

STATE OF CALIFORNIA
GOVERNMENT OPERATIONS 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. DSAAC 01/13
Received on 4/1/14

PARTICIPATION COMMENTS FOR THE NOTICE DATED MARCH 21, 2014
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: MAY 5, 2014

Date: April 1, 2014

From:

Neal Casper

Name (Print or type)



(Signature)

Casper Development Resources, Inc.

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

5360 Jackson Drive, Suite 114, La Mesa, CA 91942

Street

City

State

Zip

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

The Agency proposed modifications As Submitted on Section No. 11B.16

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 item to exclude the proposed clarification that this section "applies to counter dining surfaces where food or drink is consumed, and is not limited to counter dining surfaces where food or drink is served." or Hold for Further Study.

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.]

The proposed "Clarification" that the accessible counter requirement applies to counters where food is "consumed" as opposed to applying to counters where food or drink is "served" is both unnecessary and will have an unreasonable cost on restaurants. This is not a clarification but is instead a change in the scoping that will have significant impact on the food service industry. The 2010 ADA Standards and the 2010 CBC do not require accessible dining surfaces to be 60" wide and few existing counters in "consumption areas" would meet the proposed requirement of 60" minimum width. The proposed amendment would necessitate the modification of counters within most existing quick service food facilities.

