

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. _____

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

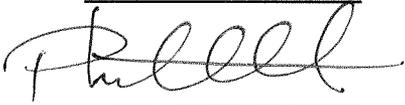
WRITTEN COMMENT DEADLINE: MAY 5, 2014

RECEIVED
2014 APR -1 P 1:09
CALIFORNIA BUILDING
STANDARDS COMMISSION

Date: 3/25/14

From:

Philip J. Terhorst, AIA
Name (Print or type)


(Signature)

TCA Architects, Inc.
Agency, jurisdiction, chapter, company, association, individual, etc.
19782 MacArthur Blvd. Suite 300, Irvine, CA 92614

Street City State Zip

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

The Agency proposed modifications As Submitted on Section No. 1110A

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:

1110a.1-1 Please clarify that "Where more than one route of travel is provided, all routes shall be accessible." means that secondary routes must meet the requirement for accessibility, but they are not necessarily required to comply with requirements for accessible routes.

We fully approve all other proposed modifications

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.]

(6) This sentence, as written, is unnecessarily ambiguous or vague

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MARCH 21 11:08 AM
CALIFORNIA BUILDING
STANDARDS COMMISSION

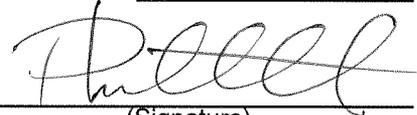
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I/We (do) (do not) agree with:

The Agency proposed modifications As Submitted on Section No. 1109A

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:

In 1109A.2.1 - Exception: We would like a definition of "attached to" and "directly serving"

We fully approve all other proposed modifications.

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.]

(6) This sentence, as written, is unnecessarily ambiguous or vague.

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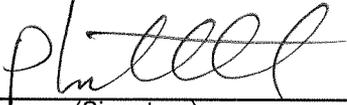
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I/We (do) (do not) agree with:

The Agency proposed modifications As Submitted on Section No. 1113A

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:

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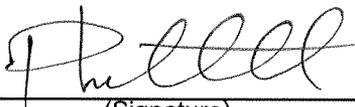
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I/We (do) (do not) agree with:

[X] The Agency proposed modifications As Submitted on Section No. 1114A

and request that this section or reference provision be recommended:

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

Suggested Revisions to the Text of the Regulations:

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.]

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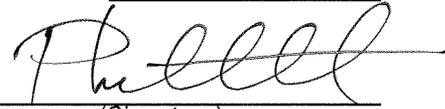
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I/We (do) (do not) agree with:

The Agency proposed modifications As Submitted on Section No. 1115A

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:

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.]

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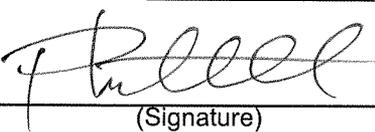
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I/We (do) (do not) agree with:

The Agency proposed modifications As Submitted on Section No. 1116A

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:

1116A.5, regarding the detectable warnings, needs much more clarification. Strictly read, there needs to be a detectable warning between an accessible parking stall and its loading zone. If someone arrived at an accessible parking stall it can be assumed they know they are in a vehicular area, and no additional warning should be required. Detachable warning strips are very uncomfortable for wheelchair users! On the other hand, we fully agree that detachable warning must be installed to prevent a pedestrian or wheelchair user from entering a vehicular area.

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.]

(6) This sentence, as written, is unnecessarily ambiguous or vague.

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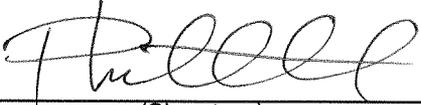
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I/We (do) (do not) agree with:

The Agency proposed modifications As Submitted on Section No. 1117A

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:

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.]

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

The Agency proposed modifications As Submitted on Section No. 1119A

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:

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.]

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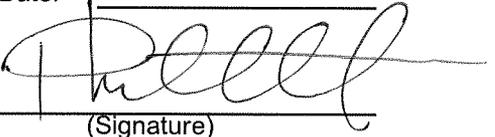
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Zip

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

The Agency proposed modifications As Submitted on Section No. 1122A

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:

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.]

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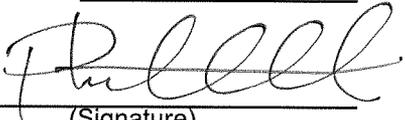
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I/We (do) (do not) agree with:

The Agency proposed modifications As Submitted on Section No. 1123A

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:

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.]

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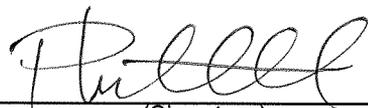
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I/We (do) (do not) agree with:

The Agency proposed modifications As Submitted on Section No. 1124A

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:

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.]

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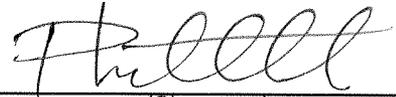
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I/We (do) (do not) agree with:

[X] The Agency proposed modifications As Submitted on Section No. 1125A

and request that this section or reference provision be recommended:

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

Suggested Revisions to the Text of the Regulations:

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.]

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(4) This amendment is not unreasonable, and is a practical alternative to code - required clearances. 4

Date: 3/25/14

From:

Philip J. Terhorst, AIA
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(Signature)

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

[X] The Agency proposed modifications As Submitted on Section No. 1126A

and request that this section or reference provision be recommended:

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

Suggested Revisions to the Text of the Regulations:

Regarding all maneuvering clearances per 1126 A.3:

We would like to see an exception for push side clearances when a door has a closer and a latch IF the door is equipment with an automatic door opening device or panic hardware.

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.]

(4) This amendment is not unreasonable, and is a practical alternative to code - required clearances.

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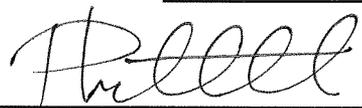
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I/We (do) (do not) agree with:

The Agency proposed modifications As Submitted on Section No. 1127A

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:

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.]

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

The Agency proposed modifications As Submitted on Section No. 1131A

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:

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.]

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Approved Disapproved Held for Further Study Approved as Amended

Suggested Revisions to the Text of the Regulations:

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Suggested Revisions to the Text of the Regulations:

While 1133A.2 - 3 & 4 require a 30" x 48" space centered on the work space, no floor space requirement is found for the use of bread boards. Also, there is no definition of "bread board", and no requirements for functionality, removability, knee space, etc.

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.]

(6) The requirements for breadboards are unnecessarily ambiguous and vague.

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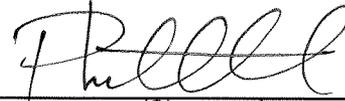
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and request that this section or reference provision be recommended:

Approved Disapproved Held for Further Study Approved as Amended

Suggested Revisions to the Text of the Regulations:

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.]

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. _____

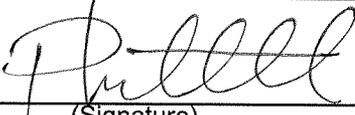
PARTICIPATION COMMENTS FOR THE NOTICE DATED MARCH 21, 2014
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: MAY 5, 2014

Date: 3/25/14

From:

Philip J. Terhorst, AIA
Name (Print or type)


(Signature)

TCA Architects, Inc.

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

19782 MacArthur Blvd. Suite 300, Irvine, CA 92614

Street

City

State

Zip

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

[X] The Agency proposed modifications As Submitted on Section No. 1138A

and request that this section or reference provision be recommended:

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

Suggested Revisions to the Text of the Regulations:

1138A.3.2 Requires a Kitchen counter-top to be a maximum of 36" above the finish floor. This is a new requirement and one which is impractical to design and install. Due to manufactured items (dishwashers, trash compactors, ice makers etc.) having fixed dimensions, and ceramic tile edge tiles being a fixed dimension, 36" is impossible to achieve. We suggest this item be removed until US manufacturers change their designs.

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.]

(4) This requirement is unreasonable & unfair.

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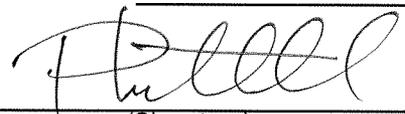
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I/We (do) (do not) agree with:

[X] The Agency proposed modifications As Submitted on Section No. 1140A

and request that this section or reference provision be recommended:

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

Suggested Revisions to the Text of the Regulations:

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.]

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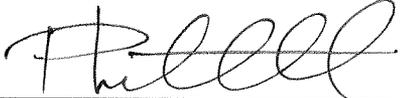
PARTICIPATION COMMENTS FOR THE NOTICE DATED MARCH 21, 2014
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TCA Architects, Inc.
Agency, jurisdiction, chapter, company, association, individual, etc.
19782 MacArthur Blvd. Suite 300, Irvine, CA 92614
Street City State Zip

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

The Agency proposed modifications As Submitted on Section No. 1143A

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:

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.]