

From: [DGS Website@DGS](mailto:DGS_Website@DGS)
To: CBSC@DGS
Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Janis Kent, FAIA, CASp
Date: Monday, April 27, 2020 3:42:22 PM

Commenter Contact Information

Name: Janis Kent, FAIA, CASp
Date: 4/27/2020 12:00:00 AM
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Proposed Building Standard

Title 24 Part #: Part 11
Section #: 11B-233.3
Proposing State Agency: 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 as Amended

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.

Housing requirements per 11B-233.3 and the corresponding technical requirements are not just applicable to public housing. Suggest adding the following 2 Notes from DOJ to better clarify;
Note 2: Housing provided by or on behalf of a place of education, irregardless of whether it is considered public or private education, which are leased on a year-round basis exclusively to graduate students or faculty that do not contain any public or common use areas available for educational programming are to follow 11B-233 and 11B-809.
Note 3: Social Service Center Establishments that provide residential dwelling units, irregardless of whether it is considered public or private, are to follow 11B-233 and 11B-809.

9 Point Criteria Info:
18930(a) 1