

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 4:12:58 PM

Commenter Contact Information

Name: Janis Kent, FAIA, CASp
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Proposed Building Standard

Title 24 Part #: Part 11
Section #: Definitions Section 202 Public Housing
Proposing State Agency: CA
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.

Eliminate items #4 and 5. These have really caused continuous confusion. Transient lodging is NOT housing and has differing requirements. Student housing is considered 'housing at a place of education' and uses transient lodging requirements for very specific reason. OR, substitute with the following language.

4. Transient Lodging is to follow 11B-224. If a hotel has in addition to the guest rooms, housing units dedicated to residential use only, then those housing units are to follow housing requirements, whether 11A or 11B. It can be either public or privately funded.

5. Only housing provided by or on behalf of a place of education, which is leased on a year-round basis exclusively to graduate students or faculty, and do not contain any public or common use areas available for educational programming, are to comply with residential facilities under 11B-233 and 11B-809 irregardless of whether the facility is considered a public or private school or the funding source.

9 Point Criteria Info:
18930(a) 3