

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
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Office Use Item No. _____

PARTICIPATION COMMENTS FOR THE NOTICE DATED OCTOBER 26, 2012
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: DECEMBER 10, 2012

Date: December 10, 2012

From:

Edric Doringo

Name (Print or type)



(Signature)

City of San Diego – Public Works Engineering

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

600 B Street, Suite 800 San Diego, California 92101

Street

City

State

Zip

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

The Agency proposed modifications As Submitted on Section No. _____

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:

PLEASE SEE COMMENTS IN THE ATTACHED.

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.]

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.

Proposed Changes to California Building Code, Access Standards

Comments by PW-Engineering ADA Curb Ramp Committee

December 10, 2012

<u>Reviewer</u>	<u>Comment</u>
Fletcher Callanta	The 4'-0" new required bottom landing at "Type A" curb ramps will be problematic.
Jose Navarro	<p>"11B-406.5.9 Clear Space. Beyond the bottom grade break, a clear space 48 inches (1219 mm) minimum by 48 inches (1219 mm) minimum shall be provided within the width of the pedestrian street crossing and wholly outside the parallel vehicle travel lane. At marked crossings, the clear space shall be within the markings."</p> <p>I see this first paragraph being a problem only in midblock ramps without a marked crossing and when the first lane (including parking, shoulder, or bike lane) is less than 16' wide since travel lane width only needs to be 12'. Note that "At marked crossings, the clear space shall be within the markings."</p>
Alexandra Warner	

1. Landings for parallel curb ramps

CBC 11B_406.3 Parallel Curb Ramps. Parallel curb ramps shall comply with 11B/406.3 and 11B/406.5.

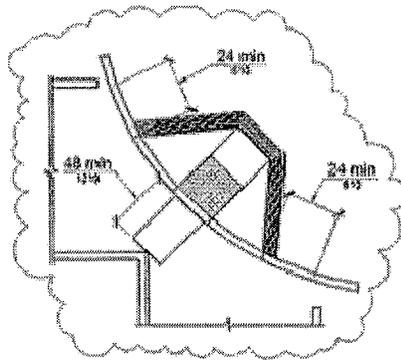
11B_406.3.1 Slope. The running slope of the curb ramp segments shall be in/line with the direction of sidewalk travel. Ramp runs shall have a running slope not steeper than 1:12.

11B_406.3.2 Turning Space. A turning space 48 inches (1219 mm) minimum by 48 inches (1219 mm) minimum shall be provided at the bottom of the curb ramp. The slope of the turning space in all directions shall be 1:48 maximum.

Comment: The turning space level landing at the bottom of the curb ramp is an issue when the existing street have more than 2% slope.

2. Requirement for the 24" defined edge within the marked crossings

11B_406.5.10 Diagonal Curb Ramps. Diagonal or corner type curb ramps with returned curbs or other well/defined edges shall have the edges parallel to the direction of pedestrian flow. Diagonal curb ramps with flared sides shall have a segment of curb 24 inches (610 mm) long minimum located on each side of the curb ramp and within the marked crossing.



Comment: if the wings exceed the 5' standard length then the 24' will push the crossings farther from the corners, therefore we request the code include a maximum distance from the corner for the location of the marked crossing.

3. Landings

11B_406.5.3 Landings. Landings shall be provided at the tops of curb ramps and blended transitions. The landing clear length shall be 48 inches (1219 mm) minimum. The landing clear width shall be at least as wide as the curb ramp, excluding any flared sides, or the blended transition leading to the landing. The slope of the landing in all directions shall be 1:48 maximum.

PROW R304.3 Parallel Curb Ramps. Parallel curb ramps shall comply with R304.3 and R304.5.

R304.3.1 Turning Space. A turning space 1.2 m (4.0 ft) minimum by 1.2 m (4.0 ft) minimum shall be provided at the bottom of the curb ramp and shall be permitted to overlap other turning spaces and clear spaces. If the turning space is constrained on 2 or more sides, the turning space shall be 1.2 m (4.0 ft) minimum by 1.5 m (5.0 ft). The 1.5 m (5.0 ft) dimension shall be provided in the direction of the pedestrian street crossing.

R304.3.2 Running Slope. The running slope of the curb ramp shall be in-line with the direction of sidewalk travel. The running slope of the curb ramp

shall be 5 percent minimum and 8.3 percent maximum but shall not require the ramp length to exceed 4.5 m (15.0 ft) minimum. The running slope of the turning space shall be 2 percent maximum

Comment: The Public right of Way Guidelines does not require landings on the parallel curb ramps. The CBC does requires landings which can be unachievable on steep streets.

11B_406.5.11 Grooved Border. Curb ramps shall have a grooved border 12 inches (305 mm) wide along the top of the curb ramp at the level surface of the top landing and at the outside edges of the flared sides. The grooved border shall consist of a series of grooves . inch (6.4 mm) wide by . inch (6.4 mm) deep, at . inch (19 mm) on center.

EXCEPTIONS: 1. At parallel curb ramps, the grooved border shall be on the level surface of each top landing across the full width of the curb ramp.

Comment: Again the CBC is including in their language the requirement of landings on parallel curb ramps.