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September 27, 2021

California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, California 95833
SENT BY EMAIL: cbsc@dgs.ca.gov

Re: 2021 Triennial Code Adoption Cycle
Public Comment Periods for Proposed Building
Standards
Reviewed by the Code Advisory Committees (CAC)

Dear Commission Members and Agencies Submitting
Regulations:

California Building Officials is a non-profit corporation dedicated to promoting public health and safety in building construction through responsible legislation, education, and building code development. Our membership includes building officials, building inspectors, and plan reviewers working for cities and counties throughout California to enforce the California Building Code. Our membership also includes associations, organizations, firms, or individuals interested in architecture, engineering, building inspection, code enforcement, or construction. We understand and appreciate the democratic process that creates excellent building standards to provide a more livable community.

Our committee on Accessibility has reviewed the proposed code changes related to accessibility. This letter provides our comments on these changes.

1. California Building Standards Commission
BSC 03/21—Amend the 2022 edition of the California Green
Building Standards Code, Part 11, Title 24

We support the code change at 5.106.5.3.4 Accessible EVCS, which references Section 11B-228.3 of the California Building Code for the scoping of accessible features required for electric vehicle charging stations.

2. Division of the State Architect—Access Compliance

DSA-AC 01/21—Adopt and amend Chapter 11B of the 2022 edition of the California Building Code, Part 2, Title 24

We support all of the proposed changes to Chapter 11B as submitted for their clarity and reorganization.

2.01 – Eliminates confusion on improper location of detectable warnings in access aisles and recognizes access aisles are provided at both parking spaces and electric vehicle charging stations.

11B-01 – Provides improved code enforcement for accessibility violations by providing an easily referenced charging section for all violations of Chapter 11B.

11B-02 – Removes accessible means of egress requirements from accessible entrance requirements and relocates in the appropriate section for added clarity.

11B-03 – Relocates accessible means of egress requirements from accessible entrance requirements to the section where they make the most sense. Clarifies existing code language and requirements for doors at stairwells and excess exits at ground levels. Harmonizes requirements with other sections of the California Building Code for doors on an accessible route (11B-404) and doors to spaces (11B-206.5). This is an important change for clarity and consistency for all of the code requirements for exit doors and is consistent with the 2010 ADA Standards for Accessible Design and ICC A117.1, upon which it is based and the agencies that interpret these standards, the U.S. Access Board and International Code Council.

11B-04 – Clarifies units within the scope by changing to more easily understood and used terms.

3. Department of Housing and Community Development

HCD 03/21—Amend the 2022 edition of the California Green Building Standards Code, Part 11, Title 24

Item 4. – Chapter 4 Changes. – We generally support the changes for clarity and consistency with the provisions of the California Building code with one exception. There appears to be a conflict between the Exception in 4.106.4.2.2.1 and the language in 4.106.4.2.2.3. Reader is left to ponder if the exception can be used generally and how it applies to public housing, which often is a multifamily development.

HCD 1-AC 04/21—Adopt and amend Chapter 11A of the 2022 edition of the California Building Code, Part 2, Title 24

Item 1. – We support the clarification of the effective date of Chapter 11A to match the Fair Housing Act. However, we also recommend that HCD further revise Chapter 11A in a future code cycle to address the gap in scoping that occurred for all multi-family dwellings between the CBC and FHA for the time period between March 13, 1991 and the subsequent edition of the California Building Code that harmonized the requirements for types of dwelling included.

Item 2. – We support using generic references that do not need updating as frequently.

Item 3. – We support the deletion of the reference to grab bars in dwelling units meeting the same technical provisions as common areas. This new section has caused some confusion to our members. Allowable clear floor space around the water closet is significantly smaller in dwelling units that required in common areas. Such differences do not allow grab bars or their wall reinforcement in dwelling units as stated.

We continue to appreciate the time and effort given by the conscientious employees of the state agencies to improve building standards in California. We hope they find our comments helpful in making their great effort even better.

Respectfully,



Shane Diller
CALBO President 2021-2022