



January 11, 2011

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

Dear Mr. MacLeod:

On behalf of the Massachusetts Retail Lumber Dealers Association (MRLDA), I am submitting comments on the Department of Public Safety's State Building Code Amendment Proposal (Code Change Number 2010_12_12) concerning residential sprinklers. With its 258 member companies, MRLDA represents independent lumber and building material dealers, manufacturers, wholesalers, distributors, and other associated businesses in this state. Employing more than 7,000 Massachusetts residents, the Association's member companies account for \$1.3 billion in annual sales in the state.

The proposed code change would allow cities and towns to require the installation of residential sprinklers in one and two-family residential new construction. This proposal ignores the recommendations of the OTFRSC report and would destabilize attempts at creating a uniform building code. Further eroding the benefits of a uniform building code does not help anybody.

Additionally, the added costs to homeowners would be substantial and could damage an already weakened housing market. As the housing market starts its recovery, burdensome regulations such as this dramatically increase the cost of housing and erode housing gains and stall recoveries. The costs provided to the committee for North Andover¹, \$4500-\$6500 depending on square footage, represent a substantial additional cost to housing; and come from an area of Massachusetts that has some of the lowest costs for residential sprinklers. This means that it is likely that the costs in other towns and cities can be dramatically higher. These

¹ NPFA report shows costs of three homes in No. Andover

North Andover – System Costs

Sprinklered Space Living Space

System Cost

Size \$/SF Size \$/SF Living Space

House 1 \$4,500 3,568 \$1.26 3,084 \$1.46

House 2 \$5,800 4,632 \$1.25 4,148 \$1.40

House 3 \$6,500 5,906 \$1.10 5,422 \$1.20

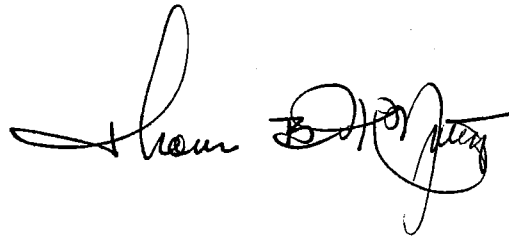
If needed, a tank system approximately \$3,500 - \$5,000.

unnecessary costs hinder the housing market and new homeownership. Homeowners always have the option of adding residential sprinklers if they are wanted.

Furthermore, we have heard from other areas where residential sprinklers are mandatory that many new homeowners request that they are removed or turned off before purchase because they fear they will cause more property damage than a potential fire. Smoke detectors are an effective live saving tool that the public is willing to use. Residential sprinklers are seen as prohibitive, costly, and damaging devices that many homeowners do not want and will not use. Therefore the added cost and burden may not come with any additional benefits as there is a high chance that the sprinkler systems would not be used or maintained.

MRLDA appreciates the opportunity to comment and ask that the residential building code be allowed to stay uniform and allow homeowners to make the decisions concerning adding substantial costs. Please contact me if you have any questions or need for assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom McNulty". The signature is fluid and cursive, with a large initial "T" and "M".

Tom McNulty
President
Massachusetts Retail Lumber Dealers Association

cc: Joseph Burgoyne, Chair MRLDA Legislative Committee
Jeff Keller, Manager of Legislative & Regulatory Affairs, NRLA