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**To:** [CBSC@DGS](mailto:CBSC@DGS)  
**Cc:** [Clair, Ida@DGS](mailto:Clair_Ida@DGS)  
**Subject:** RE: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Eric McSwain  
**Date:** Monday, April 24, 2023 6:18:19 PM

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To whom it may concern,  
I would like to submit the following comments regarding proposed changes to CBC Section 11B-605.

Proposed Building Standard  
Title 24 Part #: Part 2  
Section #: (ET Item 15) 11B-605  
Proposing State Agency: DSA-AC  
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

9 Point Criteria Info:  
18930(A) 8

I have a number of concerns regarding 11B-605.

**1.** 11B-604 is titled "Water closets and toilet compartments". As currently proposed, 11B-605 is titled "Urinals". Consider changing the title of 11B-605 so that it is similar to 11B-604:

***11B-605 Urinals and urinal compartments***

**2.** The language of 11B-605 could be simplified. The proposed language is as follows:

***"11B-605.1 General.*** *Urinals not provided in urinal compartments shall comply with Section 11B-605 Sections 11B-605.1 through 11B-605.4. Urinals provided in urinal compartments shall comply with Sections 11B-605.1 through 11B-605.5."*

Please consider changing it to say:

***11B-605.1 General.*** *Urinals shall*

*comply with Sections 11B-605.1 through 11B-605.4. Urinal compartments shall comply with Section 11B-605.5.*

**3.** While 11B-605.4 begins by saying that urinal flush controls may be hand operated or automatic, proposed additional language appears to not allow automatic flush controls in urinal compartments. The proposed additional language is as follows:

*"Urinals provided in urinal compartments shall have hand operated flush controls located on the open side of the urinal."*

Please consider changing it to say:

*Where hand operated flush controls are provided in wheelchair accessible urinal compartments, they shall be located on the open side of the urinal.*

**4.** 11B-605.5.1 requires urinals in wheelchair accessible compartments to be located off-center, within 17"-18" of a side wall measured to the center of the fixture. In addition, it states that urinals shall be arranged for left-hand or right-hand approach.

***"11B-605.5.1 Urinal location.***

*Urinals in compartments shall have the centerline of the urinal located 17 inches (432 mm) minimum to 18 inches (457 mm) maximum from the side wall or partition. Urinals shall be arranged for a left-hand or right-hand approach."*

I am not a wheelchair user, and I am not familiar with how a wheelchair user might approach and use a urinal. I imagine that would vary depending on an individual's disability. However, I wonder if a (roughly) centered fixture might be more usable to a wider range of people.

Chances are, if urinal compartments are provided, more often than not there will only be one. If that compartment provides, say, a left-handed arrangement, those requiring a right-handed arrangement may not be able to use it. Consider calling for urinals to be (roughly) centered in these compartments instead of located to one side. Consider something like:

**11B-605.5.1 Urinal location.**

*Urinals in wheelchair accessible compartments shall be located within 3" of the center of the mounting wall in measured to the center of the fixture.*

Or:

**11B-605.5.1 Urinal location.**

*Urinals in wheelchair accessible compartments shall be located within 30"-36" from a side wall measured to the center of the fixture.*

It might be prudent to add additional language or an exception for compartments that are < 66 wide:

*Urinals in wheelchair accessible compartments that are < 66" wide shall be located within 2" of the center of the mounting wall measured to the center of the fixture.*

Or:

*Urinals in wheelchair accessible compartments that are < 66" wide shall be located within 28"-32" from a side wall measured to the center of the fixture.*

5. 11B-605.5.2 prescribes a maneuvering space that is located entirely in front of the urinal. No clearance is prescribed on either side of the urinal, even though the figures in Figure 11B-605.5 show the space on each side of the urinals as clear. In addition, 11B-605.5.2 calls for a turning space within the compartment. This is redundant: the prescribed maneuvering clearance is large enough to contain a turning circle. Lastly, 11B-605.5.2, Exception does not align as well as it should with 11B-605.5.4 as the latter includes the possibility that toe clearance may be provided beneath one wall but not another and the former does not. Here is the relevant section:

**11B-605.5.2 Maneuvering**

**clearance.** *A minimum 66 inches (1676 mm) wide and 66 inches (1676 mm) deep maneuvering space shall be provided in front of the urinal. A turning space complying with Section 11B-304 shall be provided within the compartment.*

**Exception:** *Where toe clearance complying with 11B-605.5.4 is provided, the required maneuvering space in front of the urinal fixture shall be permitted to be reduced to 60 inches (1524 mm) minimum wide and 60 inches (1524 mm) minimum deep.*

As with water closets, consider modifying the language to call for the space on each side of urinals in a wheelchair accessible compartment to be clear, and eliminating redundant language calling for a turning space. Lastly, consider modifying the exception so that it allows for toe clearance to be provided beneath just one wall.

Please consider changing 11B-605.5.2 to say:

**11B-605.5.2 Clearance.** *Clearance around a urinal shall be 66 inches (1676 mm) minimum wide and the urinal depth plus 66 inches (1676 mm) minimum deep.*

**Exception:** *Where toe clearance complying with 11B-605.5.4 is provided in the side wall, the required clearance around the urinal may be reduced to 60 inches (1524 mm) minimum wide. Where toe clearance complying with 11B-605.5.4 is provided in the front wall, the required clearance in front of the urinal may be reduced 60 inches (1524 mm) minimum deep.*

**6.** As with wheelchair accessible toilet compartments, 11B-605.5.3 calls for compartment doors to be located 4" maximum from the corner opposite the fixture. The toilet compartment requirement is a carry-over from the 2010 ADAS, which allows for much smaller compartments than the CBC

does. In addition, urinals, which are typically smaller than water closets, are less likely to obstruct access into and out of wheelchair accessible urinal compartment. The relevant text of the section reads as follows:

*"...Doors shall be located in the front partition or in the side wall or partition farthest from the urinal. Where located in the front partition, the door opening shall be 4 inches (102 mm) maximum from the side wall or partition farthest from the urinal. Where located in the side wall or partition, the door opening shall be 4" maximum (102 mm) from the front partition. ..."*

Please consider revising as follows:

*Doors shall be located in the front or side partition or wall such that the urinal does not project into the maneuvering clearance required on the compartment side of the door.*

**7.** A statement within 11B-605.5.3 conflicts directly with (proposed) 11B-213.3.1.2 and subsequent statement within 11B-605.5.3. The relevant text of the section reads as follows:

*"...The urinal compartment door shall be out-swinging, self-closing and have a privacy latch. Door pulls complying with Section 11B-404.2.7 shall be placed on both sides of the door near the latch. Doors shall not swing into the clear floor space at the urinal. Doors may swing into that portion of maneuvering space and turning space which does not overlap the clear floor space required at a urinal."*

The first sentence in the language above states that urinal compartment doors must be out-

swinging, whereas the last sentence and 11B-213.3.1.2 say they may and must, respectively, be in-  
swinging. I don't think the swing direction should be dictated by the code, but either way, these  
differences require reconciliation.

Thank you,

Eric

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