



Joint Committee on Housing
Public Hearing
Tuesday, February 18, 2020

Raised Bill No. 5118

Good Morning Chairman Anwar and Chairman McGee and members of the Committee.

My name is Anthony J. Vasiliou. I am currently the Executive Director of the Milford Redevelopment & Housing Partnership. Additionally, I am the President of the New England Regional Council of the National Association of Housing and Redevelopment Officials (NAHRO) and serve as a member of the Executive Board of our state housing chapter. As you may know, in Connecticut, our organization is known as CONN-NAHRO.

Today, I would like to comment on Raised Bill No. 5118, An Act Requiring Landlords to Provide Security Systems and Lighting in Rental Property Hallways. Specifically, I want to speak to the issue that a landlord shall: “(7) provide and maintain sufficient lighting and a security system in all hallways of the premises having public access.”

The Milford Redevelopment and Housing Partnership (MRHP) began installing one of the most extensive and technically advanced security systems in a medium-sized public housing authority in the industry. The system has been operational for approximately ten years and was reviewed by Securitas USA, one of the world’s largest full-service supplier of enterprise security solutions.

The company's more than 150-year-old heritage began with its founding by Allan Pinkerton, the original "private eye".

As property managers, MRHP acknowledges that there is no such thing as 100% security. Our security review stated that "security levels are usually determined by the degree of risk perceived to be present and how much risk the organization is prepared to assume." To assess the type and degree of potential security risk exposures and vulnerabilities associated with our multi-story residential properties we evaluated and documented the following:

- Physical layout, configuration, location and immediate surroundings
- Access control measures and perimeter protection
- Physical security (the use of locks, mechanical keys and electronic fobs, as well as other physical barriers and safeguards, such as entrance and exit doors, warning signage, exterior lighting, etc.)
- Current electronic security system applications, including electronic access control and security cameras
- Security-related internal operating policies, procedures and controls with special attention to fob/key control records management and storage, and
- The role and responsibilities of personnel who have direct or indirect fob/key control and other security protection duties at the residences.

Simply stated, MRHP maintains extensive perimeter lighting, extensive exterior cameras, sliding door access systems controlled operated by serialized fobs, and cameras in our elevators, lobbies, hallways and where required in stairwells.

I am sharing this with you to establish the level of security MRHP maintains to provide a safe residential living environment for our tenants in public housing. However, the proposed legislation requires landlords to provide and maintain sufficient lighting and security system in all hallways of the premises having public access.

What constitutes “sufficient lighting”? MRHP tested multiple types of exterior lighting systems prior to selecting a system that provided adequate lighting for our elderly and disabled residents to walk safely from parking lots to the building. The exterior lighting also impacted the quality and capabilities of the surveillance cameras. Understanding the nexus of good lighting and the technical aspects of the cameras is essential in establishing a useful security system capable of deterring threats and aiding the police to apprehend suspects. The range of costs to install and maintain high quality exterior lighting and cameras can very quickly become cost prohibitive. Landlords would be vulnerable to complaints, reasonable accommodation requests or lawsuits testing the proposed legislation’s language of what constitutes “sufficient” lighting and security systems. Further complicating the issue is that in the absence of technical standards every building, location, and level of risk to be managed varies extensively by numerous tangible and intangible factors.

Because the state does not annually provide operating and capital subsidies similar to the federal government for the state-assisted housing portfolio, it would be problematic that adequate public funding would be available to install and maintain over time complex lighting and security systems that would be sufficient to manage the maximum level of acceptable risk.

Although I agree with the spirit of the legislation's provision to ensure adequate lighting and security in hallways, the lack of specific technical details, the generally prohibitive cost of such systems, and the variability of security factors on a building-building basis would be unworkable as currently proposed. Furthermore, lighting and security systems must be multilayered to be effective. From the exterior perimeter of the building to electronic door control access systems to the location of cameras in the building to the key systems in the building must all work in unison to be effective and provide residents with peace of mind that they are secure.

In closing, CONN-NAHRO asks that the provision of sufficient lighting and security be stricken from the bill. If we work together, the serious issue of security and how best to provide lighting and surveillance cameras to protect our public housing residents can be further discussed and encouraged for all landlords in Connecticut to adopt cost acceptable technology to better protect their residents.

Thank you for listening to me today.