



October 14, 2008

Comments to the Housing and Environmental Standards Work Group of the Virginia Housing
Commission

Re: Senate Bill 363 and House Bill 333

Thank you for the opportunity to offer the Chamber's perspective on issues before the workgroup.

On the important issue of fire safety, we recognize that doing nothing is not an option; our organization is entirely supportive of efforts to improve fire safety in such properties in a cost-effective manner. At the same time, going forward with a legislative remedy that mandates one particular solution is not the answer. Building codes are a regulatory issue, not a legislative one. As such, this should be considered as part of the 2009 codes cycle, a regulatory process administered by the Department of Housing and Community Development.

Accordingly, we urge you to recommend that the Housing Commission ask the Department of Housing and Community Development to consider multiple options for increasing fire safety in unsprinkled high-rise residential structures as part of the 2009 Uniform Statewide Building Code (USBC) adoption process.

In this way, stakeholders could assess several options, including the concept of a evaluation system that would determine what type of retrofitting from among several options is needed by an existing structure. In some cases, it might be that sprinkling is mandated by the current condition of the structure. In other cases, it might be that the current condition of the structure warrants less costly retrofits. In any event, the resulting regulation would be a product of consensus among the various stakeholders and experts in the field, and of broader concern to the business community, it would be one meted out in the proper venue for this type of issue.

Thank you again for the opportunity to comment on this matter.

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Contact:
Tyler Craddock
Director of Government Affairs
Virginia Chamber of Commerce
(804) 237-1455
t.craddock@vachamber.com