



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.

Auburn  
Citrus Heights  
Colfax  
Davis  
El Dorado County  
Elk Grove  
Folsom  
Galt  
Isleton  
Lincoln  
Live Oak  
Loomis  
Marysville  
Placer County  
Placerville  
Rancho Cordova  
Rocklin  
Roseville  
Sacramento  
Sacramento County  
Sutter County  
West Sacramento  
Wheatland  
Winters  
Woodland  
Yolo County  
Yuba City  
Yuba County

2012 DEC 12 12:03:18  
SACOG  
COMMUNICATIONS

**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



**Sacramento Area  
Council of  
Governments**

1415 L Street,  
Suite 300  
Sacramento, CA  
95814



PITNEY BOWES

**\$ 00.45<sup>0</sup>**

02 1R

0006559602

DEC 10 2012

MAILED FROM ZIP CODE 95814

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

