



## Associated Subcontractors of Massachusetts, Inc.

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January 11, 2011

Alexander MacLeod, AIA, LEED-AP  
Chairman Board of Building Regulations and Standards  
One Ashburton Place, Room 1301  
Boston, MA 02108

Dear Mr. MacLeod:

The Associated Subcontractors of Massachusetts represents nearly 400 specialty contractors of all trades (including many in the MEP trades) who work on building projects of all types across the state. On behalf of these businesses, I write today to express strong opposition to the proposal for a “stretch residential sprinkler code” that will allow cities and towns the option of requiring sprinkler installation in residential buildings.

We take no position for or against the installation of sprinklers. Our members work predominately in the commercial arena, where sprinklers are the norm. The question whether sprinklers should be required in residential dwellings as a safety measure, is one we leave for others to decide.

Our concern is with the integrity of the state building code, and consistency of requirements in cities and towns across the commonwealth. Allowing municipalities to adopt different code requirements sets the stage for confusion, chaos, and costly mistakes, on the part of consumers, contractors and enforcement officials. Such was the situation in the past, which is what lead to the creation of the single unified code we have now. Allowing for optional “stretch” codes is a step backwards.

Furthermore, it is our understanding the installation of sprinklers is governed by state licensing authorities, and different licensed trades may be involved, depending on the exact type of system installed. This brings additional complexity to the issue – and increases the potential for confusion.

In short, we believe the creation of a stretch residential sprinkler code is yet another “slippery slope” that threatens to undermine the state’s uniform building code, which by all accounts has served the state well. We urge you to reject this well-intentioned but ill-advised proposal to allow yet another “stretch” code as a local option.

Sincerely,

Monica Lawton  
CEO

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