



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

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*Your Home  
Is Our  
Business*

March 12, 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 6972, AAC Fire Safety**

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 HB 6972, and contrary to the bill's title it has nothing to do with fire safety.**

HB 6972 would change who sits on the 21-member Codes and Standards Committee (CSC) by adding two more fire marshals and removing two public members. The CSC is the statutory body that adopts, in conjunction with the State Building Inspector and State Fire Marshal, CT's building and life safety codes. The table below outlines the makeup of the current CSC and proposed makeup under HB 6972.

<b>Current Law</b>	<b>HB 6972</b>
2 architects	2 architects
3 engineers (2 structural, mechanical or electrical engineers, and 1 mechanical or fire protection engineer)	3 engineers (2 structural, mechanical or electrical engineers, and 1 <del>mechanical or</del> fire protection engineer)
2 builders (1 commercial, 1 residential)	2 builders (1 commercial, 1 residential)
1 public health official	1 public health official
2 building officials	2 building officials
2 fire marshals	<b>4 fire marshals</b>
1 building trades labor union member	1 building trades labor union member
1 energy efficiency expert	1 energy efficiency expert
4 public members (1 with expertise in accessibility matters)	<b>2 public members</b> (1 with expertise in accessibility matters)
1 electrician, 1 plumber and 1 HVAC contractor	1 electrician, 1 plumber and 1 HVAC contractor
Total: 21 members	Total: 21 members

**"Building CT's Economy, Communities and Better Lives with Advocacy and Knowledge that Solves Our Member's Problems."**

The current CSC is a broad-based group of code and construction experts who are all volunteers. By and large, it is a well balanced group that is very deliberate and thorough in its work, and generally reliant on facts and evidence put before it when it votes on specific code matters. **HB 6972 upsets that broad-based balance and skews the balance toward fire marshal positions.** By adding two more fire marshals and removing two public members, the CSC would – oddly – have twice as many fire marshals as building officials on the body that writes the CT State Building Code. Also, which two of the four existing public members would this bill force off the CSC?

**Balanced representation is critical to our code development process.** Our state building and life safety codes are based on “model” codes drafted by out-of-state book publishing companies (the ICC and NFPA). These so-called “model” codes are far from perfect and the CSC must closely scrutinize the provisions of the “model” codes and write amendments to them so the codes work for CT. Every state does this. These amendments can add, delete or amend provisions of the “model” codes. The “model” codes’ length, technical nature and imperfections – as well as the need to ensure they are cross-referenced appropriately so as to not cause confusion among the design and construction industry and among code officials who enforce them – is why it takes a long time for CSC to do its work. Since a new edition of the “model” codes are published every three years, the CSC is constantly working on the next versions. Yet, it’s rare that code knowledge and new ideas about construction rise to such an importance that a three-year cycle of change is truly necessary. Consequently and appropriately, CSC has skipped a version of the “model” codes, and more states are moving to a six-year code cycle. Also, our codes allow for new technologies to be utilized without code changes and specific, limited amendments to our code can be adopted at any time if necessary. **The current balanced CSC sorts out the controversial provisions placed into the model codes by the publishers or are otherwise proposed as amendments in CT by various stakeholders. In doing so there are always winners and losers. At times, various stakeholders who are unsuccessful with the CSC go to the legislature to support their issue.**

A subgroup of the CSC, the Code Amendment Subcommittee, is the group that first reviews the model codes and makes recommendations regarding amendments to the full CSC. One example, about which some stakeholders have disagreed, is the 11-2 vote the subcommittee has taken to delete out of the International Residential Code (IRC) the mandate to install fire sprinklers in all new one and two family homes. We have commented elsewhere on [How the Sprinkler Mandate Got Into the 2009 IRC model code](#): – manufacturers stand to make billions with a nationwide mandate (see our testimony on HB 6777 this session). **Nonetheless, changing the makeup of the CSC should not be the answer to an adverse vote by the CSC on a matter of importance to any single constituency or stakeholder.**

**We urge the Public Safety Committee to not pursue this unnecessary change in the makeup of the Codes and Standards Committee and urge you to vote against HB 6972.**

Thank you for the opportunity to submit this testimony on this legislation.