

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: 12/05/2012

From:

Pat Merriman

Name (Print or type)



(Signature)

Masons Supply Company

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

2637 SE 12th Avenue

Street

Portland

City

OR

State

97202

Zip

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

The Agency proposed modifications As Submitted on Section No. **11B-705.1.1.1 Dome Size**

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:

We appreciate the opportunity to provide public comments in regards to the code revision of the California Building Code (CBC) for detectable warning panels. CASTinTACT® precast concrete tactile warning panels are a proven product with a successful long history in California. CASTinTACT® is a unique product being that it is a high strength cementitious concrete tactile warning panel that is unlike the majority of other products on the market that are made with polymer resins. The major advantage of CASTinTACT® being a cementitious concrete, is that it has a similar co-efficient of expansion to the base concrete. It is more compatible with the surrounding concrete than polymer resin based products.

As the manufacturer of CASTinTACT®, we are concerned with the proposed modifications to the detectable warning geometry in section **11B-705.1.1.1 Dome Size**.

CBC Proposed Changes:

705.1.4 11B-705.1.1.1 Dome Size. Truncated domes in a detectable warning surface shall have a base diameter of 0.9 inch (~~23 mm~~) (22.9 mm) minimum and ~~1.4 inches (36 mm)~~ 0.92 inch (23.4 mm) maximum, a top diameter of ~~50 percent of the base diameter minimum to 65 percent of the base diameter maximum~~ 0.45 inch (11.4 mm) minimum and 0.47 inch (11.9 mm) maximum, and a height of ~~0.2 inch (5.1 mm)~~ 0.18 inch (4.6 mm) minimum and 0.22 inch (5.6 mm) maximum.

Suggested Changes:

705.1.4 11B-705.1.1.1 Dome Size. Truncated domes in a detectable warning surface shall have a base diameter of 0.9 inch (~~23 mm~~) (22.9 mm) minimum and **1.0 inch (25.4 mm)** ~~0.92 inch (23.4 mm)~~ maximum, a top diameter of ~~50 percent of the base diameter minimum to 65 percent of the base diameter maximum~~ 0.45 inch (11.4 mm) minimum and 0.60 inch (15.2 mm) maximum, and a height of ~~0.2 inch (5.1 mm)~~ 0.18 inch (4.6 mm) minimum and 0.22 inch (5.6 mm) maximum.

Reason for Changes:

The United States Access Board's Public Right of Way Accessibility Guidelines (PROWAG) outline the dome dimensions in R305.1.1 Dome Size. **Truncated domes in a detectable warning surface shall have a base diameter of 0.9 inch (23mm) minimum and 1.4 inches (36mm) maximum, a top diameter of 50 percent of the base diameter minimum to 65 percent of the base diameter maximum, and a height of 0.2 inch (5.1mm).** Our CASTinTACT® dome geometry will not comply with your proposed new specification if it is changed. Our product has a textured slip-resistant surface on the top of the domes. Alteration to requirements of dome geometry may alter the effectiveness of slip resistance (especially when detectable warning panels are wet).

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.