From:
 DGS Website@DGS

 To:
 CBSC@DGS

Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Matt Sigler

Date: Friday, April 03, 2020 2:44:41 PM

Commenter Contact Information

Name: Matt Sigler

Date: 4/3/2020 12:00:00 AM

Representing: Plumbing Manufacturers International (PMI)

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Proposed Building Standard Title 24 Part #: Part 2

Section #: 11B, Section 809.10.6.2 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 slope requirements for showers should be consistent with those currently required in Chapter 11A [specifically Section 1134A.6 (Showers)]. In accordance with all applicable industry standards (ASME A112.19.1/CSA B45.2, ASME A112.19.2/CSA B45.1, ASME A112.19.3/CSA B45.4, CSA B45.5/IAPMO Z124 and CSA B45.12/IAPMO Z402) and consistent with the 2019 California Plumbing Code and the 2018 Uniform Plumbing Code, the slope of shower receptors are designed within a range of 1/8 inch per foot to 1/2 inch per foot. Limiting the slope to 1/4 inch per foot maximum significantly reduces product selection for a specific segment of the population without any technical justification.

9 Point Criteria Info: 18930(a) 1