From:
 DGS Website@DGS

 To:
 CBSC@DGS

Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Steven Dombrowski

Date: Monday, April 13, 2020 12:27:50 PM

Commenter Contact Information Name: Steven Dombrowski Date: 4/13/2020 12:00:00 AM

Representing: Endelman & Associates

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Proposed Building Standard Title 24 Part #: Part 2 Section #: 1136A

Proposing State Agency: Department of Housing and Community Development

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.

Whereas 1136A.1 & 1136A.2 both state that receptacles, switches, and controls shall be located within the reach ranges specified in Section 1138A.3, it is therefore also necessary to amend 1138A.1 (2) Obstructed High Reach to state the following "Exception: Kitchen countertops in dwelling units shall be allowed to extend 25-1/2 inches (647.7 mm) from the wall beneath the operable part." Further, it is necessary to also amend 1138A.3 (2) Obstructed High Reach to state the following: "Exception: Kitchen countertops in dwelling units, and the tops of washing machines and clothes dryers shall be permitted to be 36 inches maximum above the finish floor and countertops shall be allowed to extend 25-1/2 inches (647.7 mm) from the wall beneath the operable part."

Failure to also amend 1138A.3 will result in a circular reference from 1136A.1 and 1136A.2 still requiring a 25" max counter depth for an obstructed forward reach and a 24" max counter depth for an obstructed high side reach.

9 Point Criteria Info: 18930(a) 1