

August 26, 2015

To: Jim McGowan, Executive Director,  
California Building Standards Commission

I'm a Senior Civil Engineer and work for the California Department of Transportation, (Caltrans); I'm involved with accessibility standards and policies for our Department. I am designated the liaison to work closely with the Federal Highway Administration and DSA. Here's our comments.

Item 11B.25, 11B-403.5.1.1 Sidewalks and Walks: Support. Numerous times, in highway projects, Caltrans and local agencies encounter above ground features in sidewalks that have been in place under the Federal clear width standard of 36 inches. Features such as light poles, traffic signal poles, utility poles, etc., are necessary in the public rights-of-way, but may not allow 48 inches of clear width due to the restricted width of available public rights-of-way. This momentary reduction of clear width is reasonable.

Item 11B.41, 11B-503.6 Identification: Support. The ISA sign is not required in the 2010 ADA Standards (Federal Code) for passenger loading/unloading zones. The current requirement in the CBC causes confusion with drivers who are aware that the ISA sign means for the exclusive use of disabled persons, per the California Vehicle Code. I am aware of a City that removed the ISA sign from a newly built passenger loading/unloading zone because of drivers believing that it would be for the exclusive use of disabled persons; also the placement of the ISA sign in passenger loading/unloading zones is not authorized in the California Vehicle Code.

Item 11B.47, 11B-705.1.1.1 Dome Size: Oppose. The proposed dome height change to 0.2 inch is absolute. Although, this is consistent with the current Federal dome height standard, it provides a broader range of dome heights due to the rounding compared to the existing range language of 0.18 inch to 0.22 inch. The proposed 0.2 inch is to the 1/10 inch accuracy standard. Basic mathematical rounding is allowed from the 1/100 measurements to the 1/10, when the standard is to the 1/10 accuracy as in this case. Therefore, when judging dome height compliance, dome height measurements from our Lab given in the 1/100 such as 0.16 can be rounded to the 1/10 accuracy of 0.2 inch. Likewise, a measurement of dome height of say 0.24 can be rounded to 0.2 inch. So the proposed change in the Code will actually result in a broader range of dome heights that are allowable (i.e., 0.16 inch to 0.24 inch) compared to the existing range of 0.18 inch to 0.22 inch. I coordinate and approve the Detectable Warning Products for our Department and the existing range of 0.18 inch to 0.22 inch has been in the CBC for 20 some years and has been the basis of approvals/denials. Although, the ADA allows for construction industry tolerance, there is no tolerance specified for dome heights, according to the Federal Highway Administration. The existing range of 0.18 to 0.22 inch acts as the tolerance, per the ADA when a range is specified; this covers all the many types of materials that detectable warnings come in. The existing range is a more narrow range than what the proposed Code change is supposed to accomplish, but it will have the opposite effect. Please keep the existing Code language.

Thank you

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