

**INITIAL STATEMENT OF REASONS  
FOR PROPOSED BUILDING STANDARDS  
OF THE DIVISION OF THE STATE ARCHITECT (DSA-AC)  
REGARDING THE 2025 CALIFORNIA BUILDING CODE & 2025 CALIFORNIA  
EXISTING BUILDING CODE  
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 2 & 10  
(DSA-AC 01-24)**

The Administrative Procedure Act (APA) requires that an Initial Statement of Reasons be available to the public upon request when rulemaking action is being undertaken. The following information required by the APA pertains to this particular rulemaking action:

**STATEMENT OF SPECIFIC PURPOSE, PROBLEM, RATIONALE and BENEFITS**

Government Code Section 11346.2(b)(1) requires a statement of specific purpose of each adoption, amendment, or repeal and the problem the agency intends to address and the rationale for the determination by the agency that each adoption, amendment, or repeal is reasonably necessary to carry out the purpose and address the problem for which it is proposed. The statement shall enumerate the benefits anticipated from the regulatory action, including the benefits or goals provided in the authorizing statute.

**2025 CALIFORNIA BUILDING CODE, Part 2  
ITEMS 1 through 19**

**ITEM 1**

**Chapter 2 DEFINITIONS, Section 202, MULTI-BEDROOM HOUSING UNIT**

DSA proposes to change the term “toilet and bathing room” for “bathroom” in the definition for consistency and clarity. The term “bathroom” is used and defined in both the California Building Code and the Fair Housing Act, and this amendment defines the applicable design requirements for bathrooms as stated in the definition.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 2**

**Chapter 11B ACCESSIBILITY TO PUBLIC BUILDINGS, PUBLIC ACCOMMODATIONS,  
COMMERCIAL BUILDINGS AND PUBLIC HOUSING, Section 11B-213.2 Toilet rooms  
and bathing rooms.**

DSA is proposing to remove the language of Section 11B-213.2 exception 5 to eliminate duplicative language. The exception is duplicated at Section 11B-603.6. Duplication is a violation of Health and Safety Code 18930(a)(1), also known as item one of the nine-point criteria for building standards. Furthermore, there are no references in Section 11B-224 specific to transient lodging that reference any requirement in Section 11B-213.2.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 3**

**Chapter 11B ACCESSIBILITY TO PUBLIC BUILDINGS, PUBLIC ACCOMMODATIONS, COMMERCIAL BUILDINGS AND PUBLIC HOUSING, Section 11B-224 Transient lodging guest rooms, *housing at a place of education and social service center establishments.***

DSA proposes to amend scoping requirements for Section 11B-224 applicable to transient lodging facilities and housing at a place of education. In the 2010 ADA Standards, the requirement for housing at a place of education to follow the requirements of 224 for transient lodging facilities is in regulation in Section 35.151 of 28 CFR Part 35 for Title II entities and Section 36.406(e) of Subpart D of 28 CFR Part 36 for Title III entities, and not in the text of Section 224. In order to appropriately determine the required scope for these facilities, specific requirements for housing at a place of education is necessary in Section 11B-224. However, where all the requirements in Section 11B-224 are applicable to transient lodging facilities, not all the requirements of Section 11B-224 are applicable to housing at a place of education.

To distinguish the requirements for each, DSA proposes to remove “dormitories” as an example of “similar transient lodging facilities” and to include “housing at a place of education for undergraduate students” in Section 11B-224.1.

DSA proposes to amend Section 11B-224.1.2 by adding “In transient lodging facilities” to the requirement for bathroom doors to be either sliding or hung to swing in the direction of egress from the bathroom. This requirement is not applicable to housing at a place of education which requires compliance to the more restrictive requirements of the Fair Housing Act for residential dwelling units with adaptable features. Additionally, this requirement in the 2010 CBC and prior editions was specific to transient lodging facilities only.

DSA proposes to amend Section 11B-224.1.4 by adding “In transient lodging facilities” to the requirement to provide all toilet and bathing fixtures in a location that allows a person using a wheelchair to touch the wheelchair to any sanitary fixture. This requirement is not applicable to housing at a place of education which requires compliance to the more restrictive requirements of the Fair Housing Act for residential dwelling units with adaptable features. Additionally, this requirement in the 2010 CBC and prior editions was specific to transient lodging facilities only.

DSA proposes to amend Section 11B-224.2 to include “housing at a place of education for undergraduate students” to provide applicable scoping to the requirements of Section 11B-806.2. Additionally, DSA proposes to clarify that only transient lodging facilities are subject to the scoping requirements of Sections 11B-224.2.1 and 11B-224.2.2, which are in regulation in Section 36.406(c) of Subpart D of 28 CFR Part 36 applicable to transient lodging facilities of Title III entities. DSA confirmed with the US Department of Justice (USDOJ) this proposed language is in keeping with the USDOJ regulations.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 4**

**Chapter 11B ACCESSIBILITY TO PUBLIC BUILDINGS, PUBLIC ACCOMMODATIONS, COMMERCIAL BUILDINGS AND PUBLIC HOUSING, Section 11B-228.3.2 Minimum number.**

DSA proposes to amend the exceptions in Section 11B-228.3.2, which are not clear to code users and enforcement entities, leading to variant interpretations and enforcement. The term “public” is used with two distinct meanings within this section, adding to the lack of clarity. DSA proposes to remove exception 2 as the proposed amended language at exception 1 covers a specific driver, an employee, and a resident in public housing. The proposed amendment separates the types of drivers and vehicles that are exempted from the section to provide clarity for the code user.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 5**

**Chapter 11B ACCESSIBILITY TO PUBLIC BUILDINGS, PUBLIC ACCOMMODATIONS, COMMERCIAL BUILDINGS AND PUBLIC HOUSING, Section 11B-233.3 Public housing facilities.**

Currently there is no language directing code users to Section 11B-809 from the scoping sections for public housing at 11B-233. This proposed amendment for Section 11B-809.1 adds this additional reference to 11B-809. Section 11B-809.6 requires residential dwelling units with adaptable features to comply with 11B-809.7 through 11B-809.12 therefore referencing directly to 11B-809.6 for the requirements and providing needed clarity.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 6**

**Chapter 11B ACCESSIBILITY TO PUBLIC BUILDINGS, PUBLIC ACCOMMODATIONS, COMMERCIAL BUILDINGS AND PUBLIC HOUSING, Section 11B-233.3.1.2.6.1 Single building with one common (lobby) entrance.**

DSA proposes to correct the reference in Section 11B-233.1.2.6.1 which incorrectly references Section 11B-233.3.1.2.6.2, a different unusual characteristic test of site impracticality. This correction should appropriately reference Section 11B-233.3.1.2.6.5, which lists features with which remaining ground floor dwelling units are required to

comply.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 7**

**Chapter 11B ACCESSIBILITY TO PUBLIC BUILDINGS, PUBLIC ACCOMMODATIONS, COMMERCIAL BUILDINGS AND PUBLIC HOUSING, Section 11B-233.3.1.2.6.5  
Additional requirements.**

DSA proposes to provide additional information about the applicability of this section with the introductory language. DSA also proposes to correct the references for clarity. Item number 2 in Section 11B-233.3.1.2.6.5 should reference the requirements for manual doors in Section 11B-404.2.3 and not the requirements in Section 11B-404.3.1 which are applicable to a subsection of automatic and power-assisted doors and gates. Item number 4 in Section 11B-233.3.1.2.6.5 should reference the requirements for Section 11B-809.8.4 for door signaling devices and not the requirements in Section 11B-809.8.1 for thresholds.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 8**

**Chapter 11B ACCESSIBILITY TO PUBLIC BUILDINGS, PUBLIC ACCOMMODATIONS, COMMERCIAL BUILDINGS AND PUBLIC HOUSING, Section 11B-603.6 Guest room toilet and bathing rooms.**

DSA proposes to amend Section 11B-603.6 to clarify a California-specific requirement only applicable to transient lodging facilities, and not to housing at a place of education. The requirements for bathrooms in residential dwelling units with adaptable features in housing at a place of education are required to comply with the Fair Housing Act, which provides greater accessibility to bathrooms in units that are not required to provide mobility features.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 9**

**Chapter 11B ACCESSIBILITY TO PUBLIC BUILDINGS, PUBLIC ACCOMMODATIONS, Section 11B-705.1.2 Location.**

DSA proposes to clarify requirements for detectable warning surfaces at blended transitions that are lengthy and continuous, such as occurs at the entrance to large retail facilities. At these locations, the perspective of “width” and “depth” is relative because

pedestrian traffic can be parallel to the blended transition or perpendicular to the transition. The proposed language orients the code user in application of the requirements.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 10**

**Chapter 11B ACCESSIBILITY TO PUBLIC BUILDINGS, PUBLIC ACCOMMODATIONS, COMMERCIAL BUILDINGS AND PUBLIC HOUSING, Section 11B-806.2.3.1 Personal lift device floor space.**

DSA proposes to amend the technical requirements for personal lift device clear floor space to clarify that this requirement is applicable to transient lodging where many hotel owners block the underside of the bed. This requirement is not applicable to housing at a place of education which requires compliance with Fair Housing Act design requirements and also requires a place of education to provide reasonable modification for a student upon request.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 11**

**Chapter 11B ACCESSIBILITY TO PUBLIC BUILDINGS, PUBLIC ACCOMMODATIONS, COMMERCIAL BUILDINGS AND PUBLIC HOUSING, Section 11B-806.2.4 Toilet and bathing facilities.**

This requirement in Section 11B-806.2.4.1 applies to both transient lodging facilities, which uses the term “toilet or bathing rooms” and to housing at a place of education, where the requirements for the defined term “bathroom” apply. DSA proposes to use both terms in this section to denote applicability in both types of facilities.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 12**

**Chapter 11B ACCESSIBILITY TO PUBLIC BUILDINGS, PUBLIC ACCOMMODATIONS, COMMERCIAL BUILDINGS AND PUBLIC HOUSING, Section 11B-809 Residential dwelling units.**

DSA proposes to amend Section 11B-809.1.1 to clarify that door signal devices in buildings with three or more dwelling units are required. This amendment brings consistency with the requirements of public housing units with adaptable features. DSA

also proposes to amend section 11B-809.1.2 Viewing devices to include a lower viewing device where viewing devices are provided, to bring consistency to residential dwelling units. These are companion proposals (Item 5) amending scoping requirements in 11B-233.3, which are proposed to state that residential dwelling units in public housing facilities are to comply with Section 11B-809.

DSA additionally proposes to add Section 11B-809.1.3 to provide the same requirement for residential dwelling units with mobility features as is provided in Section 11B-809.11, which requires residential dwelling units with adaptable features to provide one of each type of washing machines and clothes dryers within the unit, where such appliances are provided. This provision is a requirement of the Fair Housing Act. There is currently no scoping for clothes washing and drying machines for residential dwelling units with mobility features when these units are provided in newly constructed multifamily dwellings in public housing.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 13**

**Chapter 11B ACCESSIBILITY TO PUBLIC BUILDINGS, PUBLIC ACCOMMODATIONS, COMMERCIAL BUILDINGS AND PUBLIC HOUSING, Section 11B-809.6 Residential dwelling units with adaptable features.**

DSA proposes to remove reference to “multifamily” from the residential dwelling units with adaptable features in Section 11B-809.6. As written, the term defines the unit and not a multi-family building. In the 2022 Intervening Code Cycle, DSA proposed and adopted clarifying scoping requirements in Section 11B-233.3.1.2, which clarified the requirement that newly constructed buildings with three or more residential dwelling units must provide residential dwelling units with adaptable features; therefore, the reference to “multifamily” in Section 11B-809.6, which is intended to provide scoping and is thereby misplaced in the technical requirements, is proposed to be removed to provide greater consistency and eliminate confusion.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 14**

**Chapter 11B ACCESSIBILITY TO PUBLIC BUILDINGS, PUBLIC ACCOMMODATIONS, COMMERCIAL BUILDINGS AND PUBLIC HOUSING, Section 11B-809.8 Doors.**

DSA proposes to amend the requirements of 11B-809.8 to provide clarity for interior doors within residential dwelling units with adaptable features. Existing language in the code required interior doors to comply with Section 11B-404.2, yet subsequent requirements in the section provided a list of specific requirements for interior doors that conflicted with Section 11B-404.2 and created an invalid exception to the requirements. Conflicting

requirements are a violation of Health and Safety Code 18930(a)(1), also known as item one of the nine-point criteria for building standards. This created confusion to the code user. The proposed language lists the specific requirements of Section 11B-404.2 which are applicable to interior doors in residential dwelling units with adaptable features and provides greater clarity to the requirements that are specific to interior doors in residential dwelling units with adaptable features provided in Section 11B-809.8.

To further clarify the requirements, the existing exceptions in Section 11B-809.8 are proposed to move to the more appropriate location in Section 11B-809.8.3.1.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 15**

**Chapter 11B ACCESSIBILITY TO PUBLIC BUILDINGS, PUBLIC ACCOMMODATIONS, COMMERCIAL BUILDINGS AND PUBLIC HOUSING, Section 11B-809.10 Bathrooms and powder rooms.**

DSA proposes to change all reference to “toilet and bathing rooms” to “bathrooms” for Section 11B-809.10, which is applicable solely to residential dwelling units with adaptable features. The variant terms create confusion for the code user. California Building Code (CBC) Chapter 2 has a definition for “bathroom” which defines applicable requirements under the Fair Housing Act but does not contain a definition for “toilet and bathing rooms”. By using “bathrooms”, the definition enforces the requirements that all fixtures must be in one bathroom or compartmented interconnected bathrooms.

DSA proposes to amend Section 11B-809.10.1 to include reference to Section 11B-809.10.5.2 which requires backing for grab bars at bathtubs. This reference was omitted in prior rulemaking.

DSA proposes to amend Section 11B-809.10.2 to create consistency and clarity with no regulatory effect.

DSA proposes to amend Section 11B-809.10.3 to remove the reference for Section 11B-809.10.5.2, grab bars in bathtubs, and 11B-809.10.6.4, grab bars in showers, from the powder room requirements. Powder rooms, by the definition in CBC Chapter 2, may only include a toilet and a lavatory. The appropriate references for grab bars and showers are provided in Section 11B-809.10.1. Inclusion of these requirements was an error in prior rulemaking.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

## ITEM 16

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

DSA proposes to amend Section 11B-809.10.6.1 Item number 1 which requires compliance with Section 11B-608.1, incorrectly including all requirements for fully accessible showers, when the requirement should reference only the shower size requirements. In the 2022 Intervening Rulemaking Cycle, DSA attempted to clarify this requirement; however, the Building Standards Commission requested that DSA provide further study because many individuals with disabilities wanted to preserve the clear floor space requirement referenced in Section 11B-608.1, instead of the clear floor space requirement of Section 11B-809.10.6.3.

This proposal brings forth the applicable requirements of Section 11B-608.1 specific to size into Section 11B-809.10.6.1. A companion proposal included in this rulemaking increases the clear floor space for all shower types in residential dwelling units with adaptable features and defines positioning requirements for the clear floor space at a transfer shower, thereby providing clarity to the requirements in the section specific to residential dwelling units with adaptable features and eliminating the need for reference to Section 11B-608.1. (See companion proposal for Section 11B-809.10.6.3.)

#### **CAC Recommendation:**

[Enter CAC recommendation(s), if any]

#### **Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

## ITEM 17

### Chapter 11B ACCESSIBILITY TO PUBLIC BUILDINGS, PUBLIC ACCOMMODATIONS, COMMERCIAL BUILDINGS AND PUBLIC HOUSING, Section(s) 11B-809.10.6.3 Clearance.

DSA proposes to amend Section 11B-809.10.6.3 to increase the clear floor space width from 30 inches to 36 inches at showers in residential dwelling units with adaptable features. In the 2022 Intervening Rulemaking Cycle, DSA attempted to clarify in Section 11B-809.10.6.1 the reference to Section 11B-608.1, which specifies the size for transfer showers. In addition to the size, the reference provided for a 36" x 48" clear floor space at the shower fixture, and a subsequent reference in Section 11B-809.10.6.3 which specifies a 30" x 48" floor space, provided for conflicting requirements. While the 30" minimum clear floor space width is the minimum permitted by the Fair Housing Act, individuals with disabilities acknowledged the minimum clear floor space requirements were insufficient. The Building Standards Commission did not approve the proposal and requested that DSA provide further study. DSA advances this proposal to increase to 36" wide the clear floor space at all showers in residential dwelling units with adaptable features. A referenced figure is necessary to illustrate the position of the clear floor space relative to the control wall of the shower and ensure the ability to enforce the elements clarified in the figure. (See companion proposal for Section 11B-809.10.6.1.)

#### **CAC Recommendation:**

[Enter CAC recommendation(s), if any]



**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 18**

**Chapter 11B ACCESSIBILITY TO PUBLIC BUILDINGS, PUBLIC ACCOMMODATIONS, COMMERCIAL BUILDINGS AND PUBLIC HOUSING, Section 11B-902.2 Clear floor or ground space.**

DSA proposes to amend Section 11B-902.2 to indicate that in dining areas, where an accessible route is required, the accessible route shall be maintained clear so as not to require a diner to reposition to make clear the accessible route. This amendment is needed to prohibit overlap, so as not to conflict with the requirement in Section 11B-305.6, which permits a clear floor space to overlap an accessible route except where prohibited.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 19**

**Chapter 15 ROOF ASSEMBLIES AND ROOFTOP STRUCTURES, Section 1511.9.6 Accessibility and egress.**

DSA proposes to amend a provision in the 2024 International Building Code (IBC). Section 1511.9.6 is a new code section that will be adopted for the CBC when the BSC adopts the 2024 IBC as model code. This proposal replaces the ICC reference to Chapter 11 with a reference to Chapter 11A and Chapter 11B, as applicable.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**2025 CALIFORNIA EXISTING BUILDING CODE, Part 10  
ITEMS 20 through 21**

**ITEM 20**

**Chapter 3 PROVISIONS FOR ALL COMPLIANCE METHODS, Section 306 Accessibility For Existing Buildings (Not adopted by HCD or OSHPD)**

DSA does not adopt Title 24 Part 10 California Existing Building Code (CEBC), Section 306 Accessibility for Existing Buildings. DSA has historically added a banner indicating that projects under DSA authority for accessibility should refer to Part 2 California Building Code (CBC) Chapter 11B.

DSA proposes to remove the text of CEBC Section 306 et seq. and amend the banner to state that public buildings, public accommodations, commercial facilities, and public housing are required to comply with Chapter 11B. This creates clarity from the requirements for housing in the note provided by HCD regarding housing required to

comply with Chapter 11A.

DSA has received inquiries from code users regarding the application of CEBC Section 306 to projects that are covered by CBC Chapter 11B. Printing both CEBC Section 306 and CBC Chapter 11B is duplicative and conflicting, creating an unnecessary ambiguousness for code users. Duplicative and conflicting requirements are a violation of Health and Safety Code 18930(a)(1), also known as item one of the nine-point criteria for building standards.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 21**

**Chapter 16 REFERENCED STANDARDS, Section ICC**

DSA proposes to amend the referenced standard provided in Chapter 16 of the ICC Existing Building Code (IEBC), eliminating the Section 306 subsections that reference ICC A117.1. The IEBC is proposed to be adopted as model code for the California Existing Building Code. DSA does not adopt either Section 306 or ICC A117.1 for accessibility requirements, and instead adopts Chapter 11B, which is based on the 2010 Americans with Disabilities Act Standards. DSA does not propose to strike the remaining sections; Sections 502.6, 503.18, 1011.4 and 1101.6 relate to general room acoustics. The 2010 Americans with Disabilities Act Standards and the CBC Chapter 11B scoping does not include room acoustics scoping requirements.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**TECHNICAL, THEORETICAL, AND EMPIRICAL STUDY, REPORT, OR SIMILAR DOCUMENTS**

Government Code Section 11346.2(b)(3) requires an identification of each technical, theoretical, and empirical study, report, or similar document, if any, upon which the agency relies in proposing the regulation(s).

The proposed height for viewing devices is derived from the Federal Department of Justice Figure A3 Dimensions of Adult Sized Wheelchairs

**STATEMENT OF JUSTIFICATION FOR PRESCRIPTIVE STANDARDS**

Government Code Section 11346.2(b)(1) requires a statement of the reasons why an agency believes any mandates for specific technologies or equipment or prescriptive standards are required.

The proposed building standards clarify accessibility provisions contained in the 2025 California Building Code and 2025 California Existing Building Code. Accessibility is required by the federal Americans with Disabilities Act and corresponding California

statutes and regulations; lack of consistent scoping and technical requirements creates confusion for code users, building officials, and building and facility owners.

### **CONSIDERATION OF REASONABLE ALTERNATIVES**

Government Code Section 11346.2(b)(4)(A) requires a description of reasonable alternatives to the regulation and the agency's reasons for rejecting those alternatives. In the case of a regulation that would mandate the use of specific technologies or equipment or prescribe specific action or procedures, the imposition of performance standards shall be considered as an alternate. It is not the intent of this paragraph to require the agency to artificially construct alternatives or describe unreasonable alternatives.

The Division of the State Architect has not identified any reasonable alternatives to the proposed action.

### **REASONABLE ALTERNATIVES THE AGENCY HAS IDENTIFIED THAT WOULD LESSEN ANY ADVERSE IMPACT ON SMALL BUSINESS**

Government Code Section 11346.2(b)(4)(B) requires a description of any reasonable alternatives that have been identified or that have otherwise been identified and brought to the attention of the agency that would lessen any adverse impact on small business.

The Division of the State Architect has not identified any reasonable alternatives to the proposed action, and no adverse impact to small business due to these proposed changes is expected.

### **FACTS, EVIDENCE, DOCUMENTS, TESTIMONY, OR OTHER EVIDENCE OF NO SIGNIFICANT ADVERSE ECONOMIC IMPACT ON BUSINESS**

Government Code Section 11346.2(b)(5)(A) requires the facts, evidence, documents, testimony, or other evidence on which the agency relies to support an initial determination that the action will not have a significant adverse economic impact on business.

The Division of the State Architect has no evidence indicating any potential significant adverse impact on business with regard to this proposed action.

### **ASSESSMENT OF EFFECT OF REGULATIONS UPON JOBS AND BUSINESS EXPANSION, ELIMINATION OR CREATION**

Government Code Sections 11346.2(b)(2) and 11346.3(b)(1)

The Division of the State Architect has assessed whether and to what extent this proposal will affect the following:

**A. The creation or elimination of jobs within the State of California.**

The Division of the State Architect has determined that the proposed action has no effect.

**B. The creation of new businesses or the elimination of existing businesses within the State of California.**

The Division of the State Architect has determined that the proposed action has no effect.

**C. The expansion of businesses currently doing business within the State of California.**

The Division of the State Architect has determined that the proposed action has no effect.

**D. The benefits of the regulation to the health and welfare of California residents, worker safety, and the state's environment.**

The Division of the State Architect has determined that the proposal establishes the minimum requirements to safeguard the public health, safety and general welfare through access to persons with disabilities.

**ESTIMATED COST OF COMPLIANCE, ESTIMATED POTENTIAL BENEFITS, AND RELATED ASSUMPTIONS USED FOR BUILDING STANDARDS**

Government Code Section 11346.2(b)(5)(B)(i) states if a proposed regulation is a building standard, the initial statement of reasons shall include the estimated cost of compliance, the estimated potential benefits, and the related assumptions used to determine the estimates.

The Division of the State Architect estimates that the cost of compliance with these proposed regulations will be minimal. With few exceptions all proposed amendments remove conflicts or provide greater clarity in the requirements and will not have any associated costs. The addition of viewing devices, door signal devices and washer dryers are only a requirement when such elements are provided and are not a requirement of all residential facilities regulated by Chapter 11B. Clear and consistent scoping and technical requirements benefit code users, building officials, and building and facility owners.

**DUPLICATION OR CONFLICTS WITH FEDERAL REGULATIONS**

Government Code Section 11346.2(b)(6) requires a department, board, or commission within the Environmental Protection Agency, the Resources Agency, or the Office of the State Fire Marshal to describe its efforts, in connection with a proposed rulemaking action, to avoid unnecessary duplication or conflicts with federal regulations contained in the Code of Federal Regulations addressing the same issues. These agencies may adopt regulations different from these federal regulations upon a finding of one or more of the following justifications: (A) The differing state regulations are authorized by law and/or (B) The cost of differing state regulations is justified by the benefit to human health, public safety, public welfare, or the environment.

The regulations proposed for adoption do not duplicate or conflict with federal regulations.