

From: [Eric McSwain](#)
To: CBSC@DGS
Cc: [Clair, Ida@DGS](mailto:Clair_Ida@DGS)
Subject: RE: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Eric McSwain
Date: Monday, April 24, 2023 7:13:23 PM

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To whom it may concern,
I would like to submit the following comments regarding proposed changes to CBC Section 11B-809.10.6.1, Item 1

Proposed Building Standard
Title 24 Part #: Part 2
Section #: (ET Item 16) 11B-809.10.6.1, Item 1
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):
Approve as Amended

9 Point Criteria Info:
18930(A) 1

The proposed change to 11B-809.10.6.1, Item 1 eliminates the reference to the 11B-608.1 requirements for transfer showers, and instead relies on the simple statement of dimensions provided in 11B-809.10.6.1 and the requirements that follow in subsequent subsections of 11B-809.10.6 for surface slope, floor space, wall reinforcement for grab bars, thresholds, control height, and enclosures.

Here is the current language:

***"11B-809.10.6.1 Size.** When one or more shower stalls are provided within the same dwelling unit, as least one shower stall shall comply with one of the following:*

- 1. A transfer type shower compartment 36 inches (914 mm) wide by 36 inches (914 mm) deep with an entrance opening 36 inches (914 mm) complying with Section 11B-608.1; or ..."*

Chapter 11A, Section 1134A.6, Item 1.1, which is the corresponding section to 11B-809.10.6, calls for a shower stall that is 42" wide x 48" deep minimum. This so-called California shower is not a "transfer type shower".

A "transfer type" shower is a very specific type of shower with exacting requirements for clear floor space, a fixed seat, controls and grab bar location that are not included in 11B-809.10.6. It is a mistake, I think, to eliminate the reference to the requirements of 11B-608.1, if the 11B-809.10.6.1, Item 1 shower is identified as a "transfer type".

Please consider leaving 11B-809.10.6.1, Item 1 as it is, with the reference to 11B-608.1.

Or consider adding a subsection to 11B-809.10.6 that calls for wall reinforcement for a fixed shower seat, at least in the 36"x36" shower. Perhaps something like this:

11B-809.10.6.8 Reinforcement for a shower seat. *In 36"x36" showers, continuous reinforcement shall be installed in the wall opposite the control wall 2 inches (51 mm) maximum to 18 inches (457 mm) minimum above the finish floor. The shower seat reinforcement shall be 16" minimum in height.*

Or consider removing "transfer type" from 11B-809.10.6.1, Item 1:

11B-809.10.6.1 Size. *When one or more shower stalls are provided within the same dwelling unit, at least one shower stall shall comply with one of the following:*

- 1. A shower compartment 36 inches (914 mm) wide by 36 inches (914 mm) deep with an entrance opening 36 inches (914 mm) complying with Section 11B-608.1; or*

...

Lastly, if the 11B-809.10.6.1, Item 1 shower will not be a transfer type, consider calling for the dimensions to be minimums so that larger showers may be provided:

11B-809.10.6.1 Size. *When one or more shower stalls are provided*

*within the same dwelling unit, as
least one shower stall shall
comply with one of the following:*

- 1. A shower compartment 36
inches (914 mm) minimum
wide by 36 inches (914 mm)
minimum deep with an
entrance opening 36 inches
(914 mm) minimum wide; or*

...

Thank you,
Eric

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