



Sept 26, 2019

Doug Orth  
Washington State Building Code Council  
1500 Jefferson St SE  
Olympia, WA 89504

Dear Doug,

This testimony is submitted on behalf of the Tiny Home Industry Association (THIA), a 501(c)(6) nonprofit organization, operating as a trade association that was originally formed in 2016 with support funding provided by the Colorado Blueprint 2.0 Initiatives in coordination with the Colorado Office of Economic Development & International Trade and under the leadership of former Colorado governor, John Hickenlooper.

It is our mission to promote the interests of the Tiny Home Industry by developing standards and promoting best practices in the construction, placement and use of tiny houses as permissible and permanent housing.

The THIA strongly endorses your currently proposed changes in WAC 51-51-60104, which add provisions for tiny houses to the Washington State version of the International Residential Code (IRC) by the inclusion of the IRC Appendix Q, as required by ESSB 5383.

More specifically, we endorse the inclusion of the planned 2021 changes to the IRC's Appendix Q. We recognize those changes to Appendix Q as being significant improvements over the 2018 version of Appendix Q. In order to provide additional clarity, the planned 2021 version of Appendix Q modifies potentially ambiguous language that is present in the 2018 version. The planned 2021 version of Appendix Q also includes new language whose intent is to further clarify the intent of the 2018 version of Appendix Q.

ESSB 5383 states that "tiny house" and "tiny house with wheels" means a dwelling to be used as permanent housing with permanent provisions for living, sleeping, eating, cooking, and sanitation built in accordance with the state building code.

The THIA believes that the planned improvements to the Washington State IRC, along with the planned 2021 version of the IRC Appendix Q, fully addresses the requirements for tiny houses. However, we believe that the IRC Appendix Q falls short of adequately addressing tiny houses with wheels. It is for that reason that we offer the following suggestions:

1. Require such tiny houses with wheels to be built on an engineered trailer system in which the chassis:
  - a. meets the requirements of the Washington State Building Codes for a compliant flooring system.
  - b. includes an engineered means of attachment of the tiny house to a fixed foundation that meets the requirements of the Washington State Building Codes.
2. Require such engineered trailer system designs to be approved through a combination of appropriate inspection and approval authorities that are recognized and authorized by Washington State to perform such design inspections and design approvals in the state of Washington.
  - a. The engineered anchoring system design must be approved through an appropriate building design inspection and approval authority.
  - b. The design elements of the trailer system that permit the unit to travel the public highways must be approved through an appropriate trailer design inspection and approval authority.
  - c. The resulting trailers that are produced according to an approved trailer system design must be licensed for use on public highways by the Washington Department of Licensing.

The above suggested approach to defining a legal and habitable tiny house with wheels, envisions that such an engineered trailer system would require two (2) approvals:

1. Approval of the unit and the floor/foundations system on the chassis to meet SBCC standards inclusive of Appendix Q
2. Approval of the unit's transportable elements, e.g. hitch, lights, wheels, axles, brakes, tongue weight, etc., to be completed by the Washington Department of Licensing.

With the two approvals, the State would have a legal tiny house with wheels as contemplated by legislative directive in ESSB 5383.

Thank you for your kind consideration of our proposals.

Regards,  
Brad Wiseman  
Chairman of the Board of Directors for the THIA