From: DGS Website@DGS
To: CBSC@DGS
Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Matt Sigler
Date: Friday, April 03, 2020 2:39:07 PM

Commenter Contact Information
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Date: 4/3/2020 12:00:00 AM
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Proposed Building Standard
Title 24 Part #: Part 2
Section #: Chapter 11B, Section 809.10.5.2
Proposing State Agency: DSA-AC
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):
Disapprove

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.

PMI believes that the grab bar reinforcement requirements for bathtubs should be consistent with those currently required in Chapter 11A [specifically Section 1134A.5 (Bathtubs)]. First, no technical data has been provided in DSA-AC's initial statement of reasons to demonstrate that the grab bar reinforcement requirements are insufficient for mounting grab bars in bathtubs as currently required by the code. Furthermore, most manufactured bathtubs (that include the surrounding walls) already include the reinforcement (backer boards) built into the walls. These backer board dimensions are based on the requirements in Chapter 11A. Therefore, if DSA-AC's proposed changes for grab bar reinforcement for bathtubs are approved, current product that meets Chapter 11A requirements will no longer be permitted for adaptable multi-family residential dwelling units, forcing manufacturers to either design new product or redesign current product without any technical data to justify the costs.

9 Point Criteria Info:
18930(a) 1