Commenter Contact Information
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Proposed Building Standard
Title 24 Part #: Part 2
Section #: 11B, Section 809.10.6.4
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 grab bar reinforcement requirements for showers should be consistent with those currently required in Chapter 11A [specifically Section 1134A.6 (Showers)]. First, no technical data has been provided in DSA-AC's initial statement of reasons to demonstrate that the grab bar reinforcement requirements are insufficient for mounting grab bars in showers as currently required by the code. Furthermore, most manufactured showers designed for accessibility already include the reinforcement (backer boards) built into the walls. These backer board dimensions are based on the requirements in Chapter 11A. Therefore, if DSA-AC's proposed changes for grab bar reinforcement for showers are approved, current product that meets Chapter 11A requirements will no longer be permitted for adaptable multi-family residential dwelling units, forcing manufacturers to either design new product or redesign current product without any technical data to justify the costs.

9 Point Criteria Info:
18930(a) 1