



State of Connecticut

HOUSE OF REPRESENTATIVES
STATE CAPITOL
HARTFORD, CONNECTICUT 06106-1591

REPRESENTATIVE BEN MCGORTY
ONE HUNDRED TWENTY-SECOND DISTRICT

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ASSISTANT HOUSE REPUBLICAN LEADER

MEMBER
BANKING COMMITTEE
PUBLIC SAFETY AND SECURITY COMMITTEE
REGULATION REVIEW COMMITTEE

March 10, 2022

Department of Administrative Services
Codes and Standards Committee
Office of the State Building Inspector
450 Columbus Boulevard, Suite 1303
Hartford, CT 06103

Re: 2022 Connecticut State Fire Safety Code

Dear Louis Free, Chairman Carlton Smith, Vice Chairman and members of the Codes and Standards Committee, my name is State Representative Ben McGorty of the 122nd House Assembly District representing the towns of Shelton, Stratford and Trumbull. I am also a Lieutenant and Deputy Fire Marshal for the Town of Stratford. I have been in the fire service for over forty years.

Within my jurisdiction, I am receiving complaints and have discovered during routine inspections, illegal dwelling units in two and three family dwellings. This is a very common occurrence in Stratford and believe all municipalities statewide experience this same problem. In the Town of Stratford, we have hundreds of two family dwellings. Many of these dwellings have been converted into three and four family dwellings without building permits or zoning approval. These units are separate from the legal first and second floor apartments. The illegal dwelling units have been built in attics and basements. Many of these illegal dwelling units may have full kitchens and cooking equipment but lack a second means of egress, windows for rescue and other fire protection features that are required for three or more family apartment buildings.

The State Fire Marshal's office was in Stratford a few years ago to assist with compliance of the fire code of a two-family dwelling that is operating as a three family. At that time, it was declared the dwelling unit in question a "Guest Suite" and as an accessory to the second-floor apartment as there was no stove for cooking within the unit in question.

I believe that justification of a dwelling's unit should not fall on whether there is or isn't a kitchen stove. Most home fires and casualties are from five major causes: cooking, heating, electrical, candles and smoking. Somehow our code only addresses cooking equipment and no other fire source.

In my experience I have found landlords hiding the kitchen stoves and cooking equipment when we inspect and replace them after we leave as they are aware of the loophole in the code. The practice of allowing these apartments to be occupied because they do not have a kitchen stove is not, in my opinion, fulfilling the protection of human life. Allowing these apartments to exist as they are called "Guest Suites" is dangerous as many tenants do not know that the dwelling unit is not fire code compliant.

I, therefore, would like to make a change to the regulations to the 2018 CT State Fire Safety Code- The Internal Fire Code Sections 202 General Definitions page 16:

Dwelling

"A single Unit providing complete independent living facilities for one or more persons, including permanent provisions for living, sleeping, eating, cooking and sanitation"

I would like to delete from this regulation the reference to eating and cooking.

When you conduct an inspection and there are locked doors between each dwelling unit and the tenants are not related or tenants in common, these apartments should be classified as separate dwelling units, not guest suites. A dwelling unit should not be subject to whether you cook or eat.

I hope that you can support this change and recommend that this change be added to the new 2022 CT State Fire Safety Code. I am happy to discuss further at your convenience.

Sincerely,



State Representative Ben McGorty
122nd District
Representing Shelton, Stratford & Trumbull
(Cell) 203-415-8428

From: Abbott, William
Sent: Tuesday, February 8, 2022 9:17 AM
To: Hobbs, Darren
Subject: Fwd: Change request for the 2018 CSFC

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From: Rep. McGorty, Ben <Ben.McGorty@cga.ct.gov>
Sent: Monday, February 7, 2022 8:58 PM
To: Abbott, William
Subject: Change request for the 2018 CSFC

Fire Marshal Abbott,

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Ben McGorty
State Representative 122 District
Representing Shelton, Stratford & Trumbull
203-415-8428