

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.

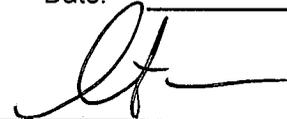
WRITTEN COMMENT DEADLINE: DECEMBER 10, 2012

Date: DECEMBER 10, 2012

From:

ROBERT NEWMAN

Name (Print or type)



(Signature)

CITY OF SANTA CLARITA

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

23920 VALENCIA BOULEVARD, SANTA CLARITA, CA 91384

Street

City

State

Zip

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

The Agency proposed modifications As Submitted on Section No. 11B-406

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:

Clear Space Within ETW-11B-406.5.9 Clear Space. *Beyond the bottom grade break, a clear space 48 inches (1219 mm)*

minimum by 48 inches (1219 mm) minimum shall be provided within the width of the pedestrian street crossing and wholly outside the parallel vehicle travel lane. At marked crossings, the clear space shall be within the markings.

- This will increase the pedestrian crossing distance by 8 feet in each crosswalk and increase the pedestrian crossing time and exposure in the roadway. In turn, it will have an adverse safety impact to pedestrians.
- The signal time at intersections will increase to add more time for pedestrian crossing, thus the traffic delay and congestion will increase at intersections, which will lead to more pollution and gas consumption for the motorists. In addition, added congestion will likely cause more collisions on roadways and at intersections.

- It is not feasible and impractical to retrofit the existing intersection to provide 48" Clear Space due to lack of Right-of-Way.
- As for new intersections, it will require more right-of-way and intersections to be wider. This is counterproductive for pedestrian safety since it will increase pedestrian exposure in the intersections.

Top of Landing for Parallel Curb Ramp- *11B-406.5.3 Landings. Landings shall be provided at the tops of curb ramps and blended transitions.*

The landing clear length shall be 48 inches (1219 mm) minimum. The landing clear width shall be at least as wide as the curb ramp, excluding any flared sides, or the blended transition leading to the landing. The slope of the landing in all directions shall be 1:48 maximum.

- A significant amount of public streets/sidewalks are steeper than 1:48 slope ratio. In order to add curb ramps and retrofit existing ramps which incorporate landings having a maximum slope of 1:48 in all directions in these areas extensive modifications would be required. These may include the need for easements, retaining walls, and the need to increase the grade of adjoining sidewalks.
- The requirement of landing of 48" with maximum of 2% grade in all directions at the top of ramps will require a significant design change that will often result in steeper street grades between the landings.

Pavement Reconstruction *11B-406.5.8 Counter Slope. Counter slopes of adjoining gutters and road surfaces immediately*

adjacent to and within 48 inches (1219 mm) of the curb ramp shall not be steeper than 1:20. The adjacent surfaces at transitions at curb ramps to walks, gutters, and streets shall be at the same level.

- The proposed change to project a maximum slope of 5% immediately adjacent to and within 48 inches of curb ramps will be difficult to accomplish as the City's pavements require ongoing rehabilitation. In order to maintain the City's pavement condition, streets are regularly overlaid with an additional thickness of new asphalt, sometimes resulting in slopes greater than 5% adjacent to curb ramps. In these cases to comply with this slope requirement the overlay design would need to be modified requiring reconstruction of the majority of the streets thereby significantly increasing the cost of the City's pavements maintenance program. This will add additional challenges to public agencies as they already struggle with infrastructure maintenance deficit and financial crisis.

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.