

LARIMER COUNTY | Community Development

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May 6, 2022

ASTM International

To Whom it May Concern:

I am aware that ASTM is considering final approval for a Tiny Home Standards Development Committee, a proposal which overwhelmingly received COTCO approval. I am also aware that the International Code Council (ICC) has raised objections to such approval. As a governmental member of ICC, a Colorado county building official, and one of the initiators of the Tiny Home bill (HB22-1242) currently nearing final approval in the Colorado Legislature, I write to urge you to issue final approval for this critically needed committee without further delay.

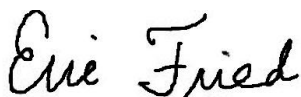
Some may argue that no ASTM standard is needed or that ICC's International Residential Code (IRC) should be THE standard for Tiny Houses. Nothing could be further from the truth. As you no doubt know, the IRC's prescriptive standards for footings and foundations have no place for Tiny Houses on Wheels and only apply to wood, masonry, and concrete foundations with footings placed below the frost depth of the locality. IRC voluntary Appendix Q for Tiny Houses does not address structural concerns such as footings, foundations or framing at all, only ceiling height, lofts, stairs, egress windows and energy efficiency. With no IRC rules, each Tiny Houses on Wheels would need an engineered foundation system and/or its wheels removed and placed on a conventional foundation.

Most Tiny Homes do not fit this limited model. Most Tiny Home owners want the potential mobility associated with a home on wheels, while being able to live for more than 30 days outside of an RV park. A purported solution that excludes 95% of the subject is obviously no solution at all. We need a solution in this state and across the US that allows Tiny Houses to come out of the shadows and into the full sunlight of legal approval, permitting and quality assurance.

Because Larimer County residents kept coming to me, other county staff and elected leaders asking how they could legally live on acreage in their Tiny Home, and we kept having to tell them there is no way to do so under existing state law, I worked with State Representative Cathy Kipp, the Colorado Division of Housing, and held numerous stakeholder meetings as we developed a bill to address the issue. As they saw the opportunity to legalize Tiny Houses on Wheels and give a boost to the industry, almost all Tiny Home groups in Colorado and beyond jumped enthusiastically on board.

There is a ticking clock here. HB22-1242 mandates the Division of Housing to adopt a standard appropriate to Tiny Homes by July 1, 2023. If ASTM does not develop its standard, or even if the ASTM standard is sufficiently delayed, the Division of Housing may have no option but to adopt the IRC with Appendix Q as the default standard. I administer the IRC every day. It is a fine code – but it does not remotely fit Tiny Houses on Wheels, a crucial part of the solution to our growing national housing affordability crisis.

In my professional and personal opinion, the real solution is a national standard for Tiny Homes, which are not RVs, mobile, manufactured, or modular homes. ASTM is in prime position to produce that standard. Please do not be dissuaded by incorrect information or questionable lobbying tactics by proprietary groups with conflicts of interest.



Eric Fried
Chief Building Official