

STATE OF CALIFORNIA  
STATE AND CONSUMER SERVICES AGENCY  
CALIFORNIA BUILDING STANDARDS COMMISSION  
2525 NATOMAS PARK DR., SUITE 130  
SACRAMENTO, CA 95833  
(916) 263-0916 Phone  
(916) 263-0959 Fax  
Email: cbsc@dgs.ca.gov

Office Use Item No. \_\_\_\_\_

**PARTICIPATION COMMENTS FOR THE NOTICE DATED FEBRUARY 20, 2013.**  
Written comments are to be sent to the above address.

**WRITTEN COMMENT DEADLINE: APRIL 5, 2013**

Date: April 5, 2013

From: Deepak Dandekar, AIA  
Name (Print or type)  
UCSF Medical Center

  
(Signature)

Agency, jurisdiction, chapter, company, association, individual, etc.

3333 California St, Suite 115      San Francisco      CA      949118  
Street                                      City                                      State                                      Zip

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

The Agency proposed modifications As Submitted on Section No. 602.3.1.

California Mechanical Code  
Sections: 217.0; 407.2.1; 407.4.1;  
407.4.1.1; 407.4.1.4; 602.1;  
California Plumbing Code Sections:  
217.0; 604.1; 609.9; 612.0; 612.2;  
701.0; 701.1; 701.1.2.1; 906.2.1

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:**

*NO REVISIONS. REASONS FOR SUPPORT: SEE BELOW.*

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

We strongly support the proposed modifications since they help us provide safe and effective patient care without incurring unnecessary costs. We are increasingly focused on providing primary care at various locations within the community we serve. In many instances, we are unable to lease space for one of these clinics in a medical office building designed for primary care clinics or doctors' offices without making extraordinary modifications to

meet 2010 CBC OSHPD-3 requirements. Proposed provisions of OSHPD 3SE subcategory will provide a relief from the code requirements that don't benefit our patients or our staff but expend increasingly scarce dollars that can be better used for improving patient care.

## 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.