

July 27, 2022

Mo Madani, Technical Director
Florida Building Commission
2601 Blair Stone Road
Tallahassee, FL 32399

Dear Mr. Madani:

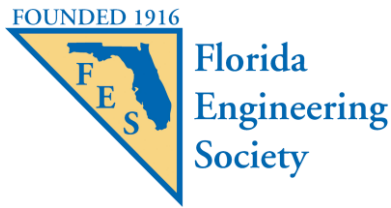
In the weeks following the collapse of the Champlain Tower South, a working group of structural engineers began to meet to develop recommendations for structural inspections of existing buildings. The Surfside Working Group (SWG), led by the Florida Engineering Society and the American Council of Engineering Companies of Florida, quickly grew to include representatives of the Florida Structural Engineers Association, the Florida Section of the American Society of Civil Engineers, the Florida Association of the American Institute of Architects, the Florida Building Officials Association and the International Concrete Repair Institute. The [recommendations](#) were released to the Florida Legislature on October 28, 2021.

As required by Senate Bill 4D, passed and signed into law by Governor Ron DeSantis earlier this year, the Florida Building Commission (FBC) is reviewing the new statute with comments and recommendations due at the end of 2022. The Florida Building Commission has requested, and we are happy to provide, comments to assist the FBC in this effort.

The SWG stands by our original [recommendations](#) released in October, 2021. Many of the [recommendations](#) were incorporated into Senate Bill 4D, but key elements must still be addressed.

First, in the new law, the qualifications of the individuals performing the inspection(s) are very vague. All that is required is licensure under Chapters 471 or 481 of the Florida Statutes. [SWG recommendations](#) recommended 10 years of experience in design, and five years of experience in inspection of similar type structures for those performing Phase 2 inspections. We believe this an important issue to address.

Second, the new law requires the Florida Building Commission to conduct a review and submit comments and recommendations to the Governor and the Legislature by December 31, 2022. The law further requires the Commission to



consult with the State Fire Marshall's Office to develop recommendations for "the adoption of comprehensive structural and life safety standards for maintaining and inspecting all types of buildings and structures in this state that are three stories or more in height."

It is our hope that this leads to the adoption of a second key element, which is that the Florida Building Commission become charged with developing and maintaining the standards for all existing building inspections, in addition to Condominiums and Cooperative buildings, and that these standards be adopted into the Florida Building Code. Doing so will allow the many other details and issues that will need to be addressed in the coming years be done by the Commission.

We sincerely appreciate the opportunity to engage in this process and stand willing to assist the Commission in any way possible.

Sincerely,

A handwritten signature in black ink, appearing to read 'Allen Douglas', with a stylized flourish at the end.

Allen Douglas
Executive Director