

Compliant by Design LLC
Building Code Consulting
31695 Carolyn Lane
Fraser, MI 48026

April 4, 2024

Tony Williamson
Bureau of Construction Codes
P.O. Box 30254, Lansing, MI 48909

Re: Public Comment on proposed 2021 Michigan Rehabilitation Code for Existing Buildings
Rules of Public Act 230 of 1972

Dear Sir:

I will be unable to attend the public hearing scheduled for 4/4/24. Enclosed are my comments on the proposed rules which would adopt and amend the 2021 International Building Code to become the 2021 Michigan Building Code.

Rule 554 should be amended as follows

Section 101.2 should be amended to read:

101.2 Scope. The provisions of this code shall apply to the repair, alteration, change of occupancy, addition, and relocation of existing buildings. ~~A building or portion of a building which has not been previously occupied or used for its intended purpose shall comply with the provisions of the Michigan building code for new construction.~~ Repairs, alterations, change of occupancy, existing buildings to which additions are made, historic buildings, and relocated buildings complying with the provisions of the Michigan building code, the Michigan electrical code, the Michigan residential code, the Michigan mechanical code, and the Michigan plumbing code shall be considered to be in compliance with this code.

Reason for code change: The second sentence of the language inserted into Section 101.2 by Rule 554 is already covered and in conflict with the language that exists in in Section 101.4.1 which is proposed to be adopted without amendment. This redundant and conflicting language should be deleted.

Rule 557

The definition of "Registered design professional" is intended to be amended to mean an individual who is licensed under **the occupational code**, 1980 PA 299, MCL 339.101 to ~~339.2919~~ **339.2677**.

There are numerous professions that are licensed under 1980 PA 299. These include barbers, accountants, appraisers and others. The correct reference should be to individuals who are licensed under **article 20** of the occupational code, 1980 PA 299. That is the article that licenses architects, engineers and land surveyors who should be the licensed professionals that are submitting plans for approval with building permit applications.

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I appreciate the opportunity to submit these public comments. I can be reached via email at marks@compliantbydesignllc.com.

Respectfully submitted.

Mark Stimac, R.A., C.B.O.
Compliant by Design LLC

LARA-BCC-Rules

From: Tracie Pack <paxnmac@gmail.com>
Sent: Thursday, April 4, 2024 1:58 PM
To: LARA-BCC-Rules
Subject: Re: Rehabilitation Code Rules

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Good afternoon. I'm recommending that the Bureau of Construction Codes keep the current rehabilitation code rules as they are with no amendments.

Thank you,
Tracie Pack

To Whom it may concern,

In review of the proposed changes to the Michigan Building Code, I present the following on behalf of the Metro Building Inspectors Association of Greater Grand Rapids, and myself.

General

- In several modifications to rule language there appears a change from a metric measurement symbol to a metric word. To be clear, the short forms for metric units (such as mm for millimeter) are symbols, not abbreviations. These correct ways to use the Système international d'unités, and other related units are set by the international standards that define the SI. There is no need to create additional confusion of measurements or additional rules that will need to be reviewed in the next promulgation process. Please allow the symbol mm to remain where used in the model code.

Rule 557

- The definition for "Act" should not be written into code language. There are references within established rules and draft rules that reference different Public Acts of Michigan, such as the Skilled Trades Regulation Act, the Occupation Code, the Adult Foster Care Licensing Act, as well as the Stille Derosett-Hale Single State Construction Act. Where any Act is referenced within code language it is, and properly so, identified using its full name. PA 230 is named the "Stille Derosett-Hale Single State Construction Act" within the Act. It does not need to be redefined in code language that is subordinate to the Act.

Rule 561

- The current reference to section 410.7 was modified to reference 306.7.2, the correct section to reference is 306.7.1

Thank you for the consideration of these items and honestly (honestly, because inflection can be misread in written communication) thank you for your diligence in updating the codes.

William A Hordyk, MCP