

STATE OF CALIFORNIA  
STATE AND CONSUMER SERVICES AGENCY  
CALIFORNIA BUILDING STANDARDS COMMISSION  
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Office Use Item No. \_\_\_\_\_

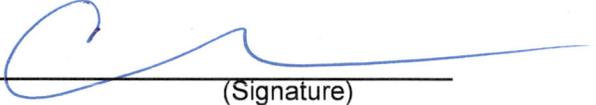
**PARTICIPATION COMMENTS FOR THE NOTICE DATED AUGUST 24, 2012**  
**Written comments are to be sent to the above address.**

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

Date: 5 October 2012

From:

Carol Corr  
(AA) 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 not agree with:

The Agency proposed modifications As Submitted on Section No. 1224.29.1.2

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:**

**1224.29.1.2 Patient space.** *In new construction, each patient space (whether separate rooms, cubicles, or multiple bed space) shall have a minimum of 200 square feet (18.58 m<sup>2</sup>) of clear floor area with a minimum headwall width of 13 feet (3962 mm) per bed. There shall be a minimum clear dimension of 1 foot (305 mm) clear space from the head of the bed to the wall, a minimum of 5 feet (1524 mm) clear space from the foot of the bed to the wall. Clearances shall allow for a minimum of 5 feet (1524 mm) clear space on one side of each bed for patient transfer, a minimum of 4 feet (1218 mm) clear width on the non-transfer side, and a minimum of 8 feet (2438 mm) clear space between beds. for patient transfer.*

**Reason:**

- (1) The proposed building standards conflicts with, overlap, or duplicate other building standards- specifically 1224.32.4.2 Space Requirements. Inconsistent but closely stated requirements leads to inconsistent interpretation of the requirements.
- (2) The cost to the public is unreasonable, based on the overall benefit to be derived from the building standards. The way the proposed amendment is written does not take into account that the length of the bed

varies by manufacturer. In order to meet the requirement and accommodate any bed that the facility chooses to purchase in time for licensure, requires designers to oversize the room dimensions, in most cases increasing the building structural grid. While adding a minimum of 20 net square feet to each room, the full building impact is much higher, typically 8,000 to 10,000 square feet per hospital.

### 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:
- (3) The proposed building standards do not conflict with, overlap, or duplicate other building standards.
  - (4) The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.
  - (5) The public interest requires the adoption of the building standards.
  - (6) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
  - (7) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
  - (8) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
  - (9) 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.
  - (10) The format of the proposed building standards is consistent with that adopted by the commission.
  - (11) 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.