

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 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-224.3**

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-224.3 Beds. In guest **any transient lodging** rooms having more than 25 beds, 5 percent minimum of the beds shall have clear floor space complying with 11B-806.3.

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.]

Reason: Provides greater clarity. , the word “guest” is redundant and unnecessary. Section 11B-224 deals with Transient Lodging Guest Rooms- which includes hotel & motel and **dormitories**, which we feel this section is specifically relating to. Usually within the hotel and motel we do not have a “guest room” with 25 or more bed. We see these in Hostels, and dormitory settings. (buildings on campuses, labor camps housing and even in barracks in the training camps and housing under a military settings) but never in a hotel and motel setting-. You do not associate the definition of a guest room include more than just a couple of beds within a hotel, motel, or time share. If the intent is to justify clear space at bed within a dormitory type setting then it should say that- the proposed change only removes the “guest” parts of the language uses the “Rooms” in general

This section is also duplicated in Section 11B-224.1.5 Social Service Center Establishments-

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.