

**Hobbs, Darren**

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**From:** Harwood Loomis <loomish@southington.org>  
**Sent:** Wednesday, March 2, 2022 2:16 PM  
**To:** CodesStandards, DAS  
**Cc:** Jeffrey Pooler  
**Subject:** Proposed State Building Code - Comments  
**Attachments:** Proposed\_CSBC\_Amendments.pdf; Proposed\_CSBC\_Cover\_Letter.pdf

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To the Codes and Standards Committee:

As public comment during the comment period for the proposed 2022 State Building Code Supplement, the Southington Building Department respectfully submits three additional amendments, which this department believes are necessary to enable proper enforcement of the intent of the codes. Inclusion of the proposed language would counteract pushback we routinely encounter from permit applicants when we cite deficiencies in construction documents submitted in support of permit applications.

~ ~ ~ ~ ~  
Harwood W. Loomis, RA, LBO  
Assistant Building Official  
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# Office of Building Department

## Town of Southington, Connecticut

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John Weichsel  
Municipal Center  
196 North Main Street  
Southington, CT 06489

March 2, 2022

Department of Administrative Services  
Office of the State Building Inspector  
450 Columbus Boulevard, Suite 1303  
Hartford, CT 06106

Re: Proposed Building Code Amendments

To Whom It May Concern:

Pursuant to the Notice of Intent to Adopt the 2022 Connecticut State Building Code, the Southington Building Department submits the following proposed amendments to the IBC and IRC portions of the proposed Connecticut Supplement for consideration. After internal discussion based on issues that continually arise in the course of plan reviews and field inspections of construction in progress, this department believes that the proposed amendments will "level the playing field," resulting in more uniform administration and enforcement of the intent of the code throughout the state. The proposed amendments are offered in order to clarify what the ICC has always maintained is the intent of the code, but which the current code language does not clearly and explicitly convey.

Thank You,

A handwritten signature in blue ink that reads "Harwood W. Loomis".

Harwood W. Loomis, RA, LBO  
Assistant Building Official  
E-mail: [loomish@southington.org](mailto:loomish@southington.org)

Attachment: as

Proposed amendment to IBC 107.2.1:

**(Amd) 107.2.1 Information on construction documents.** *Construction documents* shall be dimensioned and drawn upon suitable material. Electronic media documents are permitted to be submitted where *approved* by the *building official*. *Construction documents* shall be of sufficient clarity to indicate the location, nature and extent of the work proposed and show in detail that it will conform to the provisions of this code and relevant laws, ordinances, rules and regulations, as determined by the *building official*. Where the quality or arrangement of materials is essential for conformity to this code, as determined by the *building official*, neither this code nor any reference standards adopted hereunder shall not be cited, nor terms such as “legal,” “per code,” “as required,” or their equivalent used, as a substitute for providing specific information.

Discussion:

When the Connecticut State Building Code for other than 1- and 2-family dwellings was based on the *BOCA National Building Code*, the provision addressing information on plans and specifications read as follows:

**111.5 Plans and specifications.** The application for the permit shall be accompanied by not less than two copies of specifications and of plans drawn to scale, with sufficient clarity and detail dimensions to show the nature and character of the work to be performed. When quality of materials is essential for conformity to this code, specific information shall be given to establish such quality; and this code shall not be cited, or the term “legal” or its equivalent be used, as a substitute for specific information. The code official is permitted to waive the requirement for filing plans when the work involved is of a minor nature.

When the BOCA codes were first replaced by the ICC family of codes, the provision prohibiting citing the code as a substitute for specific information was not carried forward into the IBC. I questioned this to the ICC at that time, and the response was that the intent of the code remains the same, and that code officials can cite Section 107.2.1. Since the adoption of IBC 2003 by Connecticut in 2005, we have consistently seen construction drawings that omit key information (such as guard details) and simply insert notes such as “Guard as required by code.” When we attempt to cite such statements as not being acceptable because of Section 107.2.1, we invariably get push-back because the language of the code does not explicitly prohibit the use of such notes.

The amendment proposed above would restore the language we lost when we shifted from BOCA to the IBC. This will make administration and enforcement easier and more consistent throughout the state.

Proposed amendments to IRC 106.1.1

**(Amd) R106.1.1 Information on construction documents.** *Construction documents* shall be drawn upon suitable material. Electronic media documents are permitted to be submitted where *approved by the building official*. *Construction documents* shall be of sufficient clarity to indicate the location, nature and extent of the work proposed and show in detail that it will conform to the provisions of this code and relevant laws, ordinances, rules and regulations, as determined by the *building official*. Where the quality or arrangement of materials is essential for conformity to this code, as determined by the *building official*, neither this code nor any reference standards adopted hereunder shall not be cited, nor terms such as “legal,” “per code,” “as required,” or their equivalent used, as a substitute for providing specific information.

Discussion:

When the residential portion of the Connecticut State Building Code was based on the *CABO One and Two Family Dwelling Code*, the section of the code addressing plans read as follows:

**112.1 Plans required.** When required by the building official, plans shall be drawn to scale and shall be of sufficient clarity to indicate the nature and extent of the work proposed and shall show in detail that it will conform to the provisions of this code and all relevant laws, ordinances, rules and regulations. Plans shall include a plot plan drawn to scale showing the location of all easements, drainage facilities, adjacent grades, property lines, the proposed building and of every existing building on the site.

Neither the predecessor *CABO One and Two Family Dwelling Code* nor the current *International Residential Code* includes an explicit prohibition against citing the code instead of providing specific information and/or details in the construction documents. we have consistently seen construction drawings that omit key information (such as guard details) and simply insert notes such as “Guard as required by code.” When we attempt to cite such statements as not being acceptable because of Section 106.1.1, we invariably get push-back because the language of the code does not explicitly prohibit the use of such notes.

The amendment proposed above would restore language was included in the *BOCA National Building Code* and which would be helpful in administering and enforcing the IRC portion of the State Building Code. we lost when we shifted from BOCA to the IBC. This will make administration and enforcement easier and more consistent throughout the state.

## Proposed amendments to IRC 106.2

**(Amd) R106.2 Site plan or plot plan.** The *construction documents* submitted with the application for *permit* shall be accompanied by a site plan showing the size and location of new construction and existing structures on the site and distances from *lot lines* the locations of all easements, drainage facilities, and adjacent grades. In the case of demolition, the site plan shall show construction to be demolished and the location and size of existing structures and construction that are to remain on the site or plot. The *building official* is authorized to waive or modify the requirement for a site plan where the application for *permit* is for *alteration* or repair or where otherwise warranted.

Discussion:

When the residential portion of the Connecticut State Building Code was based on the *CABO One and Two Family Dwelling Code*, the section of the code addressing plans read as follows:

**112.1 Plans required.** When required by the building official, plans shall be drawn to scale and shall be of sufficient clarity to indicate the nature and extent of the work proposed and shall show in detail that it will conform to the provisions of this code and all relevant laws, ordinances, rules and regulations. Plans shall include a plot plan drawn to scale showing the location of all easements, drainage facilities, adjacent grades, property lines, the proposed building and of every existing building on the site.

The current IRC requires that the grade must slope away from the building at ½ inch per foot for the first six feet from the building, The IRC also requires a foundation drainage system for all residential structures with habitable or usable spaces (*i.e.* basements) below grade, and that this drainage system discharge “by gravity or mechanical means into an approved drainage system.” However, the IRC does not require that the site plan show grades or drainage facilities. Without a site plan showing the location and extent of the subsurface drainage system and the discharge therefrom, it is not possible for building officials to fully assess code conformity during the plan review process.

The amendment proposed above would restore language was included in the *CABO One and Two Family Dwelling Code* which would be helpful in administering and enforcing the IRC portion of the State Building Code, and we lost when we shifted from CABO to the IBC. This will make administration and enforcement easier and more consistent throughout the state.