

From: [DGS Website@DGS](mailto:DGS_Website@DGS)
To: CBSC@DGS; nubyaan.scott@disabilityrightsca.org
Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Nubyaan Scott
Date: Monday, June 5, 2023 5:11:27 PM

Commenter Contact Information

Name: Nubyaan Scott
Date: 6/5/2023 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: Division of the State Architect - Structural Safety
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.

We support changes that use the phrase “all genders” where possible, to better reflect the various expressions of gender identity. Further, we understand the agency’s attempt to address privacy concerns in facilities that serve all genders, based on the feedback received at the All-Gender Plumbing Code Workshop on July 19, 2022. However, we are concerned about the possibility of privacy compartments with full-height walls, pre-manufactured panel systems and doors, or floor-to-ceiling doors, if they are to be used in accessible urinals. Disability Access Advocates have continually expressed concerns to Disability Rights California about the need for enough turning space, especially for wheelchair footrests that may limit access for wheelchair users attempting to turn freely while adjusting themselves to use urinals. A lack of openings at the bottom of privacy compartments may directly impede turning space for people with disabilities using accessible urinal compartments. Thus, if such privacy compartments are required with accessible urinals, the agency should strongly reconsider modifying the proposed language to remove floor-to-ceiling and full-height requirements as referenced above. See HSC subsections 18930(a)(1), 18930(a)(2), 18930(a)(3), and 18930(a)(4).

9 Point Criteria Info:
18930(a) 1