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Sent: Tuesday, May 10, 2011 9:33 AM

To: Doug Hensel

Cc: Lynn Mohrfeld; Randi Knott; Tom Daly

Subject: Re: HCD: Invitation to Work Group Meeting on May 17, 2011 (Recycled Content/Renewable Materials; Carbon Monoxide Alarms; Electric Vehicle Charging)

Importance: High

Hi, Doug: Thanks again for your e-mail and for all of your work on the CO issues.

I will be at the workgroup meeting on the 17th, and I look forward to seeing you.

In the meantime, I wanted to pass on a couple of thoughts that have been raised regarding HCD's proposed amendments to the CO alarm standards so that you can have some time to consider them prior to the 17th:

1. Most of the proposed amendments are very helpful and address a number of the concerns that Tom Daly and I discussed with you and Shawn earlier -- thanks!
2. The proposed exception to Section 420.4 states that single station CO alarms are not required in sleeping units or dwelling units which do not themselves contain a fuel-burning appliance or have an attached garage as long as all of three conditions are met. The third condition ("the building is provided with a common area carbon monoxide alarm **system**") is problematic. Section 420.4.1.1 indicates that such a system must include CO detectors and audible notification appliances that meet specified standards.

If we understand the "system" requirement correctly, this could be onerous to hotel operators, especially those with smaller properties, because of their cost. For example, if one imagines a typical limited-service three-story hotel built on grade (i.e., with no basement), the mechanical room on the grade level will almost always have a hot water heater/boiler that is fueled by natural gas. As written, the proposed exception would need to have a common area CO alarm system, **OR** it would have to put single station alarms in each guest room. We question whether a common area system is needed in order to exempt such a hotel from the requirement to put CO alarms in each guest room when there is no fuel-burning appliance or attached garage.

3. Proposed Section 420.4.2 would require CO alarms in existing dwellings or sleeping units "that have attached garages or fuel-burning appliances" prior to July 1 of this year if certain conditions are met.

Sections 420.4.2.1 and 420.4.2.2 would require that "all other existing dwelling units intended for human occupancy" as defined in SB 183 must have approved CO alarms, but they do not contain the SB 183's triggering criteria (i.e., "a fossil fuel burning heater or appliance, fireplace, or an attached garage"). While one could infer that only dwelling units that have fuel-burning appliances or an attached garage are covered by these proposed sections, because they are apparently subdivisions of Section 420.4.2, this is not altogether clear. We suggest that, in order to avoid confusion, the triggering criteria be expressly set out in Sections 420.4.2.1 and 420.4.2.2.

We are still analyzing the proposed amendments, and if we have any additional thoughts, we will raise them at the meeting on May 17.

If you would like to reach me prior to that meeting, you can do so via this e-mail address or my cell phone (916-425-8476).

Thanks again for your help, Doug.

Jim Abrams