

Nearman, Michael@DGS

From: Afshan Afshar <afshan.afshar@build-laccd.org>
Sent: Monday, April 14, 2014 1:05 PM
To: CBSC@DGS
Subject: Proposed Accessibility Regulations Comments

Please see a few items for your consideration below:

Under definitions:

Please address the definition of fixture in toilet rooms. Add word "Plumbing" if the intent is for plumbing fixtures, and not dispenser or other accessory fixtures:

*11B-603.2.3 Door swing . Doors shall not swing into the clear floor space or clearance required for **any** PLUMBING fixture.* This makes sense for a single user toilet, but not for a multi-user where one can be hit by a door swing in front of accessories.

Under Section for parking stall:

11B-502.7.2 Wheel stops . A curb or wheel stop shall be provided if required to prevent encroachment of vehicles over the required clear width of adjacent accessible routes

A bumper is practical, but technically is in contradiction with requirements of section 11B-502.4 Floor or ground surfaces. As another practical preventive element would you be able to also address overhang (over planter or wide sidewalk in front) in lieu of bumper, and clarify the requirement for access aisle length when overhang is used.

11B-213.3

Address fractions in computing the required number of accessible compartments, urinals, lavatories and water closets. Round up or down?

11B-215.1

Exception: In existing facilities, visible alarms for fire alarm systems shall not be required except where an existing fire alarm system is upgraded or replaced,

Implies if strobes are NOT provided, no requirement to provide them until the next upgrade, but it does not clarify if strobes ARE provided, but in non-compliant quantity or positions, if it is required to upgrade to existing visual alarm system.

11B-226.4

Baby changing tables in public Men's rooms in the open if it's location is not properly situated within the room may create unintended consequences. Please address if any safe-harbor for existing changing tables that are located inside accessible toilet stall.

11B-406.5.8

24" does not make sense. Curb ramps are a component of accessible route. Maximum running slope at accessible route at walks is 1:20.

*11B-406.5.8:Counter slope. Counter slopes of adjoining gutters and road surfaces immediately adjacent to and **within 24 inches (610 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*

11B-604.8.1.1 Clarify if and under what conditions toilet paper and other dispensers or disposer elements may project from wall into the required floor clearances of the stall and WC

Thank you

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