

**From:** Marc Scrivener <mscrivener@windhamct.com>  
**Sent:** Tuesday, February 22, 2022 10:09 AM  
**To:** CodesStandards, DAS  
**Subject:** Testimony RE: Draft 2022 State Codes

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On behalf of the Connecticut Career Fire Chiefs Organization, which represents approximately 50 of the Fire Chiefs of career municipal or state fire departments, I submit the following testimony regarding proposed changes in the Connecticut Fire Code 903.2.8. exception # 2. Specifically, the testimony concerns the current and proposed language regarding Group R as it relates to a change in occupancy from any occupancy to Group R-2.

As we understand it, the proposed changes would permit the conversion of an existing building (meeting certain height restrictions) to a 3 or more dwelling unit building without fire sprinklers in certain situations.

In our opinion, the conversion of an attic space to a dwelling unit places sleeping residents in a more perilous location without adequate fire protection features including implied single exit features.

We believe a single means of egress, if blocked by fire or other condition, would present a life-threatening hazard to occupants. Furthermore, a blocked single means of egress in a residential occupancy during a fire presents an extreme hazard to firefighters and firefighting operations such as attempting to affect a rescue.

We stand with our peers, in the Connecticut State Fire Marshal's Association, in opposition to the proposed changes. We call for the Codes and Standards Committee to correct the language to prevent allowing a single means of egress to a non-sprinklered residential occupancy.

Sincerely,

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Be miserable. Or motivate yourself. Whatever has to be done, it's always your choice -  
Wayne Dyer

National Suicide Prevention Lifeline **1-800-273-8255**

Fire/EMS Helpline: 1-888-731-FIRE (3473)

Crisis Text Line: Text HOME to 741741 to connect with a crisis counselor

I am vaccinated and boosted for COVID-19.