



## Westchester County Volunteer Firemen's Association, Inc.

Mr. Mark Blanke  
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Albany, NY 12231-0001

As a member of the fire service in New York State, I am writing as part of the Public Comment Period for the IRC adoption process. I urge the New York State Code Council to consider a change to the International Residential Code they approved in August. Although the fire service still strongly supports the inclusion of residential sprinklers for one- and two family homes, we realize that obtaining that goal at this time is unlikely. Despite that realization we ask the Code Council to at least require sprinklers in townhouses.

Here are some of the reasons I believe Townhouses can and should be sprinklered:

1. Sprinklers in townhouses is a "bare minimum" for the safety of firefighters and the public.
2. Studies demonstrate a cost savings to builders when they install sprinkler systems rather than two-hour fire rated separations.
3. Sprinklers in townhouses may be even more critical for life safety than in detached residences.
  - a) Newly constructed homes burn hotter and faster than older homes.
  - b) In townhouses, compact living space plus petroleum-based furniture plus higher heat from fire equal more dangerous fire conditions.
  - c) There are limited means of egress for residents
  - d) Limited ingress, egress, and points of attack for fire suppression results in more dangerous conditions for the fire service.
  - e) Residents of townhouses can suffer fire loss, injury or even death through no fault of their own. A fire may be caused by the actions of a neighbor, impacting other victims.
  - f) Townhouses are generally connected to municipal water, eliminating the need for additional pumps or storage tanks.
4. While the number of fires has decreased and the number of line of duty deaths has been reduced or remained relatively steady, the number of Line of Duty Deaths (LODD) per 100,000 fires has increased. This is due in part to flashover and collapse attributed to modern construction methods.

I Strongly urge New York State Code Council to require residential sprinklers in townhouses.

Thank you for your consideration,

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Signature

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Name

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Address