

Mr. Irvin Poke
Director, Bureau of Construction Codes
Department of Energy, Labor and Economic Growth
Post Office Box 30254
Lansing, Michigan 48909

Dear Mr. Poke,

I am writing this letter to oppose a fire sprinkler mandate in residential homes and townhouses. The proposed sprinkler mandate would be a hardship for affordable housing organizations and the families they serve in Michigan. By raising the cost of the home and setting forth another barrier in the way of those facing the greatest challenges in obtaining a home, the state would be harming the mission of those who are trying to increase their ability to provide simple, decent and affordable housing to families in need.

While sprinkler advocates claim costs of \$.50 to \$2.25 per square foot, actual quotes in Michigan from sprinkler installers show costs from \$4,000 to \$8,000 for homes on municipal water and upwards of \$15,000 for homes on wells. The initial expense, along with the additional maintenance, service costs and annual inspection fees, will disproportionately affect low-income families.

Fire death statistics do not justify the installation of mandatory sprinklers. From 2000 through 2006 inclusive, Michigan's 4.5 million homes averaged 109 fatal fires each year (2.41 homes per 100,000), 93% occurring in homes without working smoke alarms. A Johns Hopkins University study, paid for by the U.S. Fire Administration (USFA), found 75% of residential fire deaths could be prevented by working smoke alarms.

Residential fire sprinklers still face questions about their reliability. A 2009 report by the National Fire Protection Association (NFPA) found sprinklers installed in one- and two-family homes did not operate or were not effective in 61% of the fires that occurred in these homes. Over four years ago, the federal government recalled more than 3.5 million defective fire sprinkler heads. According to the National Association of Fire Marshalls, nearly two-thirds of those defective sprinkler heads remain in use today. Sprinkler manufacturers say they lack information on where the heads were installed, and installers expect reimbursement for labor to replace defective units.

For these reasons and more, sprinklers should NOT be mandated in residential homes.

Sincerely,

