



THE CITY OF
BENICIA
CALIFORNIA

May 12, 2011

California Building Standards Commission
2525 Natomas Park Drive, #130
Sacramento, CA 95833
Attn: Dave Walls, Executive Director

Re: Changes to Building Standards for Carbon Monoxide Alarms

Dear Mr. Walls,

Proposed Sections 420.4.1.2 exp #5, 420.4.1.3 exp #4, R315.1.2 exp #4 and R315.1.3 exp #4 refer to alteration or repair of plumbing or mechanical systems. Since the CBC and the CRC do not regulate plumbing or mechanical, it appears plumbing and mechanical permits do not require carbon monoxide alarms. Furthermore, plumbing and mechanical permits are typically issued for the type of work not on the valuation. The valuation is unknown.

I contend that as the Building Standards are currently written, any reference to require carbon monoxide detectors with plumbing or mechanical permits is not correct.

If you have any questions, I can be reached at 707-746-4230.

Sincerely,

C.H. Higgs
Building Official

HH:sh
F:CDD/Building/Staff/Harvey/Letters/California Building Standards

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