

From: Wisniewski, Marena
Sent: Thursday, March 17, 2022 4:49 PM
To: CodesStandards, DAS
Subject: 2022 Codes - Public Comment
Attachments: [2022 State Building Code Comment.pdf](#); [2022 State Fire Codes Comment.pdf](#)

Good Afternoon,

Please find attached our agency's comments regarding the proposed 2022 codes. Should you have any questions, please do not hesitate to reach out.

Best,
Marena Wisniewski
State Register Coordinator
Environmental Reviewer
State Historic Preservation Office
Dept. of Economic & Community Development
450 Columbus Boulevard, Suite 5
Hartford, CT 06103
860-500-2357



**WE HAVE MOVED! Please send all correspondence to:
State Historic Preservation Office
Attn: Marena Wisniewski
450 Columbus Boulevard, Suite 5
Hartford, CT 06103**

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March 17, 2022

Mr. William Abbott
Department of Administrative Services
Office of the State Fire Marshall
450 Columbus Boulevard, Suite 1303
Hartford, CT 06103

Subject: Notice of Intent to Adopt the 2022 Connecticut Fire Safety Code
Notice of Intent to Adopt the 2022 Connecticut Fire Prevention Code

Dear Mr. Abbott:

The State Historic Preservation Office (Office) has reviewed the proposed drafts of the 2022 Connecticut State Fire Safety Code and Connecticut Fire Prevention Code, both published by the Department of Administrative Service (DAS) for review and comment January 31, 2022.

This Office is disappointed in the repeated deletion of exemption/modification opportunities for historic properties that are referenced in the model code International Fire Safety Code 2021 (IFC), the National Fire Protection Association Fire Code (NFPA 1), and the National Fire Protection Association Life Safety Code (NFPA 101). Published by the International Code Council, the IFC has been adopted by the majority of states, as well as by specific municipalities. These widely accepted regulations provide a base standard for safeguarding life and property that is both rigorous and conservative. Their consideration of historic properties follows this philosophy, exemplified in Section 102.6, “the provision of this code relating to the construction, *alteration*, repair, enlargement, restoration, relocation, or moving of buildings or structures shall not be mandatory for existing buildings or structures identified and classified by the state or local jurisdiction as historic buildings where such buildings or structures do not constitute a distinct hazard to life or property. Fire protection in designated historic buildings shall be provided with an *approved* fire protection plan as required in Section 1103.1.1.” This section, as well as its accompanying Section 1103.1.1., is proposed to be deleted from the 2022 Connecticut Fire Safety Code without justification.

While the proposed 2022 Fire Safety code provides for Alternative Compliance (proposed addition 102.1.1), the deletion of the above implies that historic properties are not able to seek modification or alternative methods of fire and life safety protection measures. This deletion/substitution has already been communicated to our office by concerned constituents. As stated in our letter to Joseph Cassidy, (attached), Chapter 12 of the International Existing Building Code 2021 (IEBC) includes multiple examples of features within historic buildings that provide protection for their occupants. Section 1203 in particular makes reference to historic building materials that meet 1 hour fire-resistance-rated construction. Section 1103.1.1. of the IFC provides additional guidance through NFPA 914, a guide entirely dedicated to providing fire protection measures specific to historic structures.

State Historic Preservation Office

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As an alternative, this Office suggests amending rather than deleting Section 102.6 to be more in line with the proposed amendments to the Connecticut Building Code 2022, specifically proposed amendment 104.10.3 - *Historic structures exemption*, “Pursuant to section 29-259 of the Connecticut General Statutes, exemptions may be granted to the provisions of this code for historic structures as defined by section 10-410 of the Connecticut General Statutes, which have been classified as such in the State Register of Historic Places as long as the provisions of subsection (b) of section 29-259 of the Connecticut General Statutes are adhered to and provided that such exemptions shall not affect the safe design, use or construction of such property.” This amendment ensures that all design and life safety requirements are met, while allowing the character defining features of historic properties to be considered, and provides a uniform treatment applied across multiple State codes. As currently proposed, the codes are not aligned and will result in confusion among professionals trying to achieve compliance.

Historic structures are assets to our communities, and are given consideration under many state and federal laws. We urge you to consider these irreplaceable resources within the proposed 2022 Fire Codes. For further information please contact Marena Wisniewski, Environmental Reviewer, at (860) 500-2357 or marena.wisniewski@ct.gov.

Sincerely,

A handwritten signature in black ink that reads "Jonathan Kinney". The signature is written in a cursive, flowing style.

Jonathan Kinney
State Historic Preservation Officer



March 17, 2022

Mr. Joseph V. Cassidy, P.E.
Department of Administrative Services
Office of the State Building Inspector
450 Columbus Boulevard, Suite 1303
Hartford, CT 06103

Subject: Notice of Intent to Adopt the 2022 Connecticut State Building Code

Dear Mr. Cassidy:

The State Historic Preservation Office has reviewed the proposed draft of the 2022 Connecticut State Building Code, published by the Department of Administrative Service (DAS) for review and comment January 31, 2022.

This Office commends DAS for considering historic properties with the addition of Section 104.10.3 - *Historic structures exemption*, and Section 1201.1.1 - *Exemptions* to the proposed model code (International Building Code 2021, IBC), as well as similar additional language in complementary model codes. These considerations are vital tools to help maintain a property's historic integrity while encouraging the rehabilitation and preservation of historic places.

Within the proposed model code International Existing Building Code 2021 (IEBC), Chapter 12 (Section 1201-1206) provides concrete examples for modifications for historic structures that allow character defining features to remain, while maintaining, and in some cases aiding, in providing life safety for occupants. SHPO suggest that this chapter be referenced within the above sections, to aid architects, contractors, and property owners in the rehabilitation of their historic properties.

As referenced in Connecticut General statutes 10-410, historic structures are assets to our communities, and are given consideration under many state and federal laws. We appreciate their continued consideration in the State Building Code, and the recognition of their value. For further information please contact Marena Wisniewski, Environmental Reviewer, at (860) 500-2357 or marena.wisniewski@ct.gov.

Sincerely,

A handwritten signature in black ink that reads "Jonathan Kinney". The signature is fluid and cursive.

Jonathan Kinney
State Historic Preservation Officer

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