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Via Email: DAS.CodesStandards@ct.gov

Department of Administrative Services
Office of the State Fire Marshal
450 Columbus Boulevard, Suite 1303
Hartford, CT 06103

RE: Intent to Adopt the 2022 Connecticut Fire Safety Code

To Whom It May Concern,

Thank you for the opportunity to offer comments on Connecticut's Notice of Intent to Adopt the 2022 Connecticut Fire Safety Code. My name is Karl Fippinger and I respectfully submit the following comments in my capacity as Vice President, Fire and Disaster Mitigation for the International Code Council (Code Council). My experience includes more than 30 years in the fire and emergency services and more than 20 years as a practicing emergency manager at the federal, state, and local levels. I was born in Hartford and resided in Wethersfield for 23 years.

The Code Council is a nonprofit organization, driven by the engagement of its more than 65,000 members, dedicated to helping communities and the building industry provide safe, resilient, and sustainable construction through the development and use of model codes (I-Codes) and standards used in the design, construction, and compliance processes. One of the primary strengths of the I-Codes is the coordination of technical requirements. The I-Codes are designed to be used as a complete set of complementary documents, which provides users with full integration and coordination of technical requirements.

The Code Council applauds and supports the State of Connecticut's intent to adopt the 2021 edition of the International Fire Code (IFC) for all new construction and existing buildings permitted on or after January 1, 2006. This approach is consistent with and complementary to the State's intended adoption of the 2021 International Building Code (IBC), International Existing Building Code (IEBC), and the International Existing Building Code (IEBC) as part of its 2022 Connecticut State Building Code adoption.

Alternatively, the State of Connecticut's approach to regulating existing buildings permitted on or before December 31, 2005 is inconsistent. In its approach, the State intends to amend and delete significant portions of the consensus-based model code under IFC *Chapter 11 - Construction Requirements for Existing Buildings*. More specifically, the State proposes to delete the significant provisions from IFC Chapter 11 that address *Fire Safety Requirements for Existing Buildings (Sec. 1103)* and *Means of Egress for Existing Buildings (Sec. 1104)*.

The proposed deletion of IFC Chapter 11 requirements coupled with administrative rulemaking that establishes separate regulatory schemes for existing buildings creates an overly burdensome process for regulators and design professionals. In simple terms, the existing building requirements compel code officials and design professionals to work across three sets of model fire and life safety codes, promulgated by two different codes and standards development organizations, which are then incorporated into two state fire codes - the Connecticut State Fire Safety Code and the Connecticut State Fire Prevention Code. We offer this approach is both inefficient and counterintuitive. More importantly the process this creates lends itself to increased risk for misinterpretation and inconsistent application, inspection, and enforcement of the fire code, potentially compromising life safety.

We understand the inherent budget and staffing challenges faced by building and building and fire code officials in the State of Connecticut, particularly across its small towns and rural communities. We also understand the pressure placed on the design community to continually innovate while remaining cost-competitive for their clients. For these reasons we advocate for a consolidated, streamlined, and more efficient approach to fire code regulation for Connecticut's existing buildings.

As mentioned above, the I-Codes are correlated and designed as a complete set of complementary documents. The good news is that all nine of the I-Codes that are intended for adoption as part of the 2022 Connecticut State Building Code process will work seamlessly with the IFC under the Connecticut State Fire Safety Code, but only for buildings permitted in 2006 or after. Rather than amending and deleting the IFC Chapter 11 requirements, we recommend the State recognize IFC Chapter 11 and fully apply the IFC throughout the Connecticut State Fire Safety Code. This approach will streamline the Connecticut State Fire Safety Code by eliminating the need for Part IV. This would relieve fire code officials, building code officials, and design professionals from a technically complex and overly burdensome process.

Our team has been privileged to review alternative proposals developed by Connecticut fire marshals and life safety professionals incorporating IFC Chapter 11 requirements into the Connecticut State Fire Safety Code. These proposals effectively address critical issues for the State including conflicts in code, existing elevators, fire alarms, fire sprinkler systems, egress requirements, door size, etc. We understand the State has also reviewed these proposals. On behalf of our Connecticut members and the design community, we urge you to consider incorporating these proposals as an alternative to the requirements currently intended for adoption in your final rulemaking for the 2022 Connecticut State Fire Safety Code,

We appreciate the opportunity to submit comments and remain available to answer any questions.

Sincerely,



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