

STATE OF CALIFORNIA
DEPT. OF GENERAL SERVICES - GOVERNMENT OPERATIONS AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
2525 NATOMAS PARK DR., SUITE 130
SACRAMENTO, CA 95833
(916) 263-0916 Phone
(916) 263-0959 Fax
Email: cbsc@dgs.ca.gov

Office Use Item No. _____

PARTICIPATION COMMENTS FOR THE NOTICE DATED AUGUST 14, 2015
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: SEPTEMBER 28, 2015

Date: 9-26-15

Eugene Lozano Jr.

From: Eugene Lozano Jr.

Name (Print or type) (Signature)
California Council of the Blind

Agency, jurisdiction, chapter, company, association, individual, etc.
4537 Sycamore Avenue Sacramento CA 95841

Street City State Zip

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

The Agency proposed modifications As Submitted on Section No. 11B-703.7.2.6.4

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-703.7.2.6.4 Edges and vertices of geometric symbols. Edges shall be eased, rounded or chamfered to a maximum of 1/16 inch (1.59 mm). Vertices shall be blunt, with a maximum radius of 1/8 inch (3.2 mm).

Reason: The California Council of the Blind (CCB) is in full support of substituted text for Section 11B-703.7.2.6.4 proposed by Sharon Toji of Access Communications Inc. The reasons for supporting the substituted text are:

1. The purpose of the text is to ease the edges and corners of the symbols so that someone touching the edge of the sign or the vertex of a triangle cannot get a finger cut or pricked.
2. The 1/4 inch thickness of the symbol and the vertices of the triangle serve a specific purpose in allowing the person who is blind to quickly identify by touch the shape of the symbol, with either a straight or curved edge denoting either a male or female gender-specific facility. If both the inner and outer edges of the 1/4 inch thick material are chamfered by 1/8 inch, the material is no longer 1/4 inch thick at the edge where it is felt. Therefore, we believe that the DSA proposed text is counter-productive to the purpose of the symbol.
3. It is not necessary to use a 1/4 inch radius for the points of the triangle to make them safe to touch. Blunting them by 1/8 inch is more than adequate and they cannot then be mistaken as curved edges by a quick touch.

[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.]

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.