



Delaware Valley Association
of Structural Engineers *Est. 1991*

NATIONAL COUNCIL OF STRUCTURAL ENGINEERS ASSOCIATIONS

October 26, 2009

City of Philadelphia
City Council
Councilwoman Maria D. Quiñones-Sánchez
592 City Hall
Philadelphia, PA 19107

**RE: City Council Bill Number 090568
Amendment to The Philadelphia Property Maintenance Code
For Periodic Inspection of the Exterior Walls of Certain Buildings**

Dear Councilwoman Sanchez:

The Delaware Valley Association of Structural Engineers (DVASE) is a non-profit membership organization, representing structural engineers from over 30 firms and approximately 200 members in the tri-state Philadelphia area. As the voice for the structural engineering community in the City of Philadelphia, we would like to provide our professional input to the recently introduced City Council Bill Number 090568 (hereafter referred to as the Bill) regarding periodic inspections of exterior walls and appurtenances of certain buildings.

Our technical comments to the Bill being introduced are attached for your consideration. We would like to recommend that the City consider the inclusion of the technical standard "*ASTM E2270 - 05 Standard Practice for Periodic Inspection of Building Facades for Unsafe Conditions*". This ASTM document represents the consensus of practicing professionals and describes methods and procedures for inspection, evaluation and reporting for periodic inspection of building facades for unsafe conditions. The ASTM members who created this standard represent leading forensic architects and engineering firms all over North America. The inclusion of this ASTM document will be a tremendous help to the City, since it will establish a common criteria for the review of all facades within the scope of the Bill. In addition, the standard addresses the concerns of the community expressed during the City Council Facade Inspections Meeting on October 7, 2009, where minimum qualifications for the inspector and the level of inspection were discussed. The inclusion of ASTM E2270 as the referenced standard to which inspections are to be conducted will require revision of the ordinance language to supplement the standard with information specific to Philadelphia's requirements, similar to Philadelphia's reference to other building standards (e.g., IBC).

Ultimately should it be decided that referencing whole or part of the ASTM Standard is not to be pursued; we are also providing our comments to the existing ordinance for your consideration. Please note that the edits and comments address several aspects of the ordinance which are substantive to the structural engineering community.

We appreciate the opportunity to help define and shape this piece of legislature for the city of Philadelphia. The preservation of our city's infrastructure and the safety of all Philadelphians is important to our organization and this Bill will help to realize both of these goals. In preparing the final amendments for this Bill, we hope you evaluate and consider our comments attached. In the future, please contact DVASE for technical assistance, when bills are proposed to City Council that affect the structural engineering industry.



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Regards,
Delaware Valley Association of Structural Engineers

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