



**HOME BUILDERS & REMODELERS ASSOCIATION  
OF CONNECTICUT, INC.**

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*Your Home  
Is Our  
Business*

February 19, 2015

To: Senator Timothy D. Larson, Co-Chairman  
Representative Stephen D. Dargan, Co-Chairman  
Members of the Public Safety & Security Committee

From: Bill Ethier, CAE, Chief Executive Officer

Re: **Opposition to HB 6777, An Act Requiring the Installation of  
Automatic Fire Extinguishing Systems in New Residential Buildings**

The HBRA of Connecticut is a professional trade association with about eight hundred (800) member firms statewide employing tens of thousands of CT's citizens. Our members, all small businesses, are residential and commercial builders, land developers, remodelers, general contractors, subcontractors, suppliers and those businesses and professionals that provide services to our diverse industry and to consumers. We build between 70% to 80% of all new homes and apartments in the state each year and engage in countless home remodeling projects.

**The HBRA of CT strongly opposes a mandatory requirement that all new 1&2 family homes include a fire sprinkler system.** We greatly respect and honor the service that fire fighters provide to protect our communities. Also, all home builders would be happy to install a fire sprinkler system in a new home if requested to do so by their customer. **However, our opposition to a fire sprinkler mandate is about logic, reason and common sense. This mandate would be ineffective at reducing fire deaths, is extremely expensive and unwise policy.**

Some history of this proposed mandate follows: **The CT Code Amendment Subcommittee (CAS) voted 11-2 on October 13, 2010, to exclude the mandatory fire sprinkler section from the 2009 International Residential Code (IRC),** our current code that covers 1&2 family home construction in CT. Part of the vote to exclude the mandate was to establish a working group of code experts and fire sprinkler advocates to study the issue. The HBRA had one seat on the 34-member working group. A year later, on Oct. 20, 2011, a final draft of the working group report ([click here](#)) highlighted a number of problematic issues with a mandatory sprinkler law that persist to this day. See also a corrected section m ([click here](#)) and [HBRA of CT's comments on final draft report](#). The CAS has more recently decided to again exempt the sprinkler mandate in the 2012 IRC, part of the 2012 ICC family of codes that is expected to be adopted in CT later in 2015 by the CT Codes & Standards Committee (CSC).

**While CT's building code body has recognized that a sprinkler mandate is either not warranted or feasible, the issue has seen a recurring debate in the state legislature.** The same sprinkler mandate for 1&2 family homes has been introduced in five previous legislative sessions, most recently in 2011 (see [House Bill 6378](#)). All five previous attempts did not pass. The arguments on both sides are the same. More importantly, the

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facts that should dictate your logical and common sense decision to not adopt a sprinkler mandate are the same. We again urge you to not pass this mandate on new home owners.

To summarize the arguments, mandatory fire sprinklers in 1&2 family new construction, even if at local option, should be opposed for all of the following reasons:

- **Requiring sprinklers in new homes would be ineffective because it does not address the problem of fire deaths in homes.** Most residential fires (88 – 90%) and almost all fire deaths and serious injuries occur in homes that are 30 or more years old. **New homes are simply built better than they used to be,** incorporating better fire stopping materials, better electrical systems and electrical installations, better egress (i.e., ways to get out of a home), the hard wiring of smoke detectors and placement of such smoke detectors in every bedroom and additionally on each level of a home. **The argument made by some proponents of a mandate, i.e., that there’s no difference between old and new homes and that we have to start somewhere, is both inaccurate and misses the point.** As homes built today become older, they will still retain the newer fire safety construction standards by which they were built. **It is the homes built to older codes (i.e., prior to 1979, certainly prior to 1985) that are more dangerous. Installing sprinklers in new homes starts in the wrong place.**
- **The cost for individual new home buyers would be \$7,000 to \$10,000 and up.** While individuals can make a legitimate decision to buy this protection, **it is a choice home buyers should make for themselves;** not imposed on them by legislation, codes or municipalities.
- **The 1996 legislative task force report showed that installing fire sprinklers in new 1&2 family homes would cost society \$403,000,000 to save one life.** The 1996 data showed that there is one fire related death for every 61,000 housing units. Since that time, fire deaths have been decreasing and more recent data shows one death for every 91,000 homes. **Therefore, we will have to put sprinklers in 91,000 new homes to protect, on average, that one life –** assuming sprinklers work 100% of the time and that home owners perform monthly and annual maintenance as recommended, and ignoring the fact that fires occur at a greater rate (and almost all deadly fires occur) in homes built before 1979. This is a massively expensive undertaking as a society. We could spend that level of resources in so many better ways to save many more lives. It’s simply illogical to proceed down this path.
- **This mandate is also unwise policy. Adding costs to new homes keeps potential buyers in older homes, potentially increasing their risk of fire-related injuries or death.** Housing economists calculate that for every \$1,000 in increased price for a home, 217,000 buyers nationally are priced out of that home. Some portion of those buyers will, therefore, be forced to stay put in older homes or choose a less expensive, perhaps older, existing home versus a new home. **Since the vast majority of fire-related injuries and deaths occur in older homes, requiring sprinklers in newly constructed homes could actually increase a person’s risk of injury and death from a home fire by keeping them in an older home.**

- While not proposed in HB 6777, sprinkler proponents have asserted in prior years that municipalities be allowed to require sprinklers. **Providing local variance of our statewide building code is a huge step backwards.** If municipalities are allowed to begin adopting local variations to our statewide code then why stop at fire sprinklers? We have had a statewide building and life safety code for four decades. **Our statewide code has created consistency and uniformity that benefits the public safety, the building and design industry and local enforcement officials.**

**Nobody is opposed to public safety. But any public safety measure comes with a price and necessary cost-benefit analysis. We hope common sense and rationality guide your decision to not support HB 6777.**

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Supporting documentation: Additional background research and documents justifying opposition to a sprinkler mandate in 1&2 family homes appear below (links should be active in the online pdf version of this testimony):

- [Facts About Fire Sprinklers](#) (NAHB);
- [Smoke Alarms Work - brochure](#) (NAHB); [Smoke Alarms Work - website](#) (NAHB);
- [CT Attorney General's Opinion 1992-023](#): State Fire Safety Code and State Building Code preempt the field and municipalities do not have the authority to require fire sprinklers;
- [How the Sprinkler Mandate Got Into the 2009 IRC model code: IRC Hearings Rigged by Sprinkler Proponents](#) (manufacturers stand to make billions with a nationwide mandate);
- [CT General Assembly Fire Sprinkler Task Force Report](#) (Jan. 2, 1997) - outlining data, not refuted by any other member of the task force, concluding it would cost society ~ \$403,000,000 per life saved by mandating fire sprinkler installations in new homes;
- [Fire Deaths by Age of Home in CT](#) (Connecticut fires occurring from 2000-2006 show no deaths during this 7 year period in any one or two family home built after 1985, the year hard-wired smoke detectors became mandatory); see also [National Fire Incident Reporting System-CT Table 2002-2006 SF Homes](#);
- [History of Fire Deaths in Homes in US](#) (Housing Economics, Elliot Eisenberg, Nov. 2002);
- [Fire Sprinkler Talking Points](#) (NAHB) (Provides a succinct overview of the issues surrounding fire sprinklers);
- [Talking Points in Response to Sprinkler Proponent's Reports](#) (NAHB);
- [Fire Sprinkler Q&A](#) (NAHB) (Common questions regarding fire safety and residential fire sprinklers);
- [Fire Sprinklers and Homeowners Insurance](#) (Sept. 14, 2007, NAHB);
- [NAHB's Content and Economic Review of NFSA White Paper](#) (critically reviews Nat'l Fire Sprinkler Association's white paper, "Residential Fire Sprinklers for Life Safety");
- [Fire Sprinklers: Problems with NFPA 13D](#) (NAHB, Feb 8, 2008);
- [Fire Sprinkler Technical Concerns](#) (NAHB Research Center, 2007);
- [The Priced-Out Effect of Raising Interest Rates or Costs](#) (NAHB, 2005).  
(Demonstrates how home buyers are priced out of the market when costs are raised)