



**HOME BUILDERS & REMODELERS
ASSOCIATION OF CAPE COD**
We Build Our Community



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Officers

December 13, 2011

President

Rich Bryant
Cape Associates, Inc.

Brian Gale, BBRS Chairman
One Ashburton Place
Boston, MA

Vice President/Treasurer

Jim Gronski
Jim Gronski Construction

Re: Stretch Residential Sprinkler Code

Vice President/Secretary

Scott Gladish
Cape & Islands Glass

Dear Mr. Gale,

Immediate Past President

Rob McPhee
McPhee Associates, Inc

I am a licensed builder, past President and current board member of the Home Builders and Remodelers association of Cape Cod (HBRACC). The HBRACC opposes code changes that would in any way weaken the Uniform Building Code and especially while legislation regarding Stretch Codes is pending.

Executive Officer

Christine Duren

Board of Directors

Bill Almeida '13
Falmouth Lumber

No doubt mandatory automatic sprinkler systems required in all new construction of one & two family dwelling will raise the cost of housing in a market that already has some of the highest housing costs in the country. Design costs to construction costs as well as additional unknown costs associated with local water utilities are a major concern to all.

Kevin Bengert '12
Bengert Construction

Skip Carleton '12
Mid-Cape Home Centers

Mike Duffany '13
M. Duffany Builders, Inc.

The Stretch Sprinkler Code would be an open door for local regulators and water utilities that could result in above code fire sprinkler systems. The disparities across the state that may require a second water line coming into the house for the sprinkler system, upgrades for system monitoring, alarms, external hose connectors, and annual maintenance costs for back-flow preventers when required should be addressed up front.

Paul Diggin '14
Advanced Comm. Technologies

Brian Harding '13
Andersen Windows

Stephen Klug '12
Fine Building & Finish

The Massachusetts Water Works Association (MWWA) noted in their 12/14/10 comments to the Board that the installation of residential sprinklers will indeed have impacts on water utilities and their customers. They have made it clear requirements will vary by utility and there will be infrastructure costs, not only in installation, but for ongoing maintenance and future replacement. While backflow protection and cross connection control are recommended options for residential sprinkler installation it does not preclude utilities from imposing different requirements. There may also be costs for additional water quality monitoring and annual backflow device testing. Homeowners might be required to install a dedicated service for the sprinkler system or a second meter and ensure that the system is properly maintained. Some utilities may require testable backflow prevention devices.

Elizabeth C. Kovach '12
Windswept Custom Homes

Tony Shepley '13
Shepley Wood Products

[year denotes term expiration]

Hall of Fame

Jan Nickerson
Mid-Cape Home Centers

Tony Shepley
Shepley Wood Products

Elizabeth Kovach
Windswept Custom Homes

Michael Cole
Cape Associates

The MWWA states all these issues are of special concern given the increasingly limited resources at many smaller water utilities. These unknown additional costs will ultimately be paid for by MA home owners. The MWWA also states that "Costs to the homeowners could range from one hundred dollars to thousands of dollars depending on the utilities' requirements." We believe there needs to be more uniformity among water purveyors before sprinklers become viable.

Properties located in areas where there is an insufficient water supply for sprinklers will require a tank and a pump adding additional cost to construction. Homes supplied by wells will need a larger well pump or booster pump and a larger expansion tank to meet the additional water pressure demands for sprinklers.

Seasonal home owners on Cape Cod, who pay some of the highest utility costs in the state, will face additional costs associated with sprinklers beyond installation costs, where utilities including heat, electricity, and water are typically shut off for the winter. According to figures from the Cape Cod Commission 33% of the Cape's homes are seasonal and it is estimated that seasonal homes account for 40% of new home construction.

By law homeowners will be required to get permission of the fire department to shut the sprinkler system down when the utilities are typically turned off for the season. The OTFRSC 2009 report notes that it may be necessary to amend MGL to assure uniform statutory allowance of fire sprinkler system shut down.

While the Fire Chiefs Association has indicated that permission to shut down a sprinkler system would be attainable, will the homeowners' insurer provide coverage if there was a fire during shut down?

If the systems are not shut down, utilities could not be shut down in the homes when unoccupied. The additional utility costs and energy consumption conflicts with energy conservation policies.

Will insurance coverage be limited or excluded for false triggering events that damage property? What about false triggering especially in vacant seasonal homes where there may be resulting water and mold damage? Insurance companies have already restricted coverage for mold damage and remediation, a very real potential exposure that could result from a false triggering event.

From Massachusetts data, one fire death per year is experienced in single and two-family homes constructed post-1986. Smoke alarms potentially save more lives than sprinklers. A 2006 study by the U.S. Fire Association (USFA) on the presence of working smoke alarms in residential fires from 2001-2004 showed that 88 percent of the fatal fires in single-family homes occurred where there were no working smoke alarms. USFA and NFPA data continue to show that the vast majority of home fire fatalities occur when there are no operational smoke alarms. Common sense tells you that the uniform State Building Code is effective. Further analysis should be made to assess the incremental cost vs. benefit of installing residential fire sprinklers in homes to mitigate the risks of fires.

The members of the HBRACC respectfully request that the BBRS vote no on the Stretch Residential Sprinkler Code.

Sincerely,

Elizabeth Kovach