

DSA Public Hearing - California Building Code Accessibility Proposals during the 2022 Intervening Code cycle.

March 23, 2023

Eric Driever:

Good morning, everybody. Welcome to the DSA Public Hearing for the California Building Code Accessibility Proposals during the 2022 Intervening Code cycle. This public hearing is being recorded. This public hearing is occurring during the 45-day public comment period. The public hearing was scheduled in addition to the regular 45 day written comment process to ensure that some important changes made in response to the BSC Code Advisory or the CAC, recommendations for further study could be heard. However, DSA will receive comments today on all proposals. The 45-day public comment period for these proposals began on March 10th and continues through April 24th. Written comments received today and through throughout the 45-day public comment period will be entered into the record.

I'm joined today here with Michelle Davis, Supervising Architect and Jessica Axtman, Associate Governmental Program Analyst. Jessica will be assisting the administration of admitting remotely, and Michelle will present each code proposal prior to receiving public comment on each item.

Item numbers for the proposals relate to the assigned item number in the 45-day express terms, which are available for download on the Building Standards Commission's website. DSA will present specific proposals recommended by the CAC for further study first but will allow for comments related to other items in mass at the end of the agenda.

As mentioned, this public hearing is in addition to the normal 45-day written comment period. All comments whether presented verbally today or provided to the Building Standards Commission prior to the established and published deadline will be entered into the record and included into the report to the Building Standards Commission for their review on DSA's submission for approval.

Comments whether provided verbally today or in written form to the BSC should be as specific as possible and include reasoning for the suggested change. Reasonings should be consistent with one of the nine-point criteria. Proposing agencies are required to confirm the proposing regulations. In general, those criteria are 1) Criteria one, that the proposals are not duplicative or overlapping. 2) Are expressly the jurisdiction or not expressly the jurisdiction of another entity. 3) Are in the interest of the public. 4) Are not unreasonable, arbitrary, unfair, or capricious. 5) Are of unreasonable cost based upon the overall benefit. 6) Are not unnecessarily ambiguous or vague. 7) National publications, so public standards and model codes have been incorporated. 8) Are consistent with format adopted by the BSC. And 9) Have written approval of the State Fire Marshall if they approve, or excuse me, if they promote, fire or panic safety.

When commenting today, please state your name prior to providing your comments. In the interest of time, verbal comments provided today must be within two minutes. A 30 second and ten second warning will be given by Jessica. And at that time, we would request that the commenters conclude their comments.

If additional clarification is desired by the commenter, we would suggest that the comment be provided in writing to ensure that DSA receives the full comment. Commenters are asked to use the raise hand function in Zoom to identify the desire to comment and will be called upon in the order raised. Call in attendees, and I noticed that we have one, can use the pound and the two buttons. So, pound two on their cell phone to raise their hand.

It's requested that attendees manage their microphones using the mute buttons when not speaking and unmute themselves when called upon to comment. Call in users may toggle their mute and unmute functions by pressing star six for each function.

We'll be taking breaks approximately every 90 minutes. One of the breaks will be a break for lunch and that will be an extended duration for that purpose.

There are now 17 total items being proposed during this code cycle. However, item two has been withdrawn. DSA will present individually the following items in order. First, we'll deal with the urinal compartment grouped items, and related items. Item number nine, toilet facilities multiuser, all-gender. 14, item 14, privacy latches on compartments. Item 15, urinal compartments and the last two are additional, subsequent to the CAC meetings, and that is item number 17 toilet room signs and 18, the diaper changing stations.

Those are in response to comments received during at the advisory committee meeting. All those changes actually, all changes in that item are in response to the further study comments. Next, we'll take comments and present residential dwelling units with adaptable features, which is item 11. And then lastly, all other items will be taken in mass and not presented, but those items are 1, 8, 10, 12, 13, and 16. Should you have a comment on one of those items, we would be glad to hear those comments after having heard the specific items that relate to urinal compartments for residential dwelling units.

The purpose of this meeting is for DSA to receive the public comment. But DSA will not be responding during this meeting unless a specific clarification is requested on an item. DSA will provide response in accordance with the 45-day rule making process. So, with that, do we, I will share our agenda for the day. Pardon me while I bring up the agenda. Share my screen.

Is the agenda viewable by everybody, Jessica?

Jessica Axtman:

It should be. I can see it.

Michelle Davis:

Is there any questions? Okay. Then the first item that we will be reviewing today or receiving comments on today is, DSA tracking number item nine. The topic is toilet facilities, multi-user, all gender, and do we need to read the current code language, or do we just move into the proposed changes?

Eric Driever:

Let's go ahead and read the current.

Michelle Davis:

Okay. The way the code is currently written. This is section 11B-213 titled Toilet facilities and Bathing facilities. 11B-213.1 General. Where toilet facilities and bathing facilities are provided. As per normal, the three dots indicate that we have left out text and we will not be reviewing all of the text in some sections, just to provide more brevity and clarity.

11B-213.2 Toilet rooms and bathing rooms. Where toilet rooms are provided and that follows down to 11B-213.2.1. Unisex, single-user or family toilet, and unisex, single user or family bathing rooms. Followed by section 11B-213.2.2. Unisex, patient toilet rooms in medical care and long-term care facilities. And 11B-213.2.3 Unisex. We have a typo here. Yeah. All right. We have a typo in this section which we will fix.

Following down to 11B-213.3 Plumbing fixtures and accessories. Plumbing fixtures and accessories provided in a toilet room or bathing room. And then it follows instructions at 11B-213.3.1 Toilet compartments. Where toilet compartments are provided, at least 5% of the toilet compartments, or 5% of the combination of toilet compartments and urinals, but no fewer than one toilet compartment shall comply with section 11B-604.8.1. In addition to the compartments required to comply with section 11B-604.8.1, where six or more toilet compartments are provided or where the combination of urinals and water closets total six or more fixtures, toilet compartments complying with section 11B-804.8.2 shall be provided in the same quantity as the toilet compartments required to comply with section 11B-604.8.1. The next subsection, 11B-213.3.2 Water closets. Speaks to where water closets are provided. And the following section 11B-213.3.3 Urinals, says where one or more urinals are provided, at least 10%, but no fewer than one shall comply with section 11B-605. The suggested text for our proposed amendment, is again at section 11B-213, Toilet facilities and bathing facilities.

The requirements for unisex single user or family unisex patient toilet bathing rooms and unisex bathing rooms in medical care facilities remains unchanged. We add a new subsection below those, though called 11B-213.2.4 titled Multi-User All-Gender Toilet Facilities. Where multi-user all-gender toilet facilities are provided, they shall comply with section 11B-213.3.1.

The next subsection is 11B-213.3. Plumbing fixtures and accessories. And section 11B-213.3.1 has new text which reads Toilet compartments and urinal compartments. Where only toilet compartments are provided, they shall comply with section 11B-213.3.1.1. Where both toilet and urinal compartments are provided, they shall comply with section 11B-213.3.1.2.

The following subsections are new numbers so 11B-213.3.1.1 is the language that had been previously in the code for toilet compartments. Where toilet compartments are provided, at least 5% of the toilet compartments or 5% of the combination of toilet compartments and urinals, but no fewer than one toilet compartment shall comply with section 11B-604.8.1. In addition to the compartments required to comply with section 11B-604.8.1 Where six or more toilet compartments are provided or where the combination of urinals and water closets total six or more fixtures. Toilet compartments complying with section 11B-604.8.2 shall be provided in the same quantity as the toilet compartments required to comply with section 11B-604.8.1. Subsection 11B-213.3.1.2 is new. Toilet compartments with urinal compartments. Where both toilet compartments and urinal compartments are provided at least 5% of toilet compartments but no fewer than one shall comply with section 11B-604.8.1.

And at least 10% of urinal compartments, but no fewer than one shall comply with section 11B-605.5. In addition to the toilet compartments required to comply with section 11B-604.8.1, and urinal compartments required to comply with section 11B-605.5 where the combination of urinals and water closets totals six or more fixtures. Toilet compartments complying with section 11B-604.8.2 shall be provided in the same quantity as the toilet compartments required to comply with section 11B-604.8.1. At all compartments not required to comply with section 11B-604.8, or section 11B-605.5, compartment doors shall be in swinging and self-closing. All individual compartments shall be identified with a sign complying with section 11B-216.8.3. This section continues on with requirements for water closets, urinals, and lavatories.

Eric Driever:

And so, at this point we will pause to see if, and I apologize if I'm looking off the camera, I'm looking at the list over here on the left to make sure that we're capturing any hands raised. So, we'll receive public comment at this point on those proposals.

Jessica Axtman:

Eric, I just wanted to interrupt really fast to say that your notifications are blocking some of the text on the screen.

Eric Driever:

Thank you. I've turned off, I'll turn off my outlook as well. I think the team's notification, I turned teams off as well, so, that shouldn't be a problem.

Richard Skaff:

Eric, there're, there's still, there are now three different items blocking the screen.

Eric Driever:

Interesting.

Nubyaan Scott:

Eric, this is Nubyaan. I would suggest stopping screen share and then starting again. I think that might resolve it.

Eric Driever:

Alright. Thank you, Nubyaan. Changes off. The chat still popped up. Do you still see the items being blocked? If so, I can raise it above.

Richard Skaff:

No, it's fine now.

Eric Driever:

Okay. Thank you. So, Richard, actually, you were the first hand raised, so I will take your comment.

Richard Skaff:

Thank you Eric. Good morning to everybody. I only have a very quick question. It's because my 79-year-old ears aren't hearing correctly this morning. Did I hear, and I couldn't see in the code language that you had up on the screen, did you say that the doors would be swinging in?

Michelle Davis:

Only the doors at non-accessible compartments.

Richard Skaff:

Ah, okay. That's what I wanted. Clarification. Thank you very much. Sorry.

Michelle Davis:

You're very welcome.

Eric Driever:

Thank you. Richard. You can lower your hand if you'd like. Tim, you are next. And you are muted, Tim.

Tim Thimesch:

There. Sorry about that.

Eric Driever:

It's okay.

Tim Thimesch:

My button was stuck. I just, I wanted to thank DSA and both of you for thinking this through. This wasn't an easy task and made some great improvements to the language here. I'm hoping Connie speaks earlier, she still had some concerns about the usability of the door, and I've heard those. I, she's gonna express them better and I support her additional comments. But thank you again for all these additions.

Eric Driever:

Thank you, Tim. I see Nubyaan your hand is raised next.

Nubyaan Scott:

Yes.

Eric Driever:

Go ahead. Thank you, Nubyaan.

Nubyaan Scott:

I just wanted to check if I'm the only ones that can't see your actual screen.

Eric Driever:

Can, is my screen visible?

Andrew Burke:

It's black to me.

Richard Skaff:

It's black. There it is.

Eric Driever:

Thank you. I seem to be having some issues with screen share today. Nubyaan, can you see it now or can anybody confirm that they can see it?

Nubyaan Scott:

I currently just see that it says that you've started screen sharing, but it isn't actually sharing it.

Andrew Burke:

And I don't see it either.

Eric Driever:

Okay. I'm going to take it off of the TV monitor. I will stop sharing it there and I'll place it on the secondary monitor that we have and see if that resolves the issue. Are you seeing me fumble around with the various windows?

Nubyaan Scott:

I just see gray.

Richard Skaff:

Yeah, I do too. Hey, Eric. I thought this, I thought all this technology was supposed to make our lives easier.

Eric Driever:

It was supposed to, and in many ways it does, Richard. In many ways it does, but currently struggling with it a bit, which is {indiscernible}. Pardon me. I'm going to try to log out of the meeting and log back in. I'll rejoin this meeting momentarily. There it is {indiscernible}.

Michelle Davis:

It's still showing you as logged in.

Nubyaan Scott:

I think we're; I think we got it now.

Jessica Axtman:

You're muted, Eric.

Eric Driever:

Can you hear me now?

Jessica Axtman:

Yes, we can.

Eric Driever:

And can you see my screen now?

Jessica Axtman:

Yes, we can.

Eric Driever:

Okay. Thank you for your patience everybody. Tim, your hand is still up I see. Nubyaan was announcing that we were having some technical difficulties. And so, currently I see no other hand raised.

Jessica, do you confirm?

Michelle Davis:

Oh, Connie.

Eric Driever:

Connie, your hand is raised.

Connie Arnold:

Can you hear me?

Eric Driever:

I can.

Connie Arnold:

Okay. This is Connie Arnold, disability rights advocate for 30 plus years. Really more than that. But anyway, let me see if I can get to my screen so I can see.

Eric Driever:

And if I need to zoom in, please let me know Connie.

Connie Arnold:

Okay. Are we doing these as a grouped item so I can just make my general comment about item 15 and 16 now? Or do we have to go through each individual item?

Michelle Davis:

We were gonna go through the grouped items having to do with the multi-user all gendered toilet rooms. So, if you have specific comments on 15 and 16...

Connie Arnold.

Yes,

Michelle Davis:

We will take them when we get there in a couple minutes.

Eric Driever:

Yeah. So, we are going through in a group item fashion, but item by item. So, we have not yet reached and presented 15 and 16.

Connie Arnold:

Okay. So, I'm trying to do, I'm trying to actually take information.

Nubyaan Scott:

I think they're on item nine.

Connie Arnold:

We're on item nine. All right. Let me put my hand down for now, and then I'll raise it back up in a minute.

Eric Driever:

Okay. Thank you, Connie. So, with no other, I do not believe we have any other comments. Jessica, would you please confirm.

Jessica Axtman:

There are no other comments.

Eric Driever:

Okay, thank you. So that will present the next item.

Michelle Davis:

Okay. All right. And the next item relating to all-gender multi-user toilet rooms and toilet compartments is item number 14.

Item number 14 is a relatively minor change. I think we will read the suggested text of this amendment since it's relatively short. We are proposing to change section 11B-604.8.1.2 having to do with the doors at toilet compartments. And it reads Toilet compartment doors, including door hardware, shall... and then goes on to list a number of items. The text we then propose to change so that it says that the door shall be self-closing and we propose to add the text and have a privacy latch. The section continues on to say a door pull complying with section 11B-404.2.7 shall be placed on both sides of the door near the latch. Doors shall not swing into the clear floor space or clearance required for any fixture. Doors may swing into that portion of maneuvering space which does not overlap the clearance required at a water closet. And then the exceptions begin.

This same requirement for having a privacy latch is proposed to be included at section 11B-604.8.2.2. Also referring to toilet compartment doors and it will read toilet compartment doors including door hardware shall comply with section 11B-404, except that if the side approach or if the approach is to the latch side of the compartment door, clearance between the door side of the compartment and any obstruction shall be 44 inches minimum. The door shall be self-closing and have a privacy latch. A door pull complying with section 11B-404.2.7 shall be placed on both sides of the door near the latch. Toilet compartment doors shall not swing into the minimum required compartment area.

And that is the end of the proposed text. And we can open it up to comments.

Eric Driever:

Mr. Skaff, your hand I believe is raised first, and then we have Nubyaan and Connie

Richard Skaff:

Thank you, Eric. Couple of questions. The first one being I appreciate that we've added the language of have a privacy latch. Which I assume will be included not only in the ambulatory accessible compartments, but all of the compartments.

Actually, I see it is in the all of the compartments. The problem is, I believe, and please correct me if I'm wrong, you would then refer to operating mechanisms, which state that operating mechanisms like a privacy latch, cannot require tight grasping, twisting, or pinching. And I've raised this issue before because it has much broader implications.

A good example of that is the fire alarm pull stations, that presently meet that requirement, but don't really provide the kind of access that is required. And that is for everyone needing to use that operating mechanism, in this case, a privacy latch. What happens to a person that has no hands or has had a stroke and are unable to manipulate their fingers to open or close the privacy latch?

So, I, you know, I don't think there's any intent here, but I'm just saying, I believe we must change.

Jessica Axtman

30 seconds.

Richard Skaff:

I believe we must change the operating mechanism requirement taking out with one hand.

Eric Driever:

Thank you, Richard.

Richard Skaff:

Thank you.

Eric Driever:

Nubyaan.

Nubyaan Scott:

Yes. Thank you. Nubyaan Scott, Staff Attorney with Disability Rights California. I just wanted to communicate that we have been in ongoing discussions with some accessibility advocates to try to make sure that we're collecting their feedback on concerns on this package. And so, one of the concerns which Richard referenced just a moment ago, is that certain folks didn't know whether the operable mechanism component was in reference here.

Basically, people were concerned that to, to make sure that the privacy latch actually is going to be accessible. And so, I just wanted to just state for the advocates {Indiscernible. Audio cuts out}. Express that concern that our understanding is in line with what Richard said that the reference to 404, section 11B-404.2.7 then references you to 11B-309.4 and 309.4 talks about that the operable parts have to be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist.

And that the force required is five pounds maximum. And so that doesn't address the concern Richard just shared, which is that we should think about taking out the one hand portion, but I at least wanted to express for purpose of the advocates that express concerns that there, there is going to be a requirement that the privacy latch meet that component about, you can use it with one hand that doesn't require grasping, pinching, or twisting of the wrist.

And that's the end of my comment. Thank you.

Eric Driever:

Thank you, Nubyaan. Connie.

Connie Arnold:

Well, not to repeat what was said, but that was a concern, the twisting, grasping, and pinching requirement. But not only that, but one of the problems with the privacy latch and that I've seen in toilet compartments is when it's a, like a half circle, or I wanna call it a loop like you'd find on a kitchen cabinet.

Sometimes that makes it hard for people where the privacy latch, that's, you can just push sideways with the back of a hand, or a body part works well. And the other thing is, sometimes those latches that they kind of just stick out like a loop. Like you just put your hand in there and pull open are easier for people too, just in terms of opening a door more from the outside of things.

And I realize you're talking about the privacy latch on the inside, that's a slider latch. So, you know, if it could say and have a privacy slider latch, that would be more clear to me because you are sliding it. And in the slider latching some of them they make 'em a flat surface and some of them they make so that there's like a little knob that sticks out of the, of that.

And to me, the one that has a little knob sticking out is easier because your actually can get your body or your back of your hand easier to touch it and slide over.

Jessica Axtman:

30 seconds.

Connie Arnold:

That's it. That's all I have to say. Thank you.

Eric Driever:

Thank you, Connie. Jessica, I do not see any other hands raised other than Connie. Yours is still up. And actually, Richard just lowered his. Thank you.

Richard Skaff:

And just Eric, I apologize. Just very one quick response to this, the operating mechanisms concerned I raised and Nubyaan discussed, and Connie raised. I will once again ask DSA to find a way to develop an advisory group that can actually not only discuss possible code, existing code or propose code, but can also work with DSA staff in testing and understanding the implications of code and whether they are actually once adopted, create an a, a, an accessible environment.

So, I'm hopeful for that because right now we have like the privacy latch, which is very important, we have no studies done indicating that what exists based on that language and the language that defines operating mechanisms. We have no, no research, no group study very much like the EDWAC committee.

So, I'm asking DSA to consider creating that advi, a separate advisory committee to actually analyze and test proposed code changes or needed existing code changes. Thank you.

Eric Driever:

Thank you Richard. Connie, I presume your hand is still up from the previous comment?

Connie Arnold:

No, I have an additional comment based on what Richard said, but also, I agree with Richard Skaff, but I also wanna say in commenting on a, being a privacy slider latch, and this is because this needs to be pulled forwards, is that the privacy latch needs to work with a suggested automatic door opener or a power assist device. That is something that we're gonna recommend on our comments later.

So, in consideration of that, I'm bringing it up now. Thank you. Is that clear?

Eric Driever:

Yes. Thank you. Okay. I see Jennifer Mahato has raised her hand.

Jennifer Mahato:

Yes. Thank you for letting me just ask a quick question. With the inclusion of the privacy latch, is there language that I am maybe not seeing in the code that discusses that it cannot interfere with the door pull? And I'm looking specifically for a minimum number of inches between the two and, devices because I could see, I could see some in-house solutions possibly making it so the privacy latch actually interferes with the door pull and I'd like to be able to see that I can point to a code that says, no, you have to have so much clearance.

Eric Driever:

So, there is no specific technical requirement requiring separation between a door pull and the privacy latch. That they must be operable would be the language that would be guiding the design, the ultimate design solution for those latches, the operable parts reference.

Jennifer Mahato:

Thank you.

Eric Driever:

You're welcome. Connie, I presume your hand is still up from the previous comment. Thank you. I see no other hands. Jessica, can you please confirm?

Jessica Axtman:

Doesn't look like any other hands are up.

Eric Driever:

Okay, thank you. Then we'll move on to the next, to the next item.

Michelle Davis:

And the next item is item number 15. And the topic is urinal compartments. There are currently no requirements in the code for urinals that are located in a compartment. So 11B-605.1 General is proposed to be amended to read Urinals not provided in urinal compartments shall comply with sections 11B-605.1 through 11B-605.4. Urinals provided in urinal compartments shall comply with sections 11B-605.1 through 11B-605.5.

This section goes on to subsections 11B-605.2 height and depth. 11B-605.3, which for everybody's knowledge is clear floor space. A clear floor or ground space complying with section 11B-305 positioned for forward approach shall be provided. Then section 11B-605.4 flush controls is proposed to read Flush controls shall be hand operated or automatic. Hand operated flush controls shall comply with section 11B-309 except that the flush control shall be mounted at a maximum height of 44 inches above the finished floor. Proposed new text reads Urinals provided in urinal compartments shall have hand operated flush controls located on the open side of the urinal.

New subsection 11B-605.5 urinal compartments is proposed to read wheelchair accessible urinal compartments shall comply with 11B-605.5. Compartments containing more than one plumbing fixture shall comply with section 11B-603. This is a long section.

Eric Driever:

So, this is a long section. So, I, what I'm going to propose is that we continue all the way up through maneuvering clearance at 605.5.2, and then we'll pause for comments and then continue with the rest of the requirements and sections.

Michelle Davis:

Okay. So, then subsection 11B-605.5.1, urinal location. Urinals in compartments shall have the center line of the urinal located 17 inches minimum to 18 inches maximum from the side wall or partition. Urinals shall be arranged for a left-hand or right-hand approach.

Section 11B-605.5.2 Maneuvering Clearance is proposed to read a minimum 66 inch wide and 66-inch-deep maneuvering space shall be provided in front of the urinal. A turning space complying with section 11B-304 shall be provided within the compartment. Exception: Where toe clearance complying with 11B-605.5.4 is provided, the required maneuvering space in front of the urinal fixture shall be permitted to be reduced to 60 inches minimum wide and 60 inches minimum deep. And we'll pause there to take comments. Looks like there is a hand raised from Nubyaan.

Eric Driever:

And if it would be helpful, I can bring up the graphic which would be presented as part of this, the figure 11B-605.5. Often that's, that makes it a little bit easier to understand the tech, to understand the words on the code. Understanding though

that this is, that figures are non-regulatory specifically and are really just included to help describe the text.

So, Nubyaan.

Nubyaan Scott:

Yes. Yeah. Thank you, Eric. Again, Nubyaan Scott with Disability Rights California. I just wanted to comment that in the language that says in front of, doesn't specify the proper location of the maneuvering clearance, so, we would suggest changing the language to say something like, the space shall be provided in front of the urinal and centered horizontally 17 inches to 18 inches from the center of the urinal so that it's specified.

And I can copy and paste that language into the chat if it's helpful. But of course, we're gonna provide ultimate, public comment for CBSC. But if it's helpful, I'm glad to put the language into the chat as well.

Eric Driever:

I will, I'll leave that up to you. I will say that we are not gathering as official record, any of the chat items provided. Those specific comments should be provided in writing.

Nubyaan Scott:

Okay.

Eric Driever:

Thank you. Connie, it looks like you are up next. And you're muted, Connie.

Connie Arnold:

Connie Arnold, hold on a second. Thank you.

Eric Driever:

You're welcome.

Connie Arnold:

My comments are in generally speaking is that I, on all the items, I support the comments by Disability Rights California, but including item nine, whether they're verbal or come in writing. Additionally, I support the work that DSA and Eric, you, and the members of DSA, have done to try to make improvements, and particularly in relation to urinal compartments.

So, whether it's all gender, neutral single use, or multiple use restrooms, I support the recommended action on it. But I believe that myself and others still feel further actions are needed concerning the urinal compartments in gender neutral, all-gender restrooms, whether standalone or multiple use facilities as it relates to individuals who use larger motorized wheelchairs and scooters. Because even the turnaround interior space of 66 inches inside the stall, even if we support the proposal, and I say strongly support the proposal as the improvements from the original T-shaped interior design, it still, in our opinion remains a problem because we need more study as far as getting an actual size that's really gonna be usable and provides meaningful access to...

Jessica Axtman:

30 seconds

Connie Arnold:

...to persons with motorized wheelchairs. And also additionally, the lack of the power assist or automatic door, stall door opener to open outward opening toilet urinal compartment stall remains a problem for motorized wheelchair users who have one arm or...

Jessica Axtman:

10 seconds.

And it, it needs to work with the privacy latch, slider latch. Thank you.

Eric Driever:

Thank you Connie. And I recognize that the reminders can be a little bit startling at the moment, but in an interest of time, we appreciate your patience on receiving those reminders. Richard, your hand was up next.

Richard Skaff:

Thank you Eric, and I'll make it very brief. Thank you. I, you all probably know my mind works in strange ways, so I'll just finish with that. In thinking about what you did, and thank you for that, about the size within the proposed urinal stall, the 66, was it 66 I believe you said? Whatever the size that we finally all agreed on, how does that relate to a toilet stall, and should we be then changing the size of an accessible, not an ambulatory, but a non-ambulatory, fully accessible stall to be a minimum of that same size so there's no difference? It is saying by doing that, that the, whether it's a urinal stall or a, a toilet stall or a combination stall, there is a minimum and this is what the minimum is. And they're all the same cause they're all stalls. Thank you.

Eric Driever:

I'll provide a little bit of a background on that. The, as I read in the preamble, regulations that we propose may not be arbitrary, capricious, et cetera. The size of 66 inches actually exists currently in water closets when there is no toe clearance. That the order in which the baseline requirements is worded differently.

So, the baseline requirements in water closets is 60 inches. The exception to that requires one to enlarge that space if there is no toe clearance. DSA recognizes that the urinal compartment in large part, if not completely, will only be used in privacy compartments where there is no toe clearance.

And so, being, remaining consistent with the existing requirements, but making the baseline because of that expectation, 66 inches was an important shift. And so, the exception that was read to the 11B-605.5.2, allows one to reduce it if there happens to be toe clearance. Again, we do not expect urinal compartments to be utilized in anything other than a situation where a privacy, full height privacy compartment or one that compromises the toe clearance would be used.

And so, the baseline was set at 66.

So, with that Andrew Burke, I believe your hand was up next.

Andrew Burke:

Yeah. I just didn't understand the first question about centering the 66-inch maneuvering space on the urinal, which is centered at 17 to 18 inches. I don't understand how you would do that.

Eric Driever:

I think they were talking about the wheelchair space in front of the urinal.

Andrew Burke:

Okay. That a clear floor space?

Eric Driever:

Correct. I believe that was the comment and that came from Nubyaan. We'll review that more thoroughly when she proposes that in her written comment. I believe that was the end, the intent on her comment.

Nubyaan Scott:

Eric, just to clarify based on what you said. This is Nubyaan, again. We're, you're not expecting that we provide addition, like written comment in addition to what we're sending to CBSC directly to DSA, right. You're saying you'll review the comments that are sent to CBSC, correct?

Eric Driever:

Yeah. They'll route all comments to us. I believe Connie, your hand was up next.

Connie Arnold:

Yes. I just have a comment here. I wanted to mention that generally while we're supportive of this, we're concerned also just to make sure that the baby changing tables are not placed in the compartments. We're not interfering with the clear floor space. And also, the concern is also about, some concern was expressed before about the toe clearance exception.

And that's why we need the larger space for mobility devices. And also, I think you've addressed some of that, but we still want further improvements. Thank you.

Eric Driever:

Thank you. And just a quick comment we will be covering, there is a new proposal that was not presented at the Code Advisory Committee that was created in response to the comments provided at the Code Advisory Committee that addresses baby changing stations.

Connie Arnold:

Okay. Thank you.

Eric Driever:

Thank you. Andrew, your hand is still up. I presume that's still up from the previous comment. Thank you.

Jessica, I see no other hands. Can you please confirm?

Jessica Axtman:

I do not see any hands up.

Eric Driever:

Okay. So, we'll go ahead and continue with the rest of this item starting with 11B-605.5.3.

Michelle Davis:

Okay, so we're still on item 15, just for those of you that are shuffling papers. And 11B-605.5.3 Doors is proposed to read urinal compartment doors, including door hardware shall comply with 11B-404 except that if the approach is from the push

side of the compartment door, clearance between the door side of the compartment and any obstruction shall be 48 inches minimum measured perpendicular to the compartment door in its closed position. Doors shall be located in the front partition or in the side wall or partition farthest from the urinal.

Where located in the front partition, the door opening shall be four inches maximum from the side wall or partition farthest from the urinal. Where located in the side wall or partition, the door opening shall be four inches maximum from the front partition. The urinal compartment door shall be out-swinging, self-closing and have a privacy latch.

Door pulls complying with section 11B-404.2.7 shall be placed on both sides of the door near the latch. Doors shall not swing into the clear floor space at the urinal. Doors may swing into that portion of the maneuvering space and turning space which does not overlap the clear floor space required at a urinal.

Exception: When located at the side wall or partition of a urinal compartment, the compartment door opening shall provide a clear width of 34 inches minimum. Section 11B-605.5.4 Toe Clearance. The front partition and at least one side partition shall provide a toe clearance of nine inches minimum above the finished floor, and six inches deep minimum beyond the compartment-side face of the partition, exclusive of partition support members. Partition components at toe clearances shall be smooth without sharp edges or abrasive surfaces. Compartments for children's use shall provide a toe clearance of 12 inches minimum above the finish floor.

Exception: Toe clearance at the front partition is not required in a compartment where the maneuvering clearance in front of the urinal is 66 inches deep minimum. Toe clearance at the side partition is not required in a compartment greater than 66 inches wide.

And then the figure 11B-605.5 has been included and now shows two configurations, a front opening door and a side opening door. The front opening door is titled and opening door in the figure.

Excuse me. And with that, I think we can open it up to comments again.

Eric Driever:

Absolutely. Currently see no hands. Excellent.

Michelle Davis:

All right if there are no additional comments, then we will move on to item 17. This is a new item that was not reviewed at the Code Advisory Committee meeting and is in response to comments received at that time. So, the applicable code section is 11B-216.8. As I said, the topic is toilet rooms signs.

Currently section 11B-216.8. Toilet room and bathing rooms calls for geometric symbols at toilet rooms, at the doors. And we propose to amend section 11B-216.8 to call for both geometric symbols and signs at toilet and urinal compartments. The proposed subsection reads 11B-216.8.1 Geometric symbols. There's no change there.

But then we propose to add section 11B-216.8.2. Identification for all-gender multi-user toilet facilities. Geometric symbols complying with section 11B-703.7.2.6.3 shall be provided at the entrance to all-gender multi-user toilet facilities. In addition, a sign complying with sections 11B-703.1 through 11B-703.5 shall be provided stating quote ALL-GENDER MULTI-USER. End quote.

Section 11B-216.8.3. Signs at toilet and urinal compartments is proposed to read where both toilet compartments and urinal compartments are provided, each individual compartment shall be identified with a sign complying with sections 11B-703.1 through 11B-703.5. Signs shall identify the type of fixture within the compartment, either urinal or toilet. A pictogram identifying the fixture type within the compartment is not permitted.

Exception: A sign with tactile characters shall be permitted on an in-swinging and self-closing door at compartments not required to comply with section 11B-604 or section 11B-605.5.

Eric Driever:

And with that we'll pause. I believe that's the end of the...

Michelle Davis:

That is the end of that proposed section. Again, section or item number 17.

Eric Driever:

So, it looks like Nubyaan and then Connie.

Nubyaan Scott:

Yes, thank you. Nubyaan Scott with Disability Rights California. I wanted to clarify the language that says a pictogram identifying the fixture type within the compartment is not permitted. Is that intended to say, or is the intention or reasoning behind that, that you don't want a pictogram to take the place of the other signage or that, like would you be opposed to both a pictogram and the other signage if people chose to do that? So, that's what I'm trying to figure out.

Eric Driever:

Understood. We, the intent of the language is in recognition that there really are no universally recognizable pictograms for {audio disruption} or a urinal or technically a water closet.

I'm sure many exist. But currently there's no broadly accepted pictogram. Additionally, pictograms have additional requirements specifically required, which would be redundant to the raised text sign provided. Pictograms are additionally required to have braille, which isn't necessarily a conflict, but it is redundant.

Nubyaan Scott:

But is the goal... So, I guess I'm still trying to figure out if you'd be comfortable with people choosing to do, well not comfortable, but if you, if the issue is that you wouldn't want to people to use a pictogram instead of the signage that you've identified?

Eric Driever:

The language is proposed is a prohibition on any pictograms.

Nubyaan Scott:

Okay. Okay. Thank you.

Eric Driever:

Connie, your comment next.

Connie Arnold:

Okay. I think it was of what Nubyaan was raising also as well about the pictograms and the signage for individuals that are develop, have developmental disabilities for them to understand which pictures in which compartment. And, and you're saying that I'm hearing you say is that it's prohibited right now in and has a lot of excessive requirements on pictograms as well.

Eric Driever:

It is. The proposal is to prohibit the use of pictograms. There are no, and the reasoning again is there are no recognizable pictograms for a urinal.

Connie Arnold:

Is that something that would be a potential development by DSA, or would it have to come from outside industry to create a pictogram that would, that could be universally used to identify urinal stalls, compartment stalls.

Eric Driever:

So, the complexity in developing a pictogram requires quite a bit of study. Copyright law analysis, et cetera on pictograms. So, DSA, this proposal would not, this cycle would not be proposing, we do not anticipate proposing pictograms.

The pictograms that are included in the code are part, are part of model code or have been previously used in the code. So, we don't anticipate developing any pictograms.

Connie Arnold:

So, in the all-gender multi-user restroom stalls, what are they using for the signage then? What is being proposed exactly for a, it's just, it's gonna say urinal or it's gonna say toilet to identify which one is the urinal. Is that correct?

Eric Driever:

Correct. And those are specific in quotes to be used specifically. No, no other language would meet the intent of this proposal.

Connie Arnold:

Okay. Thank you.

Eric Driever:

You're welcome.

Michelle Davis:

And do we have any other comments on item 17 Toilet room signs?

Eric Driever:

I see Richard Skaff raised your hand.

Richard Skaff:

Again, based on the 79-year-old mind, could you please clarify whether there will, the tactile signage will include braille as well as raised letters?

Eric Driever:

It does.

Michelle Davis:

Yes, it does.

Eric Driever:

All tactile...

Richard Skaff:

Thank you.

Eric Driever:

Signs..

Richard Skaff:

Thank you.

Eric Driever:

Require braille. You're welcome. I see no other hands. Jessica, do you see any others?

Jessica Axtman:

No other hands.

Eric Driever:

Okay. Thank you. Thank you all for your comments. We'll move on to the next item.

Michelle Davis:

Okay. And this is our final item in the urinal compartment grouping. This is also a new item that was not heard at the Code Advisory Committee hearing.

It is DSA tracking number 18, and the topic is Baby Diaper Changing Stations in Urinal Compartments. Current code language for baby diaper changing stations is found at section 11B-226.4 and reads Baby diaper changing stations shall not be located in toilet compartments complying with section 11B-604.8 within a multiple accommodation toilet facility.

We propose to amend the language of section 11B-226.4 to read, pardon me a minute. Okay. We propose to amend the section to read Baby diaper changing stations shall not be located in toilet compartments complying with section 11B-604.8 or urinal compartments complying with section 11B-605.5 within a multiple accommodation toilet facility.

It's as simple as that. So, we are simply adding a prohibition against baby diaper changing station in accessible urinal compartments as well.

Eric Driever:

Mr. Skaff, I see your hand is raised and then we'll go to Connie Arnold.

Richard Skaff:

This is another one of those I wish we had also statements. I have no problem with what's being proposed. My concern is that we continue to allow a vast number of baby changing table product with no specific standards on how they are opened to be used.

That is problematic. There, there is a variation. They, many of them require stiff fingers and a hand to be able to operate the, open them in the way the manufacturer intended. And again, there is a vast variation of systems used. I again ask the DSA create some way to bring industry in to create some standardization by code, that no matter which manufactured product it is, it's still gonna be accessible.

And I've gotta say, many of the baby changing tables are now presently not accessible because of the type of opening system that requires grasping.

Eric Driever:

Thank you, Richard. Connie.

Connie Arnold:

I support the comments by Richard Skaff, Connie Arnold, and I would still like to make sure that in the future that enforcement doesn't allow those baby changing stations in the toilet or urinal compartments because they tend to not be enforcing the code very well. And that is a concern. But baby changing stations do need to be accessible, and I think that needs to be considered as far as when we're looking at urinal and compartments and toilet compartments for the future, for accommodating larger motorized wheelchair and scooters for that issue as well.

So, it can be contained in a space that eventually people could easily use and not have separate different facilities. Thank you.

Eric Driever:

Thank you, Connie. Richard, is your hand up again or?

Richard Skaff:

It, it is, it's up again, Eric and I'll make it very quick. Connie raised a very important issue that relates to not just DSA's code writing and adoption process, but to every code writing agency in the state. What Connie just said relates to the end enforcement user of the codes you develop.

There's a huge problem, and the problem is, as you, I'm sure know, Eric, these code changes over the years have become massive for any, anybody to be able to manage that at a building department is overwhelming. And for smaller building departments, impossible. Where, where there's a building official and maybe one building inspector that are responsible for not only doing all the plan check and building inspection, but also understanding what the present code requirements are. Is there any way that there could be a standardized way you, as DSA, would consider and support the other code writing agencies to do a bullet point summary every time code changes occur, yours in this case, sent out to building officials throughout the state through CALBO or whatever way you want to do it.

Jessica Axtman:

30 seconds.

Richard Skaff:

They will also get, of course, their package of code changes in the code that will go into their code document binders. I'm talking about an email from DSA and the other code writing agencies that says, we have just had a proposed code change that has been adopted. Here are the bullet point code changes.

It would make it very...

Jessica Axtman:

10 seconds.

Richard Skaff:

Very much more simple for them to better understand, oh, we've got some, we've got some new ones here, or there have been changes to existing. Thank you.

Eric Driever:

Connie, your hand is still up. Let me respond briefly. Oh, thank you. I'll respond briefly to Richard. We do publish a summary of code changes each cycle and publish it online for the availability of, of various entities whether it's school districts or building officials to download.

We do not publish or send an email to each of the building officials in the state. But we do make that list available to them via download.

I believe, let's see. So, we are at 11:24 and we had talked about having a 90-minute break. This seems like a good spot to take a break since we have wrapped up the grouped items on urinal compartments and all-gender multi-user facilities. So, I will propose that we take a brief 10-minute break and come back at 11:34 and we will continue to present the remainder of the agenda starting, I believe with the proposals on multi-family dwelling units.

And subsequent to that, we will follow up with just an open, sort of open forum in mass comment period where you will be given the opportunity to comment on any of the other items that are in the DSA Access provisions proposals. So that, it's now 11:25. So, let's make that 11:35.

We'll reconvene in this room. Thank you.

Richard Skaff:

You mean 12, 12:35, don't you?

Eric Driever:

No. 11:35.

Michelle Davis:

Just a brief 10-minute break.

Eric Driver:

We're just gonna take a brief 10-minute break since we're at the 90-minute mark, Richard.

Richard Skaff:

Thanks, Eric.

Eric Driever:

All right. Thank you. We will take a lunch, if, if we need to continue beyond the next break, and we'll decide that at that point.

Break

Eric Driever:

Welcome back everybody. We are a little bit tardy, apologize, still trying to work through some of the technical issues. I had shared the agenda just to baseline where

we are at now. So, we are at item or agenda item 4B, and we will go over the residential dwelling units with adaptable features, item 11.

And then subsequent to receiving public comments on that item, we will address all other comments on all other items, specifically items one through eight. Again, two has been withdrawn. Item 10, 12, 13, and 16. And once we've finished with those, then we will be able to adjourn. So, without further ado, I will bring up item number 11 on public housing and let, oh, sorry. Before we start, I see Connie, you have your hand raised.

Connie Arnold:

Could you just repeat again which items are not, have they been pulled, or?

Eric Driver:

Item number two has been pulled. And I'm struggling with....

Michelle Davis:

That was the definition of the elevator buildings.

Eric Driver:

Correct. So, it's in relation to this proposal number 11.

Michelle Davis:

And we withdrew that one because we've made additional changes to item number 11, which we're about to go through.

Connie Arnold:

Thank you.

Eric Driver:

Okay. Thank you, Connie.

Michelle Davis:

Okay. That being said, I will explain something first about item number 11. People were having a bit of a hard time understanding the overall section of 11B-233.3, and so when we printed the proposal, we added subsections 11B-233.3.1.2.4, and .5 to the proposal.

However, there are no additional proposed changes to them. The text is nearly there for context. So that being said, the proposal looks much longer than it was, but it is

not actually significantly longer because we've simply included more information to make it more clear.

So, 11B-233 Public Housing Facilities. Our proposal is addressing specifically residential dwelling units with adaptable features. We are not proposing any changes to residential dwelling units with mobility features. The beginning of the changed section starts at 11B-233.3.1.2. Residential dwelling units with adaptable features. The proposed revised language reads in buildings with three or more residential dwelling units, adaptable residential dwelling units. I think you wanna scroll to the next section. Adaptable residential dwelling units complying with sections 11B-809.6 through 11B-809.12 shall be provided as required by sections 11B-233.3.1.2.1 through 11B-233.1.2.6. Adaptable residential dwelling units shall be on an accessible route as required by section 11B-206.

Exception: The number of required adaptable residential units shall be reduced by the number of units required by section 11B-233.3.1.1.

The bulk of the changes begins at section, subsection 11B-233.3.1.2.1 Elevator buildings. A residential building with one or more elevators shall have an elevator serve all floors with a residential dwelling unit entrance and all floors with common use spaces. Elevators shall comply with section 11B-407. Residential dwelling units on floors served by an elevator shall be adaptable.

Exceptions: Number one, a building with only an elevator that serves a parking garage or building entry level not containing residential dwelling units to the first ground floor above grade containing residential dwelling units. Exception two, a building with a multi-story residential dwelling unit with an elevator within the unit. Subsection 11B-233.3.1.2.2 is proposed to have the title changed to ground floor residential dwelling units and proposed to read ground floor Residential dwelling units shall be adaptable. A building may have one or more ground floors.

The remaining subsections 11B-233.3.1.2.3 Ground floors above grade. 11B-233.3.1.2.4. Multi-story residential dwelling units in buildings with one or more elevator. And 11B-233.3.1.2.5. Multi-story residential dwelling units in buildings with no elevator, do not have proposed changes, but those are the sections that were included for clarity in this proposal.

That being said, we can open it up to comments. If you have something you'd like to say, please raise your hand.

Eric Driever:

I'm seeing no hands raised. Jessica, can you confirm?

Jessica Axtman:

I see no hands raised. Oh, Nubyaan.

Eric Driever:

Nubyaan Scott.

Nubyaan Scott:

Yes, thank you. Sorry for the late hand raise. Nubyaan Scott with Disability Rights California, I just wanted to state that we very strongly support these proposed changes and think that they will provide clarification and will help ensure accessibility. So, thank you.

Eric Driever:

And I, I see Connie's hands raised. I'd like to maybe pause and thank Nubyaan and Disability Rights California for the proposal. This proposal was provided to us by them, and really it worked very strongly at helping us to develop this proposal. So, I'd like to extend our thank you to and your constituents for that input.
Connie.

Connie Arnold:

I'd just like to support what Nubyaan Scott had said from Disability Rights California on this. And my only concern is that, you know, what we're seeing is a lot of the developments are interested in, starting the residential, like I could say this is in Elk Grove, that they had tried to start the housing units on the second floor and then this was a way of getting around other issues about putting in affordable housing. That's all my comment is. Thank you.

Eric Driever:

Thank you. Connie.

I do not see any other hands raised. Jessica, can you confirm?

Jessica Axtman:

No other hands.

Eric Driever:

Alright, thank you. So, with that, as I mentioned, we would open the floor up to a more en mass, general comment period. Or anybody wishing to provide comments on items not specifically covered in or described in this meeting, but that are part of our proposal package.

We, in the interest of time again, we would appreciate comments being specific QA proposals so that we can, manage the, this code proposal package in the 45-day comments. I will say that it looks like Connie, either your hand is still raised or that you have a comment on another item.

Michelle Davis:

Before we open it up to comments though...

Eric Driever:

Go ahead.

Michelle Davis:

If you want to go to the bookmarks on the screen, will be, should be easy to navigate on the item numbers as people choose to comment on them.

Eric Driever:

Perfect. Thank you. All right, so Connie's lowered her hand. So, it looks like Tim, and I assume that's Tim Thimesch?

Tim Thimesch:

Hi. I just wanted to comment on 16. Much of what I was said, was said before the interim committee, that item 16 again is supposedly clarifying that adaptable units with transfer showers or that could be adapted to transfer showers would only have to have a landing that's 30 inches wide. That's smaller than the 36 inches for public housing. That's smaller than the 36 inches for public accommodations like hotels. Is smaller than what the US Access Board shows is needed to make a transfer.

Again, my comments is, this was a legislative bargain proposed by DSA. It was a legislative bargain accepted by the community. It provided a way to get in and out of transfer showers. The language is literally lifted. The language that you guys are asking to excise from the code was literally lifted from the definition of transfer showers for public housing, word for word.

You, you said, okay, we're gonna follow this definition of transfer showers. Now you guys want to take that out. The beginning and endpoint here is, is it usable? And somewhere, somebody from industry, I presume...

Jessica Axtman:

30 seconds.

Tim Thimesch:

...came to you folks and said, hey, this is a conflict. And you chose less usability instead of more. I would like to know the considerations that went into DSA's mind in choosing less. Adaptable units do not have to be different than public housing. We are the same...

Jessica Axtman:

10 seconds.

Tim Thimesch:

We choose more accessibility, not less. And so, I would like DSA to be a leader. I don't see why this proposal needs to go forward.

Last time when we suggested you should choose greater accessibility, you said now we're stuck. We already proposed last. We'd have to start all over. Well, that's not true. You guys have made a lot of changes here to the code, to adapt to the comments. So that's what I have to say. Thank you so much.

Eric Driever:

Thank you, Tim. Andrew. Andrew Burke.

Andrew Burke:

Hello. I'm just curious about tracking number 13. It's a revised diagram for parallel curb ramps. It seems to me it should include the changes for detectable warnings and the pass-through requirements in 11B-705.1.2.2.2.1 where you know, for all intents and purposes, you're really gonna need 72 inches, not 48 inches total width on these ramps.

Eric Driever:

So, the current proposal is really just to align two figures in the figure. But having received the comment, we will look into that in potentially another code cycle to clarify if needed.

Andrew Burke:

Okay.

Eric Driever:

Nubyaan Scott, your hand is raised.

Nubyaan Scott:

Yes. Thank you. Nubyaan Scott with Disability Rights California. I just wanted to broadly support Tim's comments regarding item 16 and just also reiterate, which we have in the past to DSA already stated that we are also strongly opposed to the change for showers.

I think the primary reason is because while I understand that DSA acknowledges it as an unintentional change to the code and you feel like you're just recorrecting that. I think in application, to my understanding, there has already been housing built under those, with that, with those higher accessibility showers in mind and or in place. And so, it in effect does decrease accessibility. And of course, we're opposed to that because of our representation of the disability community. So, I just wanted to state that. Thank you.

Eric Driever:

Thank you, Nubyaan. Mr. Skaff, Richard.

Richard Skaff:

Thank you. Thank you, Eric. This argument about what an accessible roll in shower is, has been going on for a number of years. Prior to your being at DSA, Eric, it's been bandied about that we had to meet the requirements by the feds. And the disability community came out rather strongly and said, do not remove the 42 by 48 shower, down to the 36 by 36-inch shower or smaller because we can't transfer. We can't get our, to the many different options we would have with the, that the 42 by 48 shower allowed as a transfer shower.

The smaller shower does not provide those alternatives, and not everybody transfers exactly the same way. And that's what we have assured is going to be available to people is only one way of transferring. And I know why it was done. DSA listened to the contractors, the developers, the people who said we need, by having the large shower, it takes up more room, and therefore we have less units that we can build.

Well. So, what are we basing access on?

Jessica Axtman:

30 seconds.

Richard Skaff:

Contractor's desire or true accessibility for people with disabilities? So, I'll leave it with that. I'm not happy with this and I don't support it.

Michelle Davis:

Thank you, Richard. It looks like Connie Arnold is next. Connie, please go ahead.

Connie Arnold:

Connie Arnold, disability rights Advocate. I concur with the statements made by Tim Thimesch, Nubyaan Scott from Disability Rights California and Richard Skaff, a longtime access expert. And as a person who had formally been in an apartment and

know people in apartments, with the housing explosion going to be happening with all of the need for adapt, and with all the need for affordable and low income housing, particularly for the homeless and people with disabilities and with things coming down on a federal level to ensure accessibility and the non-exclusion of persons with disabilities from public housing and af, and low income housing, affordable housing from HUD, it behooves you to not move forwards with this proposal to try to correct a code error that was, that may have been made by allowing new construction to go forth that would reduce access for people with disabilities at a time of critical need.

When reports show that the greatest number of individuals becoming homeless are 50 years and older and are seniors and are needing more accessibility to reduce the standard to an unusable situation just to meet a business requirement of wanting to save money and provide less...

Jessica Axtman:

30 seconds

Connie Arnold:

Square footage of access, that is a problem.

So, I would ask that this not go forwards, and if it does go forwards, I assure you I'm going to be putting this out to the community for them to strongly oppose this change. Thank you so much.

Michelle Davis:

Thank you, Connie.

Eric Driever:

Thank you, Connie. I see no other hands raised. Jessica, can you confirm?

Jessica Axtman:

No other hands raised.

Eric Driever:

Well, it is just before noon. So that is the end of our agenda items. I, DSA greatly appreciates all of the feedback that we've received on these items. We, as I mentioned in the preamble, this is part of the 45-day public comment period. You have the ability; we have taken notes and will be responding to comments provided to us in this public hearing.

As part of our 45-day package. If you provide written comments to Building Standards Commission consistent with their requirements, you can go to Building Standards, commission's webpage to, to submit those comments. We would of course be forwarded those comments and include responses to those as well as part of our 40, as part of our final package to Building Standards Commission.

So, I'd like to thank everybody for your attendance. This has been a great greatly attended meeting. To one of Richard's earlier comments when we were struggling with the, the technology, I'll say that we've had over 30 folks in attendance to this meeting, which greatly exceeds attendance that we had prior to remote meetings. So, in certain ways, technology certainly has helped expand the ability for us to receive comments in forums such as this as opposed to a an in-person meeting. I see our state architect has gone on camera. I presume that, although she hasn't raised her hands, I presume that Ida Clair may have something to add.

Ida Clair:

I would've raised my hand. Thank you, Eric. I just wanted to thank everyone for coming and I was listening in so, appreciate the comments. Thanks.

Eric Driever:

Thank you, Ida. So, with that, we will adjourn. Thank you everybody. And you get the rest of your afternoon off. The weather seems to have a break, so please enjoy the day. Thank you.