



December 20, 2017

By Facsimile Transmission to: doboyle@dhs.in.gov

Mr. Douglas J. Boyle
Commission Director
Fire Prevention & Building Safety Commission
Indiana Government Center South
302 W. Washington Street
Indianapolis, IN 46204

Re: Carbon Monoxide Detector Legislation

Dear Mr. Boyle:

I write to you on behalf of the Real Estate Investors Association of North Central Indiana. We are an organization of landlords who have rental properties in St. Joseph County and surrounding counties.

Our organization is very concerned about the recently passed carbon monoxide ordinance in St. Joseph County. Our members are probably the people who are most affected by this new ordinance. However, neither our organization nor our members were ever contacted for their input on this ordinance prior to its passage. In our opinion, there was inadequate public notice and inadequate public input on this ordinance.

We join with other organizations in this state which have indicated that the State needs a uniform law on carbon monoxide detectors. A uniform law is needed to avoid the patchwork of ordinances that may be passed around the State unless there is a statewide law. Already, the ordinances that have been passed in various counties are inconsistent with each other, and many counties have no ordinances at all. For example, we have landlord members who own rental properties in both LaPorte County and St. Joseph County. Although these two counties are adjacent to each other, their ordinances are inconsistent with each other.

We also believe that rental units should be treated just like homeowner occupied units. If carbon monoxide detectors are going to be required in all rental units, then the same safety concerns should cause carbon monoxide detectors to be required in all homes as well.

We are also concerned about the required locations for carbon monoxide detectors, the number of carbon monoxide detectors that will be required for the amount of space covered, and the decibel levels of the detectors. These subjects need to be made uniform across the state.

Finally, we believe that the implementation time for any new regulation needs to allow adequate time for landlords to make the changes. A landlord who has two or three rental properties should not have difficulty getting carbon monoxide detectors into his or her properties within thirty (30) days. However, a landlord who has five hundred to one thousand (500- 1,000) rental properties would not likely to be able to get carbon monoxide detectors installed in six (6) months. We believe that a reasonable phase in of the implementation is a much more reasoned governmental approach to this problem.

It is for these reasons that we are requesting that the St. Joseph County ordinance not be approved as written. Thank you for your consideration of our concerns.

Very truly yours,



Richard C. Taylor

President

Real Estate Investors Association of North Central Indiana

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