



**HOME BUILDERS & REMODELERS ASSOCIATION
OF CONNECTICUT, INC.**

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*Your Home
Is Our
Business*

February 9, 2017

To: Senators Guglielmo and Larson and Representative Verrengia, Co-Chairs
Representative Sredzinski, Ranking Member
Members of the Public Safety and Security Committee

From: Bill Ethier, CAE, Chief Executive Officer

Re: **Concerns HB 5177, AA Incorporating the International Property
Maintenance Code into the State Building Code**

The HBRA of Connecticut is a professional trade association with about eight hundred (800) member firms statewide employing tens of thousands of CT's citizens. Our members, all small businesses, are residential and commercial builders, land developers, remodelers, general contractors, subcontractors, suppliers and those businesses and professionals that provide services to our diverse industry and to consumers. We build between 70% to 80% of all new homes and apartments in the state each year and engage in countless home remodeling projects. Some of our members build for their own account, i.e., they own the apartments they built and rent units as an additional revenue stream.

**The HBRA of CT has concerns about adopting the International Property
Maintenance Code (IPMC) into the State Building Code.**

The statement of purpose on SB 5177 properly notes the purpose of the IPMC is to establish minimum standards for basic equipment, light, ventilation, heating, sanitation and fire safety. However, the IPMC itself also notes the following, "The IPMC provides for the regulation and safe use of existing structures in the interest of the social and economic welfare of the community." We believe the "social and economic welfare of the community" is too broad a standard to empower state or local authorities to enter existing buildings (which the IPMC also authorizes) to conduct inspections and demand changes be made. If this bill is to move forward, we urge you to limit its authority to protecting the public's clearly identified health and safety issues.

Additionally, the IPMC should not be used to require any changes to buildings that were properly built pursuant to the then-existing State Building Code at the time of construction. Since the State Building Code is updated every few years, allowing the authority of the IPMC could be a license to code officials to continually harass owners and landlords of buildings with ever-changing and new demands. Moreover, many in our industry do not want to trust its proper and reasonable implementation to the whims of local building or fire officials or of other enforcement officials or attorneys.

Finally, how the IPMC interplays with existing housing code ordinances in many municipalities needs to be determined. Property owners should not be faced with dual, competing "codes" for existing buildings, and since the State Building Code is a statewide code with no local option, all existing local housing codes should be extinguished upon the IPMC's adoption. Thank you for the opportunity to comment on this legislation.

Vision: "Building CT's Economy, Communities and Better Lives One Home at a Time"
Mission: "Using Effective Advocacy and New Knowledge to Solve Our Member's Problems."