



HOME BUILDERS
ASSOCIATION
of
METRO DENVER®

June 13, 2025

Commerce City
Mayor Stephen Douglas
Members of City Council
7887 East 60th Avenue
Commerce City, CO 80022

Dear Mayor Douglas and Members of City Council:

On behalf of our active builders and developers in Commerce City, the HBA is writing in support of the proposed amendment to the residential sprinkler requirements previously adopted through the 2021 International Residential Building Code (IRC) in 2023.

These comments are being provided by the Home Builders Association of Metro Denver on behalf of our active builders and developers in Commerce City.

The HBA of Metro Denver represents over 550 homebuilders, developers, remodelers, architects, mortgage lenders, title companies, subcontractors, suppliers, and service providers in the eight metro-area counties we serve. In Commerce City, HBA Metro Denver represents numerous builders and developers that are currently active with over 125 registered permits so far this year.

The HBA of Metro Denver (“HBA”) strongly recommends that Commerce City amend out the current residential fire sprinkler requirement for single family homes, duplexes and townhomes from the 2021 IRC.

The requirement to add residential sprinkler systems has significantly impacted housing attainability in Commerce City, pricing more aspiring homeowners out of the market. These systems are quoted to cost over \$4.50 per square foot, adding over \$15,000 to the price of an average new home once overhead and profit are factored into the price. In order to comply with the new mandate, developers are now also required to increase the size of their water taps from ¾” size to a 1” tap, adding an additional \$1,000 cost to the price of each home.

Homebuilders and buyers must also consider additional expenses such as increased costs for architectural drawings—estimated at an extra \$1 per square foot, totaling more than \$2,500 per home—potential delays in the permitting process, and ongoing costs for annual sprinkler system testing, which homeowners are responsible for conducting.

Please see the additional reasons that we are in favor of amending out residential fire sprinkler requirements in Single Family Attached (including duplexes and townhomes) and Detached units from the IRC building code:

- The vast majority of Front Range municipalities and counties have continued to amend the residential sprinkler requirements out of their updated codes. Nationally, 46 states have completely removed the sprinkler requirements for one- and two-family homes and two states have limited the requirement based on home size and height. Only California and Maryland have left the model code sprinkler mandate in place.
- The number of home fires and fire deaths continue to decline as more new housing stock is constructed since new homes are built requiring superior safety code standards.
- Townhomes are generally constructed with a two-hour fire separation. A shaft wall system not only provides a sound buffer but provides a two-hour firewall. This mitigates concerns about fires to the adjacent units.
- The effectiveness of smoke alarms cannot be underestimated, reducing the number of fires and fatalities by 50 percent since 1980 and this figure continues to go down as smoke detector technology advances – like hardwired, interconnected smoke alarms now required in all new homes.
- Fire sprinklers can discharge unintentionally causing extensive damage - According to NFPA's 2021 "U.S. Experience with Sprinklers" fire departments in the U.S. responded to an estimated average of 4,700 non-fire activations of home fire sprinklers per year caused by a system failure or malfunction and 5,400 unintentional sprinkler activations per year.
- Insurance rebates do not balance costs – When the 2008 Fire Protection Research Foundation investigated insurance costs savings related to fire sprinklers it only averaged a savings of \$22 per year on an annual premium, making it impossible for homeowners to recoup costs through lower rates.
- Labor is already a huge challenge in the residential construction industry. Adding additional labor will further increase costs with an additional multiplier effect.

The HBA acknowledges that some Front Range municipalities have considered residential fire sprinkler requirements in response to the Marshall Fire. However, it is important to note that these systems are not designed to protect homes from wildfires. The State of California has been mandating sprinklers in single family homes since 2011, and it is very likely that the devastation caused by the Palisades fire in Los Angeles earlier this year included many homes with internal fire suppression systems.

While wildfire mitigation efforts are crucial, mandating expensive sprinkler systems will not address the primary threats posed by wildfires and will instead place an additional financial burden on homebuyers. However, consumers wishing to purchase a sprinkler system are not precluded from doing so, and those who would like to purchase one for their home can always make this request before or after their home is built.

As all of you are acutely aware, housing attainability across the front range has only become more elusive given our recent environment of rising interest rates coupled with rampant inflation. Mortgage rates have increased from 3.1% just a few years ago to nearly 6.8% today – making it the largest magnitude increase for mortgage costs in decades. Current price inflation is now widely expected to be further exacerbated by new international tariffs on construction materials to build a home. According to NAHB, the cumulative impact of tariffs on building costs will add an additional \$10,900 to the price of a single-family home in 2025.

It is important to recognize that the fire sprinkler requirements on new homeowners is just one of several new fees and mandates imposed by Commerce City since 2023. Over the past two years, Commerce City has implemented substantial increases to its Public Parks and Recreation Fee, Drainage Fee, and Road Impact Fee. The City has also implemented a series of new fees for public safety, general government, and public works. Collectively, these new and existing fee increases have added \$20,722.09 to the cost of building a home - an

over a 400% increase. Like tariffs at the national level, these additional fee increases levied by the City are being passed on to existing renters and future residents who wish to call Commerce City home. These fees have exacerbated housing affordability challenges at a time when builders are struggling to remain profitable and provide attainable housing options. Repealing the current fire sprinkler requirement would be a meaningful step in helping to reduce the cost burden on these residents.

In the fourth quarter of 2024, a family earning the nation's median income of \$97,800 needed 38% of its income to cover the mortgage payment on a median-priced new home. Low-income families, defined as those earning only 50% of the median income, would have to spend 76% of their earnings to pay for the same new home. Source: NAHB/Wells Fargo Cost of Housing Index (CHI).

According to NAHB, for every \$1,000 increase in price, an additional 2,373 households are priced out of the market in the State of Colorado.

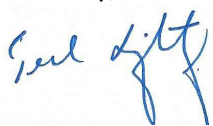
Please see the attached HBA Housing Fact Sheets for more detail on Commerce City's housing costs.

Families who cannot qualify to purchase homes due to the increased costs from well-meaning, but expensive fire sprinkler systems will remain in housing that is more hazardous, because it's built to less stringent code requirements. These older homes can have outdated appliances, space heaters, faulty wiring, or other characteristics that might lead to a greater risk of a fire starting, or a lack of smoke alarms and egress windows installed to today's codes which increase the chances of dying in a fire.

Given the precarious environment that the residential construction industry finds itself, as well as the considerable financial challenges currently being confronted by thousands of Commerce City residents – a thoughtful code amendment exempting fire sprinklers for new homes will help to relieve unnecessary financial challenges for hardworking families while making your community safer.

Thank you for your time and consideration of our analysis. Please feel free to reach out to the HBA of Metro Denver, if you have any additional questions or concerns.

Sincerely,



Ted Leighty
Chief Executive Officer
Home Builders Association of Metro Denver

Cc: Jeff Brasel, Community Development Director

Summary of Builder Fees (per unit)		Single-Family Detached	Townhome
County		Adams County	Adams County
School District		Adams County SD14 / 27J Schools	Adams County SD14 / 27J Schools
Permit/Plan Review		\$7,477.68	\$3,499.30
Use Tax		\$16,500.94	\$10,387.36
Development Impact		\$18,620.00	\$13,879.00
System Development		\$27,437.00	\$17,178.00
Total Estimated Builder Fees (per unit)		\$70,035.62	\$44,943.66
Permit/Plan Review			
Building Valuation Data/Source		ICC Building Valuation Data 02/2023	ICC Building Valuation Data 02/2023
Total Living Area SF (\$167.37 x SF)		2,400	1,600
Garage SF (\$66.48 x SF)		600	500
Porch/Patio Cover SF (\$11.00 x SF)		200	0
Finished Basement SF (\$167.37 x SF)		1,000	500
Unit Valuation		\$611,146.00	\$384,717.00
Permit Charge (First \$500,000/\$100,000)		\$4,184.13	\$1,285.10
Permit Charge (additional \$1,000)		\$6.15	\$7.25
Building Permit		\$7,327.68	\$3,349.30
Master Plan Check Fee		\$150.00	\$150.00
Total		\$7,477.68	\$3,499.30
Use Tax			
Commerce City Use Tax		4.5% of 60% of Unit Valuation	4.5% of 60% of Unit Valuation
Total		\$16,500.94	\$10,387.36
Development Impact			
Impact		(Select below Multifamily for townhouses or select SFD for duplexes) Multifamily (Townhomes)	
Park Facilities	\$7,502.00	\$5,698.00	
General Government Facilities	\$707.00	\$538.00	
Public Works Facilities	\$612.00	\$465.00	
Police Facilities	\$2,175.00	\$1,651.00	
Water Acquisition	\$2,782.00	\$2,782.00	
Road Impact Fee	(Select Below)	(Select Below)	
Core City/Northern Range Fee	Northern Range Road Fee	Multi - Northern Range Road Fee	
	\$4,842.00	\$2,745.00	
Total		\$18,620.00	\$13,879.00
System Development			
Wastewater			
Water District	SACWSD	SACWSD	
Connection Fee	\$20,200.00	\$9,941.00	
Sanitation Tap			
Sewer District	SACWSD	SACWSD	
Connection Fee	\$7,237.00	\$7,237.00	
Total		\$27,437.00	\$17,178.00
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Total Builder Fees (Single-Family Detached): \$70,035.62
Fire Sprinkler Requirement: \$15,000
Total SFD Cost: \$85,035.62

Impact Fees SFD 2023: \$4,923.00
Impact Fees SFD 2025: \$18,620.00

Top 10 municipalities with highest development fees in Denver Metro area (excluding water tap)

Total Fees (Excluding Water)	SFD
Castle Rock	\$46,623
Commerce City	\$41,512
Denver	\$31,544
Parker	\$30,162
Erie	\$29,027
Longmont	\$28,945
Brighton	\$28,326
Elbert County	\$22,564
Aurora	\$21,795
Thornton	\$21,543

Confidence Plumbing Co., Inc
72 Inverness Drive East
Englewood, CO 80112
303.694.3262
303.771.6685 Fax

October 9, 2024

TriPointe Homes
8055 E. Tufts Avenue
Suite 678
Denver, CO 80237

RE: 4036 Plan – Reunion Ridge 40s, Commerce City, CO
Fire Sprinkler System

Water Main / System

1 – Watts LF007M2QTFZH 1 1/4" Double Check Valve (Backflow Preventer)
1 – Watts NR3XLH 1 1/4" Pressure Reducing Valve
1 – Red/ White 1 1/4" Ball Valve
1 – Red/ White 1/2" Ball Valve
1 – 100 PSI Pressure Gauge
1 1/4" Type L Copper Pipe, Fittings
3/4" Uponor White Pipe, Red Lettering for Hot Water Lines
1" Uponor AquaPEX for Fire Sprinkler Lines
1/2" & 3/4" Uponor White Pipe, Blue Lettering for Cold Water Lines
4 – 3/4" 3-Outlet Multi-Port Tees
1 – 3/4" 4-Outlet Multi-Port Tee
Uponor Rings with Stops, Tees, Adapters, Bend Supports as Needed

Fire Sprinklers

27 – Senju RC-RESLF37 10 GPM Concealed Fire Sprinklers
3 – Senju RC-RESLF37 13 GPM Concealed Fire Sprinklers
2 – Senju RC-RESLFTT 10 GPM Concealed Fire Sprinklers
30 – Senju 40611 White Cover Plates (for RESLF37)
2 – Senju 40612 White Cover Plates (for RESLFTT)
14 – Uponor LF73000WH White Pendant Fire Sprinklers
14 – Uponor Q71850LW White Recessed Escutcheons
46 – Uponor Fire Sprinkler Mount Brackets
1 – Uponor Q7500700 Sprinkler Socket Wrench
1 – Uponor Q7500400 Recessed Pendent Socket Wrench

Rough Material & Labor	\$ 10,830.00
Trim Material & Labor	\$ 660.00
Total	\$ 11,490.00



AAA Fire Protection, Inc.
4805 Olive Street
Commerce City, CO 80022
Tel: 303-340-3473
State License # 24S-04206

JUNE 6, 2024

Mr. Kevin Brodkorb,

We are pleased to offer our proposal for design, installation, and testing for The Coach House Collection at Reunion, for a fire protection system located in Commerce City, CO.

Your cost for the above referenced project based on the scope of work and associated exclusions that follow is:

PROJECT COST (NFPA 13D Backflow / Passive Purge):

The Percheron – Plan 130.....	(\$5,970.00)
The Shire – Plan 131.....	(\$6,835.00)
The Beligan – Plan 132.....	(\$7,525.00)
The Friesian – Plan 133.....	(\$8,570.00)
The Haflinger – Plan 134.....	(\$7,810.00)
The Clydesdale – Plan 135.....	(\$7,525.00)
The Breton – Plan 136.....	(\$6,260.00)
The Suffolk – Plan 137.....	(\$8,065.00)

Total Design Cost, All 8 Models.....\$13,600.00

All pricing above includes 4.35% sales tax on materials, additional taxes to be covered by use taxes paid Owner and sufficient documents provided to AAA Fire for reduction in taxes on materials from local suppliers.

Please read through the remainder of the proposal for detailed descriptions of the scope of work we are including for the project above as well as clarifications and exclusions related to the scope of work.

Should you have any questions or require additional information, please contact us. This offer is valid for 60 days from the date of this proposal, after which it is subject to our review.

The price quoted is subject to a mutually agreed upon project schedule and mutually acceptable subcontract agreement. Should you have any questions, feel free to contact me directly at 303-340-3473 or damon@aaa-fireprotection.com.

Sincerely,

Damon Huff, Estimator / P.M.
Sales Representative
AAA Fire Protection

PROJECT SCOPE OF WORK

- Design, install, and test one new wet pipe fire sprinkler system for each unit in accordance with the 2016 Edition of NFPA 13D, *Standard for the Installation of Sprinkler Systems in Single Family Residential Occupancies* and the drawings dated 6/14/2022. Please note specifications were not provided for the fire sprinkler system, scope of work and materials are industry standard and within compliance of NFPA 13D and NFPA 13.
- Protection wet system piping routed through the attic structure above per NFPA 13D is included. Piping to be insulated, by others, to prevent piping from freezing.
- All systems to be installed as a single zoned system, Passive Purge System for each home is included.
- Pricing is based on a minimum of 1" underground fire line to each building, provided by others. AAA Fire Protection's scope to begin at a level flange located approximately 1'-0" above finished floor.
- All Options finished and unfinished basements, cost included in base price.

Sprinkler types and locations:

Interior living areas:

Reliable residential concealed pendants with white trim plates throughout the building, Viking residential concealed sidewall sprinklers at the top floor are included.



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Pricing includes sprinklers spaced to maximize the distance between sprinklers per code and manufacturer's requirements in order to minimize the number of sprinklers in each building. Sprinklers located in the centerline and / or quarter point locations of ceiling tiles, locating sprinklers in alignment with other ceiling fixtures, or locating sprinklers for aesthetic considerations are not included.

Piping:

CPVC piping with CPVC fittings included for all areas.

Note: AAA Fire Protection may substitute materials at its discretion. Any and all substituted materials will be comparable and will meet or exceed NFPA 13 and UL listing criteria.

EXCLUSIONS

- Overtime, all labor to be performed during AAA Fire Protection's normal business hours.
- Painting, priming, or preparation of piping or any other system components for painting.
- Pipe identification
- Patching or painting of walls or ceilings
- Firestopping and sealing penetrations.
- Custom color sprinklers or sprinkler escutcheon plates
- Fully concealed sprinklers with flat cover plates.
- Sidewall sprinklers at top floor.
- Locating sprinklers in the centerline and/or quarter point locations of ceiling tiles or alignment of sprinklers with ceiling fixtures.
- Power to any fire protection components
- Fire alarm system
- Design, installation, testing, or flushing of underground piping.
- Bonds of any type
- Prevailing Wage labor rates
- Design requirements required by any risk management, insurance entity, Authorities Having Jurisdiction, etc. that exceed the NFPA standards listed in the scope of work above.
- Accelerated schedule.
- Trash dumpsters, recycle bins, etc.
- Disinfection, chlorinating, or flushing piping.
- Any sprinkler coverage within concealed spaces included but not limited to above suspended ceilings, between floors, and attic spaces.
- Composite clean-up
- Structural analysis of the building for support of the sprinkler system
- Structural reinforcement or enhancement to support the sprinkler system.
- Cost of CAD files for our system design
- 3D design and / or 3D coordination



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- Fire watch
- Insulating or other means of freeze protection for piping subject to freezing, (Tenting).
- Special hanging methods such as seismic bracing
- Antifreeze or Dry pipe systems
- Standpipe systems
- Galvanized piping or fittings
- Fire Pump not included.
- Water curtain protection of any exterior windows.

One-year warranty included from the date of final inspection.

By signing this document, the owner and or owner representative have fully read and are agreement to all terms and conditions specified in this proposal.

This document shall consider in whole or impart a binding contractual agreement by and between (Oakwood Homes) and AAA Fire Protection, Inc.

Customer:

Accepted: Kevin Brodtkorb Title: PD Director



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