

From: [DGS Website@DGS](mailto:DGS_Website@DGS)
To: CBSC@DGS
Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Natasha Reyes
Date: Thursday, May 14, 2020 5:18:05 PM

Commenter Contact Information

Name: Natasha Reyes
Date: 5/14/2020 12:00:00 AM
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Proposed Building Standard

Title 24 Part #: Part 2
Section #: Chapter 11B, Item 11B.16 Sec. 11B-233.3.2
Proposing State Agency: Division of the State Architect (DSA)
This comment is intended for review during: 45-Day Comment Period

Your recommendation based on the criteria of Health and Safety Code Section 18930(a):
Approve

In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a). If you recommend anything other than approve, cite the criteria in your comment. If you oppose a proposed building standard, offer a solution or alternative for the state agency to consider.

We support this proposal as it brings this part of the Code into compliance with federal requirements and brings clarity to the Code. As noted by DSA, the text is almost verbatim from the US Department of Justice 2010 ADA Accessible Design Standards at ADA Title II, 28 C.F.R. section 35.151(j)(2). As noted in the DOJ ADA 2010 Standards themselves, "State and local government facilities must follow the requirements of the 2010 Standards, including both the Title II regulations at 28 CFR 35.151; and the 2004 ADAAG at 36 CFR part 1191, appendices B and D." ADAAG 2010 by its terms includes all of these requirements. The proposal is in the public interest providing consistency with accessibility statutes and regulations (Item (a)(3)).

9 Point Criteria Info:
18930(a) 3