## Centre Region Council of Governments REGIONAL FIRE PROTECTION PROGRAM

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November 30, 2009

Mr. Arthur Coccodrilli, Chairman Independent Regulatory Review Commission 333 Market Street, 14<sup>th</sup> Floor Harrisburg, PA 17101

Dear Mr. Coccodrilli,

I am writing to advise passage of Labor and Industry Regulation 12-89, the adoption of the 2009 ICC Code revision as provided in Act 45. The member municipalities of the Centre Region Council of Governments recognize the importance of this regulation, particularly with respect to residential sprinklers, and support its passage.

The Pennsylvania Department of Labor and Industry's Building Code Review and Advisory Committee invested significant time and energy in considering the facts related to residential fire sprinklers and, despite early leanings against accepting them, ultimately endorsed the International Residential Code sprinkler requirements.

I am confident you will receive many letters from fire service personnel that address the life safety issues related to the adoption of the 2009 Code. The life safety benefits of residential sprinklers are well documented and easy to understand. What is less frequently documented and I suspect less easily understood is the impact this bill would have on the long term viability of the volunteer-based Pennsylvania Fire Service and the economic impact on Pennsylvania citizens generally. The Centre Region Council of Governments has considered the impact of residential sprinklers and has published a white paper outlining their support for this initiative. The Centre Region COG includes six municipalities: College, Ferguson, Patton, Harris, and Halfmoon Townships, and the Borough of State College. All six of the municipalities are protected by volunteer fire companies and all of them endorse the adoption of the 2009 code, including the requirements for residential sprinklers. The elected officials and fire company officers believe that requiring sprinkler systems in new residential construction will significantly contribute to the ability to maintain a volunteer fire service. The sprinkler requirement will reduce the severity of fire and will protect firefighters and the general public.

The Centre Region COG has also considered the potential impact of residential sprinklers on affordable and workforce housing, an important issue in our region. Affordable housing owners often have trouble meeting their escrow obligations, which

Serving the Townships of College, Ferguson, Patton, the Borough of State College, and Penn State University.

n Angelesiek ferhalikaten alekariten afal gehan dar enter enterfik an erratioatikat gebaar statisten meter inter are comprised of taxes and insurance. Homes equipped with residential sprinklers are afforded insurance reductions of 5% to19%, and by supporting the viability of the volunteer fire service they are a crucial element in controlling long term local tax growth. At our meetings with Habitat of Humanity of Centre County and the Centre County Housing Council, both organizations agreed that residential sprinkler systems were important to affordable housing in the long term.

In the spirit of Act 45 minimum standards for public safety in the built environment through nationally vetted code development is in the best interests of the Commonwealth and its citizens. I strongly encourage favorable action and passage of Labor and Industry Regulation 12-89.

Very Truly Yours,

Steven W. Bair CRCOG Fire Director

CC: James C. Steff, CRCOG Executive Director Stanley L. Clouser, Jr., Fire Chief, Alpha Fire Company Chris Dry, Fire Chief, Boalsburg Fire Company Sam Connor, Fire Chief, Port Matilda Fire Company