

I am in support of this bill, provided that it is amended. Removing the sprinkler requirement for up to four units is a step in the right direction towards right-sizing regulations for house sized multifamilies: the missing middle housing that New Hampshire’s villages, towns, and cities are in desperate need of.

As it stands now a four-unit building and a 20 story high rise use the same building code. They are not the same building and they do not require the same safety mechanisms or construction techniques. I recommend that the committee amend HB 1004 to read “amend the New Hampshire Residential Code to include three-family (triplex) and four-family (quadplex) dwellings within its scope by modifying, transitioning, and establishing minimum prescriptive requirements to address the design and construction of those dwellings and make conforming changes to the Code in accordance with this section.”

There are several benefits to this change. One is to remove the requirement for sprinkler systems and annunciator systems. These are not necessary in a house-sized multifamily and add additional cost and complexity without delivering additional safety. The National Fire Protection Association’s own data shows that fire safety in small multi-unit buildings is delivered by hard-wired smoke detectors, which alert residents and allow them to leave the building.

Figure 1. Reported home structure fires by year: 1980–2020

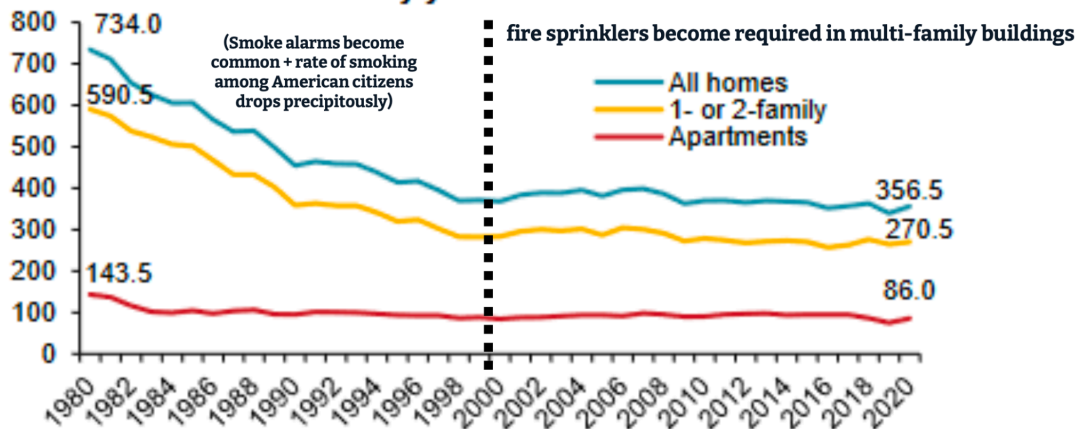
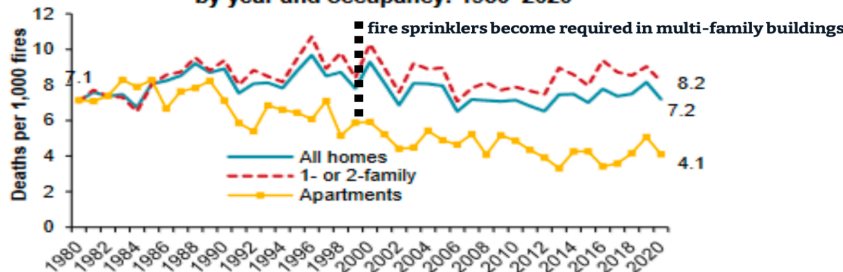


Figure 5. Deaths per 1,000 reported home fires by year and occupancy: 1980–2020



Another benefit to this change has to do with who builds buildings. Currently builders who build single detached units do not want to undertake three and four unit buildings because their systems are set up to use the International Residential Code. Building a 3 or 4 unit building means using the International Building Code, the same one used for a 65 unit building or a high rise. Allowing these house-sized multi-unit buildings to use the IRC opens up a bigger pool of contractors. As it stands now contractors specialize in singles or in big multi-unit buildings, not in the missing middle buildings that NH residents have said over and over that they want to see in their neighborhoods.

[Dallas](#) Texas has made this change, allowing up to 8 units in a building to use the IRC; [North Carolina](#) made the change effective January 1, 2025; [Memphis, Tennessee](#) allows up to 6 units in a building to use the IRC.

It's time for New Hampshire to make the same change.

[Dallas IRC ordinance](#)

<https://citysecretary2.dallascityhall.com/resolutions/2025/04-23-25/25-0688.pdf>

Ivy Vann AICP, CNU-A

ivy.vann@gmail.com

603.533.0357

Peterborough NH 03458