

From: [DGS Website@DGS](mailto:DGS_Website@DGS)
To: CBSC@DGS
Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Bryce Nesbitt
Date: Monday, October 18, 2021 11:58:42 PM

Commenter Contact Information

Name: Bryce Nesbitt
Date: 10/18/2021 12:00:00 AM
Representing:
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Proposed Building Standard

Title 24 Part #: Part 10
Section #: General
Proposing State Agency: SFM
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):
Further Study Required

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.

For the SFM
Regarding fire separation and the building code.

In my work I help homeowners bring non-compliant divisions of their property into compliance as accessory dwelling units. These divisions are often decades old. Sometimes they are rented, other times the owner is too concerned about renting unpermitted space and the units sit empty. The biggest barrier I face in these projects is generally the fire separation rules, both the internal 1 hour rating and the external ASTM E119 walls. The external walls come up because the fire separation distance is greater than our area's setbacks.

I urge the SFM to work with the development community to find ways to subdivide and repurpose space within our existing housing stock, in a responsible manner, but a different manner than used for new construction. I believe that alternative methods exist to create more or at least equivalent fire safety.

As it is some projects I evaluate don't happen, because of the cost of meeting the prescriptive codes. And that's often a missed opportunity make other safety improvements including cleaning up bad past work, and create additional housing units in good locations.

Bryce Nesbitt

Member, Casita Coalition

Unpermitted Construction Consultant Oakland Albany and Berkeley California

9 Point Criteria Info:

18930(a) 5