

**PUBLIC COMMENT on PROPOSED BUILDING STANDARDS**

For Publication in Title 24, California Code of Regulations

See instructions for completing this form on Page 2.

Commenter Contact Information	
Name:	<u>John Chrysler</u> Date: <u>10/17/2018</u>
Representing:	<u>Chair, TMS 402/602 Committee (National Masonry Standard)</u>
Mailing Address:	Number & Street: <u>1315 Storm Parkway</u>
	City: <u>Torrance</u> State: <u>CA</u> Zip Code: <u>90501</u>
Telephone #:	<u>310-257-9000</u> Email: <u>jc@masonry.pro</u>

Proposed Building Standard	
Title 24 Part #: (select one)	<u>Part 2</u> Section #: <u>2103.5</u>
Proposing State Agency	<u>OSHPD</u>
This comment is intended for review during: (select one)	<input type="checkbox"/> Code Advisory Committee <input checked="" type="checkbox"/> 45-Day Comment Period <input type="checkbox"/> 15-Day Comment Period <input type="checkbox"/> Commission Meeting
Your recommendation based on the criteria of Health and Safety Code Section 18930(a) printed on the back of this form is: (select one) <input type="checkbox"/> Approve <input checked="" type="checkbox"/> Disapprove <input type="checkbox"/> Further Study Required <input type="checkbox"/> Approve as Amended	

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 2018 OCT 26 A 11:03  
 CALIFORNIA BUILDING STANDARDS COMMISSION

**In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a) printed on the back of this form. 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. Please use separate pages if your comment does not fit in this space.**

This provision is not only duplicative (TMS 602, Article 2.2, ASTM C476, Section 3, Note 2) it is not enforceable since compliance for air entrainment is not defined in the code. Conflicts with Nine Point Criteria, Items 1 and 4.

Do not adopt.

**Attachments?**  
 Check if you have attached additional pages. The number of pages attached is:

**For CBSC Office Use Only** Date Received: 10/26/18 Rulemaking Item #: 03/18

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Proposed Building Standard	
Title 24 Part #: (select one)	<u>Part 2</u> Section #: <u>2104.2.1</u>
Proposing State Agency	<u>OSHPD</u>
This comment is intended for review during: (select one)	<input type="checkbox"/> Code Advisory Committee <input checked="" type="checkbox"/> 45-Day Comment Period <input type="checkbox"/> 15-Day Comment Period <input type="checkbox"/> Commission Meeting
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<input type="checkbox"/> Approve <input checked="" type="checkbox"/> Disapprove <input type="checkbox"/> Further Study Required <input type="checkbox"/> Approve as Amended	

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1<sup>st</sup> Paragraph- "...mortar droppings or other foreign material." conflicts with the Referenced National Standard, TMS 602, Article 3.2 D. Conflicts with Nine Point Criteria, Item 1.

Do not adopt.

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Proposed Building Standard	
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Proposing State Agency	<u>OSHPD</u>
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4<sup>th</sup> Paragraph- "Reinforcement, embedded items and bolts shall be solidly embedded in grout." duplicates the Referenced National Standard, TMS 602, Articles 3.4 B.2 and 3.4 D.1. Conflicts with Nine Point Criteria, Item 1.

Do not adopt.

**Attachments?**

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4<sup>th</sup> Paragraph- "Reinforcement and embedded items... prior to grouting." duplicates the Referenced National Standard, TMS 602, Article 3.2 A. This sentence also conflicts with allowable placement tolerances (CBC 2104.1, TMS 602, Article 3.4 B.11) which was addresses by TMS 602, Article 3.4 B.1. Conflicts with Nine Point Criteria, Item 1.

Do not adopt.

**Attachments?**

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Name: John Chrysler Date: 10/17/2018  
Representing: Chair, TMS 402/602 Committee (National Masonry Standard)  
Mailing Address: Number & Street: 1315 Storm Parkway  
City: Torrance State: CA Zip Code: 90501  
Telephone #: 310-257-9000 Email: jc@masonry.pro

**Proposed Building Standard**

Title 24 Part #: (select one) Part 2 Section #: 2104.2.1

Proposing State Agency OSHPD

This comment is intended for review during: (select one)  
 Code Advisory Committee  
 45-Day Comment Period  
 15-Day Comment Period  
 Commission Meeting

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Approve  Disapprove  
 Further Study Required  Approve as Amended

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5<sup>th</sup> Paragraph- "All units shall be free of dust and dirt." duplicates the Referenced National Standard, TMS 602, Article 3.3 B.8.a. Conflicts with Nine Point Criteria, Item 1.

Do not adopt.

**Attachments?**

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**Proposed Building Standard**

Title 24 Part #: (select one) Part 2 Section #: 2104.2.1  
Proposing State Agency OSHPD  
This comment is intended for review during: (select one)  
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 45-Day Comment Period  
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6<sup>th</sup> Paragraph duplicates the Referenced National Standard, TMS 602, Article 3.5 E.1.b. Conflicts with Nine Point Criteria, Item 1.  
  
Do not adopt.

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Proposed Building Standard	
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7<sup>th</sup> Paragraph duplicates the Referenced National Standard, TMS 602, Articles 3.5 E.1.a and 3.5 F. Conflicts with Nine Point Criteria, Item 1.

Do not adopt.

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**Proposed Building Standard**

Title 24 Part #: (select one) Part 2 Section #: 2104.2.1  
Proposing State Agency OSHPD  
This comment is intended for review during: (select one)  
 Code Advisory Committee  
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8<sup>th</sup> Paragraph essentially duplicates the Referenced National Standard, TMS 602, Articles 3.5. In addition "subject to the approval of OSHPD" is capricious in the greatest sense since individuals will not consistently evaluate grouting procedures. Conflicts with Nine Point Criteria, Items 1 and 4.  
  
Do not adopt.

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Telephone #: 310-257-9000 Email: jc@masonry.pro

**Proposed Building Standard**

Title 24 Part #: (select one) Part 2 Section #: 2104A.1.3.1.2.2

Proposing State Agency OSHPD

This comment is intended for review during: (select one)  
 Code Advisory Committee  
 45-Day Comment Period  
 15-Day Comment Period  
 Commission Meeting

Your recommendation based on the criteria of Health and Safety Code Section 18930(a) printed on the back of this form is: (select one)

Approve  Disapprove  
 Further Study Required  Approve as Amended

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This proposal is partially duplicative and partially conflicting with the National Referenced Standard, TMS 602, Article 3.5 D. There is no known rationale to limit grout lift height to 4 feet, then allow an exception for a higher grout lift height. This should be amended to simply reference the National Standard. Conflicts with Nine Point Criteria, Items 1 and 6.

Do not adopt.

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**Proposed Building Standard**

Title 24 Part #: (select one) Part 2 Section #: 2105.2  
Proposing State Agency OSHPD  
This comment is intended for review during: (select one)  
 Code Advisory Committee  
 45-Day Comment Period  
 15-Day Comment Period  
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PUBLIC BUILDING STANDARDS COMMISSION

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Exception, 2<sup>nd</sup> Paragraph-"When an f'm greater... contract specifications." is duplicative since the method of quality control is clearly contained in the National Referenced Standard, TMS 402, Section 3.1 and TMS 602, Article 1.6. If anything, the proposed language should require that the minimum QA Level should be required. Conflicts with Nine Point Criteria, Item 1.  
  
Do not adopt.

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**Proposed Building Standard**

Title 24 Part #: (select one) Part 2 Section #: 2105.3

Proposing State Agency OSHPD

This comment is intended for review during: (select one)  
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CALIFORNIA BUILDING  
INDUSTRY COMMISSION

Your recommendation based on the criteria of Health and Safety Code Section 18930(a) printed on the back of this form is: (select one)

Approve  Disapprove  
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2<sup>nd</sup> Paragraph-The reference to TMS 402, Section 7.4.4.2.2 is simply wrong since it has nothing to do with strength requirements. It is a Seismic Restriction for certain types of materials.

Do not adopt.

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Proposed Building Standard	
Title 24 Part #: (select one)	<u>Part 2</u> Section #: <u>2105.3</u>
Proposing State Agency	<u>OSHPD</u>
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<input type="checkbox"/> Approve <input type="checkbox"/> Disapprove <input type="checkbox"/> Further Study Required <input checked="" type="checkbox"/> Approve as Amended	

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2<sup>nd</sup> Paragraph-All of the references to mortar testing conflict with ASTM Standards C270, C780 and C1586. All of the ASTM Standards state that mortar should be specified by property OR proportion, not both. There are at least 9 references in the Standards explaining why field mortar testing is not representative of mortar strength in the wall. Conflicts with Nine Point Criteria, Item 1.  
Do not adopt.

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Proposing State Agency	<u>OSHPD</u>
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<input type="checkbox"/> Further Study Required	<input checked="" type="checkbox"/> Approve as Amended

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3<sup>rd</sup> Paragraph-The reference to ASTM C1586 is simply wrong. C1586 is Quality Assurance of Mortars and has nothing to do with testing. The National Reference Standard lists verification requirements in the Quality Assurance Tables with testing requirement for mortar (if applicable) through TMS 602 Article 2.1 A, ASTM C270, ASTM C780 and grout (if applicable) through TMS 602, Article 2.2 B. Conflicts with Nine Point Criteria, Item 1.  
Do not adopt.

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**Proposed Building Standard**

Title 24 Part #: (select one) Part 2 Section #: 2105.5

Proposing State Agency OSHPD

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This is a duplication of the National Referenced Standard (TMS 602, Articles 1.4 B.3 and 1.4 B.4) which conflicts with Nine Point Criteria, Item 1.

Do not adopt.

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**Proposed Building Standard**

Title 24 Part #: (select one) Part 2 Section #: 2105.6

Proposing State Agency OSHPD

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 15-Day Comment Period  
 Commission Meeting

Your recommendation based on the criteria of Health and Safety Code Section 18930(a) printed on the back of this form is: (select one)

Approve  Disapprove  
 Further Study Required  Approve as Amended

**In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a) printed on the back of this form. 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. Please use separate pages if your comment does not fit in this space.**

This is a duplication of the National Referenced Standard (TMS 602, Articles 1.4 B.2) which conflicts with Nine Point Criteria, Item 1.

Do not adopt.

**Attachments?**

Check if you have attached additional pages. The number of pages attached is:

**For CBSC Office Use Only** Date Received: 10/26/18 Rulemaking Item #: 03/18

**PUBLIC COMMENT on PROPOSED BUILDING STANDARDS**  
For Publication in Title 24, California Code of Regulations

See instructions for completing this form on Page 2.

**Commenter Contact Information**

Name: John Chrysler Date: 10/17/2018  
Representing: Chair, TMS 402/602 Committee (National Masonry Standard)  
Mailing Address: Number & Street: 1315 Storm Parkway  
City: Torrance State: CA Zip Code: 90501  
Telephone #: 310-257-9000 Email: jc@masonry.pro

**Proposed Building Standard**

Title 24 Part #: (select one) Part 2 Section #: 2105A.5

Proposing State Agency OSHPD

This comment is intended for review during: (select one)  
 Code Advisory Committee  
 45-Day Comment Period  
 15-Day Comment Period  
 Commission Meeting

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Your recommendation based on the criteria of Health and Safety Code Section 18930(a) printed on the back of this form is: (select one)

Approve  Disapprove  
 Further Study Required  Approve as Amended

**In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a) printed on the back of this form. 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. Please use separate pages if your comment does not fit in this space.**

This is a duplication of the National Referenced Standard (TMS 602, Articles 1.4 B.3 and 1.4 B.4) which conflicts with Nine Point Criteria, Item 1.

Do not adopt.

**Attachments?**

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Representing: Chair, TMS 402/602 Committee (National Masonry Standard)  
Mailing Address: Number & Street: 1315 Storm Parkway  
City: Torrance State: CA Zip Code: 90501  
Telephone #: 310-257-9000 Email: jc@masonry.pro

**Proposed Building Standard**

Title 24 Part #: (select one) Part 2 Section #: 2105A.6

Proposing State Agency OSHPD

This comment is intended for review during: (select one)  
 Code Advisory Committee  
 45-Day Comment Period  
 15-Day Comment Period  
 Commission Meeting

Your recommendation based on the criteria of Health and Safety Code Section 18930(a) printed on the back of this form is: (select one)

Approve  Disapprove  
 Further Study Required  Approve as Amended

In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a) printed on the back of this form. 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. Please use separate pages if your comment does not fit in this space.

This is a duplication of the National Referenced Standard (TMS 602, Article 1.4 B.2) which conflicts with Nine Point Criteria, Item 1.

Do not adopt.

**Attachments?**

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**Commenter Contact Information**

Name: John Chrysler Date: 10/17/2018

Representing: Chair, TMS 402/602 Committee (National Masonry Standard)

Mailing Address: Number & Street: 1315 Storm Parkway

City: Torrance State: CA Zip Code: 90501

Telephone #: 310-257-9000 Email: jc@masonry.pro

**Proposed Building Standard**

Title 24 Part #: (select one) Part 2 Section #: 2107.4

Proposing State Agency OSHPD

- This comment is intended for review during: (select one)
- Code Advisory Committee
  - 45-Day Comment Period
  - 15-Day Comment Period
  - Commission Meeting

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Your recommendation based on the criteria of Health and Safety Code Section 18930(a) printed on the back of this form is: (select one)

- Approve
- Disapprove
- Further Study Required
- Approve as Amended

**In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a) printed on the back of this form. 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. Please use separate pages if your comment does not fit in this space.**

This maximum bar size of 1/8<sup>th</sup> nominal wall thickness is a duplication of the National Referenced Standard (TMS 402), Section 6.1.2.5 which conflicts with Nine Point Criteria, Item 1. The National Standard also applies to all masonry, not just Allowable Stress Design.

Do not adopt.

**Attachments?**

Check if you have attached additional pages. The number of pages attached is:

**For CBSC Office Use Only** Date Received: 10/26/18 Rulemaking Item #: 03/18

**PUBLIC COMMENT on PROPOSED BUILDING STANDARDS**  
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Commenter Contact Information	
Name:	<u>John Chrysler</u> Date: <u>10/17/2018</u>
Representing:	<u>Chair, TMS 402/602 Committee (National Masonry Standard)</u>
Mailing Address:	Number & Street: <u>1315 Storm Parkway</u>
	City: <u>Torrance</u> State: <u>CA</u> Zip Code: <u>90501</u>
Telephone #:	<u>310-257-9000</u> Email: <u>jc@masonry.pro</u>

Proposed Building Standard	
Title 24 Part #: (select one)	<u>Part 2</u> Section #: <u>2107A.4</u>
Proposing State Agency	<u>OSHPD</u>
This comment is intended for review during: (select one)	<input type="checkbox"/> Code Advisory Committee <input checked="" type="checkbox"/> 45-Day Comment Period <input type="checkbox"/> 15-Day Comment Period <input type="checkbox"/> Commission Meeting
Your recommendation based on the criteria of Health and Safety Code Section 18930(a) printed on the back of this form is: (select one)	<input type="checkbox"/> Approve <input checked="" type="checkbox"/> Disapprove <input type="checkbox"/> Further Study Required <input type="checkbox"/> Approve as Amended

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**In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a) printed on the back of this form. 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. Please use separate pages if your comment does not fit in this space.**

This maximum bar size of 1/8<sup>th</sup> nominal wall thickness is a duplication of the National Referenced Standard (TMS 402), Section 6.1.2.5 which conflicts with Nine Point Criteria, Item 1. The National Standard also applies to all masonry, not just Allowable Stress Design.

Do not adopt.

**Attachments?**  
 Check if you have attached additional pages. The number of pages attached is:

**For CBSC Office Use Only** Date Received: 10/24/18 Rulemaking Item #: 03/18

**PUBLIC COMMENT on PROPOSED BUILDING STANDARDS**  
For Publication in Title 24, California Code of Regulations

See instructions for completing this form on Page 2.

**Commenter Contact Information**

Name: John Chrysler Date: 10/17/2018  
 Representing: Chair, TMS 402/602 Committee (National Masonry Standard)  
 Mailing Address: Number & Street: 1315 Storm Parkway  
 City: Torrance State: CA Zip Code: 90501  
 Telephone #: 310-257-9000 Email: jc@masonry.pro

**Proposed Building Standard**

Title 24 Part #: (select one) Part 2 Section #: 2110.1  
 Proposing State Agency OSHPD  
 This comment is intended for review during: (select one)  
 Code Advisory Committee  
 45-Day Comment Period  
 15-Day Comment Period  
 Commission Meeting

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Your recommendation based on the criteria of Health and Safety Code Section 18930(a) printed on the back of this form is: (select one)  
 Approve  Disapprove  
 Further Study Required  Approve as Amended

**In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a) printed on the back of this form. 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. Please use separate pages if your comment does not fit in this space.**

This proposed language does not make sense. The stress restriction is duplicative with the National Reference Standard, TMS 402, Section 13.1.1.2 (explained in Commentary) and there is no guidance on what is meant by designing glass block for seismic forces. Conflicts with Nine Point Criteria, Items 1 and 6.

**Attachments?**  
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**PUBLIC COMMENT on PROPOSED BUILDING STANDARDS**  
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**Commenter Contact Information**

Name: John Chrysler Date: 10/17/2018  
 Representing: Chair, TMS 402/602 Committee (National Masonry Standard)  
 Mailing Address: Number & Street: 1315 Storm Parkway  
 City: Torrance State: CA Zip Code: 90501  
 Telephone #: 310-257-9000 Email: jc@masonry.pro

**Proposed Building Standard**

Title 24 Part #: (select one) Part 2 Section #: Chapter 35

Proposing State Agency OSHPD

This comment is intended for review during: (select one)  
 Code Advisory Committee  
 45-Day Comment Period  
 15-Day Comment Period  
 Commission Meeting

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Your recommendation based on the criteria of Health and Safety Code Section 18930(a) printed on the back of this form is: (select one)

Approve  Disapprove  
 Further Study Required  Approve as Amended

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The correct address for TMS is: 105 South Sunset, Suite Q, Longmont, CO 80501-6172

**Attachments?**

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Commenter Contact Information	
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Representing:	<u>Chair, TMS 402/602 Committee (National Masonry Standard)</u>
Mailing Address:	Number & Street: <u>1315 Storm Parkway</u>
	City: <u>Torrance</u> State: <u>CA</u> Zip Code: <u>90501</u>
Telephone #:	<u>310-257-9000</u> Email: <u>jc@masonry.pro</u>

Proposed Building Standard	
Title 24 Part #: (select one)	<u>Part 2</u> Section #: <u>Chapter 35</u>
Proposing State Agency	<u>DSA</u>
This comment is intended for review during: (select one)	<input type="radio"/> Code Advisory Committee <input checked="" type="radio"/> 45-Day Comment Period <input type="radio"/> 15-Day Comment Period <input type="radio"/> Commission Meeting
Your recommendation based on the criteria of Health and Safety Code Section 18930(a) printed on the back of this form is: (select one)	
<input type="radio"/> Approve <input type="radio"/> Disapprove <input type="radio"/> Further Study Required <input checked="" type="radio"/> Approve as Amended	

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