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**To:** [CBSC@DGS](mailto:CBSC@DGS); [akiko.nishino@disabilityrightsca.org](mailto:akiko.nishino@disabilityrightsca.org)  
**Subject:** PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Akiko Nishino  
**Date:** Friday, June 30, 2023 3:11:44 PM

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Commenter Contact Information

Name: Akiko Nishino  
Date: 6/30/2023 12:00:00 AM  
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Proposed Building Standard

Title 24 Part #: Part 5  
Section #: Chapter 4, Section 422.2  
Proposing State Agency: DSA  
This comment is intended for review during: 15-Day Comment Period

Your recommendation based on the criteria of Health and Safety Code Section 18930(a):  
Approve

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.

Please see DRC letter submitted 6/30/23 via e-mail for complete comments.

We strongly support the proposed code and commend the Agency on their responsive changes to DRC's previous comment letters, as well as previous discussions with disability advocates and the transgender, gender-variant, and intersex (TGI) community. The change to provide further flexibility in the code to account for persons with disabilities who may need additional turning space in urinals. Further, it takes into consideration that LGBTQIA+ community members may also be disabled...

We recommend Item 2, section 422.2(2) and section 422.2(3) include a substitution of the language "both sexes" to "all genders," to ensure the language uniform with state statutory language. This modification to use the phrase "all genders" reflects the current statutory language of "all-gender toilet facilities" originally proposed under AB 1732 in 2016, and codified in 2017 under Health & Safety Code Section 118600 et seq. The change will also create consistent language throughout the section. See HSC subsections 118600(a-d), 18930(a)(1), 18930(a)(2), 18930(a)(3), and 18930(a)(4).

Contractors should remember to follow the applicable California Building Code in tandem with the Plumbing, Electrical, Mechanical & Energy codes for full accessibility standards.

Please see DRC letter submitted 6/30/23 via e-mail for complete comments.

9 Point Criteria Info:

18930(a) 1