



**International Code Council**  
500 New Jersey Avenue, NW  
Sixth Floor  
Washington, DC 20001  
tel: 888.icc.safe (422.7233)  
fax: 202.783.2348  
[www.iccsafe.org](http://www.iccsafe.org)

April 29, 2014

Chairman Brian Gale  
Massachusetts BBRS  
Department of Public Safety  
One Ashburton Place  
Room 1301  
Boston, MA 02108

RE: BBRS White paper: The Cost Effectiveness for Health, Safety and Security of Fire Alarm Systems and Fire Sprinkler Systems in 3 to 6 Unit Residential Buildings

Dear Chairman Gale,

This letter offers public comment from the International Code Council (ICC) on the BBRS White Paper.

The ICC is a membership association dedicated to building safety, fire prevention, energy conservation and sustainability. The ICC develops the codes used to construct residential and commercial buildings. Most U.S. cities, counties and states that adopt codes, choose the International Codes developed by the ICC. The International Codes (*I-Codes*) are developed through a consensus process utilizing building, fire safety, energy and sustainability experts from across the U.S. It is the mission of the ICC to provide the highest quality codes, standards, products, and services for all concerned with the safety and performance of the built environment. As you know, the 2009 *I-Codes* are the base model codes for the Massachusetts 8<sup>th</sup> edition Building Code.

ICC's public comments are noted in [blue text](#) as follows:

Conclusion 1:

There is a pressing need for more housing in the Commonwealth, especially more densely placed affordable housing in its various urban regions. The BBRS has a role in addressing this issue because it regulates building requirements for both new and existing buildings. If building requirements are *many or unclear* then the price of a new or existing building *will be higher than* if the requirements are *fewer and clear*.

**ICC Public Comment:** ICC recognizes states may need to make modifications to the ICC model codes (*I-Codes*) as published to address special building construction or safety issues unique to the state. ICC promotes the unamended adoption of the most current model codes. The *I-Codes* are developed through a consensus process utilizing construction safety and fire prevention, building construction, energy and sustainability experts from across the U.S. The ICC Code Development Process is an open, inclusive process that encourages input from all

individuals and groups and allows those governmental members, including representatives from Massachusetts, to determine the final code provisions. The *I-Codes* are revised and updated every three years through a consensus process that strikes a balance between the latest technology, installation techniques, new building products, and cost while incorporating the most recent advances in public and first responder safety.

#### Conclusion 2:

This conclusion is a corollary to conclusion 1. There is a need for building and fire officials to be trained on the use of the *International Existing Building Code 2009* (IEBC) and its MA amendments and the *2014 BBRS Official Interpretation of the Existing Building Code*. Section 3c outlines impediments to development and low cost construction including unclear, conflicting, or duplicative construction requirements. The IEBC is interpreted differently<sup>1</sup>, and therefore enforced differently, across the Commonwealth.

**ICC Public Comment:** ICC agrees that initial and continuing training of code officials and design professionals in the fundamental understanding and use of the IEBC and all other adopted codes is essential. ICC offers numerous training courses taught by expert instructors to achieve the consistent administration of the *I-Codes* intended to maximize construction efficiency and balance construction costs with a minimum acceptable level of life safety, energy efficiency, resiliency and sustainability. There are several ICC chapters in MA who take advantage of the free training class offered each year. In fact, the MBCIA Chapter will be having a class on the 2009 IEBC later in the year.

#### Conclusion 3:

This conclusion parallels conclusion 2 with training to private, municipal, and state building owners, developers, builders, engineers and architects.

**ICC Public Comment:** ICC recommends that the BBRS work with the various stakeholder associations to host “jointly sponsored” training programs at different locations across the state to facilitate cost effective training and to bring the different disciplines together in the classroom. ICC would welcome the opportunity to present a Training Proposal to the BBRS to assist with a statewide training program on the Massachusetts 8<sup>th</sup> Edition.

#### Conclusion 4:

This conclusion is a corollary to conclusion 1. There exists a potential to build *lower cost* multiunit residential buildings in the Commonwealth with *enhanced or equivalent* overall building occupancy life safety performance relative to those built to current code requirements.

**ICC Public Comment:** *See comment for conclusion 1*

#### Recommendation 1:

The BBRS should direct its Department of Public Safety (DPS) staff to provide the materials and the training to constituent bodies as described in Conclusions 2 and 3.

**ICC Public Comment:** ICC would welcome the opportunity to present a Training Proposal to the BBRS to assist with a statewide training program on the Massachusetts 8<sup>th</sup> Edition.

#### Recommendation 2:

The BBRS should direct its DPS staff, with technical expert assistance as required, to create a code proposal for new construction R-2 buildings up to 6 units, which addresses Conclusions 1 and 4 and the issues outlined in this paper. This code proposal should incorporate

Recommendation 3.

**ICC Public Comment:** ICC recommends that the BBRS submit this code change proposal to the ICC for consideration by the ICC membership for inclusion in the next edition of the International Building Code. ICC membership includes governmental members from all over the country. ICC has a Building Code Action Committee that includes a representative of the National Multi-Housing Council and this committee would be a good place to vet this code change proposal.

Recommendation 3:

Because of the recent changes in the Energy Conservation requirements in the code and feedback from the regulated community on cost of these requirements for low rise residential multi-unit buildings the BBRS should direct its DPS staff to author a White Paper on Cost and Effectiveness for Health, Safety, and Security of Energy Conservation Systems in Multi-Unit Residential Buildings and incorporate the conclusions of it into the code proposal in Recommendation 2.

**ICC Public Comment:** ICC recommends that the DPS include the 2015 IECC in this review. The 2015 *I-Codes* will be available in June 2014. ICC would be happy to provide an overview of the significant changes from the 2012 IECC to the 2015 IECC if the BBRS would find that helpful.

The International Code Council is honored to partner with the Commonwealth of Massachusetts and we look forward to continuing to serve your needs. Thank you for the opportunity to submit these public comments concerning the cost effectiveness for health, safety and security of fire alarm systems and fire sprinkler systems in 3 to 6 unit residential buildings.

I would be pleased to answer any questions or provide additional documentation. I can be reached at 888-422-72323 Ext 7276 or e-mail at [BEJohnson@iccsafe.org](mailto:BEJohnson@iccsafe.org) . My mailing address is also included below.

Sincerely,



Bruce E. Johnson  
Vice President  
State and Local Government Relations

International Code Council  
Long Island Field Office  
PO Box 655  
Jamesport, New York 11947

CC: Commissioner Thomas G. Gatzunis, P.E.  
BBRS Staff