



## BALTIMORE HOUSING

STEPHANIE RAWLINGS-BLAKE  
Mayor

PAUL T. GRAZIANO  
Executive Director, HABC  
Commissioner, HCD

# MEMORANDUM

To: The Honorable President and Members of the Baltimore City Council  
c/o Karen Randle, *Executive Secretary*

From: Paul T. Graziano, *Commissioner*

Date: June 1, 2010

Re: **City Council Bill 10-0437 - Residential Code - Automatic Fire Sprinkler Systems**

The Department of Housing and Community Development and the Housing Authority of Baltimore City (Baltimore Housing) have reviewed City Council Bill 10-0437, which was introduced for the purpose of requiring the installation of automatic fire sprinkler systems in any newly constructed or substantially rehabbed townhouses and other residential dwellings.

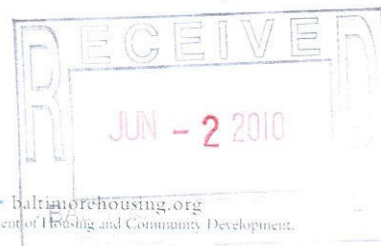
If approved, City Council Bill 10-0437, would require that any new constructed residential structure, including single family dwellings, must have Automatic Fire Sprinkler Systems (AFSS) installed. The bill exempts existing homes under active alteration or modification provided that the scope of the work is confined to less than 30% of the gross floor area of the residence as defined in Zoning Code § 1-304. Baltimore Housing applauds the intent if the lead and co-sponsors to reduce the risk the danger to occupants in the case of house fires; however, we cannot support this proposed legislation in its present form.

Baltimore Housing concurs with the requirement of sprinkler installation for newly constructed houses and notes that this building requisite is already incorporated in the 2009 International Residential Code and will likely be included in the upcoming recodification of Building, Fire and Related Codes of Baltimore City (BFR CBC) anticipated for introduction before the City Council this summer. While this new regulation is increasingly becoming a national standard for newly constructed homes, Baltimore Housing believes that this will increase individual construction costs as much as \$8000 - \$10,000 per home based on discussions with local contractors.

Of specific concern to Baltimore Housing is the legislation's very low threshold of 30% or more of "alteration" of gross floor area to trigger the installation of sprinklers. "Alteration", as defined in the BFR CBC, means:

"Any construction or renovation to an existing structure other than repair or addition that requires a permit."

*Unfair comment*



Under this broad definition, a small rowhouse owner replacing the cabinets in their kitchen, installing new appliances or plumbing fixtures, or working on their basement could be required to then install sprinklers retroactively in their home because a permit would need to be issued for these activities. Since an AFSS requires a separate water service, wall and ceilings throughout the structure would need to be opened to install new piping and therefore the entire house becomes the actual “work zone”. Based on conversations with contractors, Baltimore Housing believes that the cost to install an AFSS in an existing structure would be an additional \$5000 over the \$8000 - \$10,000 for new construction projecting an estimated total of \$13,000 to \$15,000 in added costs for a home renovation falling at the 30% or more alteration trigger. This makes home renovations cost prohibitive for many City residents.

Beyond the impact on private citizens, this low threshold creates a distinct problem for the Housing Authority of Baltimore City with regard to our plans to use stimulus funds to rehabilitate approximately 230 scattered site public housing units over the course of the next three years or more. The renovation costs and timelines have already been approved in accordance with the federal requirements for stimulus funds and a sudden increase to these costs would likely slow these projects as new figures will need to be recalculated and fewer properties will be rehabilitated.

In light of the forthcoming recodification of the BFCBC,, Baltimore Housing respectfully recommends that the Council defer further consideration of City Council Bill 10-0437 so that these issues may be addressed in context to the entire code. In the event that the Council wishes to move forward with this legislation prior to the entire recodification, we request that the alteration threshold be amended to apply to a property that is effectively under a “gut” rehab that affects 80% or more of gross floor area so that there is no ambiguity as to when a AFSS needs to be installed. Baltimore Housing strongly implores the Council to set a multi-year phase in period for any alteration requirement so as not to disrupt current renovations already in “our pipeline” and to permit the construction industry and homeowners in general to prepare for the increased costs.

Baltimore Housing respectfully opposes the adoption of City Council Bill 10-0437 at this time but pledges our assistance to work with the sponsors for alternative approaches.

PTG:pmd

cc: Ms. Angela Gibson, *Mayor’s Office of Government Relations*  
Ms. Diane Hutchins, *Mayor’s Office of Government Relations*  
Ms. Kaliopé Parthemos, *Deputy Mayor*