

**OREGON
Fire Marshals
ASSOCIATION**

March 29, 2023

Senate Committee on Housing and Development
Oregon State Capitol
Salem, OR 97301

Dear Honorable Chair Jama and Members of the Committee:

Thank you for the opportunity to provide comments on SB 847. On behalf of the Oregon Fire Marshal's Association (OFMA), I want to express our strong concerns to SB 847 regarding fire and life safety. OFMA supports the much-needed housing statewide, especially for vulnerable populations. While we support SB 847, OFMA would like to highlight a few concerns:

- I. As written, the current proposal would go around the formal process of state building and fire code adoption due process. It would eliminate the subject matter experts in providing opinion on fire and life safety concerns prior to adoption.
- II. Reference to Seattle Building Code, Seattle Fire can provide high-rise rescue using aerial apparatus. The Oregon fire service is limited in these capabilities statewide.
- III. Single exit stair proposal is less stringent than national code standards. The International Building Code (IBC) and the Oregon Structural Special Code currently limit the configuration to 3 stories above grade plane. Codes are developed due to the loss of life.
- IV. The basic concept of "two paths" for egress is that if one becomes unavailable during an incident, the second one allows firefighters ingress to the fire location and occupants are still able to evacuate. Single exit paths are allowed only in limited circumstances, within reachable rescue height.
 - a. Most recent example of large loss of life incident, Grenfell Tower Fire-2017, 72 fatalities. Single means of exiting contributed to the large loss of life.
- V. We have concerns that DCBS would be required to adopt single exit design standards regardless of whether the structures board determines that a single exit option is safe without the fire service's considerations and resources.

Additional Sections to SB 847:

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Fire Apparatus Access Concerns

- I. Section (2) Residential Use of Commercial Lands, Section (7) Emergency Shelter Siting, Section (17) Single Room Occupancy and Section (20) Siting Duplexes "Middle Housing", we have concerns with emergency vehicle access as it relates to fire department access, response times may increase within vulnerable communities if fire department access is not reviewed by local fire authorities.

On behalf of the Oregon Fire Marshal's Association, thank you for this opportunity to provide testimony.

Regards,



Shawn C. Olson
President
Oregon Fire Marshal's Association