



# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

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December 10, 2012

IN REPLY PLEASE

REFER TO FILE: **D-3**

Mr. Jim McGowan, Executive Director  
California Building Standards Commission  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA 95833

Dear Mr. McGowan:

**PROPOSED BUILDING STANDARDS OF THE  
DIVISION OF THE STATE ARCHITECT (DSA-AC)  
REGARDING THE CALIFORNIA CODE OF REGULATIONS,  
TITLE 24, PART 2, 2013 CALIFORNIA BUILDING CODE**

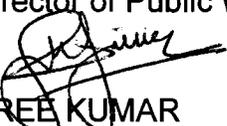
Although the 2013 California Building Code (CBC) is only applicable to buildings for which an application for a building permit is made, we feel that accessible route requirements may include elements constructed within the public right of way. Therefore, we recommend that the proposed language of the CBC be consistent with the 2010 Americans with Disability Acts Standards and the federal Public Rights of Way Accessibility Guidelines, currently in draft form.

Enclosed are our comments on the proposed changes to the code related to accessibility within the public right of way.

If there are any questions, please contact Mr. Keegan Fahey of my staff at (626) 458-7931.

Very truly yours,

GAIL FARBER  
Director of Public Works

  
SREE KUMAR  
Assistant Deputy Director  
Design Division

KDF:dc  
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Enc.

cc: California State Association of Counties (Ms. Kiana Buss)

**PROPOSED BUILDING STANDARDS OF THE  
DIVISION OF THE STATE ARCHITECT (DSA-AC)  
2013 CALIFORNIA BUILDING CODE, CHAPTER 11B, PART 2**

| CHAPTER/<br>SECTION # | Page | RECOMMENDATION      | SUGGESTED TEXT   | REASON  |
|-----------------------|------|---------------------|--|---|
| 11B-209.2.3           | 159  | APPROVED AS AMENDED | On-street bus stops shall comply with 11B-810.2. to the maximum extent practicable.  | The Suggested Text is taken from the 2010 ADA Standards and is consistent with the Draft PROWAG language. Our shuttles provide service in residential communities where the existing sidewalk/parkway (area between curb and the right-of-way line) is less than 8 feet. This requirement will prevent us from establishing new bus stops in Los Angeles County transit-dependent communities where services are very much needed. We request the flexibility to establish new bus stops where the existing parkway is less than 8 feet.  |
| 11B-247               | 188  | DISAPPROVED         | DELETE 11B-247.1.2.4;<br>DELETE 11B-247.1.2.5;   | 2010 ADA Standards and Draft PROWAG guidelines do not require Detectable Warnings at Bus Stops or Hazardous Vehicular Areas. The inclusion of these sections is unreasonable due to the vagueness of the sections for bus stops and hazardous vehicular areas. There are no sketches indicating how to apply the standard to bus stops or hazardous vehicular areas. The inability to properly identify these locations and/or construct the necessary improvements to be in compliance with the standard is the reason we recommend to delete these sections and follow the Draft PROWAG guidelines. |
| 11B-403.5.1           | 200  | APPROVED AS AMENDED | 11B-403.5.4 Clear Width for Sidewalks and Walks. The clear width for sidewalks and walks shall be 48 inches (1219 mm) minimum. Exception: The clear width for sidewalks and walks shall be permitted to be reduced to 32 inches (813mm) minimum for a length of 24 inches (610 mm) maximum where obstructions limit available clear width. | Clear width for sidewalks and walks should be defined separately and not as an exception. It should have its own section 11B-403.5.4 with its own exception for clear width where obstructions limit available width. Sidewalks should be allowed the same exception as 11B-403.5.1 Exception Number 1. This would be consistent with the 2010 ADA Standards.   |
| 11B-405.7.2.1         | 212  | DISAPPROVED         | DELETE Section   | Both 2010 ADA Standards and Draft PROWAG allow for landings to be as wide as the widest ramp run. Specifying a minimum top landing width of 60 inches is an arbitrary increase in the minimum width and this could pose a problem within the public right of way where space can be limited.  |
| 11B-405.7.3.1         | 212  | DISAPPROVED         | DELETE Section   | Both 2010 ADA Standards and Draft PROWAG allow for landing lengths to be a minimum of 60 inches in the direction of the ramp run. Specifying a minimum length for the bottom landing of 72 inches is an arbitrary increase that may not be accommodated within the public right of way where space can be limited.  |
| 11B-405.7.4           | 212  | APPROVED AS AMENDED | 11B-405.7.4 Change in Direction. Ramps that change direction between runs at landings shall have a clear landing 60 inches (1524 mm) by 60 inches (1524 mm) minimum.   | Both 2010 ADA Standards and Draft PROWAG allow for landings that change direction between runs to be a minimum of 60 inches by 60 inches. Specifying a minimum length of 72 inches in the direction of downward travel from the upper ramp is an arbitrary increase that may not be accommodated within the public right of way where space can be limited.   |
| 11B-406.5.9           | 217  | DISAPPROVED         | MOVE 11B-406.5.9 Clear Space to 11B-406.5.10.1<br>The Exception to 11B-406.5.1 should read 'Diagonal curb ramps shall comply with 11B-406.5.10.1.'   | This is a vague standard that might get misinterpreted. In the 2010 ADA Standards this clear space requirement is only for diagonal curb ramps. Move it to subsection 11B-406.5.10.1.   |
| 11B-705.1.2.4         | 283  | DISAPPROVED         | DELETE 11B-705.1.2.4 Bus Stops.  | Both the 2010 ADA Standards and Draft PROWAG guidelines do not require Detectable Warnings at Bus Stops. The inclusion of this section is unreasonable due to the vagueness of the section. There are no sketches indicating how to apply the bus stop standard. The inability to properly identify locations and/or construct the necessary improvements to be in compliance with the standard is the reason we recommend to delete this section and follow the Draft PROWAG guidelines.   |



**PROPOSED BUILDING STANDARDS OF THE  
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| CHAPTER/<br>SECTION # | Page | RECOMMENDATION      | SUGGESTED TEXT   | REASON  |
|-----------------------|------|---------------------|--|---|
| 11B-705.1.2.5         | 283  | DISAPPROVED         | DELETE 11B-705.1.2.5 Hazardous Vehicular Areas.  | Both the 2010 ADA Standards and Draft PROWAG guidelines do not define Hazardous Vehicular Areas. This proposed standard is too general and any driveway could potentially be a hazardous vehicular area. Recommend deleting section and following the locations listed in the Draft PROWAG.   |
| 11B-810.2.2           | 299  | APPROVED AS AMENDED | Bus stop boarding and alighting areas shall provide a clear length of 96 inches ( <del>2440</del> 2438 mm) minimum, measured perpendicular to the curb or vehicle roadway edge, and a clear width of 60 inches ( <del>1525</del> 1524 mm) minimum, measured parallel to the vehicle roadway, to the maximum extent allowed by legal or site constraints. | The majority of our buses provide service in residential communities where the existing sidewalk/parkway (area between curb and the right-of-way line) is less than 8 feet. This requirement will prevent us from establishing new bus stops in Los Angeles County transit-dependent communities where services are very much needed. We request the flexibility to establish new bus stops where the existing parkway is less than 8 feet. |

