



Indiana Builders Association

November 24, 2020

Comments on Updating Commission's Rules

Indiana Builders Association (IBA) represents nearly 3,000 residential builders, developers, remodelers and building industry professionals in Indiana. We appreciate the opportunity to provide comments to the Indiana Fire Prevention and Building Safety Commission (Commission) on updating the building code (675 IAC 13), the fire code (675 IAC 22), the mechanical code (675 IAC 18), the fuel gas code (675 IAC 25), and the adopted NFPA standards.

Our association and its members have historically participated in the code review and adoption process for the majority of the commission's rules to ensure that equal consideration is given to safety, energy efficiency and affordability. We welcome the opportunity to do so again should the commission decide to move forward with updating any of the aforementioned codes and standards.

We support minimum statewide codes that allow for the use of new technology and above-code performance. We also support the variance process that offers relief to home and business owners from code requirements when hardship is demonstrated and compliance with a safe alternative can be achieved. Those things, coupled with Indiana's thorough code review and adoption process that allows participation from all stakeholders, have helped Indiana to maintain distinction as a Next Level state with housing that is safe and affordable and a regulatory environment where businesses thrive.

As the Commission considers updating its codes and standards, we respectfully request that consideration be given to:

- o the need to address issues related to health or safety that are supported by Indiana-specific data
- o the fiscal impact of new requirements
- o the administrative costs for adopting new codes and standards, e.g. retraining for code officials, builders and contractors, buying new books, and updating permit forms and other resources utilized by building departments

Indiana's reputation as "A State that Works" is one we've earned, in part by adopting minimum, uniform, statewide building codes, which offer a level and predictable playing field for designers, builders and suppliers. Let's protect that by considering sensible, flexible, cost-effective regulations that maintain the delicate balance between safety, energy efficiency and affordability, which are essential to Indiana's economic growth. We thank the Commission for considering these comments and for their service.

CC: Sam Hyer, Senior Operations Director, Office of Governor Eric J. Holcomb