



## Casper Development Resources

5360 Jackson Drive, Suite 114 | La Mesa, California | 91942

November 7, 2012

Jim McGowan  
California Building Standards Commission  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA 95833

Re: Comments on Proposed 2013 California Building Code - DSA-AC

Dear Mr. McGowan:

I would like to submit the following comments regarding the proposed revision of the California Building Code submitted by the Division of the State Architect Accessibility Committee (DSA-AC):

1. Figure 11B-404.2.4.1 (k) shows that 50" minimum is required on the push side of the latch approach, push side, door provided with closer.

This figure is in direct conflict with Table 11B-404.2.4.1 which states that 44 inches shall be provided plus 4 inches if closer is provided. This table would only require 48" of clearance rather than the 50" shown in the figure.

I encourage the BSC to correct this and revise Figure 11B-404.2.4.1 (k) to show 48" to match the table.

2. Figure 11B-404.2.6 (a) and (b) show 52 min between doors. However, 11B-404.2.6 states that only 48" is required. The existing 2010 CBC Figure 11B-30 and 11B-31 show 48" between doors and the Initial Statement of Reasons provided for this section states it is being change to conform with the existing 2010 CBC.

I encourage the BSC to revise this back to 48" in conformance with the existing 2010 CBC.

Thank you for considering my comments. I can be reached at (619) 741-1080 with any questions.

Sincerely,

Neal Casper  
California Certified Access Specialist (CAsp#020)