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BlackHillsHomeBuilders.com

Office Of The Mayor  
Mayor Sam Kooiker  
300 Sixth Street  
Rapid City, SD 57701

Dear Mayor Kooiker & City Council Members:

This letter is in regards to the adoption of the 2012 code and associated changes. At the April 6, 2015 City Council meeting this issue was continued back to the Legal and Finance Meeting on April 29, 2015. The two issues that are in contention are the changes to the requirement for Soils Testing and the Sheet rocking or fire sprinkling of unfinished areas in basements.

The Black Hills Home Builders Association appreciates the City Council's awareness of Affordable Housing and how every dollar of added cost can put the American Dream out of the reach of families and individuals. NAHB estimates that a minimum of 25% of the cost of a home is from Government Regulation and this includes codes. We appreciate the City Council being so aware of affordable house and really contemplating these potential code changes.

**SOILS TESTING:** *The Black Hills Home Builders Association Board of Directors supports entirely deleting all soils testing sections within the 2012 code or if City Council decides to support soils testing, the current proposal as presented would be the only acceptable method.*

The proposed 2012 IRC states that the City shall require Soils Testing. To date soils testing has never been required for Residential Housing. During the hearings in the Building Board of Appeals there was a lot of discussion about this issue and requests that soils testing at some level become required primarily for the areas of expansive soils. In lieu of full soils testing a more conservative version was drafted and that is what was approved by the Building Board of Appeals.

The Black Hills Home Builders Association does believe that if the City Council agrees that soils testing of some kind should be mandated this is probably the most realistic way to accomplish this issue since it really leaves the testing between the Contractor and the Soil Professional, as well as the solution. In terms of affordability, which is difficult, the proposed change still has cost associated with it, at a minimum of \$200 to \$400 per house. If additional testing is required it will probably be an additional \$1000 to \$3000 or more depending on the scope of testing required by the soils professional. Then, after that if there is further remediation required, such as over excavation and compaction or over excavation and replacement with engineered fill the cost could exceed \$5000 to \$10000 or more depending on size of foundation and depth of over excavation. So as you can see from the dollars there can be a substantial amount of money involved with this process.

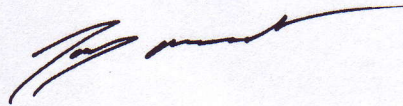


Even with those costs put forward, they are still relatively low compared to repairing the problem after the home is built and the legal fees associated with these problems.

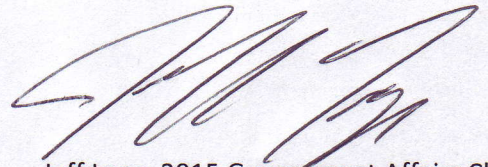
**SHEET ROCK UNFINISHED AREAS IN BASEMENT: *The Black Hills Home Builders Association Board of Directors supports the deletion of this section in the 2012 code as proposed.***

This section was discussed and struck during one of the meetings of the Building Board of Appeals. This section was struck since it is essentially adding additional costs to every home that has an unfinished basement. Also, if sheet rocking the unfinished area becomes required this material becomes garbage when the basement is finished. The rock will need to be removed to complete framing, plumbing, electrical, mechanical and etc. The difficult part to understand of the sheet rock requirement is that the materials that are now a concern have been used for 30 years and more. There is an option to do Sprinklers in lieu of sheet rock but either way there is \$2000 additional plus or minus depending on the size of the home.

Sincerely,



Jay Mendel, 2015 BHHBA President



Jeff Lage, 2015 Government Affairs Chair