

**NOTICE OF PROPOSED ACTION  
TO BUILDING STANDARDS OF THE  
DIVISION OF THE STATE ARCHITECT  
REGARDING THE 2025 CALIFORNIA BUILDING CODE  
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 2  
(DSA-AC 01/25)**

Notice is hereby given that the California Building Standards Commission (CBSC) on behalf of Division of the State Architect (DSA-AC) proposes to adopt, approve, codify, and publish changes to building standards contained in the California Code of Regulations (CCR), Title 24, Part 2. The DSA-AC is proposing building standards related to 2025 California Building Code.

**PUBLIC COMMENT PERIOD**

Reference: Government Code Sections 11346.5(a)(1), 11346.5(a)(15) and 11346.5(a)(17).

A public hearing has not been scheduled; however, written comments will be accepted from **April 17, 2026**, until midnight on **June 1, 2026**.

Comments may be submitted to CBSC via:

Email: [cbsc@dgs.ca.gov](mailto:cbsc@dgs.ca.gov)

US Mail postmarked no later than **June 1, 2026**:

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

All written comments received are considered part of the public record and will be made available for public inspection via [CBSC's website](#). Public comments may include personally identifiable information (PII) such as name, email address or mailing address. Interested persons are not required to submit their PII to comment on this rulemaking. However, any PII submitted is subject to posting on the publicly accessible [CBSC website](#) without redaction. Also, only comments received in an accessible format will be viewable on CBSC's website. Non-accessible comments will be listed on the website and made available upon request. Any interested person, or his or her duly authorized representative, may request no later than 15 days prior to the close of the written comment period that a public hearing be held.

The public will have an opportunity to provide written and oral comments regarding the proposed action on building standards at a public meeting to be conducted by CBSC to be scheduled at a date near the end of the current adoption cycle. A meeting notice will be issued announcing the date, time and location of the public meeting.

**POST-HEARING MODIFICATIONS TO THE TEXT OF THE REGULATIONS**

Reference: Government Code Section 11346.5(a)(18).

Following the public comment period, CBSC may adopt the proposed building standards substantially as proposed in this notice or with modifications that are sufficiently related to the original proposed text and notice of proposed changes. If modifications are made, the full text of the proposed modifications, clearly indicated, will be made available to the public for at least 15 days prior to the date on which CBSC adopts, amends, or repeals the regulation(s). CBSC will accept written comments on the modified building standards

during the 15-day period.

NOTE: To be notified of any modifications, you must submit written/oral comments or request that you be notified of any modifications.

## **AUTHORITY AND REFERENCE**

Reference: Government Code Section 11346.5(a)(2).

CBSC proposes to adopt these building standards under the authority granted by Health and Safety Code Section 18949.1. The purpose of these building standards is to implement, interpret, or make specific the provisions of Government Code Section 4450 through 4452, 4456, 4457, 4459, and 12955.1, Health and Safety Code Sections 19955, 19956.5, 19957, 19958 and 19959.

The Division of the State Architect is proposing this regulatory action based on Government Code Section 4450 and 12955.1(c).

## **INFORMATIVE DIGEST**

Reference: Government Code Section 11346.5(a)(3).

### **Summary of Existing Laws**

**Government Code Section 4450** authorizes the State Architect to develop regulations for making buildings, structures, sidewalks, curbs, and related facilities accessible to and usable by persons with disabilities.

**Government Code Section 4450.5** requires the regulations developed for accessible parking spaces to meet the requirements set forth in Vehicle Code Sections 22511.7 and 22511.8.

**Government Code Section 4451** limits the application to buildings and facilities intended for use by the public, with reasonable availability to persons with disabilities, including educational facilities and including those buildings and facilities constructed with state, county, or municipal funds, including any political subdivision thereof. Includes temporary and emergency construction.

**Government Code Section 4452** states that it is the intent of the Legislature that the building standards relating to disabled access are intended to be used as minimum requirements to ensure that buildings and facilities are accessible to, and functional for, disabled persons.

**Government Code Section 4456** establishes that buildings and facilities constructed prior to Nov. 13, 1968 must comply with accessibility provisions when undertaking an alteration, structural repair, or addition.

**Government Code Section 4457** requires that portable school buildings be accessible, with some exceptions.

**Government Code Section 4459** directs the State Architect to develop amendments to building regulations to meet, but not exceed, state regulations effective prior to 2001 and to meet minimum federal accessibility standards adopted by the Department of Justice.

**Government Code Section 12955.1** requires that building standards for public housing must meet minimum federal standards and gives the Division of the State Architect authority to propose regulations as deemed appropriate and necessary to implement, interpret, or make specific the provisions contained therein.

**Health and Safety Code 18942(a)(2)** limits amendments to building standards adopted during the intervening code cycles to clarifying, conforming, coordinating changes which do not materially alter existing regulations but also permits the adoption of emergency building standards, and building standards necessary to align with minimum federal accessibility laws, standards and regulations.

**Health and Safety Code Section 18949.1** transfers responsibility to adopt regulations relating to building standards from the Division of the State Architect to the Building Standards Commission.

**Health and Safety Code Section 19955** requires certain public accommodations and facilities be accessible to persons with disabilities.

**Health and Safety Code Section 19956.5** requires that public walks and curbs be accessible.

**Health and Safety Code Section 19957** provides exceptions from the literal building standards in the cases of unnecessary hardship or technical difficulty and sets enforcement and equivalent facilitation standards.

**Health and Safety Code Section 19958** provides authority for enforcement of building regulations.

**Health and Safety Code Section 19959** requires existing public accommodations to provide accessible features when alterations, structural repairs, or additions are undertaken.

## Summary of Existing Regulations

**California Code of Regulations (CCR) Title 2, Division 3, Part 2.8, Chapter 4, Section 12926.1** provides protections in the area of disabilities independent from those in the federal Americans with Disabilities Act of 1990 (Public Law 100-336).

**California Code of Regulations (CCR) Title 2, Division 4.1, Chapter 5, Subchapter 9, Article 12, Section 14020, 14340, 14342** requires that facilities that are constructed by, on behalf of, or for the use of a covered entity must be readily accessible to people with disabilities.

**California Code of Regulations (CCR) Title 24, Part 2** contains existing regulations promulgated by DSA-AC. These regulations are applicable to:

1. Publicly funded buildings, structures, sidewalks, curbs and related facilities;
2. Privately funded public accommodations and commercial facilities;

3. Public housing and private housing available for public use;
4. Any portable buildings leased or owned by a school district; and
5. Temporary and emergency buildings and facilities.

### **Summary of Effect**

The proposed action would amend the CCR, Title 24, Part 2 by:

- Providing new definitions for Educational Entity in Receipt of Financial Assistance and Social Service Center Establishments that are used to clarify scoping and technical requirements for these facilities.
- Clarifying definitions of Place of Public Accommodation and Public Housing.
- Aligning the requirements for Public Housing with the Uniform Federal Accessibility Standards (UFAS), including employee work areas within public housing facilities, as adopted by HUD.
- Clarifying and removing duplicative sections for electrical receptacles at corner work surfaces.
- Clarifying that on-call rooms in medical facilities are not transient lodging.
- Removing the site impracticality exceptions for public housing.
- Clarifying that housing provided by public entities is public housing.
- Clarifying that the existing exception for vertical clearance at existing multistory parking facility parking spaces also applies to Electric Vehicle Charging Spaces.
- Clarifying the previously adopted referenced standards for ASME and BHMA to correct an error.

### **Comparable Federal Statute or Regulations**

Comparable federal statutes and regulations include:

- Civil Rights Act of 1964 (CRA) provided the federal government the ability to prohibit entities from enacting discriminative practices, by limiting or withholding federal funds provided to those entities.
- Section 504 of the Rehabilitation Act of 1973 added persons with disabilities to the list of prior established protected classes of individuals.
- Civil Rights Restoration Act of 1987 (Public Law 100-259) clarified when any portion of an organization is in receipt of financial assistance, the entire organization is subject to the Civil Rights Act of 1964. Section 2 of the Civil Rights Restoration Act of 1987 determined legislative action was required to restore prior executive branch interpretation regarding past the administration of title IX (nine) of the Education Amendments of 1972, section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and title VI (six) of the Civil Rights Act of 1964.
- Title IX (nine) of the Education Amendments of 1972 states no person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving federal financial assistance.
- Age Discrimination Act of 1975 ensures individuals of all ages are not excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity that receives federal financial assistance.
- Regulations for Title II and Title III of the Americans with Disabilities Act of

1990, as adopted by the US Department of Justice. The regulations provide enforceable standards for accessible design, known as the 2010 Americans with Disabilities Act Standards (ADAS) for Accessible Design, in three parts.

1. 2010 Standards for State and Local Government Facilities: Title II Regulations at 28 CFR Part 35.151;
  2. 2010 Standards for Public Accommodations and Commercial Facilities: Title III Regulations at 28 CFR Part 36, Subpart D; and
  3. 2010 Standards for Title II and III Facilities: 2004 ADAAG
- Fair Housing Amendments Act of 1988.
  - The Department of Housing and Urban Development (HUD) Section 504 of the Rehabilitation Act of 1973.
  - Uniform Federal Accessibility Standards (UFAS).

### **Policy Statement Overview**

The proposed building standards are intended to align accessibility provisions for public housing with existing federal regulations and to clarify existing accessibility provisions contained in the 2025 California Building Code to ensure that publicly funded buildings, structures, sidewalks, curbs, and related facilities shall be accessible to and usable by persons with disabilities; privately funded public accommodations and commercial facilities shall be accessible to and usable by persons with disabilities; and public housing shall be accessible to and usable by persons with disabilities.

### **Evaluation of Consistency**

There are no inconsistent or incompatible regulations proposed.

### **OTHER MATTERS PRESCRIBED BY STATUTE APPLICABLE TO THE AGENCY OR TO ANY SPECIFIC REGULATION OR CLASS OF REGULATIONS**

Reference: Government Code Section 11346.5(a)(4).

There are no other matters prescribed by statute applicable to DSA-AC, or to any specific regulation or class of regulations.

### **MANDATE ON LOCAL AGENCIES OR SCHOOL DISTRICTS**

Reference: Government Code Section 11346.5(a)(5).

DSA-AC has determined that the proposed regulatory action WOULD NOT impose a mandate on local agencies or school districts.

### **ESTIMATE OF COST OR SAVINGS**

Reference: Government Code Section 11346.5(a)(6).

An estimate, prepared in accordance with instructions adopted by Department of Finance, of cost or savings to any state agency, local agency, or school district.

- A. Cost or Savings to any state agency: **No**
- B. Cost to any local agency required to be reimbursed under Part 7 (commencing with Section 17500) of Division 4: **No**

- C. Cost to any school district required to be reimbursed under Part 7 (commencing with Section 17500) of Division 4: **No**
- D. Other nondiscretionary cost or savings imposed on local agencies: **No**
- E. Cost or savings in federal funding to the state: **No**

Estimate: \$0

### **INITIAL DETERMINATION OF NO SIGNIFICANT STATEWIDE ADVERSE ECONOMIC IMPACT ON BUSINESSES**

Reference: Government Code Section 11346.5(a)(8).

If the agency makes an initial determination that the adoption/amendment/repeal of this regulation will not have a significant, statewide adverse economic impact directly affecting business, including the ability of California businesses to compete with businesses in other states, it shall make a declaration to that effect.

DSA-AC has made an initial determination that the adoption of these regulations will not create adverse economic impact on businesses, including the ability of California businesses to compete with businesses in other states.

#### **Declaration of Evidence**

Reference: Government Code Section 11346.5(a)(8).

In making the declaration, the agency shall provide in the record of facts, evidence, documents, testimony, or other evidence that the agency relied upon to support its initial determination of no effect.

No facts, evidence, documents, testimony or other evidence were relied upon nor received during pre-cycle outreach workshops indicating that there would be a significant statewide adverse economic impact to business. The public may submit any information, facts or documents either supporting DSA's initial determination or finding to the contrary.

### **COST IMPACT ON REPRESENTATIVE PRIVATE PERSON OR BUSINESS**

Reference: Government Code Section 11346.5(a)(9).

Describe all cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action. If no cost impact, provide the following statement:

DSA-AC is not aware of any cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action.

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

Reference: Government Code Section 11346.5(a)(10).

The DSA-AC has assessed whether and to what extent these proposals 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.

**FINDING OF NECESSITY FOR THE PUBLIC'S HEALTH, SAFETY, OR WELFARE**

Reference: Government Code Section 11346.5(a)(11).

Any regulation that requires a report shall not apply to businesses, unless the agency makes a finding that it is necessary for the health, safety, or welfare of the public that the regulations apply to businesses.

N/A

**ESTIMATED COST OF COMPLIANCE OF STANDARDS THAT WOULD IMPACT HOUSING**

Reference: Government Code Section 11346.5(a)(12).

DSA-AC has made an initial determination that these proposals would not have an effect on housing costs because the requirements exist in federal regulation and are already applicable to public housing projects in California.

**CONSIDERATION OF ALTERNATIVES**

Reference: Government Code Section 11346.5(a)(13).

DSA-AC has determined that no reasonable alternative considered by DSA-AC, or that has otherwise been identified and brought to the attention of DSA-AC, would be more effective in carrying out the purpose for which the action is proposed, or would be as effective and less burdensome to affected private persons than the proposed action. In addition, no reasonable alternative considered by DSA-AC, or that has otherwise been identified and brought to the attention of DSA-AC, would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provisions of law.

**AVAILABILITY OF RULEMAKING DOCUMENTS**

Reference: Government Code Sections 11346.5(a)(16) and 11346.5(a)(20).

All of the information upon which the proposed regulations are based on is contained in the rulemaking file, which is available for public review, by contacting the person named below. This notice, the express terms and initial statement of reasons can be accessed from the [CBSC website](https://dgs.ca.gov/BSC): [dgs.ca.gov/BSC](https://dgs.ca.gov/BSC).

Reference: Government Code Section 11346.5(a)(19).

Interested parties may obtain a copy of the final statement of reasons, once it has been prepared, by making a written request to the contact person named below or at the [CBSC website](https://www.dgs.ca.gov/en/BSC): <https://www.dgs.ca.gov/en/BSC>.

Reference: Government Code Section 11346.5(a)(21).

DSA-AC shall provide, upon request, a description of proposed changes included in the proposed action, in the manner provided by Section 11346.6, to accommodate a person with a visual or other disability for which effective communication is required under state or federal law. The statement shall note that providing the accessible description of proposed changes may require extending the period of public comment for the proposed action.

### **CBSC CONTACT PERSON FOR PROCEDURAL AND ADMINISTRATIVE QUESTIONS**

Reference: Government Code Section 11346.5(a)(14).

General questions regarding procedural and administrative issues should be addressed to:

Kevin Day, Deputy Executive Director  
California Building Standards Commission  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA 95833  
Telephone: (916) 263-0916

### **PROPOSING STATE AGENCY CONTACT PERSON FOR SUBSTANTIVE OR TECHNICAL QUESTIONS ON THE PROPOSED CHANGES TO BUILDING STANDARDS**

Specific questions regarding the substantive or technical aspects of the proposed changes to the building standards should be addressed to:

Primary Contact:

Michelle Davis, Supervising Architect  
Division of the State Architect  
Headquarters, Architectural Codes and Policies/ Accessibility Unit  
(279) 799-3835  
[Michelle.Davis@dgs.ca.gov](mailto:Michelle.Davis@dgs.ca.gov)

Back up Contact:

Eric Driever, Principal Architect  
Division of the State Architect  
Headquarters, Architectural Codes and Policies/ Accessibility Unit  
(916) 443-9829  
[Eric.Driver@dgs.ca.gov](mailto:Eric.Driver@dgs.ca.gov)