



City of Santa Barbara
Community Development

Memorandum

DATE: November 19, 2019

TO: Building & Fire Code Board of Appeals

FROM: Andrew Stuffer, Chief Building Official

SUBJECT: Staff Report – Board Comments on Two New Division Accessibility Policies

Attached are two new Division policies that will go into effect January 1, 2020. These policies were drafted after consulting with Certified Accessibility Specialists program (CASp) individuals from within the City's Building & Safety Division and outside of the City.

Path of Travel Improvements

This policy allows a designer to apply the costs of providing an accessible Path of Travel element (entry, restroom, parking stall, etc.) in an alteration, where no equally accessible feature currently exists, towards the State mandated Path of Travel improvements. With few exceptions, the value of those improvements must be 20% (or more) of the adjusted construction costs. When reaching out to CASps around the State, it appears that half of the CASps agree with this policy and half feel that new construction must meet the current accessibility standards and thus, should not be included in the 20% Path of Travel improvement obligation.

Common Restroom Plumbing Fixture Analysis

Whenever an alteration is submitted for a space that relies upon common use restrooms, the City asks the designer to confirm that there are sufficient common use restroom fixtures to support the proposed alteration's plumbing fixture demand. This necessitates that the designer determine the plumbing fixture needs of every other tenant that relies upon the common use fixtures based on the Plumbing Code that was in effect at the time of each of those tenant improvements. This policy offers the designer the option to either submit their plumbing fixture analysis to Building & Safety for review or to make a statement on the approved plans and receive City approval for use of common use plumbing fixtures without having to show the City the analysis demonstrating that the common use fixture count is sufficient for the proposed alteration or improvements.

Our office asks that the Board review and comment on these policies so that our office can take the Board's comments into consideration as we prepare for official implementation of the policies as noted above.



City of Santa Barbara
Community Development Department

DATE: January 1, 2020
TO: Division Admin File
FROM: Andrew Stuffer, Chief Building Official
SUBJECT: Path of Travel (POT) Improvements Policy

With only a few exceptions, it is the intent of the State Building Standards Code, Part 2, Volume 1, Section 11B-202.4 to require that certain existing building POT elements be brought into compliance with the current State Building Standards Code in an amount of at least 20% of the adjusted cost of construction for the entire project.

The adjusted cost of construction for all non-compliant existing building POT elements that are proposed to be removed and replaced as part of an alteration shall be allowed to be included as part of the mandatory 20% POT improvement.

This policy applies to all building permit applications or permits in any active status.



City of Santa Barbara
Community Development Department

DATE: January 1, 2020
TO: Division Admin File
FROM: Andrew Stuffer, Chief Building Official
SUBJECT: Common Use Restroom Plumbing Fixture Analysis Policy

When common use plumbing fixtures are relied upon to serve any or all of the plumbing fixture needs prescribed by the State Building Standards, the analysis and confirmation of the adequacy of the common use fixtures (quantity, type, accessibility) shall be the responsibility of the licensed professional proposing the use of the common use fixtures for their project. The following statement will be accepted as confirmation of State Building Standards Code compliance relative to the confirmation of the quantity, type and accessibility of the existing common use restrooms:

"I, as the licensed design professional for this project, have researched and believe that the quantity, type and accessibility of the available common use restroom fixtures meets or exceeds the minimum State Building Standards for this project and the existing spaces that already rely upon the same common use plumbing fixtures."

This policy applies to all BLD cases permits in any status.