



To: Gregory Day, Assistant Fire Marshal

From: AIA Maine

Re: MUBEC Chapters 1, 2 and 4 Proposed Adoptions

Date: 3/4/24

Dear Mr. Day;

AIA Maine is pleased to submit the following comments in support of the proposed adoption of Rule Chapters 1, 2, and 4. AIA Maine appreciates the hard work of the MUBEC Technical Codes and Standards Board (MUBEC Board) to lay the foundation for the adoption of additional substantive rule chapters, including the International Building Code (IBC) 2021 and the International Energy Conservation Code (IECC) 2021, as well as the future adoption of a stretch code for those towns who chose to use it.

The adoptions of Chapters 1, 2, and 4, while largely routine, represent a significant step forward in rolling out the new edition of the international codes and cleaning up the existing administrative and third-party inspectors' chapters. Specifically, the work that has been recently completed by the MUBEC Board moves the state closer toward compliance with the underlying statutes that require the MUBEC to be regularly updated to reflect the most or second-most recent edition of the international codes. 10 MRSA § 9724 et. seq.

AIA Maine also wishes to thank the MUBEC Board for its hard work in combing through the complexity of these codes sections and the ones that are forthcoming. AIA Maine has closely watched and participated in the legislative consideration of how best to support the work of the MUBEC. The challenges inherent in adopting new, robust codes can include interpretation and enforcement. We appreciate the Office of the State Fire Marshal's efforts to consider how best to lower barriers to understanding the code and to update and train Code Enforcement Officers. We believe the important provisions specific to the codes can only be best effectuated if a robust and highly trained enforcement team can help navigate flexibility inherent in the code – both to encourage compliance and to effectuate important building projects.

Finally, AIA Maine wishes to thank the Office of the State Fire Marshal for its continued leadership of the MUBEC Board and its oversight of the process and adoption of new codes. The import of new codes across all sectors of building cannot be understated – important stewardship of the code is critical to continued support from both the building and enforcement community.

Thank you for your consideration of these comments as well as your efforts to roll out the adoption of Rule Chapters 1, 2, and 4. AIA Maine looks forward to engaging on the next rule chapter proposals, and to continuing to stay active with the important processes before the MUBEC Board.

Sincerely,

Elizabeth M. Frazier

On behalf of AIA Maine