

STATE OF CALIFORNIA
DEPT. OF GENERAL SERVICES - GOVERNMENT OPERATIONS AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
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Email: cbcs@dgs.ca.gov

Office Use Item No. _____

PARTICIPATION COMMENTS FOR THE NOTICE DATED OCTOBER 8, 2015
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: NOVEMBER 23, 2015 at 5:00pm

Date: October 14, 2015

From: Mehdi Shadyab, P.E., CAsp (mshadyab@sandiego.gov)

Name (Print or type) (Signature)
On behalf of The City of San Diego, Development Services Department, Structural Plan Review Section

Agency, jurisdiction, chapter, company, association, individual, etc.
1222 First Avenue, M.S. 401, San Diego, California, 92101-4154

Street City State Zip

I/We ~~do~~ (do not) agree with:

[] The Agency proposed modifications As Submitted on Section No. ___ See below as noted. _____

and request that this section or reference provision be recommended:

[] Approved [] Disapproved [] Held for Further Study [] Approved as Amended

Suggested Revisions to the Text of the Regulations:

Please see our comments and recommended revisions to the proposed text, as highlighted below:

DIVISION 2: SCOPING REQUIREMENTS

11B-220 Automatic teller machines, fare machines and point-of-sale devices

11B-220.2 Point-of-sale devices. *Where point-of-sale devices are provided, all devices at each location shall comply with Sections 11B-309.4, 11B-707.3, and 11B-707.7.2, and 11B-707.9. In addition, point-of-sale systems that include a video touch screen or any other non-tactile keypad shall comply with either Section 11B-707.9.1.1 or 11B-707.9.1.2. Where point-of-sale devices are provided at check stands and sales and service counters required to comply with 11B-227.2 and 11B-227.3, they shall comply with ~~Section~~ Sections 11B-707.2, 11B-707.3, 11B-707.7.2, and 11B-707.9. 11B-707.9.1, and shall also comply with Sections 11B-707.2, 11B-707.3 and 11B-707.4.*

Exception: Exceptions:

1. Where a single point-of-sale device is installed for use with any type of motor fuel, it shall comply with Sections 11B-220.2 and 11B-309 11B-707.2, 11B-707.3, 11B-707.7.2, and 11B-707.9. Where more than one point-of-sale device is installed for use with a specific type of motor fuel, a minimum of two for that type shall comply with Sections 11B-220.2 and 11B-309 11B-707.2, 11B-707.3, 11B-707.7.2, and 11B-707.9. Types of motor fuel include, but are not limited to, gasoline, diesel, compressed natural gas, methanol, or ethanol or electricity.
2. Point-of-sale devices at electric vehicle charging stations required to comply with Section 11B-812 shall comply with Section 11B-812.10.3.

REASON: Okay as stated. No comment. "Approve As Amend".

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11B-233 Residential facilities.
11B-233.3 Public housing facilities. ...

11B-233.3.4 Alterations. Alterations to a public housing facility shall comply with Section 11B-233.3.4.

Exception: Where compliance with Section 11B-809.2, 11B-809.3, or 11B-809.4 for units with mobility features or Chapter 11A, Division IV for units with adaptable features is technically infeasible, or where it is technically infeasible to provide an accessible route to a residential dwelling unit, the entity shall be permitted to alter or construct a comparable residential dwelling unit to comply with Sections 11B-809.2 through 11B-809.4 or Chapter 11A, Division IV provided that the minimum number of residential dwelling units required by Sections 11B-233.3.1.1, **11B-233.3.1.2** and 11B-233.3.1.3, as applicable, is satisfied. Providing residential dwelling units complying with Section 11B-233.3.1.1 shall take priority. When that number is satisfied additional units shall comply with Section 11B-233.3.1.2.

REASON: Section 11B-233.3.1.2 as highlighted should not be crossed-off, since the Exception is dealing with technical infeasibility associated with dwelling units with mobility features and adaptable features and communication features. Disagreed as stated. Make amendment as noted.

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11B-411 Destination-oriented elevators

11B-411.2 Elevator landing requirements. ...
11B-411.2.1 Hall call consoles. ...

11B-411.2.1.3 Arrangement. Hall call console arrangement of required features shall comply with Section 11B-411.2.1.3.

- 11B-411.2.1.3.1 Keypad call console arrangement. ...**
- 11B-411.2.1.3.2 Touch screen call console arrangement. ...**
- 11B-411.2.1.3.3 Proximity of required elements. ...**

11B-411.2.1.3.4 Position. Display screens and touch screens shall be positioned so glare is reduced on the screen. The face of individual individual elements or group of individual elements that are operated by user input Keypads or buttons shall slope away from the user at 15 to 25 degrees from the vertical plane and shall be in compliance with 11B-307. The face of hall call console assemblies and the face of touch screens shall be sloped away from the user at 7 to 25 degrees from the vertical plane. Display screens and touch screens shall be positioned so glare is reduced on the screen.

REASON: Okay as stated. No comment. "Approve As Amend".

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/// END OF COMMENTS

Reason: [The reason should be concise if the request is for “Disapproval,” “Further Study,” or “Approve As Amend” and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

HEALTH & SAFETY CODE SECTION 18930

SECTION 18930. APPROVAL OR ADOPTION OF BUILDING STANDARDS; ANALYSIS AND CRITERIA; REVIEW CONSIDERATIONS; FACTUAL DETERMINATIONS

- (a) Any building standard adopted or proposed by state agencies shall be submitted to, and approved or adopted by, the California Building Standards Commission prior to codification. Prior to submission to the commission, building standards shall be adopted in compliance with the procedures specified in Article 5 (commencing with Section 11346) of Chapter 3.5 of Part 1 of Division 3 of Title 2 of the Government Code. Building standards adopted by state agencies and submitted to the commission for approval shall be accompanied by an analysis written by the adopting agency or state agency that proposes the building standards which shall, to the satisfaction of the commission, justify the approval thereof in terms of the following criteria:
- (1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.
 - (2) The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.
 - (3) The public interest requires the adoption of the building standards.
 - (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
 - (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
 - (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
 - (7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.
 - (A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.
 - (B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.
 - (8) The format of the proposed building standards is consistent with that adopted by the commission.
 - (9) The proposed building standard, if it promotes fire and panic safety as determined by the State Fire Marshal, has the written approval of the State Fire Marshal.