

December 10, 2012

State of California
State and Consumer Services Agency
California Building Standards Commission
2525 Natomas Park Dr., Suite 130
Sacramento, CA 95833

Subject: Proposed Changes to CBC Concerning Curb Ramps (Section 406.5.9)

Division of the State Architect:

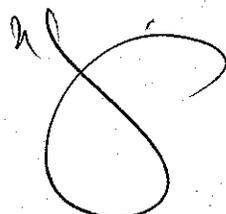
The proposed Clear Space specification (406.5.9) will significantly impact all overlay projects where turn pockets are located at the intersections. The proposed rule would require 8-ft of clear space outside the travel way (4 feet each side). This would require removal of a lane of traffic in some cases.

This requirement would also preclude the construction of bulb-outs at intersections. Bulb-outs are a highly recommended safety enhancement due to their reduction of the pedestrian crossing distance at intersections. Because ramps at bulbouts are constructed within the parking lane or shoulder, the bottom of the ramp may be located within the travel lane. The proposed language would lengthen the pedestrian crossing distance by up to 8 feet.

Since the vehicle code requires that where bike lanes are present motor vehicles wishing to turn right are to merge into the bike lane prior to turning, the Clear Space could not be located within a bike lane. So even if the language were adjusted to allow the clear space within a bike lane, turning movements would be impacted at intersections.

PROWAG only includes a Landing requirement for the top of ramp in the case of perpendicular ramps. It is our understanding that your proposed language requires a landing for parallel ramps as well. The intention of the landing is to provide maneuvering room (as opposed to a resting area in a building ramp); no maneuvering is done at the top of a parallel ramps. On a street with a slope greater than 2%, this language would increase the curb height at the top of the ramp and increase the ramp length significantly. Adding landings to the parallel ramps in such cases would add unnecessary grade breaks in the path of travel.

Respectfully,

for Roxanne 
Michael Mitchell
Principal Civil Engineer

Enclosure

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