

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

**PARTICIPATION COMMENTS FOR THE NOTICES DATED MAY 13, 2011**  
Written comments are to be sent to the above address.

**WRITTEN COMMENT DEADLINE: JUNE 27, 2011**

Date: June 27, 2011 revised

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:

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  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 ~~a minimum of~~ 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. 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 meaning of the star is to be translated into Braille as "Main". The raised characters and star 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.]

To permit a minimum of 2 inch characters would create an inconsistency with the requirement in Section 1143A.8 which states the maximum character height is two inches. Also there would exist an inconsistency with the requirement that the “outside diameter of the star shall be 2 inches”. The maximum of 2 inches is based on scientific research which finds that raised characters become illegible tactilely when exceeding this measurement.

At the same time, we do not want to reduce the height of the character to less than 2 inches which would result in a problem for people with low vision seeing the characters from a distance.

Section 1143A.8 requires that “pictorial symbol signs (pictograms)”, which would include the star on doorjamb markings, be raised.

We are requesting that it be stated in the actual section that the meaning of the raised star in Braille is the word “Main” to insure that no one requires that the word “star” in Braille would be beneath the raised symbol.

Criteria 3, 4, and 5.

## 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.