

STATE OF CALIFORNIA  
STATE AND CONSUMER SERVICES AGENCY  
CALIFORNIA BUILDING STANDARDS COMMISSION  
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SACRAMENTO, CA 95833  
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Email: cbsc@dgs.ca.gov

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

**PARTICIPATION COMMENTS FOR THE NOTICE DATED OCTOBER 26, 2012**  
**Written comments are to be sent to the above address.**

**WRITTEN COMMENT DEADLINE: DECEMBER 10, 2012**

Date: December 2, 2012

From: Mr. Jay Hyde - Chairman  
SVABO Code Development Committee, Accessibility Sub Committee

\_\_\_\_\_  
Name (Print or type)

\_\_\_\_\_  
(Signature)

Sacramento Valley Association of Building Officials

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

1215 K Street Suite 940 Sacramento California 95814  
Street City State Zip

I/We Do not agree with:

The Agency proposed modifications As Submitted on Section No. **11B-206.2.4**

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:**

**11B-206.2.4 Spaces and Elements.** At least one accessible route shall connect accessible building or facility entrances with all accessible spaces and elements **including mezzanines levels** within the building or facility which are otherwise connected by a circulation path unless exempted by 11B-206.2.3 Exceptions 1 through 8.

**EXCEPTIONS: 1. Reserved.**

2. In assembly areas with fixed seating required to comply with 11B-221, an accessible route shall not be required to serve fixed seating where wheelchair spaces required to be on an accessible route are not provided.

3. **Reserved.**

**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.]

The intent of this section is to include all levels that require access to them- With the existing language in Section 206.2.3 not really clear as to the intent of requiring access to mezzanines in all buildings and facilities this will further clarify the intent of both of these section. We know that DSA is trying to include the exact language that is specified in the ADA standards but when you read those standards and start removing items that were including in them creates a section that does nto end up with a clear and concise requirements that can be understood by all.

Cost impact proposed revision: no change in cost.

9 point criteria validation is by item **3, 4 & 6**

#### 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.