



November 23, 2020

Indiana Fire Prevention and Building Safety Commission
Indiana Government Center-South, Room E208
302 W. Washington Street
Indianapolis, IN 46204-2739

Members of the Indiana Fire Prevention and Building Safety Commission,

The Indiana Apartment Association represents over 255,000 professionally managed apartments across the state of 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 codes and standards referenced above.

The safety, health and welfare of our residents is a top priority for our membership. Our members have not voiced any concerns with the current codes. In fact, our members 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 our members from code requirements when hardship is demonstrated and compliance with a safe alternative can be achieved.

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

- the need to address issues related to health or safety that are supported by Indiana-specific data
- the fiscal impact of new requirements
- the administrative costs for adopting new codes and standards, (i.e. retraining for code officials, developers, contractors, etc.)

At a time when the multifamily housing industry must develop nearly 4,000 units annually and is experiencing record revenue loss due to a federal eviction moratorium, it is imperative that costs be kept in mind to meet the current and future need for housing. Any increase in the cost of building and development of these properties will likely stymie much-needed development.

Therefore, IAA respectfully requests that the commission not undertake the multi-year process of revising any of the aforementioned codes. Absent emergency conditions warranting an update, IAA

believes the commission and our industry needs to be mindful of the cost involved in undertaking code revisions given the scarce resources that exist in the midst of responding to a global pandemic.

As the multifamily housing industry faces challenges, the Indiana Apartment Association looks forward to working with you towards solutions. Should you have any questions or concerns regarding our requests, please feel free to reach out. We thank the Commission for considering these comments.

Sincerely,

A handwritten signature in black ink that reads "Lynne Petersen". The signature is written in a cursive, flowing style.

Lynne Petersen
President