

**Senate Local Government & Housing**

**02/06/2025 01:30 PM**

**SB25-002 Regl Bldg Codes for Factory-Built Structures**

**Typed Text of Testimony Submitted**

<b>Name, Position, Representing</b>	<b>Typed Text of Testimony</b>
<p>Jeany Rush Against themselves</p>	<p>TO: Senate Committee of Local Government &amp; Housing</p> <p>RE: SB25-002 Concerning the Development of Regional Building Codes that account for Local CLIMATIC and GEOGRAPHIC conditions for the construction and installation of residential and nonresidential factory-built structures</p> <p>SPONSORS:BRIDGES, EXUM, BOESNECKER, STEWART 2-6-25</p> <p>FROM: JEANY RUSH, COLORADO SPRINGS CONSTITUENT</p> <p>VOTE: NO</p> <p>"The bill provides that after the state housing board (board) adopts rules about any activity required to undertake or complete the construction or installation of a factory-built nonresidential structure, a factory-built residential structure, or a factory-built tiny home (factory-built structure), the state plumbing board, the state electrical board, and the state fire suppression administrator do not have jurisdiction over and their rules do not apply to a factory-built structure.</p> <p>On or before July 1, 2026, the advisory committee on factory-built structures (advisory committee) is required to develop regional building codes for factory-built structures and implementation requirements and submit the recommended codes to the board." YOUR WORDS TO INTRODUCE THIS BILL.</p> <p>This bill creates several more levels of government/over reach in our already flooded industry of real estate, construction, and mandates, statutes, rules, fees, procedures, and much more to slow down, private ownership. We have building rules for factory built, etc. forms of construction. Further we already have city, county, and state, and federal regulation for all of this. We do not need Colorado to jump into more and more STATE control like the gulag has taken permanent residency into our lives and our communities.</p> <p>I see something else that is bothersome, worrisome even. With all of the growth, development, etc. in our state, we are seeing more and more encroachment into our personal ownership lives, into our land ownership, and to my dismay, the encroachment of the counties into municipality creation, encroaching more into unincorporated areas, into county owned land, and how that restricts land owners. I am not sure some of these county encroachments are even legal by many revelations of land grabs, Chevron repeals, etc. Colorado keeps creeping further and further into the fog of OverLord control.</p> <p>When you add the professionals, plumbing, electrical, builders, etc. you are adding even more layers, when we already have those laws. This is just too much and way</p>

	<p>too fast. In the interest of satisfying the liberal bot organizations, even the Bloomberg folks writing our bills for us from afar, and the inability for our legislators and citizens to even comprehend, read, react to the over use of laws which harm not help, I would table this for now, and stop trying to take away every right we have in Colorado.</p>
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**Hanks Community Resilience and Wildfire, LLC**  
Combining regulations, knowledge, and collaboration

Esteemed Senator Bridges and the Senate Committee of Local Government & Housing,

I am a retired Fire Marshal in Southwestern Colorado and the owner of an LLC that assists local communities, developers and owners to understand, implement, and proceed through the process of development and implementation of codes to develop resilient communities, businesses and homes in Colorado. SB25-002 presents many challenges to the resilience and safety of our communities in Colorado, particularly in areas outside of the metro areas.

The bill implies that the purpose is to address the cost of housing affordability across the state. Affordability implies that after the cost of the home, the individual will have sufficient funds for other necessities. What this tends to overlook is the resilience and safety of the home or building in the long-term. For those challenged in Colorado with the high cost of construction, providing a home or business that is less likely to survive an incident does not assist the owner in the long-term. It only becomes more costly both for insurance and day-to-day costs to the owner. I support the manufactured industry but believe that it must meet the same standard of safety as other types of development and that includes interaction at a local level.

The bill appears to ignore the aspects of development that occur on a local level for the safety of all involved. It grants immunity to manufactured homes from local requirements that have been placed due to infrastructure (access, water supply, fire service capabilities, vegetation management, etc.). These are not met through a regional code but are based on site specific agreements of development for valid reasons. It would be irresponsible of the State of Colorado to have one onsite built structure adjacent to a manufactured structure with entirely different standards that place both homes at greater risk and increases the risk of the neighborhood as an entity because of a reduction in safety of the manufactured structure.

The State of Colorado has developed standards and certifications for the installation of automatic fire suppression systems that have proven to identify and correct shortcomings in design and potential failures of these systems in both on site builds and manufactured builds. This bill attempts to circumvent these rules as they relate to safety of the individuals and the complexities of local specifics. It proposes to develop 2 state entities that must hire, train and support permitting and inspection of construction of automatic fire suppression systems, one for onsite builds and one for manufactured builds which is not mindful of the state budget nor develops consistent code implementation. There will also be duplicate processes in the State of Colorado for 3<sup>rd</sup> party certifications to review, install and inspect thereby potentially increasing costs.

The issues as they relate to manufactured builds and automatic fire suppression systems have ranged from manufactured buildings with automatic fire sprinkler systems installed that are broken during transport with no ability to inspect by local on-site inspector prior, improper design of the system for the area, lack of review of the building as a whole (3000 square feet of a home built as manufactured and the additional 2500 square feet stick built on-site), 4 stories of a double hotel built as manufactured and 2 floors built on-site, sprinkler heads placed in locations in which they will not activate until such time as the home is almost fully engulfed and lack of accommodating local requirements for specific development areas. It is for these types of incidents that the system of review, permitting and

inspection for both on-site builds and manufactured builds through the Division of Fire Prevention and Control has been developed. These challenges were identified and addressed. The purpose was not to create additional cost but to ensure the systems were designed, permitted, and inspected with consistency to provide the best opportunity for success of the system when activated thereby protecting lives and property.

Site designs for locations where these structures are installed is just as critical for them as any other structure. Access for emergency services, available water supply, capabilities of the local emergency services, site specific geography, vegetation, local building codes, land use codes, etc. must all be taken into consideration when determining what is needed for the structure to be installed correctly not just how the building is built.

In short, this bill needs additional work. We, as the State of Colorado, need to reduce duplication of services at a state level, ensure equal safety for all, reduce pandering to a specific development style, work together not separately, and recognize that affordability is both short and long term.

I appreciate the opportunity to comment on this bill and hope that we remember that when someone buys or builds their first home, it may also be the only home that they can ever afford in their lifetime. We must do what we can to provide the resilience to the home and community that reduces the impact of an incident.

Respectfully,

Karola J. Hanks  
Owner of Hanks Community Resilience and Wildfire, LLC