

December, 2011

Michael Guigli, Technical Director
Board of Building Regulations and Standards
One Ashburton Place – Room 1301
Boston, MA 02108

RE: Stretch Sprinkler Code

Mr. Guigli:

I am writing to express my opposition to the Stretch Sprinkler Code proposal currently being considered by the Board of Building Regulations and Standards (BBRS). My opposition is based on the following points:

- Any “stretch” code in which cities and towns have the option to adopt a code provision serves to undermine the uniformity of the State Building Code and can only encourage other such stretch provisions, further reducing uniformity and bringing us closer to the pre-1975 condition of a fragmented regulatory process.
- Fire related fatalities rarely occur in newer homes which are built with hard-wired smoke detectors and ever improving construction methods and building codes. In fact, the number of fatal fires has been on the decline for the past two decades without mandated sprinklers.
- Data proves that the vast majority of home fire fatalities occur in older housing stock where there are no operational smoke alarms.
- The proposed code would add significant costs to the construction of every new one and two family home in the Commonwealth. The added expense will make home ownership even less affordable to first-time homebuyers. This is an unnecessary and untimely burden given the diminished returns on public safety and the dire economic housing and employment crisis in the Commonwealth.

Mandating sprinklers would be a disservice to consumers, the building community, the regulatory community and code enforcement professionals of the Commonwealth. I strongly urge the BBRS to reject the Stretch Sprinkler Code proposal.

Sincerely,