



# INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL UNION 1260 EMPOWERING THE PACIFIC

THIRTY-THIRD LEGISLATURE, 2025

Senate Committee on Public Safety and Military Affairs

HEARING DATE: Monday, March 24, 2025

TIME: 3:05 p.m.

PLACE: Senate Committee Room 225

**LATE**

RE: Senate Concurrent Resolution 48/ Senate Resolution 30 - Comments

Aloha Honorable Chair Elefante, Vice-Chair Wakai, and Committee Members;

The International Brotherhood of Electrical Workers Local 1260 (IBEW 1260) would like to offer the following **Comments on SCR48 and SR30**.

IBEW Local 1260, is comprised of approximately 3,000 members throughout Hawaii and Guam and consists of a diverse and highly-skilled workforce that supports the electric utility infrastructure across our state as well as government service contracts and broadcasting. We are committed to protecting the well-being of the members we serve and the community at large.

The two resolutions urge the International Code Council to extend the timeframe between model code updates and adoption processes and take a more balanced and deliberative approach to code revisions.

Although we appreciate the intent, we believe the remedies sought in these concurrent resolutions should be applied at the state level, specifically through Chapter 107 and the State Building Code Council.

The International Code Council is one of several national organizations which develop and maintain minimum codes and standards which govern our building industry with the underlying intent and purpose of protecting the health, safety, and welfare of the public.

Other such organizations include the National Fire Protection Association (NFPA) which promulgates the Fire Code, the National Electrical Code (NEC) and National Electrical Safety Code (NESC), as well as the International Association of Plumbers and Mechanical Officials (IAPMO) which promulgates the Uniform Plumbing Code (UPC) and the Uniform Mechanical Code (UMC).

These organizations go through extensive processes involving building officials, industry professionals, and industry stakeholders that update nationally recognized minimum codes and standards that ensure public health, safety, and welfare; improve efficiencies and reduce costs across the construction industry and built environment.

Respectfully, we recommend SCR48 and SR30 be deferred. Mahalo for the opportunity to provide comments on these resolutions.



March 21, 2025

**RE: International Code Council Comments on SCR48 and SR30**

Chair Elefante, Vice Chair Wakai, and Members of the Committee on Public Safety and Military Affairs:

The International Code Council (ICC) is a U.S. based non-profit with members in Hawai'i and across the world including architects, engineers, contractors, manufacturers, and government officials. Our mission is to help the building safety community, local and state governments, and the construction industry provide safe, sustainable, resilient, energy-efficient, affordable, and accessible buildings through the development of model codes and standards.

We submit this testimony in response to proposed SCR48 and SR30 that would urge ICC to extend the timeframe between model code updates and “take a more balanced and deliberative approach to code revisions.” **We ask the committee to defer both resolutions.**

**ICC’s code development and adoption process is already specifically designed to be both balanced and deliberative.<sup>1</sup>**

**Delaying the national model code adoption process would lead to a code that does not reflect the safest, most cost-effective methods already being implemented, such as recent updates to address issues such as:**

- **The benefits and potential risks of advancements in energy storage systems.**
- **The rising use of off-site construction to help reduce cost and waste.**
- **Evolving requirements to protect from wind and windborne debris, rain, and tsunamis.**
- **Elevating structures and critical systems to avoid damage from flooding.**
- **Methods to help ensure buildings in the wildland-urban interface are resilient in the face of wildfire.**

ICC employs a rigorous method committed to a transparent consensus-based process compliant with the federal Office of Management and Budget Circular No. A-119 establishing policies on federal use and development of voluntary consensus standards.<sup>2</sup> Participation is open to all at no cost, and ICC membership is not a condition to serving on a code review committee.

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<sup>1</sup> <https://www.iccsafe.org/products-and-services/i-codes/code-development>

<sup>2</sup> <https://www.iccsafe.org/wp-content/uploads/ICC-CDP-How-It-Works.pdf>

In addition to open committee participation, Hawai'i has three ICC Governmental Memberships (City and County of Honolulu – 12 votes, Kaua'i County – 8 votes, and State of Hawai'i – 12 votes) which can designate members to vote on whether to incorporate potential code changes.<sup>3</sup>

The code development process benefits from the inclusion of a multitude of experiences and expertise, so ICC also makes scholarships available to attend code hearings and other functions in person and provides free virtual alternatives.<sup>4</sup>

The process includes multiple opportunities for public comment, review of proposals, and appeals, which are ultimately subject to a vote by government regulators with expertise in laws and regulations relating to the public health, safety and welfare and who have **no vested financial interest in the outcome**.

The process takes three years to complete and is designed to allow for thorough vetting of proposals based on experiences gained that improve life and safety measures during disasters, evolving technology and construction practices, and updates in materials and production techniques.

Code change proposals include a statement on the cost impact to aid review, and the overall codes are reviewed regularly for opportunities to simplify language and decrease cost of implementation.

Similarly, the code is a flexible minimum code intentionally designed to adapt to local conditions. For example, while the model code addresses snow loads, it does so in a way that recognizes that is not an issue in tropical climate zones and so those provisions do not apply. While it calls for specific measures in areas such as Hawai'i that have the potential for high seismic or hurricane instances, those are not applicable in zones that do not have those designations.

ICC understands the funding and staffing challenges Hawai'i communities and the State Building Code Council face. We are committed to continuing to work with each of them and with the Governor's team to facilitate the best path forward, and we urge the Legislature to focus its efforts on the same.

ICC respectfully requests that the committee defer both resolutions.

Thank you.

Bryan Imai  
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International Code Council  
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<sup>3</sup> <https://www.iccsafe.org/voter-validation-process-faqs/>

<sup>4</sup> <https://www.iccsafe.org/professional-development/education/scholarships/>

**SCR-48**

Submitted on: 3/23/2025 1:58:46 PM

Testimony for PSM on 3/24/2025 3:05:00 PM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Dylan P. Armstrong	Individual	Oppose	Written Testimony Only

Comments:

If you want to have 200,000 displaced persons and 20,000 dead residents, letting outdated building inventory accumulate without any meaningful change in new construction is a great way to do it.

A single Category 3 hurricane on South O'ahu will in fact obliterate Honolulu. But Cat 4 and Cat 5's are also very probable, as well as these storms striking other islands like Maui.

I regretfully must oppose further degrading Hawai'i's lack of compliance on building codes.

Your friend,  
Dylan P. Armstrong