

September 29, 2021

**COMMENTS REGARDING ICC EXISTING BUILDING SAFETY INSPECTION GUIDE  
DRAFT 2.1**

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Chair of Broward County Board of Rules and Appeals

At the request of Mo Madani, Technical Director Building Codes & Standards Office, State of Florida, I have done a review of the ICC Inspection Guide Draft 2.1

**COMMENTS:**

1. Page 7: Table 4.1
  - a. What was the driving evidence and data that was used to determine the Periodic and Milestone Inspection Time requirements in Table 4.1? How were those times (30 years, 20 years) arrived at? Who made the decisions and using what basis?
  - b. Why are buildings less than 4 stories excluded?
2. Page 26: Paragraph B. the added text regarding the construction and anchorage of the roof... goes way too far for a “general condition” assessment.
3. Pages 26, 28, 29, 30, 31, 32, 33 – Added Text as Underlined
  - a. I thought that the purpose of the Existing Building Inspection Program is stated on Page 1 as follows:
    - i. “The fundamental purpose of an Existing Building Inspection Program is to confirm that the building or structure under consideration is safe for continued use under the present occupancy.”
    - ii. “Such inspection shall be for the purpose of determining the general condition of the building or structure to the extent reasonably possible of any part, material or assembly of a building or structure which affects the safety of such building or structure and or which supports any dead or design live load, and the general condition of its electrical systems.”
  - b. The added text in underline on pages 26-33 goes way beyond what should be a “general condition assessment” as stated previously in the document. These requirements are turning this program into a full-fledged and detailed Forensic Structural Evaluation for which there is no demonstrated need or purpose.

- c. These requirements will result in an inspection program that will be unnecessarily cumbersome and expensive that will transcend all limits of practicality.
  - d. Do we really want to go to that extent in inspecting buildings for this purpose?
4. I think that the adoption of a General Building Safety Inspection Program as stated in the Purpose of the document is an important decision that should involve significant discussion and consideration by Professionals with relevant experience using reliable data and criteria to make decisions. I trust that further pertinent discussion by the Hurricane Research Advisory Committee or others will take place regarding this proposed document.