



DEPARTMENT OF ADMINISTRATIVE SERVICES

June 22, 2022

I-22-04

Andrew Rizzo
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38 Manor Drive
North Haven, CT 06473

Request for Formal Interpretation of the 2018 Connecticut State Building Code

Mr. Rizzo,

You have requested a formal interpretation related to section 903.8.2 the 2015 International Building Code portion of the 2018 Connecticut State Building Code which states.

903.2.8 Group R. An automatic sprinkler system installed in accordance with Section 903.3 shall be provided throughout all newly constructed buildings with a Group R fire area or in existing buildings that have a Group R fire area newly introduced by change of occupancy, occupancy group designation or by an addition.

Question #1:

Is it the intent of the CT State Building Code to include as an “addition” an existing unfinished area within an existing building, i.e., a basement or attic that when built out as additional residential space in an R-2 occupancy would require the entire building to be sprinklered?

Answer #1:

No, this scenario would not be considered an addition if the exterior envelope of the space is not significantly increased. However, because the finishing of an existing attic or basement to form additional Use Group R space would be considered a change of occupancy from Use Group S-2 to Use Group R, the addition of sprinklers would be required under 903.2.8.

Question #2:

Is it the intent of section 903.2.8 when it says “...or in existing buildings having a group R fire area newly introduced by change of occupancy ... or by addition...”?

- a. That an existing 26-unit R-2 apartment building must now be sprinklered if two storage spaces in the lower level are converted to efficiency dwelling units?

Answer #2a:

See answer #1.

Question #2b:

- b. In an existing 12-unit apartment building is it considered a newly introduced fire area if a portion of the basement is converted to a 13th dwelling unit and thus the entire building must be sprinklered?

Answer #2b:

See answer #1.

Question #2c:

- c. In an existing 2 ½ story three family dwelling is it a newly introduced fire area by an addition or a change of use if the existing basement is built out as a fourth dwelling unit and thus the entire dwelling must be sprinklered?

Answer #2c:

Under the current CSBC yes, this scenario would require the installation of sprinklers throughout.

The proposed 2022 CSBC expands exception #2 to section 903.2.8 for any building containing an existing R use to allow up to four dwellings without requiring the addition of sprinklers. The building would need to meet the egress requirements of the exception and the requirements of Chapter 10.

2. In existing buildings four stories or less in height containing not more than four dwelling units where dwelling units are added to an existing Group R use that does not involve a physical increase in the height or area of the building and where each dwelling units has either:

2.1 An exit door directly to the exterior at a level of exit discharge,

2.2 Direct access to an exterior stair serving a maximum of two dwelling units on the same story, or

2.3 Direct access to an interior stair serving only that dwelling unit and separated from all other portions of the building with 1-hour fire-resistance-rated fire barriers.

Sincerely,



Joseph V. Cassidy, P.E.
State Building Inspector