

October 4, 2024

Michael Nearman, Deputy Executive Director
California Building Standards Commission
Attention: Public Comments
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

RE: BSC 05/24- 2025 California Building Code, Part 2.
Section

Dear Mr. Nearman:

As an architect with over 40 years experience, I realized recently when acting as an expert witness for a client that there are no provisions in the Building Code that do not permit the use of horizontal rails in a guardrail.

Horizontal rails in a guardrail act like a small ladder easily climbed by toddlers and small children that can result in injury or death.

It should be noted that many countries and some jurisdictions do not permit the use of horizontal rails due to this exact safety concern. In one case, I was asked to consider being an expert witness for a project in California where a small toddler climbed up and over a guardrail causing them to be physically impaired for life.

Propose consider adding the following sections of the code to read:

1015.4.1 Bar and Slat Directional Limitations. Required railings shall not be designed in a way that allow children the ability to climb a guardrail using horizontal bars, rods or tubes.

Exception:

1. In areas where children are not present as part of the everyday operation of the facility.
2. In areas where guardrails are not required.

Sincerely,



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Principal
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