

Dick Bower
Public Hearing Testimony
SBCC Meeting
Sept. 29, 2009

Thank you members of the Council for your attention today.

My name is Dick Bower and I'm the building/fire safety/emergency management director for the City of Gig Harbor. In ordinary language that means I wear the building official, fire marshal and emergency management directors hats. Which in times like these makes for some interesting conversations with myself.

You've heard a great deal of testimony today both in favor of and in opposition to requiring residential fire sprinkler systems in new Group R-3 residential construction. You will no doubt hear more as the discussion progresses. And I will not reiterate that testimony other than to say I am in favor of a sprinkler mandate for single family residences.

The purpose of my testimony today though is to address the possible "unintended consequences" of removing the IRC fire sprinkler requirements from the code. Those consequences arise from deleting a significant public safety feature without further addressing code changes related to its incorporation into the code. The thoughtful, deliberative process of code development hopefully strikes a balance in the introduction of new requirements by reducing or eliminating others that have been addressed through the new language. While this isn't always the case, it would appear to be so here.

Two areas where this conflict arises are found in Sections R 302.2 and R 302.2.4 dealing with townhouse construction. A review of these sections will show that the required rating of the common wall between townhouses has been reduced from two – one-hour walls to a two-hour wall and now to one-hour fire resistance. Similarly, requirements for structural independence have also been changed to except townhouse units separated by one-hour construction. In both of these instances, the reduction can be directly credited to the incorporation of sprinkler requirements for residential construction.

Remove the sprinklers from the equation and you have two single family homes separated by a single one-hour assembly. Which is less protection than two detached single family homes would normally be afforded. In addition, the structural independence that would protect adjacent units from collapse during a fire incident has been excepted where the one-hour wall is provided. Plainly stated, by eliminating sprinkler protection without revisiting dwelling unit separation leaves townhouse owners and occupants far more vulnerable to their neighbors misfortunes than in earlier codes.

In closing, I support incorporating requirements for sprinkler systems in 1-2 family residences in the IRC. The public safety, environmental, and economic benefits of providing this effective means of protection can't be overstated. But, if the Council chooses to reduce fire safety requirements for these dwellings, I do encourage you to remand the codes back to the TAG's for a review of the possible unintended consequences of that action.