Commenter Contact Information Name: Cory Cabral Date: 5/8/2020 12:00:00 AM Representing: Certified Access Services Mailing Address Number and Street: 13465 Camino Canada, Suite 106-148 City: El Cajon State: CA Zip Code: 92021 Telephone #: 6197368585 Email: cory@adacertified.com

Proposed Building Standard Title 24 Part #: Part 2 Section #: 11B-250.1 Proposing State Agency: DSA This comment is intended for review during: 45-Day Comment Period

Your recommendation based on the criteria of Health and Safety Code Section 18930(a): Approve as Amended

In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a). If you recommend anything other than approve, cite the criteria in your comment. If you oppose a proposed building standard, offer a solution or alternative for the state agency to consider.

I like that the new section clarifies that all areas of the parking lot, including parking stalls are regarded as vehicular traffic areas. I think there should be an additional exception that allows an adjacent walk to be provided at the same elevation as the vehicular areas. Physical separation would obviously need to be cane detectable but I think reducing exposure of tripping hazards should be factored in. I would suggest something along the lines of:

At locations where the circulation paths and vehicular traffic are physically separated by a curb or barrier 4" minimum in height and a railing or barrier XX" minimum in height, circulation paths shall not be required to be raised.

9 Point Criteria Info: 18930(a) 3