

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES 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 OCTOBER 26, 2012
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: DECEMBER 10, 2012

Date: December 10, 2012

From:

Jose Luis Caceres

Name (Print or type)

Sacramento Area Council of Governments


(Signature)

Agency, jurisdiction, chapter, company, association, individual, etc.
1415 L Street, Suite 300, Sacramento, CA 95814

Street

City

State

Zip

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

The Agency proposed modifications As Submitted on Section No.
11B-406.5.3,
11B-406.5.8,
11B-406.5.9

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 the attached letter for revisions and reasons.



December 10, 2012

Mr. Jim McGowan, Executive Director
State of California- State and Consumer Services Agency
California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833-2936

Mr. McGowan,

Thank you for the opportunity to comment on the proposed code changes intended for inclusion in the 2013 California Building Code (CBC), Title 24, Part 2. Since the CBC is a document that does not provide for design exceptions, it is critical that its standards be reasonable and carefully thought out. **The Sacramento Area Council of Governments (SACOG) is concerned that three proposed changes are unnecessary and would make many projects in the region cost prohibitive.**

1. Clear Space within Edge of Travel Way (*11B-406.5.9*)
2. Top Landing for Parallel Curb Ramps (*11B-406.5.3*)
3. Counter Slopes and Adjoining Gutters (*11B-406.5.8*)

1. Clear Space within Edge of Travel Way (*11B-406.5.9*)

SACOG is troubled by the proposed requirement that 48" by 48" of clear space be provided beyond the bottom grade break of the curb ramp and "wholly outside the parallel vehicle travel lane." Many streets in the region do not have this shoulder space available without infringing on the currently designated travel lanes. This requirement would significantly add to the cost of many improvement projects, making their construction cost prohibitive. Compliance would require purchasing additional rights of way for the relocation of the sidewalk in order to provide a 48" shoulder that would serve as clear space. SACOG recommends removing this requirement.

2. Top Landing for Parallel Curb Ramps (*11B-406.5.3*)

SACOG questions the inclusion of the requirement that the slope of a 48" landing at the top of a ramp be 1:48 in *all* directions. This would be difficult to construct, excessively costly, and unnecessary. Specifically, SACOG disagrees with the longitudinal slope requirement of 1:48. Instead, the CBC should allow for the maximum 1:20 slope, as allowed for accessible paths. Since nearly all of the region's sidewalk slopes match the grade of the adjacent streets, this requirement would create complications with the normally constant curb height and the matching sidewalk surface. The 1:48 slope criteria would also create a costly transition compliance issue when an existing driveway is adjacent to, or near, the top landing of a curb ramp. SACOG recommends maintaining the 1:48 slope criteria for the cross slope (perpendicular to the curb) of the landing area and maintaining the currently allowed 1:20 for the longitudinal slope of the accessible path.

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Yuba County

3. Counter Slopes and Adjoining Gutters (11B-406.5.8)

Lastly, SACOG wishes to voice its concern with the requirement that counter slopes and adjoining gutters within 48" of the curb ramp not be steeper than 1:20. This requirement would create unreasonable costs for roadway overlays and pavement reconstruction in order to sculpt the adjacent pavement to ensure compliance. SACOG recommends deleting the 48" length criteria but maintaining the requirement for a maximum slope of 1:20 for the adjoining surface slope.

Sincerely,



Matt Carpenter
Director of Transportation Services

MC:TA:JC:pm