

STATE OF CALIFORNIA
GOVERNMENT OPERATIONS AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
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Office Use Item No. _____

PARTICIPATION COMMENTS FOR THE NOTICE DATED MARCH 21, 2014
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: MAY 5, 2014

Date: 04/25/2014

From: Eugene Lozano, Jr.

Name (Print or type)

(Signature)

-- California Council of the Blind

Agency, jurisdiction, chapter, company, association, individual, etc.

4537 Sycamore Ave Sacrament CA 95841
Street City State Zip

I/We (do)(**do not**) agree with:

[] The Agency proposed modifications As Submitted on Section No. 11B-703.4.2 Location, Exception

and request that this section or reference provision be recommended:

[] Approved [] Disapproved [] Held for Further Study [] Approved as Amended

Suggested Revisions to the Text of the Regulations:

11B-703.4.2 Location. (...)

Exception: Reserved. In alterations where sign installation locations identified in Section 11B-703.4.2 are obstructed or otherwise unavailable for sign installation, signs with tactile characters shall be permitted on the corridor wall found outside of the recessed area or alcove. The tactile sign permitted in the corridor shall be on the latch-side of the door. If there are no corridor walls available, then the tactile sign is permitted on the push side of doors with closers and without hold-open devices.

Reason: [The reason should be concise if the request is for “Disapproval,” “Further Study,” or “Approve As Amend” and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

The California Council of the Blind wishes to maintain the predictability of locating tactile signs on the latch-side of the doors, including when space is not available immediately adjacent to the door. The placement of the signs on the corridor wall outside of the recess area or alcove is the first step that should be taken before placing the sign on the push-side of the door with closers and without hold-open devices.

Immediately placing the sign on the push-side of the door when there is no space on the latch-side of the door undermines more than 20 years of training persons with visual impairments as to where to find a tactile sign in hotels and other transit facilities. Also there is the benefit of having the sign in the corridor due to better lighting which increases readability for persons who have low vision.

HEALTH & SAFETY CODE SECTION 18930

SECTION 18930. APPROVAL OR ADOPTION OF BUILDING STANDARDS; ANALYSIS AND CRITERIA; REVIEW CONSIDERATIONS; FACTUAL DETERMINATIONS

- (a) Any building standard adopted or proposed by state agencies shall be submitted to, and approved or adopted by, the California Building Standards Commission prior to codification. Prior to submission to the commission, building standards shall be adopted in compliance with the procedures specified in Article 5 (commencing with Section 11346) of Chapter 3.5 of Part 1 of Division 3 of Title 2 of the Government Code. Building standards adopted by state agencies and submitted to the commission for approval shall be accompanied by an analysis written by the adopting agency or state agency that proposes the building standards which shall, to the satisfaction of the commission, justify the approval thereof in terms of the following criteria:
- (1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.
 - (2) The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.
 - (3) The public interest requires the adoption of the building standards.
 - (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
 - (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
 - (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
 - (7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.
 - (A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.
 - (B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.
 - (8) The format of the proposed building standards is consistent with that adopted by the commission.
 - (9) The proposed building standard, if it promotes fire and panic safety as determined by the State Fire Marshal, has the written approval of the State Fire Marshal.