



August 16, 2023

Mr. Michael Hyde
Operations Manager
Idaho Division of Occupational & Professional Licensing

Mr. Rick Stark, Chairman
Idaho Electrical Board
11341 W. Chinden Blvd.
Boise, Idaho 83714

RE: ZBR Rules Review, Rules of Building Safety - comments on proposed amendments

Mr. Hyde, Chairman Stark, and members of the Idaho Electrical Board,

On behalf of the Idaho Home Builders Association (formerly the Idaho Building Contractors Association) we appreciate the opportunity to provide comments on the draft rules for the electrical code board as you put into place updates from the 2023 Idaho legislative session as a result of House Bill 337.

The Idaho Home Builders Association (IHBA) consists of over 1,100 member companies engaged in the new, single-family home construction industry throughout the state. At a time when rapid population growth and rapidly rising home prices are gripping Idaho, our members are working hard to try to meet the demand with a goal of leveling off those home prices.

We are aware of the detailed work the Electrical Board is currently engaging, and very much appreciate the time, energy, and effort the Board has put into the rules review to this point. We also thank you for involving the residential homebuilders in the process and reaching out for our comments.

The IHBA is quite interested in a few aspects included in the recently adopted Idaho electrical code legislation. We are intrigued and excited about the prospect of creating a two-tiered

journeyman's license by creating a residential-level certification. We are also pleased with the residential journeyman/apprentice ratio of 1:6. We believe both of these elements will have the effect of lowering new home sales prices in Idaho.

As the Board reviews the 2023 National Electrical Code for adoption in Idaho the IHBA respectfully requests an amendment to require Arc-Fault Circuit Interrupters (AFCI) for bedrooms only in residential construction – as is the current Idaho code.

We ask the Board to take cost considerations into account. As you know, the AFCI breakers alone cost between five to ten-times more than regular breakers, not accounting for additional labor and markups.

As the Board knows, any additional cost of construction generally gets passed on in the sales price of the home. At a time when home prices in Idaho remain some of the highest in the nation, any new proposals should be carefully scrutinized.

Additionally, many of our builders have experienced complaints from consumers about AFCI breakers in their bedrooms tripping quite easily when using other appliances or utilizing those outlets. Their assumption is that our builders and electricians have failed to install the wiring and breakers correctly.

The IHBA requests the Electrical Board not adopt the NEC recommendation to require AFCI breakers in residential homes and continue the practice of requiring them only in bedrooms.

The IHBA very much appreciates the opportunity to review and comment on these proposed amendments and look forward to continuing to participate in the negotiated rule-making process as it progresses.

Notably, a recently updated study from the National Association of Home Builders shows that nationally, **nearly 25% of the sales price of a single-family home is due to the cost of government regulation** at all levels (including zoning, plan approval processes, stormwater permits, building code requirements, building permit fees, impact fees, sewer and water hookup fees, etc.). Another recent study shows that in Idaho, **for every \$1,000 increase in a home's sales price, 950 Idahoans** are priced out of the market. Our Association is dedicated to bringing the pride of homeownership to as many Idahoans as possible.

Should you have additional questions or concerns, please contact me at 208-949-9295 or danr@avimor.com or our IHBA Government Affairs Consultant, Ken Burgess at 208-861-2052 or ken@veritasadvisor.com

Thanks again for your efforts and your service to the people of Idaho, we know this process has taken much of your time and attention.

Sincerely,



Dan Richter
IHBA President

A handwritten signature in blue ink that reads "Dan Richter".