

From: [DGS Website@DGS](mailto:DGS_Website@DGS)
To: CBSC@DGS
Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Mehdi Shadyab
Date: Wednesday, May 06, 2020 10:12:49 AM

Commenter Contact Information

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Proposed Building Standard

Title 24 Part #: Part 2
Section #: 11B, Section 11B-250, Circulation paths
Proposing State Agency: DGS-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):
Further Study Required

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.

The interpretation of existing Sec. 11B-247.1.2.5 has caused challenges and countless hours of discussions over the years. The new Section 11B-250 has made some improvements but it is still not clear enough. The primary intent of this section is to protect and provide safety for individuals with visual impairment when on walks or sidewalks adjacent to, or crossing, vehicular traffic areas. Sec. 11B-250 does not seem to address the following condition:

1. Walk adjacent to parking spaces with Flush Transition. The only separation provided are wheel stops with 4ft-6ft gap between them. Is a physical separation required along the walk? If not, which exception applies?
2. Is a 4 in. 'Rolled Curb' considered an acceptable physical separation? This condition is proposed in front of many stores.
3. Is a 4in. raised curb considered an acceptable physical separation? While seem to provide compliance, creates tripping hazard.

Further clarification & study recommended.

9 Point Criteria Info:

18930(a) 1