



Mo Madani
Technical Director
Florida Department of Business and Professional Regulation
Building Codes and Standards Office
2601 Blair Stone Road
Tallahassee, FL 32399

August 31, 2022

Dear Mo,

Thank you again for the opportunity to submit comments about the work of the Florida Building Commission's Existing Building Workgroup. After hearing the ranking process during the group's first meeting, we are concerned about the idea of removing architects as qualified professionals to perform inspections.

Architects are currently in the statute to perform both phases of the inspections and we encourage the Florida Building Commission to not recommend any changes to that. Architects are responsible for the comprehensive building design including life safety and any aspect related to the human habitation of the building. An architect's duty is to protect the health, safety and welfare of the public in Florida's built environment. Architects are trained and licensed to understand the entire building and its components and can identify issues such as water intrusion before they manifest as structural issues.

Both Miami-Dade and Broward Counties include architects in their existing building inspections programs without issues of architects practicing outside their scope. Both counties require a comprehensive list of items be review covering architectural, mechanical, electrical, plumbing and structural issues. In fact, option 10 received a 75% approval from the workgroup to include roofing, curtain walls, flashing, cladding and window installation in both phase 1 and phase 2 inspections. This inspection of the building envelope is an architect's area of expertise.

Much discussion centered around special inspectors being qualified to conduct inspections. We remind the group that Florida Statute defines a special inspector as licensed architect or registered engineer who is certified under chapter 471 or chapter 481 to conduct inspections of threshold buildings.

We welcome clarification on qualifications for both architects and engineers as structural engineering is not defined by its own licensure. We encourage the workgroup and commission to build upon inspection programs already in place and not change the intent of the statute.

We reiterate that there should be a team approach with each profession working within their scope of practice holistically examining buildings to protect the health, safety and welfare of Floridians.

Sincerely,

A blue ink signature of Lourdes Solera, consisting of stylized initials and a long horizontal stroke.

Lourdes Solera, FAIA
President

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A grey ink signature of Becky Magdaleno, written in a cursive style.

Becky Magdaleno, CAE
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