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April 29, 2026

California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, California 95833

RE: 45-DAY EXPRESS TERMS FOR PROPOSED BUILDING STANDARDS OF THE DIVISION OF THE STATE ARCHITECT (DSA-AC) REGARDING THE 2025 CALIFORNIA BUILDING CODE, CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 2 (DSA-AC 01/25)

On behalf of the California Building Officials (CALBO) Board of Directors, our designated Access policy committee met and reviewed the proposed code changes for Chapter 11B. After reviewing the proposed changes, the CALBO Access Committee strongly **OPPOSES** the DSA code change proposals related to housing facilities. The implications of adopting these proposed amendments are far-reaching and introduces ambiguity that may complicate their consistent application and enforcement. In the context of California's ongoing housing crisis, these changes will also carry financial consequences, potentially affecting project feasibility, development timelines, and overall housing affordability.

Primarily, the Division of the State Architect (DSA) proposed code changes are in clear violation with the requirements set forth in Assembly Bill 130 (AB 130) of 2025, which limits intervening code cycle amendments to those necessary for editorial clarification or to incorporate minimum federal accessibility standards, as specified. The proposals are a broad application of the federal regulations to projects where these regulations are not applicable. Additionally, the proposed code changes are ambiguous, and the code language is conflicting.

During the Access Code Advisory Committee (ACAC) meeting held on March 4–5, 2026, several DSA-AC 01/25 proposals related to housing facilities—including, but not limited to:

ITEM 16A

Chapter 11B ACCESSIBILITY TO PUBLIC BUILDINGS, PUBLIC ACCOMMODATIONS, COMMERCIAL BUILDINGS AND PUBLIC HOUSING, Section 11B-233.3

- 16-1 11B-233.3.3.1, Entrances
- 16-2 11B-233.3.3.2 Accessible Route
- 16-3 11B-233.3.3.3 Toilet and Bathing Facilities
- 16-4 11B-233.3.3.4 Elements, spaces, and common use areas
- 16-5 11B-233.3.4.1 Alterations to vacated buildings
- 16-6 11B-233.3.4.4 Substantial Alterations
- 16-7 11B-233.3.4.4.1 Accessible Route
- 16-8 11B-233.3.4.4.2 Entrances

The items were formally rejected by the ACAC under 9 Point Criteria number 1 and AB 130. The meeting record reflects that motions to approve these items did not pass, and the ACAC did not recommend adoption of the proposed language. Subsequently, DSA indicated that certain rejected items were “withdrawn.” However, the CALBO Access Committee has observed that the subject matter of these disapproved proposals has been reintroduced in modified form, including within sections such as:

- ITEMS 16-1.1 through 16-10.5 (formerly ITEMS 16A and B) Chapter 11B ACCESSIBILITY TO PUBLIC BUILDINGS, PUBLIC ACCOMMODATIONS, COMMERCIAL BUILDINGS AND PUBLIC HOUSING, Section(s) 11B-233.1 and 11B-233.2
- ~~11B-233.2 Reserved. Public housing facilities.~~
- 11B-233.2.6.1.3 Entrances.
- 11B-233.2.6.1.4 Toilet facilities.
- 11B-233.2.6 Alterations.
- 11B-233.2.6.1 Substantial Facility Alterations.
- 11B-233.2.5.2 Accessible route.

These revised provisions were not presented to or reviewed by the ACAC following modification.

On behalf of CALBO, we appreciate your consideration of our comments and welcome your further inquiry at any time.

Sincerely,



Mike Brinkman, CASp, C.B.O.

President