

Congress members, below you will find many reasons to not allow SB 437 to become law. I would appreciate your time and attention to this mater.

Response to SB 437

Lines 23-25; including “condominiums” is a conflict with the official building codes of Georgia. No where in the definitions or the body of the code is this term used. Occupancy classifications are determined by the Georgia Life Safety Code and no mention of “condominiums” exist. This type of product is defined as an Apartment Building and is classified as a commercial building, therefore should not be included in this document.

Lines 36-39; is the “qualified inspector” the only individual restricted from having a financial interest in the person, firm, or corporation. Is the fact the Engineer, Architect, and Inspector are being paid by the person, firm, or Corporation considered to have financial interest?

Lines 40-43; the new definition of Regulatory Fee now listing “or by any other name” can be construed as line items such as sidewalk funds, tree preservation, technology, re-inspection fees, and/or resubmittal fees. This will be a point of contention and confusion delaying the final approval.

Lines 60-62; this requirement adds a step for the jurisdiction. Currently the application is sent directly to the reviewers for a concurrent review process.

Lines 66-71; the first sentence in this section has the time spent for a complete application counting in the 15 business days allowed for the plan review. Line 71 states that the time period is tolled when the application is rejected as incomplete. This is a conflict and will cause more contention and confusion.

Lines 81-90; this section is referring to reinspection and fees associated with such step. Are we to reduce the reinspection fee by 50%? Or refund the original building permit fee?

Lines 93-97; this section has a scheduling conflict, if the applicant doesn’t need to notify the governing authority that a private provider will perform the inspections until 2 days prior to the first inspection that means the permit has been issued and charged full price. Is the jurisdiction required to provide refunds for each project of this nature? More confusion and unnecessary work by additional city personnel.

Lines 150-152; each jurisdiction has its own opinion of virtual inspections. If the private provider wishes to perform virtual inspections in a jurisdiction that doesn't utilize that option, how can we control that process?

Lines 269-276; this allows for the local building official to verify the structure meets code. If the project is inspected by a private provide without any notifications of the inspection schedule how can this happen? Do we only inspect at the end of the project? What about the foundation, MEP's, or insulation?

Currently each jurisdiction has a signed agreement with the local utility providers identifying those responsible for inspections and meter release approvals. Will those utility providers accept letters from private providers?

This process forces the jurisdictions to separate department reviews. Site plans, landscaping, lot coverage, design standard review are all performed concurrently with the building review today, with this new requirement the applicant will need to submit a separate application and get approval prior to the building permit request.

Communities have budgets based on historical data and projection of the development growth, allowing for the reduction in fees without knowing how many times this may happen will drastically affect staffing needs. Regardless of who performs reviews and inspections, someone will collect monies whether it be the jurisdiction or a private provider.

Sincerely,

Steven Holder, CBO
ICC member 5189048
President, Northeast Inspectors Association
Building Officials Association of Georgia Board Member
Holdersteve@icloud.com
470-533-7168