

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 AUGUST 24, 2012**  
**Written comments are to be sent to the above address.**

**WRITTEN COMMENT DEADLINE: OCTOBER 8, 2012**

Date: 5 October 2012

From:

Carol Corr  
(AO) Name (Print or type)



(Signature)

**KAISER PERMANENTE**

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

1800 Harrison Street      Oakland      CA      94612  
Street                      City                      State                      Zip

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

The Agency proposed modifications As Submitted on Ch.7, Article 3. 7-119(c), 6A, 6B

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:**

**7-119(c) 6. Architectural Space and Equipment Requirements**

**6A. Space List**

- (1) The functional program shall contain a list organized by department or other appropriate functional unit that shows each room in the proposed project, indicating its ~~net size by gross floor area and clear~~ floor area
- (2) The space list shall indicate the spaces to which the following components, if required, are assigned:
  - (a) Fixed and movable medical equipment
  - (b) Furnishings and fixtures
  - (c) Technology provisions

**6B. Area**

- (1) Gross floor area for the project shall be aggregated by department, and ~~appropriate~~ multiplying factors shall be applied to reflect circulation and wall thicknesses within the department or functional area. This result shall be referred to as department gross square footage (DGSF).

- (2) DGSF for the project shall be aggregated, and appropriate multiplying factors shall be applied to reflect inter-departmental circulation, exterior wall thickness, engineering spaces, general storage spaces, vertical circulation, and any other areas not included within the intra-departmental calculations. This result shall be referred to as building gross square footage (BGSF) and shall reflect the overall size of the project.

**Reason:**

The proposed building standard is unnecessarily ambiguous or vague, in whole or in part. Clear floor area is already defined by the California Building Code. The amount of grossing can vary by the method that it is calculated.

**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.