

From: [DGS Website@DGS](mailto:DGS_Website@DGS)
To: CBSC@DGS
Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Bryan Frank
Date: Friday, October 15, 2021 4:51:20 PM

Commenter Contact Information

Name: Bryan Frank

Date: 10/15/2021 12:00:00 AM

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Proposed Building Standard

Title 24 Part #: Part 2

Section #: 1901A.2

Proposing State Agency: Division of the State Architect – SS and SS/CC 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.

Chapter 19A is co-adopted by OSHPD and DSA. The model code (2021 International Building Code) has revised the title of Section 1906 from “STRUCTURAL PLAIN CONCRETE” to “FOOTINGS FOR LIGHT-FRAME CONSTRUCTION”. DSA and OSHPD have co-adopted a prior and continuing amendment in Section 1906A, which replaces the model code content with the following: “Not permitted by OSHPD and DSA-SS”. Because of the change made to the title of this section by the model code, OSHPD has determined further clarification is needed in the code to communicate that plain concrete is not permitted. To provide this clarification, OSHPD proposes in the 45-Day Express Terms the following revisions to Section 1901A.2: (1) strike the text “Plain and” from the section title and (2) add the text “except that plain concrete is not permitted” to the end of the first sentence. Refer to document with the file name “OSHPD 06-21-ET-PT2V2-45Day.docx”.

This change is not included in the DSA 45-Day Express Terms; however, DSA should maintain alignment with OSHPD in these regulations for the clarifying benefit of the OSHPD proposal. Additionally, adding an OSHPD banner to the proposed changes will create the mistaken impression that DSA now permits plain concrete, which is untrue based on continued amendments. As such, DSA should revise Section 1901A.2 as shown in the 45-Day Express Terms document authored by

OSHPD.

9 Point Criteria Info:
18930(a) 6