

1201 15th Street NW
Washington, DC 20005

T 800 368 5242
F 202 266 8141
www.nahb.org



December 6, 2011

Sent via Electronic mail to Chairman Gale at blgalema@yahoo.com

Brian Gale, Chairman
Massachusetts Board of Building Regulations and Standards
One Ashburton Place, Room 1301
Boston, MA 02108

Dear Chairman Gale,

On behalf of our 160,000 members, the National Association of Home Builders (NAHB) wishes to commend the BBRS on its decision to remove the mandatory requirements for residential sprinklers from the proposed new building code in the Commonwealth of Massachusetts. NAHB supports the successful efforts of more than 35 States that have taken action to amend the national model codes from mandating residential fire sprinklers in one- and two-family dwellings. These 35 states understand the significant financial impact that the cost of residential fire sprinklers will have on housing and the financial burden these requirements would have on families who are trying to move out of existing substandard housing and into safer housing built under newer codes and standards.

We would like to first make it clear that we do not oppose home fire sprinkler technology or the voluntary installation of these fire suppression systems. We do however oppose the mandatory installation of them for a number of very sound reasons. Among the more significant concerns are:

- Because of changes in residential construction technology, improved building code requirements - especially for electrical and smoke alarm systems, as well as consumer behavior and the concerted efforts of our fire fighters, home builders and other safety advocates, the number of fatal fires has dropped dramatically in the last 20 years. This trend continues and the decline is even more impressive given the significant population growth and growth in housing stock.
- Even more dramatic is the drop in the actual fire death rate per million persons (FDMP) from house fires. Nationally, from 1979-2007, the rate dropped by more than 58 percent, based on data from the Centers for Disease Control. That trend will continue as more new housing stock is constructed and especially as maintenance of smoke alarms by home occupants is improved. Furthermore, the fire safety features currently required by our building codes will adequately protect the home

throughout its life without the need for fire sprinklers.

- US Fire Administration and National Fire Protection Association data continue to affirm that the vast majority of home fire fatalities occur when there are no operational smoke alarms.
- Thanks to widespread installation of residential smoke alarm systems in recent years, communities are safer than they've ever been. Based on a 2006 US Fire Administration study on the presence of working smoke alarms in residential fires, from 2001-2004, more than two-thirds of the fatal fires reported to have occurred in single-family homes that lacked working smoke alarms. The problem is not homes without sprinklers, the problem is homes without working smoke alarms.
- Home fire sprinklers are a significant expense. Mandates will have an unreasonable impact on housing affordability in the Commonwealth and around the country and have not been demonstrated to be a practical, cost effective assured means for reducing fire fatalities. More lives can be saved through increased education and other efforts to ensure every home has and maintains working smoke alarms than by mandating home fire sprinklers.
- Most unintentional fatal residential fires can be prevented if the occupants are careful of risky activities such as unattended cooking, candle burning, and smoking. Additionally, changes in smoking habits, fire safe cigarettes and ignition resistant furnishings all help reduce the risk of fires. As with smoke alarms, fire prevention education is a more practical, effective and proven approach to reducing home fire incidents, injuries and fatalities than mandates for home fire sprinklers.
- Proponents of mandatory requirements claim that cost concerns are exaggerated, often citing figures from Scottsdale, Arizona, ("the Scottsdale study"). However, our concerns over true costs are well founded and are not exaggerated. Even in Scottsdale where installation costs are considered among the lowest, they are still more than what proponent's state. The costs purported in the Scottsdale report are in no way representative of the rest of the country where installation costs are substantially higher. It would be irresponsible for a jurisdiction to rely upon the Scottsdale report as a determinant of what the true costs will be to homebuyers in your area.
- In fact, in August 2006, the NAHB Research Center surveyed home builders in jurisdictions where fire sprinklers have been mandated across the country. Survey results from over 1500 installations in homes on public water systems in jurisdictions other than Scottsdale, AZ, show that the costs of residential fire sprinklers is substantially higher than what proponents of mandatory fire sprinklers would lead one to believe. In truth, the cost of installation were on average \$2.66 per square foot and

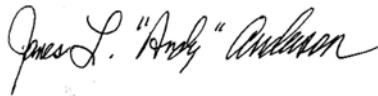
ranged as high as \$6.88 per square foot. When overhead and other factors are added in such as interest, installation costs to home buyers escalate further. For homes on wells, the results show that the typical costs are much higher because of the need for additional components such as storage tanks and larger pumps.

The National Association of Home Builders supports affirmative programs of fire safety for residential construction whose principle components are practical life safety improvements that are cost-effective. The IRC clearly states, "The purpose of this code is to provide minimum requirements to safe guard life or limb, health and public welfare." Any imposition of a mandated sprinkler requirement is excessive and is not a reasonable minimum standard for meeting the "purpose" of the code. It is important to remember that the code comprised of many life-safety requirements that have been proven to meet the "purpose" of the code.

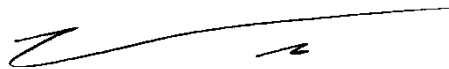
If you would like additional information about our concerns or if you would like to discuss this further, please contact me at lbrown@nahb.org or by phone. I would welcome such an opportunity.

We thank you for your time and consideration of our concerns.

Professionally,



Chair, NAHB Construction, Codes & Standards Committee



LAWRENCE BROWN, CBO

Director, Codes & Standards
Advocacy Group

National Association of Home Builders (NAHB)
1201 15th Street, NW
Washington, DC 20005

D (202) 266-8565 M (202) 420-1251
F (202) 266-8369 T (800) 368-5242 x8565

lbrown@nahb.org
www.nahb.org

cc: Mr. Robert Anderson via email at Robert.Anderson@state.ma.us
Mr. Steve Kennealy via email at Steve.Kennealy@state.ma.us
Mr. Mike Guigli via email at Mike.Guigli@state.ma.us