

**From:** Harwood Loomis <loomish@southington.org>  
**Sent:** Friday, March 4, 2022 5:03 PM  
**To:** CodesStandards, DAS  
**Cc:** Jeffrey Pooler  
**Subject:** Re: Proposed State Building Code - Comments

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I wish to offer the following comments on the proposed draft of the 2022 Connecticut State Building Code:

In the IEBC portion of the proposed 2022 CSBC, the draft Connecticut Supplement deletes the entirety of Section 105: Permits, and Section 106, Construction Documents, and replaces them with Sections 105 and 107 of the IBC. I respectfully submit that this is an unwise substitution that makes enforcement of the IEBC for alterations to existing buildings more difficult.

Taken together, IEBC Sections 105 and 106 require applicants to clearly identify the code path each project will take (Prescriptive, Work Area, or Performance); to declare whether the proposed work will be a Level 1, Level 2, or Level 3 alteration; and to specifically identify the work area or areas affected. Further, since IEBC Section 105 makes direct reference to Chapter 3, this also provides additional criteria for providing specific information that is invaluable in reviewing plans for alterations and renovations.

Sections 105 and 107 of the IBC are intended for application to projects involving new construction. By deleting the corresponding sections from the IEBC and substituting those sections from the IBC, the draft eliminates requirements for alteration-specific information needed to perform an adequate plan review, and eliminates the language that building officials can cite specifically when seeking this information if (as usual) it is not included in the application and construction documents.

Please retain Sections 105 and 106 in the IEBC portion of the 2022 Connecticut State Building Code.

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Harwood W. Loomis, RA, LBO

Assistant Building Official

Town of Southington

Tel: 860-276-6242

E-mail: [loomish@southington.org](mailto:loomish@southington.org)

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