals made by the Energy and Environment Commission (EEC). We offer the following for your consideration:

Background

For many years, members of the HBA have worked actively as members of the City's Building Codes Commission. Our members offer a great deal of knowledge and hands-on experience with the building process, along with a clear understanding of the building codes. We have been concerned that, in some cases, recommendations for changes to the code have been brought forward that were not well vetted or processed, and in some cases, reflected personal preferences rather than setting a standard that should be community-wide. In recent years, we have also seen a pattern develop where the City's EEC, who does not actively participate in the full review process, offers suggested changes to the code, mostly focused on the area of energy preservation. These suggested changes have not been thoroughly debated and discussed as a part of the process of proposing changes and updating the City's code. We believe the two boards and commissions should work together with the final regulations coming from the Building Codes Commission and its membership to the City Council for consideration.

 From the HBA's perspective, we believe that the City's codes establish the minimal building code standard for our community. Should individuals wish to go above and beyond the code, we support their right to do so, however, as a community, we must be

- careful not to establish requirements that are above the minimal standard without thorough consideration.
- Any addition to the code, particularly in the area of energy code/conservation, should only be applied if the requirement meets the 10-year payback standard.
- Adoption of codes that don't meet a cost recovery requirement and that don't provide
 the desired conservation, artificially inflate the cost of housing and create a
 circumstance requiring citizens to implement changes that are not economically
 balanced.
- Many of the suggestions which have been brought forth from the EEC, such as the
 number of high-efficiency lamps required, requiring insulation of hot water lines, the
 amount of insulation in the attic and the requirement to change from 2x4 framing to 2x6
 framing in order to accommodate additional wall insulation, have not been properly
 vetted and considered as they relate to the economic payback.
- Staff has, in some cases, submitted an economic analysis, yet we continue to see proposals, that do not meet the desired economic return.

In closing, we wish to reinforce that the codes are for the purpose of establishing the minimal standards for our community. The Building Codes Commission and its members have committed hundreds of work hours to forward to the City Council proposed changes, which are consistent with the national code and consistent with having better, stronger, more efficient buildings our community.

We hope that you find our recommendations useful in your consideration. Should you have questions, please don't hesitate to contact one of us.

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Chair HBA Building Codes Committee Member City Building Codes Commission

Member City Building Codes Commission