



**Town of Franklin
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January 4, 2012

Board of Building Regulations and Standards
One Ashburton Place
13th Floor, Room 1301
Boston, Massachusetts 02108

Dear Board Members:

On behalf of the Fire Prevention Fire Protection Technical Advisory Committee, I respectfully submit this correspondence as testimony in support of the current requirements of the 8th edition of the Building Code that requires the installation of Carbon Monoxide Detectors in all new residential uses. During our deliberations on Chapter 9 of the Building Code the FPPF thoroughly discussed and evaluated these requirements and reached consensus on the current 8th edition language (Section 916) which then received favorable action by the BBRS.

The major focus of the FPPF's consideration on this matter dealt with whether to require carbon monoxide detectors in residential uses which did not contain fossil fueled heating devices. We realized that under normal conditions residential uses without fossil fueled devices should have little practical threat from carbon monoxide. The risk of carbon monoxide we identified is associated with the use of ad hoc devices such as emergency generators, portable heating and portable cooking devices which are typically used during prolonged loss of electrical power.

The position of the FPPF was validated several times during 2011 when Massachusetts was visited by three natural disasters which caused wide spread, prolonged loss of electricity. These disasters included a tornado in June, tropical storm in August and early season snow storm in October. The snow storm proved specifically tragic for the citizens of the Commonwealth with 4 carbon monoxide related deaths (the Boston Channel.com, 11/3/11) and as many as 14 more individuals being transported for possible carbon monoxide poisoning.

Our mission is to • Have a positive impact in the lives of citizens and visitors of Franklin in their time of crisis by providing compassionate, contemporary, community driven services. • Safe guarding human life from the perils of fire, sudden illness, injury or other medical condition, natural and man-made disaster as well as preserve the environment and property from ensuing destruction. • Be responsible for a safe, productive and pleasant work environment for our employees, and provide them with opportunities to gain new skills and advance their personal career goals.

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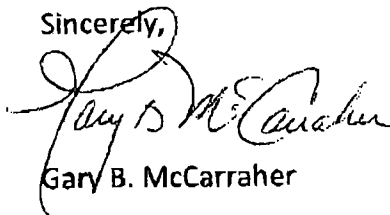
All of these tragic incidents involved the use of ad hoc device and were foreseeable and preventable with proper detection. Further these tragedies occurred when first responders and code officials are typically overwhelmed with emergency response and recovery efforts and not readily available to police or educate citizens on proper safety and use of ad hoc devices. The continuances of carbon monoxide detectors in all residential uses will provide front line of protection when local resources are oftentimes overwhelm. As such, we believe maintaining the current carbon monoxide requirement of the 8th edition of the Building Code constitutes a sound public policy intended to mitigate future risks.

During recent FFPF discussions it was intimated that supporters of striking the current 8th edition language indicated the cost of increased coverage were not warranted by the benefits to the citizens of the Commonwealth. A quick web search on amazon.com finds the costs for a dual smoke detector/carbon monoxide detector is \$ 34.97; the costs for single station smoke detectors are \$ 11.48, a net increase of \$23.49 per unit. If three detectors are needed the gross impact to building cost is \$ 70.47. Notwithstanding the issues created in Chapter 34 (which we agree should be coordinated and corrected), these costs are de minimis in context of the costs of the entire structure. Although I freely recognize and admit to my bias on this matter, it is beyond comprehension that these costs are excessive or exceed the benefit.

In brief, after due consideration and in light of recent experiences within the Commonwealth, the members of the FFPF believe the carbon monoxide requirements in the 8th edition continue to be a necessary and important component of public safety for the citizens of Massachusetts. We strongly urge you to maintain this level of protection for the citizens of the Commonwealth.

Thank you for your attention regarding this matter. Please contact me should you have any questions or require additional information.

Sincerely,



Gary B. McCarraher

cc: FFPF Members