
RB64-07/08

R313 (New), Appendix P, Chapter 43 (New)

Proponent: Ronny J. Coleman, Retired California State Fire Marshal, representing IRC Fire Sprinkler Coalition

1. Add new section as follows:

SECTION R313 FIRE SPRINKLER SYSTEMS

R313.1 General. Effective January 1, 2011, an approved automatic fire sprinkler system shall be installed in new one- and two-family dwellings and townhouses in accordance with NFPA 13D.

(Renumber subsequent sections)

2. Delete IRC Appendix P without substitution:

APPENDIX P FIRE SPRINKLER SYSTEM

~~The provisions contained in this appendix are not mandatory unless specifically referenced in the adopting ordinance.~~

~~**AP101 Fire sprinklers.** An approved automatic fire sprinkler system shall be installed in new one- and two-family dwellings and townhouses in accordance with Section 903.3.1 of the *International Building Code*.~~

3. Add standard to Chapter 43 as follows:

NFPA

13D-07 Installation of Sprinkler Systems in One- and Two-family Dwellings and Manufactured Homes

Reason: This proposal is submitted as part of a package of three proposals that were developed in cooperation with the International Association of Fire Chiefs with input from code officials, home builders, fire chiefs and other interested parties. During last year's code development cycle, many ICC members stated that the preferred way to advance fire sprinklers into new home construction is through a comprehensive approach that involves:

1. A schedule for implementation,
2. Reasonable and appropriate design and construction incentives, and
3. A simple, prescriptive methodology for designing systems.

In response, representatives of the IRC Fire Sprinkler Coalition (IRCFSC) and the International Association of Fire Chiefs have developed and submitted three proposals for this code cycle, one addressing each topic.

This proposal addresses the first issue, "a schedule for implementation." It requires new homes constructed after January 1, 2011 to have fire sprinklers. The delayed implementation date provides a time buffer that will allow for development of infrastructure, such as trained installers and inspectors, prior to the residential sprinkler requirement becoming effective. While the approach of delaying a code requirement may be unfamiliar to some, it is entirely appropriate, and it is already used by the IRC in Chapter 38, as follows:

E3802.12 Arc-fault protection of bedroom outlets. *All branch circuits that supply 120-volt, single-phase, 15- and 20-ampere outlets installed in bedrooms shall be protected by a combination type or branch/feeder type arc-fault circuit interrupter installed to provide protection of the entire branch circuit. Effective January 1, 2008, such arc-fault circuit interrupter devices shall be combination type. (emphasis added).*

It is common knowledge that fires in one- and two-family dwellings are the root of America's fire problem, and a substantial majority of ICC members who voted at last year's final action hearing, 56%, agreed that residential sprinklers are the right solution. To truly address America's fire problem, ICC members know that we must, at some point, begin to mainstream fire sprinklers into new home construction, and this proposal provides a rational way to make the transition by fixing a future date for the requirement to become effective.

During last year's debate, the IRCFSC provided detailed responses that addressed all of the concerns cited in testimony as a basis for opposing residential sprinklers. These concerns, which included the use of wells to supply sprinklers, freezing, leakage and cost, among others, were addressed in our public comment to proposal RB114-06/07 and in testimony offered at the final action hearing in Rochester. They were also addressed in a Web cast aired by the IRCFSC in May 2007, copies of which are now available on a free DVD that can be ordered at www.IRCFireSprinkler.org.

As a result of this outreach effort, opposition to sprinklers based on myths and misinformation has largely dissipated, and the debate has largely become focused on two issues: First, whether the requirement for fire sprinklers in dwellings should be determined at a local level, and second, whether the residential fire problem is limited to older homes. The remainder of this reason statement focuses on these two issues.

1. Should the requirement for fire sprinklers in dwellings be a local issue? Several speakers in Rochester who spoke in opposition to RB114 conveyed an opinion that requirements for fire sprinklers in dwellings should be decided at the local level. The question is why? By including Appendix P, the IRC has already acknowledged fire sprinklers as a basic safety feature that should be included in new homes. There is no premise for the IRC to promote residential fire safety on community-by-community basis. The IRC, as a model code, should promote safety and regulatory consistency among all jurisdictions, as opposed to creating a local "shopping list" of safety requirements.

No other ICC code treats sprinkler requirements or residential fire safety as a local choice to be made at the time of code adoption. The IBC establishes a baseline that ALL residential occupancies must be protected by fire sprinklers, including one- and two-family dwellings and townhouses. Some argue that it's appropriate for IBC to be more restrictive than the IRC because use of the IBC is only mandatory for dwellings exceeding three stories in height, but that argument disregards one very important fact; most residential fire deaths occur in one- and two-story homes. To have an impact on fire deaths in one- and two-story homes, we need a fire sprinkler requirement in the IRC.

A newly published study by the National Institute of Standards and Technology (NIST) entitled "Benefit-Cost Analysis of Residential Fire Sprinkler Systems," reports that, out of almost 2,000 fire incidents in homes equipped with fire sprinklers during the 4-year period 2002 to 2005, there were no fire-related fatalities. This statistic clearly demonstrates the potential for sprinklers to save thousands of lives that would otherwise be lost in residential fires. With the knowledge that residential fire sprinklers are a proven, life-saving technology, it is clear that the IRC should establish a model that sprinklers are a minimum safety feature that should be included in all new homes.

2. Is the residential fire problem limited to older homes?

According to a recent HUD study, the median age of homes in the U.S. is 32 years. With this in mind, it makes perfect sense that more fires and fire deaths occur in "older" homes, simply because there are many more of them. However, the residential fire problem is certainly not limited to older homes, and it is has not been correlated with home age.

To evaluate the relationship between the age of a home and fire risk, it is necessary break the concept of fire risk into its two components, the probability of a fire event occurring and the associated consequence once the event occurs. The probability of a fire event occurring equates to the risk of fire ignition. With respect to the age of a home, only those ignition sources that are permanently affixed to a home, such as central heating systems or electrical distribution systems, might be directly correlated to home age, but to date, there are no known studies demonstrating increased fire risk as these systems age. Such a study would be difficult to perform because heating and electrical systems are often replaced when a home is remodeled, breaking any correlation that might otherwise exist between the age of a home and the age of fixed systems installed therein. Nevertheless, because most fire deaths are associated with ignition scenarios related to human behavior, which are independent of home age, it is clear that home age has little to do with the probability of a fire event.

With respect to consequences associated with a fire event, assuming that an ignition has occurred, it is again difficult to establish any correlation with home age, except to the extent that the probability of safe evacuation is increased based on the possible presence of working smoke alarms and/or escape windows. On the contrary, some design and construction methods commonly used in new homes actually reduce fire safety. These include the use of lightweight trusses (now used in more than 60% of new homes according to the Wood Truss Council of America), which are known to become unstable and collapse more quickly in fire situations than conventional construction; and open floor plans, which reduce compartmentation and allow a fire to quickly spread throughout a home.

The truth is that fire growth in a home is largely dependent on contents, not the structure itself, and contents are independent of home age. Although smoke alarms and escape windows associated with newer homes are beneficial in some fire incidents, statistics show that the value of these features is declining over time, as fire deaths in homes that have working smoke alarms are becoming increasingly common. The most recent data (for the period 2000 to 2004), shows that 34% of fire deaths occurred in homes that had WORKING smoke alarms. This is up from 24% in the previous period, and as smoke alarms age, we can only assume that their reliability will continue to decline unless they are periodically replaced, which seems to be wishful thinking when one considers that we have a problem even getting people to change batteries in smoke alarms on a regular basis.

In summary, a simple risk analysis demonstrates that home age is largely independent of either the risk of ignition or the consequences of a fire, if ignition occurs. Therefore, it is clear that home age has little to do with the residential fire problem or the need for residential sprinklers.

Conclusion:

The outpouring of support for residential sprinklers has been building for many years, and today, all U.S. model building codes require fire sprinklers in residential occupancies, including one- and two-family dwellings, with the exception of the IRC. It is only logical that the IRC should finally acknowledge the value of residential sprinklers in preventing deaths, injuries and property loss by making sprinklers a standard feature in new home construction.

Although some in the IRC arena have argued that "big government" shouldn't intrude into American homes by requiring fire sprinklers, those of us who have been around for a while will recall that this same argument was made 30-years ago when smoke alarms were first required in dwellings. Today, it's hard to imagine any reasonable individual arguing that the IRC requirement for smoke alarms constitutes a "government intrusion" into the American home, largely because smoke alarms are viewed as cost-effective safety devices. Sprinklers should be viewed the same way.

Given the proposed incentive package and prescriptive design option for multipurpose fire sprinkler systems being advanced this year in a proposal by the International Association of Fire Chiefs, it is entirely feasible that it will be cheaper to build some homes with fire sprinklers than without. For those cases where there is a net cost to sprinklers, NIST's newly published "Benefit-Cost Analysis of Residential Fire Sprinkler Systems" report concludes that multipurpose residential fire sprinkler systems are still a good investment, yielding a positive present value of net benefits (PVNB) for every home type studied, including ranch-style homes, colonial-style homes and townhouses.

This proposal provides a reasonable and justified approach for advancing fire sprinklers into the body of the IRC, and the time has come to for the IRC to include fire sprinklers as part of the model for residential construction.

ABOUT THE IRC FIRE SPRINKLER COALITION: The IRC Fire Sprinkler Coalition is an organization that represents national, state and regional groups of code officials and other associations focused on public safety. The Coalition has been active in presenting training programs to code officials and others aimed at conveying facts and debunking myths and misinformation about residential sprinklers. At the time of submittal of this proposal, groups who pledged to support the IRC Fire Sprinkler Coalition's mission of mainstreaming fire sprinklers into new home construction included:

NATIONAL AND REGIONAL COALITION MEMBERS

- * International Association of Fire Chiefs – Fire and Life Safety Section
- * Center for Campus Fire Safety
- * ICC Joint Fire Service Review Committee
- * Institution of Fire Engineers, US Branch
- * International Fire Marshals Association
- * National Association of State Fire Marshals
- * New England Association of Fire Marshals

- * New England Division of the International Association of Fire Chiefs
- * Safe Buildings Coordinating Committee
- * Society of Fire Protection Engineers
- * Southeastern Association of Fire Chiefs
- * Uniform Fire Code Association
- * Western Fire Chiefs Association

STATE AND LOCAL COALITION MEMBERS

Alaska

- * Alaska Fire Chiefs Association

Arizona

- * Arizona Fire Chiefs Association
- * Arizona Fire Marshals Association
- * Arizona: Society of Fire Protection Engineers, Arizona Chapter
- * Arizona: Yuma County, AZ Fire Officer's Association

California

- * California: California Fire Chiefs Association
- * California: Northern California Fire Prevention Officers Section
- * California: Orange County Fire Chiefs Association
- * California: Southern California Fire Prevention Officers Section

Colorado

- * Colorado: Fire Marshals Association of Colorado

Connecticut

- * Connecticut: Capitol Region Fire Marshals Association of Connecticut

Delaware

- * Delaware: Fire Marshals Association of Delaware Valley

Florida

- * Florida Fire Marshals and Inspectors Association
- * Florida Fire Chiefs Association
- * Florida: Northeast Florida Fire Prevention Association

Idaho

- * Idaho Fire Chiefs Association
- * Idaho Fire Prevention Officers Association

Illinois

- * Illinois Fire Inspectors Association
- * Illinois Fire Chiefs Association
- * Illinois: Lake County Fire Chiefs Association

Indiana:

- * Indiana: Fire Inspectors Association Of Indiana

Iowa

- * Iowa: Hawkeye State Fire Safety Association, Iowa
- * Iowa Fire Marshal's Association

Louisiana

- * Louisiana Association of Fire Prevention Chiefs

Maryland

- * Maryland Building Officials Association
- * Maryland State Firemen's Association

Maine

- * Maine Fire Chiefs Association

Massachusetts

- * Massachusetts: Fire Chiefs Association of Massachusetts

Michigan

- * Michigan Association of Fire Chiefs
- * Michigan Fire Inspectors Society
- * Michigan: Macomb County Fire Chiefs Association

Missouri

- * Missouri: Tri-Lakes Fire Chiefs Association

Minnesota

* Minnesota: Fire Marshals Association of Minnesota

Nebraska

* Nebraska Municipal Fire Chiefs Association

Nevada

* Nevada: Fire Prevention Association of Nevada

New Jersey

* New Jersey Fire Prevention and Protection Association
* New Jersey: Northern Ocean Fire Chiefs Association
* New Jersey: Uniform Fire Prevention/Protection Officials Assn. of Ocean County

New Mexico

* New Mexico Fire Marshals Association

New York

* New York: Association of Fire Districts of the State of New York
* New York: Career Fire Chiefs' Association of New York State
* New York: Fire Marshals Association of Suffolk County
* New York: Firemen's Association of the State of New York
* New York: Monroe County, NY Fire Marshals & Inspectors Association
* New York State Association of Fire Chiefs
* New York State Building Officials Conference
* New York State Code Coalition to Protect and Preserve our Communities:
* New York State Fire Marshals and Inspectors Association
* New York: Suffolk County Fire Chiefs Association

North Carolina

* North Carolina State Firemen's Association

Ohio

* Ohio Fire Officials Association

Oregon

* Oregon Fire Code Committee
* Oregon Fire Marshals Association

Pennsylvania

* Pennsylvania Fire and Emergency Services Institute

Rhode Island

* Rhode Island Association of Fire Marshals

Tennessee

* Tennessee Fire Safety Inspectors Association

Texas

* Texas Fire Marshals Association
* Texas: Fire Prevention Association of North Texas

Virginia

* Virginia: Central Virginia Fire and Arson Association
* Virginia Fire Chiefs Association
* Virginia Fire Prevention Association

Washington

* Washington Fire Chiefs Association
* Washington State Assn of Fire Marshals

Cost Impact: This code change will increase the cost of construction.

Analysis: This proposal includes an "effective date" which is typically not included in the I-Codes. Typically, the provisions in the code become effective when the code is adopted.

Public Hearing:	Committee:	AS	AM	D
	Assembly:	ASF	AMF	DF