



International Code Council
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March 9, 2022

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

Re: Intent to Adopt the 2022 Connecticut State Building Code

To Whom It May Concern:

My name is William Nash, and I am a Senior Regional Manager – Government Relations in Connecticut for the International Code Council (Code Council) and your liaison to the Code Council. Please allow this letter to serve as written comments supporting the proposal to update the existing Connecticut State Building Code to the published 2021 ICC family of International Codes (I-Codes) included in the posted notice.

The ICC is a member-focused association dedicated to helping the building safety community and the construction industry provide safe and sustainable construction by developing codes and standards used in the design, build, and compliance process. Most U.S. states and communities, Federal agencies, and many global markets choose the I-Codes to set the standards for regulating on and off-site building, plumbing, mechanical, and fuel gas construction, sanitation, fire prevention, and energy conservation in the built environment.

The International Building Code (IBC), along with 14 other I-Codes are updated and revised every three years through a national consensus process that strikes a balance between the latest technology, new building products, installation techniques, economics, and cost while incorporating the most recent advances in public and first responder safety. It is an open, inclusive process that encourages input from all individuals and groups and allows Code Council Governmental Members, many of whom are from Connecticut, to determine the final code provisions. Because of the above-noted process, there were many beneficial changes to the model code that Connecticut is considering adopting. While we respectfully recommend that Connecticut adopt the most updated version of the model codes (2021 versions), we recognize the significant efforts that leaders in Connecticut have made, along with their commitment to a safe built environment via up-to-date codes for their visitors and citizens.

The I-Codes are correlated to work together without conflicts to eliminate confusion in building design, inconsistent code enforcement, or interpretation among different jurisdictions. Jurisdictions that utilize the most current edition of the I-Codes thereby ensure the highest standards for safety, energy efficiency, sustainability, economic incentive, and long-term resiliency of their built environment.

The Code Council would like to commend the State of Connecticut for its consistently outstanding work for reviewing and now proposing to update the CT State Building Code based on the 2021 I-Codes. The proposed update to the 2021 I-Codes incorporates amendments that reflect Connecticut's unique character and needs. It will ensure that the CT Building Code remains technically viable, allow for consistency in code application and



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enforcement, allow for economic investment in building construction, and provide the most significant safety to the public and emergency responders while embracing modern technology and building practices.

Connecticut's adoption of the I-Codes provides the most significant safety to its citizens. In addition, it supports the construction industry when economic investment in building construction is essential to the state and local economy. Further, the adoption of updated model building codes is a financial incentive. Statewide building construction codes reduce costs associated with personal injury in the built environment reduce property damage and associated costs while providing for the safety of the public and emergency responders, which is critical in the present economy. The economic benefits of adopting updated codes include improved safety, reduced maintenance costs, energy savings, and lower insurance premiums. For instance, the Multi-Hazard Mitigation Council of the National Institute of Building Science continues to update their 2005 landmark study on mitigation and resiliency ([Mitigation Saves: Mitigation Saves up to \\$13 per \\$1 Invested \(nibs.org\)](https://www.nibs.org/Mitigation-Saves-Mitigation-Saves-up-to-$13-per-$1-Invested-nibs.org)) to detail that for every dollar spent on building safer, stronger, and resilient buildings, on average, reduces losses from high-wind damage, floods, earthquakes and other disasters by up to thirteen dollars.

Technical assistance and training from the Code Council is always available to groups including, but not limited to the CT Dept. of Administrative Services, CT Office of the State Building Inspector, CT Office of the State Fire Marshal, CT Design Professionals, and State and Local plan review, permit, and inspection staff. In addition, they will continue to have access to Code Council training programs and materials, product Evaluation Reports, certification programs, and Code Council technical staff, who will assist with code opinions and interpretations based on the I-Codes.

Thank You for the opportunity to submit these comments. The Code Council is honored to partner with the State of Connecticut in support of the adoption and administration of the CT State Building Code based on the 2021 I-Codes, and we look forward to continuing to serve your needs for many more years. Please feel free to contact me via email or cell phone (information noted below) if you have any questions, concerns, or comments regarding the 2021 I-Codes adoption or anything else Code Council-related.

Sincerely,

A handwritten signature in blue ink that reads "William J. Nash, Jr." The signature is fluid and cursive, with "William" and "J." being more stylized and "Nash, Jr." being more formal.

William J. Nash, Jr.
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