

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
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Office Use Item No. _____

PARTICIPATION COMMENTS FOR THE 15-DAY NOTICES DATED JULY 19, 2011
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: AUGUST 2, 2011

Date: July 25, 2011

From:

Eugene Lozano, Jr.
Name (Print or type) (Signature)

California Council of the Blind
Agency, jurisdiction, chapter, company, association, individual, etc.

4537 Sycamore Avenue Sacramento CA 95841
Street City State Zip

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

[X] The Agency proposed modifications As Submitted on Section No. 1124A.8 Doorjamb marking.

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:

1124A.8 Doorjamb marking. *The floor level at all elevator hoistway entrances shall be designated by raised characters provided on both jambs. Characters shall be 2 inches (50.8 mm) in height located with the centerline 60 inches (1524 mm) from the floor. On the main entry level, a raised five-pointed star shall be placed to the left of the raised character. The outside diameter of the star shall be 2 inches (50.8 mm) and all points shall be of equal length. Both characters and star shall be raised a minimum of 1/32 of an inch. The raised characters and the star shall be white on a black background. Contracted Grade 2 Braille, conforming to Section 1143A.9, shall be placed below the corresponding raised characters and the star. The Braille translation for the star shall state "MAIN". The raised characters shall comply with Section 1143A.8. (See Figure 11A-7C.)*

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.]

Currently Sections 1143A.8 Raised characters and pictorial symbol signs and 1117B.5.5 Raised characters and pictorial symbol signs require that characters (letters and numerals) be raised a minimum of 1/32 of an inch high. These sections are mute as to how high symbols, e.g. star, are to be raised.

Section 1124A.8 as written requires that both characters and symbols be raised but there is nothing to specify how high the star is to be raised.

If this section stays as written a sign fabricator could create a sign that has the characters raised a minimum of 1/32 of an inch while interpreting the specification that the thickness of the paint to depict the star is what is only needed.

The danger is the creation of a star that technically meets the letter of the code but is not legible/useable by tactile readers.

In addition, for building officials to fully enforce 1124A.8 there needs to be a specification for how high the star is to be raised.

Therefore to harmonize the height between characters and the star there must be a sentence in Section 1124A.8 that specifies this measurement for both which is to be a minimum of 1/32 of an inch.

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.

Criteria 3, 4, and 5.

