

STATE OF CALIFORNIA  
GOVERNMENT OPERATIONS AGENCY  
CALIFORNIA BUILDING STANDARDS COMMISSION  
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Office Use Item No. HED 01/A  
Received 4/22/14

**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: 4-22-14

From:

Olivier Baviere  
Name (Print or type)

  
(Signature)

-- City of San Jose, Building Division

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

200 E Santa Clara St, Ste T2      San Jose      CA      95112  
Street                                  City                                  State                                  Zip

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

The Agency proposed modifications As Submitted on Section No. 1117A.2

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:**

2. Exits in excess of those required by Chapter 10, and which are more than 24 inches (610 mm) above grade.

The proposed language adds ambiguity to the code when compared to the proposed added language to 1110A.1 #1 and should be disapproved. CBC 1110A.1 correctly states "The accessible route shall be the most practical direct route and to the maximum extent feasible, coincide with the route for the general public and building residents." Some will argue that paths which coincide with an 'excessive' exit is not required to be made accessible. This will result in reducing accessibility to and within the site. Additionally, this proposed language would be used to allow non-accessible private entrances to units served by a corridor or other common space contrary to example 3 of DOJ/HUD statement Q35. See sample site plan. I would support language accepting a reasonable distance to between a non-accessible an accessible path, like 200' as used by 11B-206.2.3.2.

