

From: [Mr. Roy](#)
To: CBSC@DGS
Cc: [R A](#)
Subject: proposed code changes
Date: Monday, April 24, 2023 9:28:07 AM

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California Building Standards Commission
Attention: Public Comments
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

Dear California Building Standards Commission:

Please accept the following public comments as my own thoughts on the current Division of the State Architect (DSA-AC) proposed code changes regarding the 2022 California Building Code, California Code of Regulations, Title 24, Part 2 (DSA-AC 01/22) and the Department of Housing and Community Development (HCD 1-AC 01/22 proposed amendments to the 2022 edition of the California Building Standards Code, Title 24, Part 2, proposals.

I support the public comments made by Disability Rights California (DRC) on the proposed building code changes. Additionally, I support the comments of other members of the disability community who have been involved in the code development process and who seek to ensure disabled access and housing accessibility is not reduced, but will ensure true accessibility to the built environment for individuals in the disability community including Connie Arnold and others submitting comments on these DSA-AC and HCD code proposals.

Additionally, I have public comments for the following particular DSA-AC proposed code change items:

ITEM 15 - Chapter 11B ACCESSIBILITY TO PUBLIC BUILDINGS, PUBLIC ACCOMMODATIONS, COMMERCIAL BUILDINGS AND PUBLIC HOUSING Section 11B-605 Urinals

I support, strongly support the proposed code changes **except for 11B-605.5.4 Toe Clearance**, as I oppose the "Exception" that reduces Maneuvering Space to 60" which should remain larger at 66."

11B-605.5.4 Toe Clearance. The front partition and at least one side

partition shall provide a toe clearance of 9 inches (229 mm) minimum above the finish floor and 6 inches (152 mm) deep minimum beyond the compartment-side face of the partition, exclusive of partition support members. Partition components at toe clearances shall be smooth without sharp edges or abrasive surfaces. Compartments for children's use shall provide a toe clearance of 12 inches (305 mm) minimum above the finish floor.

Exception: Toe clearance at the front partition is not required in a compartment where the maneuvering clearance in front of the urinal is 66 inches (1676 mm) deep minimum. Toe clearance at the side partition is not required in a compartment greater than 66 inches (1676 mm) wide.

I, like Disability Rights California states, am strongly “**opposed to a toe clearance exception** because we believe that the maneuvering space should remain larger, since more space will likely be needed for people using large mobility devices to maneuver within a typically unsanitary location such as a urinal. To the extent that toe clearance is eliminated, sufficient toe clearance should be provided under the door because many people who use wheelchairs with foot extensions and have limited upper body mobility use their feet to open doors. See HSC subsections 18930(a)(1), 18930(a)(2), 18930(a)(3), 18930(a)(4), 18930(a)(5), 18930(a)(6), and 18930(a)(8).”

ITEM 16

Chapter 11B ACCESSIBILITY TO PUBLIC BUILDINGS, PUBLIC ACCOMMODATIONS, COMMERCIAL BUILDINGS AND PUBLIC HOUSING, Section 11B-809.10.6 Showers.

11B-809.10.6.1 Size. When one or more shower stalls are provided within the same dwelling unit, as least one shower stall shall comply with one of the following:

- 1. A transfer type shower compartment 36 inches (914 mm) wide by 36 inches (914 mm) deep with an entrance opening 36 inches (914 mm) ~~complying with Section 11B-608.1; or ...~~*

I, like Disability Rights California (DRC) states, am “strongly opposed to this proposed change as it reduces accessibility. This higher accessibility is appropriate in all of the units in public housing. To make this change would result in a reduction in accessibility because the 30x48 shower provides inadequate clearance to effectively transfer. Further, because it conflicts with other provisions, the other provisions which provide greater accessibility should take precedence. See HSC subsections 18930(a)(1), 18930(a)(2), 18930(a)(3), and 18930(a)(4).”

Thanks,

Roy Arnold, Elk Grove, CA 95757