

JDB CODE SERVICES, INC.

Date: September 29, 2021
To: HRAC C/O Mo Madani
From: Joe Belcher
Subject: Comments on Appendix C

Regarding the ICC Appendix C to the International Property Maintenance Code, I believe the involvement of the HRAC is premature. I believe by participating in the process we are potentially indicating agreement. I believe these actions are premature. The HRAC and the Florida Building Commission (Commission) should not act until there is an official report on the failure. I have the following comments.

1. International Property Maintenance Code (IPMC) The beginning of the ICC document encourages adoption of the IPMC. I do not believe such adoption is desirable in Florida.
 - a. Jurisdictions that address the upkeep and maintenance of existing buildings typically have a department separate from the building department to do inspections and enforcement,
 - b. The effort is typically targeted at existing housing stock and there are local ordinances addressing the issues.
 - c. The inspection of existing buildings is not typically a building department function.
 - d. As I recall, when what would constitute the volumes of the of the building code was being discussed, property maintenance was left out as it was considered a topic best addressed locally.
 - e. Currently, jurisdictions that wish to adopt the IPMC are free to do so by local ordinance, and some have done so.
 - f. If the IPMC is made part of the Florida Building Code, inspectors and administrators may have to be licensed per Ch. 468 Part XII F.S.
2. We appear to be working toward the development of a solution before the problem has been defined. There have been no official reports on the collapse. While it is true the event was a tragic loss of life, we do not know the cause of the collapse and whether inspection would have helped.
 - a. We know that several inspections and reports were issued over the years on the property identifying structural defects or issues. Repairs were made and it is unknown to what extent past activities may have affected the issue positively or negatively.
 - b. Early indications are there were serious maintenance issues with the property in that problems were identified but inadequately dealt with at the time.
3. I believe the HRAC should recommend the Commission not act until the official reports are in on the cause of the collapse. The study recommended for approval by the HRAC to garner data from the Miami-Dade and Broward existing building inspection programs should be funded and commenced as soon as possible.
4. If to be adopted, an appendix should be to the FBC-Existing Building.
5. Inspections by engineers familiar with structural design should be specified.
6. Qualifications for the inspectors should be established.
7. A peer review of any inspection reports should be required.
8. Assignment of such a program to the fire department of a jurisdiction should be considered. The FFPC establishes an existing building inspection program, and the fire service is familiar with these types of programs.

Respectfully submitted,

Joe Belcher