

From: [DGS Website@DGS](mailto:DGS_Website@DGS)
To: CBSC@DGS
Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Janis Kent, FAIA, CASp
Date: Thursday, April 23, 2020 6:40:48 PM

Commenter Contact Information

Name: Janis Kent, FAIA, CASp
Date: 4/23/2020 12:00:00 AM
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Proposed Building Standard

Title 24 Part #: Part 11
Section #: 11B-205.1 excep 9
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):
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.

Currently, if a work surface is placed in the corner, both outlets can be reached if located within 24" for side reach and 25" for forward reach. The big issue is when placed over a counter with no knee/toe clearance below. I am suggesting replacing the word work surface with counter. I am also suggesting more clarification that one outlet is not required to be within reach range for corner counters.

In residential dwelling units with mobility features where receptacles are provided in a kitchen at an inside corner counter, one receptacle shall be located 36 inches (915 mm) from either wall at the inside corner and the other one on the adjacent wall does not need to be within reach range.

9 Point Criteria Info:
18930(a) 3