

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: 10 December 2012

From:

Patrick Rivera, PE
Name (Print or type)


(Signature)

Jurisdiction & Agency: City & County of San Francisco, Department of Public Works
Agency, jurisdiction, chapter, company, association, individual, etc.

1680 Mission St., 4th Floor San Francisco CA 94103
Street City State Zip

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

[X] The Agency proposed modifications As Submitted on Section No. 11B-406.5.3

and request that this section or reference provision be recommended:

[] Approved [] Disapproved [X] Held for Further Study [] Approved as Amended

Suggested Revisions to the Text of the Regulations:

The requirement for a 48 inch deep clear space at the top of a curb ramp should only apply universally to new construction. Only in new construction will it be feasible to provide the necessary grading of the streets beyond intersection to include the crosswalk areas in order to allow for the provision of such level landing areas in the adjoining sidewalks.

An exception under 11B-406.5.3 should be provided for existing locations to allow providing no 48 inch deep clear space or smaller spaces at the top of a curb ramp where it is technically infeasible or structurally impracticable due to existing topography or other physical or legal constraints.

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.]

Reasons for the suggested revision are: 4, 5, 6, and 7.

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1680 Mission St., 4th Floor San Francisco CA 94103
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I/We (do) (do not) agree with:

[] The Agency proposed modifications As Submitted on Section No. 11B-705.1.1.5, Exception

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:

Revise the text to the following: "Detectible warning surfaces at curb ramps, islands or cut-through medians may be of any color, provided sufficient visual contrast is provided with the directly adjacent surrounding curb ramp, island or cut through median color."

The proposed exception phrasing "...shall not be required to comply with..." could be misconstrued by some who may claim that local jurisdictions that do require the yellow color on detectible warnings may not do so.

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.]

Reasons for the suggested revision are: 4, 5, 6, and 7.

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Street City State Zip

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

[X] The Agency proposed modifications As Submitted on Section No. 11B-705.1.2.2

and request that this section or reference provision be recommended:

[] Approved [X] Disapproved [] Held for Further Study [] Approved as Amended

Suggested Revisions to the Text of the Regulations:

Allow a range of 24 to 36 inches of detectible warnings on curb ramps. The 24 inch depth of detectible warnings of truncated domes that is allowed in the PROWAG and as adopted by the FHWA must be allowed in order for the State and Federal access standards to be in full alignment. Many jurisdictions in California have already set their curb ramp design standards and constructed many curb ramps with truncated domes with the 24 inch depth. Each jurisdiction must be allowed to choose the truncated dome amount that works best for their constituents, their capital planning and the many construction projects completed to date.

The public process that those jurisdictions undertook to develop and adopt their ADA Transition Plans for Curb Ramps and Sidewalks incorporate such standards and took much effort to achieve.

Federal studies have shown that 24 inches of detectible warnings are sufficient, and that is what most if not all of the nation is typically following.

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.]

Reasons for the suggested revision are: 4, 5, 6, and 7.

