Comparative Analysis of the
2010 Americans with Disabilities Act Standards
and the
2010 California Building Code
Chapter 11B Accessibility Standards

Prepared for the California Division of the State Architect
by
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Managing and Reading the Spreadsheet

1. This document is structured as a symmetrical 2-dimensional matrix with 2,320 rows and 7 columns. Each row contains a single accessibility topic based on the 2010 Americans with Disabilities Act Standards for Accessible Design (ADA Standards). Each column represents the corresponding source text or analysis comments.

2. In some spreadsheet cells, the contents appear truncated because they exceed Excel's capacity to properly display. Where this occurs, the reader can view the entire contents of the cell by expanding the formula bar. The Expand Formula Bar function can be initiated by clicking on the button with the inverted caret symbol on the right side of the formula bar or by the command CTRL+SHIFT+U.

3. This spreadsheet is modeled on a previous comparison of the 1991 and 2010 ADA Standards available at www.ADAStandardsComparison.com developed by ETA and available as a free download. In that document, every section of both the 1991 and 2010 ADA Standards is compared requirement-by-requirement. Although there are significant similarities between the California Building Code (CBC) and the 1991 ADA Standards, there are enough differences that this spreadsheet does not attempt to duplicate the exact comparison between the CBC, 1991, and 2010 ADA Standards. The CBC sections line up with one of the instances of the 2010 ADA Standards that were compared to them. Also, because this spreadsheet is a reduced version of the full working copy comparison, some rows appear to duplicate others where content has been deleted to simplify review.

4. This spreadsheet has been modified by the Division of the State Architect for online presentation. Modifications include deleting columns providing links to external figures and changing font height to 8 pt.

5. This spreadsheet is formatted to print full size on 11"x17" paper. Printing the entire document in this manner requires approximately 460 pages.

General Comments on the CBC

1. Metric rounding differs between the 2010 ADA Standards and the CBC. In larger dimensions, the ADA typically rounds to the nearest 5 millimeters – these minor differences are not called out in the spreadsheet.

2. References elsewhere in the CBC will need to be coordinated with any changes in Chapter 11B. For example, Chapter 10 – Means of Egress has over a dozen references to corridor and aisle widths alone. Other examples in Chapter 10 include references to handrails, ramps, edge protection, stairs, signage, protruding objects, doors, hardware, etc.

3. Due to the accumulation of years of changes as the CBC and the ADA developed, internal and cross-Standard language inconsistencies may make word searching misleading and inconclusive. Work on the revised CBC should be conducted with a clear list of the terms needed to convey all of the specific concepts called out in the ADA Standards and care should be taken to adhere strictly to the use of those specified terms only.

4. A few examples of terms that may or may not be used consistently within CBC Chapter 11B include references to wheelchair spaces, path of travel, path of egress travel, circulation path, circulation route, route, route for the general public, accessible route, exterior (and interior) routes of travel, accessible route of travel, most practical direct route, accessible path of travel, exit route, exit discharge path, pedestrian path, pathway, walks, paths, trails, travel route, and vehicle access route. Similarly, sanitary facility, bathroom, bathing facilities, toilet/bathroom, toilet room, shower room, toilet facilities, toilet stall, and toilet compartments may be used inconsistently.

5. To facilitate certification by the United States Department of Justice (DOJ) of the CBC accessibility provisions as equivalent to (or better than) the ADA Standards, DSA has decided to adopt an amended version of the ADA Standards into the next edition of the CBC. Where the spreadsheet says "2010 CBC does not address 2010 ADA requirement," the assumed recommendation is to adopt the language from the 2010 ADA Standards and amend to add current CBC provisions that provide greater accessibility.

6. The 2010 CBC relies on its figures for some of the requirements (e.g. Figure 11B-15). This is contrary to the norm in most other standards and it often creates confusion when the conditions don't match the figure. The DSA's goal is to follow the International Building Code and ADA Standards precedents, describe all requirements in writing, and use figures only for illustration purposes to the fullest extent possible.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
2	**§ 35.151 New construction and alterations.** (a) Design and construction. (1) Each facility or part of a facility constructed by, on behalf of, or for the use of a public entity shall be designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by individuals with disabilities, if the construction was commenced after January 26, 1992. **§ 36.401 New construction.** (b) Commercial facilities located in private residences. (1) When a commercial facility is located in a private residence, the portion of the residence used exclusively as a residence is not covered by this subpart, but that portion used exclusively in the operation of the commercial facility or that portion used both for the commercial facility and for residential purposes is covered by the new construction and alterations requirements of this subpart. (2) The portion of the residence covered under paragraph (b)(1) of this section extends to those elements used to enter the commercial facility, including the homeowner's front sidewalk, if any, the door or entryway, and hallways; and those portions of the residence, interior or exterior, available to or used by employees or visitors of the commercial facility, including restrooms.		***1101B.6*** 1. When a commercial facility is located in a private residence, the portion of the residence used exclusively as a residence is not covered by this chapter, except as required by Section 1111B.5, but that portion used both for the commercial facility and for residential purposes is covered by the new construction and alterations requirements of this code. 2. The portion of the residence covered extends to those elements used to enter the commercial facility, including the homeowner's front sidewalk, if any, the door or entryway, and hallways; and those portions of the residence, interior or exterior, available to or used by employees or visitors of the commercial facility, including sanitary facilities.	2010 CBC is **equivalent** to 2010 ADA.	The use of the crossreference phrase "requirements of this code" raises the possibility that the lack of equivalence in the new construction and alterations requirements in other sections of the CBC will have a negative impact on the accessibility of public accommodations in private residences.	Recommendation 1: The CBC provision could substitute the phrase "New construction and alterations requirements of the 2010 Standards" for the phrase "requirements of this code" and include an appropriate definition of 2010 Standards in section 202 of Chapter 2, Definitions. Recommendation 2: Make no change to the CBC.
2.1	**§ 36.402 Alterations.** **• (a) General.** . . . ◦ (2) An alteration is deemed to be undertaken after January 26, 1992, if the physical alteration of the property begins after that date. **§ 36.406** Standards for new construction and alterations. • (a) Accessibility standards and compliance date. ◦ (1) New construction and alterations subject to §§ 36.401 or 36.402 shall comply with the 1991 Standards if the date when the last application for a building permit or permit extension is certified to be complete by a State, county, or local government (or, in those jurisdictions where the government does not certify completion of applications, if the date when the last application for a building permit or permit extension is received by the State, county, or local government) is before September 15, 2010, or if no permit is required, if the start of physical construction or alterations occurs before September 15, 2010. ◦ (2) New construction and alterations subject to §§ 36.401 or 36.402 shall comply either with the 1991 Standards or with the 2010 Standards if the date when the last application for a building permit or permit extension is certified to be complete by a State, county, or local government (or, in those jurisdictions where the government does not certify completion of applications, if the date when the last application for a building permit or permit extension is received by the State, county, or local government) is on or after September 15, 2010, and before March 15, 2012, or if no permit is required, if the start of physical construction or alterations occurs on or after September 15, 2010, and before March 15, 2012. (3) New construction and alterations subject to §§ 36.401 or 36.402 shall comply with the 2010 Standards if the date when the last application for a building permit or permit extension is certified to be complete by a State, county, or local government (or, in those jurisdictions where the government does not certify completion of applications, if the date when the last application for a building permit or permit extension is received by the State, county, or local government) is on or after March 15, 2012, or if no permit is required, if the start of physical construction or alterations occurs on or after March 15, 2012. ◦ (4) For the purposes of this section, "start of physical construction or alterations" does not mean ceremonial groundbreaking or razing of structures prior to site preparation.		***1.1.9. Effective date of this code.*** *Only those standards approved by the California Building Standards Commission that are effective at the time an application for building permit is submitted shall apply to the plans and specifications for, and to the construction performed under, that permit. For the effective dates of the provisions contained in this code, see the History Note page of this code.* ***1.1.3. Scope.*** *The provisions of this code shall apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal and demolition of every building or structure or any appurtenances connected or attached to such buildings or structures throughout the State of California.*	2010 CBC is **equivalent** to 2010 ADA.	The 2010 Standards link compliance to the last application for a building permit or permit extension and to the date of the first certificate of occupancy and set up three separate compliance dates linked to different standards. Buildings with permits before 9/15/2010 and whose first occupancy was after 1/26/93 must be built in compliance with the 1991 Standards. Buildings with permits after 9/15/2010, but before 315/2012 must comply with either the 1991 Standards or the 2010 Standards, and buildings with permits after 3/15/2012 must comply with the 2010 Standards. The CBC provision applies its standards in effect at the time of the application for a building permit. Assuming that the other provisions in the CBC are in compliance with the 2010 Standards and assuming that the certification is obtained after 3/15/2012, then all buildings issued permits in California will comply with the 2010 Standards. Under the ADA Standards, if no building permit is required for the design and construction or for the alteration of a facility for which physical construction or alterations occurs on or after March 15, 2012, that facility must comply with the 2010 Standards. If the design and construction or alteration of some facilities covered by the ADA are not required to have building permits in California, then the CBC will have to contain language that the CBC Standards apply to any facility covered by the ADA where the start of physical construction or alterations occurs on or after March 15, 2012. The CBC would also have to state that the "start of physical construction or alterations" does not mean ceremonial groundbreaking or razing of structures prior to site preparation.	Include language in the CBC that the CBC applies to all facilities in the State of California covered by the ADA, including those for which a permit for the design and construction or alteration of the facility does not require a building permit.

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3	**§ 35.151 New construction and alterations.** (b) Alterations. (1) Each facility or part of a facility altered by, on behalf of, or for the use of a public entity in a manner that affects or could affect the usability of the facility or part of the facility shall, to the maximum extent feasible, be altered in such manner that the altered portion of the facility is readily accessible to and usable by individuals with disabilities, if the alteration was commenced after January 26, 1992. **§ 36.402 Alterations.** *(a) General.* (1) Any alteration to a place of public accommodation or a commercial facility, after January 26, 1992, shall be made so as to ensure that, to the maximum extent feasible, the altered portions of the facility are readily accessible to and usable by individuals with disabilities, including individuals who use wheelchairs. (2) An alteration is deemed to be undertaken after January 26, 1992, if the physical alteration of the property begins after that date. (b) *Alteration.* For the purposes of this part, an alteration is a change to a place of public accommodation or a commercial facility that affects or could affect the usability of the building or facility or any part thereof. (1) Alterations include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historic restoration, changes or rearrangement in structural parts or elements, and changes or rearrangement in the plan configuration of walls and full-height partitions. Normal maintenance, reroofing, painting or wallpapering, asbestos removal, or changes to mechanical and electrical systems are not alterations unless they affect the usability of the building or facility. (2) If existing elements, spaces, or common areas are altered, then each such altered element, space, or area shall comply with the applicable provisions of appendix A to this part. (c) To the maximum extent feasible. The phrase "to the maximum extent feasible," as used in this section, applies to the occasional case where the nature of an existing facility makes it virtually impossible to comply fully with applicable accessibility standards through a planned alteration. In these circumstances, the alteration shall provide the maximum physical accessibility feasible. Any altered features of the facility that can be made accessible shall be made accessible. If providing accessibility in conformance with this section to individuals with certain disabilities (e.g., those who use wheelchairs) would not be feasible, the facility shall be made accessible to persons with other types of disabilities (e.g., those who use crutches, those who have impaired vision or hearing, or those who have other impairments).		**1134B.1 Scope** **1134B.2 General** ***1134B.1 Scope.*** *The provisions of this division apply to renovation, structural repair, alteration and additions to existing buildings, including those identified as historic buildings. This division identifies minimum standards for removing architectural barriers, and providing and maintaining accessibility to existing buildings and their related facilities.* *No renovation, structural repair, alteration or addition shall be undertaken which decreases or has the effect of decreasing accessibility or usability of a building or facility below the requirements for new construction at the time of renovation, structural repair, alteration or addition.* ***1134B.2 General.*** *When alterations, structural repairs or additions are made to existing buildings or facilities, they shall comply with all provisions of Division I – New Buildings, except as modified by this division. These requirements shall apply only to the area of specific alteration, structural repair or addition and shall include those areas listed below:* . . . *The only purpose of this exception is to exclude projects from activating the provisions of this section. The exceptions are not intended to relieve projects from complying with other applicable provisions of this code (e.g., replacement of carpet does not activate the provisions of this section; however, it still must comply with Section 1124B.3).*	Which Std.provides greater access **depends** on circumstances.	The 2010 ADA Standards require that in any alteration of a covered facility, the altered portions shall be made accessible, to the maximum extent feasible, to individuals with disabilities. The CBC, however, by using the cross-reference phrases “except as modified by this division” and “those areas listed below” opens the possibility that not all areas covered by the 2010 ADA Standards are specifically addressed in the cross-referenced provisions. For example, it is unclear if the crossreference could be read to exclude the wide array of recreation facilities now covered in the 2010 ADA Standards. However, if an analysis of the CBC shows that the modifications listed in “this division” are congruent with the alterations provisions of the 2010 ADA Standards, then use of this crossreference would not create lack of equivalence with the ADA Standards. Another ambiguity is created by the statement in 1134B.2 (4), which states “The only purpose of this exception is to exclude projects from activating the provisions of this section. The exceptions are not intended to relieve projects from complying with other applicable provisions of this code. . . “ It is unclear what the reference to “this exception” is. If this crossreference is meant to be a general restatement of this entire section and only means that scope of the alteration is limited to the alteration itself, then this crossreference would not be less rigorous than the 2010 ADA Standards. If the crossreference only applies to subparagraph 4 and is meant to remove alteration of a floor surface from the path of travel requirement, then the CBC is not equivalent to the 2010 ADA Standards (because under the 2010 ADA regulation replacing an inaccessible floor surface in a primary function area of a public accommodation triggers the path of travel requirement. See 28 CFT 36.403(c)(1)(ii). The CBC does not use the phrase “to the maximum extent feasible in this section The absence of this language in this section, which limits the general ADA obligation, is of no consequence and makes the CBC more rigorous.	1. Either delete the phrase “except as modified by this division” or ensure that the modifications there crossreferenced are congruent with the alterations requirements of the ADA Standards. 2. Make clear what is included in the phrase “those areas listed below” in 1134B.2 . 3. Remove or clarify the non-numbered language at the end of 1134B.2.1, Exception 4.

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3.1	**§ 36.402 Alterations.** (b) Alteration. For the purposes of this part, an alteration is a change to a place of public accommodation or a commercial facility that affects or could affect the usability of the building or facility or any part thereof. ◦ (1) Alterations include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historic restoration, changes or rearrangement in structural parts or elements, and changes or rearrangement in the plan configuration of walls and full-height partitions. Normal maintenance, reroofing, painting or wallpapering, asbestos removal, or changes to mechanical and electrical systems are not alterations unless they affect the usability of the building or facility. (2) If existing elements, spaces, or common areas are altered, then each such altered element, space, or area shall comply with the applicable provisions of appendix A to this part.		***Section 202, Definitions.*** ***1134B.2.1. Exception 4.*** ***ALTERATION or ALTER.*** Any construction or renovation to an existing structure other than repair or addition. **[DSA-AC]** *"Alteration or Alter" is any change, addition or modification in construction or occupancy or structural repair or change in primary function to an existing structure made by, on behalf of, or for the use of a public accommodation or commercial facility. Alterations include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historic restoration, changes or rearrangement of the structural parts or elements, and changes or rearrangement in the plan configuration of walls and full-height partitions.* ***COMMERCIAL FACILITIES [DSA-AC]*** *are facilities that are intended for nonresidential use and whose operations will affect commerce, including factories, warehouses, office buildings, and other buildings in which employment may occur. Commercial facilities shall not include railroad locomotives, railroad freight cars, railroad cabooses, railroad cars covered under Title II of the Americans with Disabilities Act of 1990, or facilities that are covered or expressly exempted from coverage under the Fair Housing Amendment Act of 1988 (42 USC 3601-3631, et seq.).* ***PUBLIC ACCOMMODATION [DSA-AC]*** *includes, but is not limited to, any public use building or facility that may be classified into one or more of the following categories:* ***1.*** *Places of public lodging.* ***2.*** *Establishments serving food or drink open to public use.* ***3.*** *Places of exhibition or entertainment open to public use.*	2010 CBC is **equivalent** to 2010 ADA.	Although the CBC does not exactly track the language of the 2010 Standards, it is equivalent to the ADA Standards. In fact, the CBC is broader in coverage. For example, it specifically includes churches in its definition of public accommodations (the ADA does not); and it covers all structural repairs or additions to existing buildings or facilities, not just those that affect the usability of the building or facility (the language of the ADA rules).	No Change Required
4	**§ 35.151 New construction and alterations.** (2) The path of travel requirements of § 35.151(b)(4) shall apply only to alterations undertaken solely for purposes other than to meet the program accessibility requirements of § 35.150. **§ 36.403 Alterations: Path of travel.** (d) Landlord/tenant: If a tenant is making alterations as defined in § 36.402 that would trigger the requirements of this section, those alterations by the tenant in areas that only the tenant occupies do not trigger a path of travel obligation upon the landlord with respect to areas of the facility under the landlord's authority, if those areas are not otherwise being altered.		None	2010 CBC provides **greater access** than 2010 ADA.	The language in the ADA Regulations on Landlord/Tenant creates an exception to the path of travel requirement. It states that an alteration by a tenant in areas that only the tenant occupies do not trigger any obligation on the landlord to make additional alterations (e.g., a store in a mall makes changes inside the store; there is no obligation on the mall to make path of travel changes). The absence of a similar exception in the CBC means that an alteration in a building or part of a building would trigger a path of travel requirement regardless of the landlord/tenant relationship.	No Change Required

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5	**§ 35.151 New construction and alterations.** (i) Primary function. A ''primary function'' is a major activity for which the facility is intended. Areas that contain a primary function include, but are not limited to, the dining area of a cafeteria, the meeting rooms in a conference center, as well as offices and other work areas in which the activities of the public entity using the facility are carried out. (A) Mechanical rooms, boiler rooms, supply storage rooms, employee lounges or locker rooms, janitorial closets, entrances, and corridors are not areas containing a primary function. Restrooms are not areas containing a primary function unless the provision of restrooms is a primary purpose of the area, e.g., in highway rest stops. (B) For the purposes of this section, alterations to windows, hardware, controls, electrical outlets, and signage shall not be deemed to be alterations that affect the usability of or access to an area containing a primary function. **§ 36.403 Alterations: Path of travel.** (b) Primary function. A "primary function" is a major activity for which the facility is intended. Areas that contain a primary function include, but are not limited to, the customer services lobby of a bank, the dining area of a cafeteria, the meeting rooms in a conference center, as well as offices and other work areas in which the activities of the public accommodation or other private entity using the facility are carried out. Mechanical rooms, boiler rooms, supply storage rooms, employee lounges or locker rooms, janitorial closets, entrances, corridors, and restrooms are not areas containing a primary function. (c) Alterations to an area containing a primary function. (1) Alterations that affect the usability of or access to an area containing a primary function include, but are not limited to -- (i) Remodeling merchandise display areas or employee work areas in a department store; (ii) Replacing an inaccessible floor surface in the customer service or employee work areas of a bank; (iii) Redesigning the assembly line area of a factory; or (iv) Installing a computer center in an accounting firm. (2) For the purposes of this section, alterations to windows, hardware, controls, electrical outlets, and signage shall not be deemed to be alterations that affect the usability of or access to an area containing a primary function.		***202 Definitions*** ***1134B.1 Scope*** ***1134B.2 General*** ***1134B.2.1*** ***1134B.2.1 Exception 3*** ***1134B.2.1 Exception 4*** ***ALTERATION or ALTER.*** Any construction or renovation to an existing structure other than repair or addition. [DSA-AC] “Alteration or Alter” is any change, addition or modification in construction or occupancy or structural repair or change in primary function to an existing structure made by, on behalf of, or for the use of a public accommodation or commercial facility. Alterations include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historic restoration, changes or rearrangement of the structural parts or elements, and changes or rearrangement in the plan configuration of walls and full-height partitions. ***1134B.1 Scope.*** The provisions of this division apply to renovation, structural repair, alteration and additions to existing buildings, including those identified as historic buildings. This division identifies minimum standards for removing architectural barriers, and providing and maintaining accessibility to existing buildings and their related facilities. No renovation, structural repair, alteration or addition shall be undertaken which decreases or has the effect of decreasing accessibility or usability of a building or facility below the requirements for new construction at the time of renovation, structural repair, alteration or addition. ***1134B.2 General.*** When alterations, structural repairs or additions are made to existing buildings or facilities, they	2010 CBC is **equivalent** to 2010 ADA.	While the language in the CBC does not exactly track the language of he 2010 Standards, the CBC language makes clear that any alteration will trigger a concomitant obligation to make changes to the primary entrance of a building and its restrooms, drinking fountains, and telephones and signs serving the altered area. The exceptions in the CBC generally conform to the exceptions in the 2010 Standards for the path of travel requirement.	No changes recommended.
5.1	**§36.403 Alterations : Path of Travel** (c) Alterations to an area containing a primary function. (2) For purposes of this section, alterations to . . . signage shall not be deemed to be alterations that affect the usability of or access to an area containing a primary function.		**1134B.2.1** A primary entrance to the building and the primary path of travel to the specific area of alteration, structural repair or addition, and sanitary facilities, drinking fountains, signs and telephones serving the area.	2010 CBC provides **greater access** than 2010 ADA.	ADA does not include signs in the elements along the path of travel, that are required to be modified when the path of travel is modified.	Retain more stringent requirement in CBC.

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6	**§ 35.151 New construction and alterations.** (ii) A ''path of travel'' includes a continuous, unobstructed way of pedestrian passage by means of which the altered area may be approached, entered, and exited, and which connects the altered area with an exterior approach (including sidewalks, streets, and parking areas), an entrance to the facility, and other parts of the facility. (A) An accessible path of travel may consist of walks and sidewalks, curb ramps and other interior or exterior pedestrian ramps; clear floor paths through lobbies, corridors, rooms, and other improved areas; parking access aisles; elevators and lifts; or a combination of these elements. (B) For the purposes of this section, the term ''path of travel'' also includes the restrooms, telephones, and drinking fountains serving the altered area. **§ 36.403 Alterations: Path of travel.** (e) Path of travel. (1) A "path of travel" includes a continuous, unobstructed way of pedestrian passage by means of which the altered area may be approached, entered, and exited, and which connects the altered area with an exterior approach (including sidewalks, streets, and parking areas), an entrance to the facility, and other parts of the facility. (2) An accessible path of travel may consist of walks and sidewalks curb ramps and other interior or exterior pedestrian ramps; clear floor paths through lobbies, corridors, rooms, and other improved areas; parking access aisles; elevators and lifts; or a combination of these elements. (3) For the purposes of this part, the term "path of travel" also includes the restrooms, telephones, and drinking fountains serving the altered area.		**1102B Definitions** ***PATH OF TRAVEL*** *is a passage that may consist of walks and sidewalks, curb ramps and pedestrian ramps, lobbies and corridors, elevators, other improved areas or a necessary combination thereof, that provides free and unobstructed access to and egress from a particular area or location for pedestrians and/or wheelchair users. A "path of travel" includes a continuous, unobstructed way of pedestrian passage by means of which a particular area may be approached, entered and exited, and which connects a particular area with an exterior approach (including sidewalks, streets, and parking areas), an entrance to the facility, and other parts of the facility. In existing buildings, when alterations, structural repairs or additions are made, the term "path of travel" also includes the sanitary facilities, telephones, drinking fountains and signs serving the altered area.*	2010 CBC is **equivalent** to 2010 ADA.	Although the CBC uses the phrase "Particular area" instead of the phrase "altered area" in the 2010 Standards, it is clear from the context of the CBC that the definitions are equivalent.	No change is required.
7	**§ 35.151 New construction and alterations.** (iii) Disproportionality. (A) Alterations made to provide an accessible path of travel to the altered area will be deemed disproportionate to the overall alteration when the cost exceeds 20% of the cost of the alteration to the primary function area. (B) Costs that may be counted as expenditures required to provide an accessible path of travel may include: (1) Costs associated with providing an accessible entrance and an accessible route to the altered area, for example, the cost of widening doorways or installing ramps; (2) Costs associated with making restrooms accessible, such as installing grab bars, enlarging toilet stalls, insulating pipes, or installing accessible faucet controls; (3) Costs associated with providing accessible telephones, such as relocating the telephone to an accessible height, installing amplification devices, or installing a text telephone (TTY); and (4) Costs associated with relocating an inaccessible drinking fountain. (iv) Duty to provide accessible features in the event of disproportionality. (A) When the cost of alterations necessary to make the path of travel to the altered area fully accessible is disproportionate to the cost of the overall alteration, the path of travel shall be made accessible to the extent that it can be made accessible without incurring disproportionate costs. (B) In choosing which accessible elements to provide, priority should be given to those elements that will provide the greatest access, in the following order— (1) An accessible entrance; (2) An accessible route to the altered area; (3) At least one accessible restroom for each sex or a single unisex restroom; (4) Accessible telephones; (5) Accessible drinking fountains; and (6) When possible, additional accessible elements such as parking, storage, and alarms. (v) Series of smaller alterations. (A) The obligation to provide an accessible path of travel may not be evaded by performing a series of small alterations to the area served by a single path of travel if those alterations could have been performed as a single undertaking. (B)(1) If an area containing a primary function has been altered without providing an accessible path of travel to that area, and subsequent alterations of that area, or a different area on the same path of travel, are undertaken within three years of the original alteration, the total cost of alterations to the primary function areas on that path of travel during the preceding three year period shall be considered in determining whether the cost of making that path of travel accessible is disproportionate. (2) Only alterations undertaken on or after March 15, 2011 shall be considered in determining if the cost of providing an accessible path of travel is disproportionate to the		***1134B.2.1 Exceptions 1 & 2*** ***1134B.2.1*** *A primary entrance to the building or facility and the primary path of travel to the specific area of alteration, structural repair or addition, and sanitary facilities, drinking fountains, signs and public telephones serving the area.* ***Exceptions:*** *1. When the total construction cost of alterations, structural repairs or additions does not exceed a valuation threshold of $50,000, based on January 1981, "ENR US20 Cities" Average construction cost index of 3372.02 (Engineering News Record, McGraw Hill Publishing Company), and the enforcing agency finds that compliance with this code creates an unreasonable hardship, compliance shall be limited to the actual work of the project. The enforcing agency shall annually update the valuation threshold to a current amount based on the increase in the index since the last figure used. (For example, the January 2011 amount is $132,536.28.) For purposes of this exception, an unreasonable hardship exists where the cost of providing an accessible entrance, path of travel, sanitary facilities, public phones and drinking fountains, is disproportionate to the cost of the project; that is, where it exceeds 20 percent of the cost of the project without these features. Where the cost of alterations necessary to make these features fully accessible is disproportionate, access shall be provided to the extent that it can be without incurring disproportionate cost. In choosing which accessible elements to provide, priority should be given to those elements that will provide the greatest access in the following order:* ***1.1.*** *An accessible entrance,* ***1.2.*** *An accessible route to the altered area,* ***1.3.*** *At least one accessible restroom for each sex,* ***1.4.*** *Accessible telephones*	2010 CBC is **equivalent** to 2010 ADA.	In almost all instances, the language of the CBC specifically tracks the language of the 2010 Standards. In one area, the CBC is more rigorous than the 2010 Standards. The CBC does not allow the use of the disproportionality provision for certain projects where he cost of the alteraitons exceeds $128, 410.86; the 2010 Standards would allow the use of the disproportionality defense in all situations.	Consider rewording CBC language to eliminate the confusion among some building officials who read Exception #1 to mean that when the cost of the path of travel work is less than the current threshold, no work is required at all.

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7.1	***28 CFR 406(c) Places of lodging.*** Places of lodging subject to this part shall comply with the provisions of the 2010 Standards applicable to transient lodging, including, but not limited to, the requirements for transient lodging guest rooms in sections 224 and 806 of the 2010 Standards. ***406(c)(3) Facilities with residential units and transient lodging units.*** Residential dwelling units that are designed and constructed for residential use exclusively are not subject to the transient lodging standards. Place of public accommodation means a facility operated by a private entity whose operations affect commerce and fall within at least one of the following categories – • (1) Place of lodging, except for an establishment located within a facility that contains not more than five rooms for rent or hire and that actually is occupied by the proprietor of the establishment as the residence of the proprietor. For purposes of this part, a facility is a "place of lodging" if it is – ◦ (i) An inn, hotel, or motel; or ◦ (ii) A facility that – ▪ (A) Provides guest rooms for sleeping for stays that primarily are short-term in nature (generally 30 days or less) where the occupant does not have the right to return to a specific room or unit after the conclusion of his or her stay; and ▪ (B) Provides guest rooms under conditions and with amenities similar to a hotel, motel, or inn, including the following – ▪ (1) On- or off-site management and reservations service; ▪ (2) Rooms available on a walk-up or call-in basis; ▪ (3) Availability of housekeeping or linen service; and ▪ (4) Acceptance of reservations for a guest room type without guaranteeing a particular unit or room until check-in, and without a prior lease or security deposit.		***1107A Definitions:*** ***TRANSIENT LODGING*** *is a building, facility, or portion thereof, available to the public as an inn, hotel, motel, timeshare, or place where one or more dwelling units or sleeping accommodations are provided for transient guests, excluding inpatient medical care facilities and lodging houses with 5 or less guest rooms. Transient lodging may include but is not limited to, resorts, group homes, and dormitories.* ***1102A.1 Where required.*** *Buildings or portions of buildings and facilities within the scope of this chapter shall be accessible to persons with disabilities. Each building on a building site shall be considered separately when determining the requirements contained in this chapter, except when calculating the number of units which must comply with Section 1102A.3.1. Dwelling units within a single structure separated by firewalls do not constitute separate buildings.* *Newly-constructed covered multifamily dwellings as defined in this chapter, include, but are not limited to, the following:* ***1.*** *Apartment buildings with 3 or more dwelling units including timeshare apartments not considered a place of public accommodation or transient lodging as defined in Health and Safety Code Section 19955 (a) and Chapter 2 of the California Building Code.* ***2.*** *Condominiums with 4 or more dwelling units including timeshare condominiums not considered a place of public accommodation or transient lodging as defined in Health and Safety Code Section 19955 (a) and Chapter 2 of the California Building Code.* ***3.*** *Lodging houses, as defined in Chapter 2 of the California Building Code, used as a residence with more than 2 but not more than 5 guest rooms*	Which Std.provides greater access **depends** on circumstances.	Rather than specifically refer to the sections of the 2010 ADA Standards, the CBC lists a series of specific requirements. The review of Sections 224 and 806 in this chart will determine equivalency. The definition of places of lodging is not equivalent with the new changes to the definition in the ADA regulation of the Department of Justice Column U: Include a general statement in the CBC that places of lodging covered by the ADA shall comply with the ADA's requirements for transient lodging; conform the definition of place of lodging to the definition in the ADA regulation	

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7.2	***28 CFR 36.406(d) Social service center establishments.*** Group homes, halfway houses, shelters, or similar social service center establishments that provide either temporary sleeping accommodations or residential dwelling units that are subject to this part shall comply with the provisions of the 2010 Standards applicable to residential facilities, including, but not limited to, the provisions in sections 233 and 809.		***310.2 Definitions.*** **DORMITORY.** A space in a building where group sleeping accommodations are provided in one room, or in a series of closely associated rooms, for persons not members of the same family group, under joint occupancy and single management, as in college dormitories or fraternity houses. . . . ***SECTION 1111B*** ***ACCESSIBILITY FOR GROUP R OCCUPANCIES*** ***1111B.1 General.*** *Group R occupancies shall be accessible or adaptable as provided in this chapter. Public-use and common-use areas serving adaptable guest and/or dwelling units shall be accessible. See also the general accessibility requirements in Section 1114B.1.1.* ***Exception:*** *When the enforcing agency determines that compliance with any regulation under this section would create an unreasonable hardship, an exception shall be granted when equivalent facilitation is provided.* ***1111B.2 Public and common use rooms or areas.*** *Public- and common-use rooms and similar areas shall be made accessible to persons with disabilities, subject to specific provisions contained in other portions of these regulations. See also general requirements in Section 1114B.1.1.*	Which Std.provides greater access **depends** on circumstances.	Rather than specifically refer to the sections of the 2010 ADA Standards, the CBC lists a series of specific requirements. The review of Sections 233 and 809 in this chart will determine equivalency.	Include in the CBC a provision that group homes, halfway houses, shelters, or similar social service center establishments that provide either temporary sleeping accommodation or residential dwell units comply with the provisions of sections 233 and 809 of the 2020 ADA Standards.
7.3	***28 CFR 36.406(e) Housing at a place of education.*** Housing at a place of education that is subject to this part shall comply with the provisions of the 2010 Standards applicable to transient lodging, including, but not limited to, the requirements for transient lodging guest rooms in sections 224 and 806, subject to the following exceptions. For the purposes of the application of this section, the term "sleeping room" is intended to be used interchangeably with the term "guest room" as it is used in the transient lodging standards. ***36.406(e) (3)*** Apartments or townhouse facilities that are provided by or on behalf of a place of education, which are leased on a year-round basis exclusively to graduate students or faculty and do not contain any public use or common use areas available for educational programming, are not subject to the transient lodging standards and shall comply with the requirements for residential facilities in sections 233 and 809 of the 2010 Standards.		**1107A Definitions:** ***TRANSIENT LODGING*** *is a building, facility, or portion thereof, available to the public as an inn, hotel, motel, timeshare, or place where one or more dwelling units or sleeping accommodations are provided for transient guests, excluding inpatient medical care facilities and lodging houses with 5 or less guest rooms. Transient lodging may include but is not limited to, resorts, group homes, and dormitories.* ***1111B.4 Hotels, motels, inns, dormitories, resorts, homeless shelters, halfway houses, transient group homes and similar places of transient lodging.*** *Hotels, motels, inns, dormitories, resorts, homeless shelters, halfway houses, transient group homes and similar places of transient lodging shall provide access for persons with disabilities in accordance with the provisions of the accessibility requirements of this California Building Code, except as herein provided.*	Which Std.provides greater access **depends** on circumstances.	Rather than specifically refer to the sections of the 2010 ADA Standards, the CBC lists a series of specific requirements. The review of Sections 224 and 806 in this chart will determine equivalency.	Include a specific statement in the CBC that housing at places of education comply with the requirements for transient lodging guest rooms in sections 224 and 806 of the ADA Standards; state that the term “sleeping room” is intended to be used interchangeably with the term ‘guest room”; ensure that apartments or townhouse facilities that are provided by or on behalf of a place of education, which are leased on a year-round basis exclusively to graduate students or faculty and that do not contain any public use or common use areas for educations programming, comply with the requirements for residential facilities in sections 233 and 809 of the 2010 Standards.

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8	**§ 35.151 New construction and alterations.** (e) Social service center establishments. Group homes, halfway houses, shelters, or similar social service center establishments that provide either temporary sleeping accommodations or residential dwelling units that are subject to this section shall comply with the provisions of the 2010 Standards applicable to residential facilities, including, but not limited to, the provisions in sections 233 and 809. **§ 36.406 Standards for new construction and alterations.** (d) Social service center establishments. Group homes, halfway houses, shelters, or similar social service center establishments that provide either temporary sleeping accommodations or residential dwelling units that are subject to this part shall comply with the provisions of the 2010 Standards applicable to residential facilities, including, but not limited to, the provisions in sections 233 and 809.		**310.2** **1111B.1** **1111B.4** **SECTION 310** **RESIDENTIAL GROUP R** **310.2 Definitions.** **DORMITORY.** A space in a building where group sleeping accommodations are provided in one room, or in a series of closely associated rooms, for persons not members of the same family group, under joint occupancy and single management, as in college dormitories or fraternity houses. **SECTION 1111B** **ACCESSIBILITY FOR GROUP R OCCUPANCIES** **1111B.1 General.** Group R occupancies shall be accessible or adaptable as provided in this chapter. Public-use and common-use areas serving adaptable guest and/or dwelling units shall be accessible. See also the general accessibility requirements in Section 1114B.1.1. **Exception:** When the enforcing agency determines that compliance with any regulation under this section would create an unreasonable hardship, an exception shall be granted when equivalent facilitation is provided. **1111B.2 Public and common use rooms or areas.** Public- and common-use rooms and similar areas shall be made accessible to persons with disabilities, subject to specific provisions contained in other portions of these regulations. See also general requirements in Section 1114B.1.1. At least one of each type of amenity (such as washers, dryers and similar equipment installed for the use of occupants) in each common area shall be accessible and			

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15	**§ 36.606 Effect of certification.** (a)(1) A certification shall be considered a certification of equivalency only with respect to those features or elements that are both covered by the certified code and addressed by the standards against which equivalency is measured. (2) For example, if certain equipment is not covered by the code, the determination of equivalency cannot be used as evidence with respect to the question of whether equipment in a building built according to the code satisfies the Act's requirements with respect to such equipment. By the same token, certification would not be relevant to construction of a facility for children, if the regulations against which equivalency is measured do not address children's facilities. (b) A certification of equivalency is effective only with respect to the particular edition of the code for which certification is granted. Any amendments or other changes to the code after the date of the certified edition are not considered part of the certification. (c) A submitting official may reapply for certification of amendments or other changes to a code that has already received certification. (d) When the standards of the Act against which a code is deemed equivalent are revised or amended substantially, a certification of equivalency issued under the preexisting standards is no longer effective, as of the date the revised standards take effect. However, construction in compliance with a certified code during the period when a certification of equivalency was effective shall be considered rebuttable evidence of compliance with the Standards then in effect as to those elements of buildings and facilities that comply with the certified code. A submitting official may reapply for certification pursuant to the Act's revised standards, and, to the extent possible, priority will be afforded the request in the review process.		**NA**	**NA**	**NA**		**NA**
16	**ADA CHAPTER 1: APPLICATION AND ADMINISTRATION** **...** **SECTION 1.9 DIVISION OF THE STATE ARCHITECT** **1.9.1. Division of the State Architect – Access Compliance.** **...** **2010 CALIFORNIA HISTORICAL BUILDING CODE** **California Code of Regulations - Title 24, Part 8** Effective Date: January 1, 2011 **CHAPTER 8-1** **ADMINISTRATION** **...**		**DIVISION 1 CALIFORNIA ADMINISTRATION** **SECTION 1.1 GENERAL** **...** **SECTION 1.9 DIVISION OF THE STATE ARCHITECT** **1.9.1. Division of the State Architect – Access Compliance.** **...** **2010 CALIFORNIA HISTORICAL BUILDING CODE** **California Code of Regulations - Title 24, Part 8** Effective Date: January 1, 2011 **CHAPTER 8-1** **ADMINISTRATION** **...**	2010 CBC is **equivalent** to 2010 ADA.		Both standards provide text that speaks to the administration and application of those standards. The CHBC includes provisions for Historical Buildings. §36.405 of 28CFR Part 36 contains similar allowances for hististorical places.	

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17	**101 Purpose**		**DIVISION 1 CALIFORNIA ADMINISTRATION** **SECTION 1.1 GENERAL** **...** **1.1.2. Purpose.** The purpose of this code is to establish the minimum requirements to safeguard the public health, safety and general welfare through ... access to persons with disabilities, ... **SECTION 1.9 DIVISION OF THE STATE ARCHITECT** **1.9.1. Division of the State Architect – Access Compliance.** **General.** The purpose of this code is to ensure that barrier-free design is incorporated in all buildings, facilities, site work and other improvements to which this code applies in compliance with state law to ensure that these improvements are accessible to and usable by persons with disabilities. ... **2010 CALIFORNIA HISTORICAL BUILDING CODE** **California Code of Regulations - Title 24, Part 8** Effective Date: January 1, 2011 **CHAPTER 8-1** **ADMINISTRATION** **...** **SECTION 8-101** **...PURPOSE ...** **...** **8-101.2 Purpose.** The purpose of the CHBC is to provide regulations for the preservation, restoration, rehabilitation, relocation or reconstruction, of buildings or properties designated as qualified historical buildings or properties (Chapter 8-2). The CHBC is intended to provide solutions for the preservation of qualified historical buildings or properties, ... to provide access for persons with disabilities, ... **CHAPTER 8-6** **ACCESSIBILITY**	2010 CBC is **equivalent** to 2010 ADA.	Both standards provide text that speaks to their purpose, which generally is to provide access to persons with disabilities. The CHBC provides regulations to facilitate access and use of qualified historical buildings and properties by persons with disabilities. §36.405 of 28CFR Part 36 contains similar allowances for hististorical places.	

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18	**101.1 General.** This document contains scoping and technical requirements for accessibility to sites, facilities, buildings, and elements by individuals with disabilities. The requirements are to be applied during the design, construction, additions to, and alteration of sites, facilities, buildings, and elements to the extent required by regulations issued by Federal agencies under the Americans with Disabilities Act of 1990 (ADA).		**DIVISION 1 CALIFORNIA ADMINISTRATION** ... **1.1.2. Purpose.** The purpose of this code is to establish the minimum requirements to safeguard the public health, safety and general welfare through ... access to persons with disabilities, ... **SECTION 1.9 DIVISION OF THE STATE ARCHITECT** **1.9.1. Division of the State Architect – Access Compliance.** **General.** The purpose of this code is to ensure that barrier-free design is incorporated in all buildings, facilities, site work and other improvements to which this code applies in compliance with state law to ensure that these improvements are accessible to and usable by persons with disabilities. Additions, alterations and structural repairs in all buildings and facilities shall comply with these provisions for new buildings, except as otherwise provided and specified herein. The provisions of these regulations shall apply to any portable buildings leased or owned by a school district, and shall also apply to temporary and emergency buildings and facilities. Temporary buildings and facilities are not of permanent construction but are extensively used or are essential for public use for a period of time. Examples of temporary buildings or facilities covered include, but are not limited to: reviewing stands, temporary classrooms, bleacher areas, exhibit areas, temporary banking facilities, temporary health screening services, or temporary safe pedestrian passageways around a construction site. In addition, to incorporate standards at least as restrictive as those required by the federal government for barrier-free design under (1) Title III (Public Accommodations and Commercial Facilities), Subpart D (New Construction and Alteration) and Appendix A (Americans with Disabilities Act Standards for Accessible Design) (see 28 C.F.R., Part 36),... from the Americans with Disabilities Act of 1990,.... Some of these regulations may be more stringent than state law in order to meet the	2010 CBC is **equivalent** to 2010 ADA.	The stated purpose of each standard is to provide access to persons with disabilities to sites, facilities and buildings. Both standards apply to the design, construction, additions, and alterations of these. 101.1 also states that the 2010 ADA Stds. shall also apply to "elements". 1.9.1 states that the CBC shall aslo apply to "other improvements". 1.9.1 clarifies that portable, temporary, and emergency buildings and facilities are also covered. "Elements" and "other improvements" are very broad categories; it isn't clear whether or not they are the same thing. There are, however, requirements within the CBC that clearly apply to elements (1117B.6 Controls and Operating Mechanisms, for instance). The 2010 ADA Stds. clearly apply to "other improvements", and 201.3 clarifies that temporary structures are also covered. The CHBC provides regulations to facilitate access and use of qualified historical buildings and properties by persons with disabilities. §36.405 of 28CFR Part 36 contains similar allowances for hististorical places.	
19	**Advisory 101.1 General.** In addition to these requirements, covered entities must comply with the regulations issued by the Department of Justice and the Department of Transportation under the Americans with Disabilities Act. There are issues affecting individuals with disabilities which are not addressed by these requirements, but which are covered by the Department of Justice and the Department of Transportation regulations.		**SECTION 1.9 DIVISION OF THE STATE ARCHITECT** **1.9.1. Division of the State Architect – Access Compliance.** **General.** ... In addition, to incorporate standards at least as restrictive as those required by the federal government for barrier-free design under (1) Title III (Public Accommodations and Commercial Facilities), Subpart D (New Construction and Alteration) and Appendix A (Americans with Disabilities Act Standards for Accessible Design) (see 28 C.F.R., Part 36), and (2) Title II (Public Entities), Section 35.151 (New Construction and Alterations) (see 28 C.F.R., Part 35) both from the Americans with Disabilities Act of 1990, and (3) under the Fair Housing Amendments Act of 1988. Some of these regulations may be more stringent than state law in order to meet the federal requirement.	NA	Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b)	

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20	**101.2 Effect on Removal of Barriers in Existing Facilities.** This document does not address existing *facilities* unless *altered* at the discretion of a covered entity. The Department of Justice has authority over existing *facilities* that are subject to the requirement for removal of barriers under title III of the ADA. Any determination that this document applies to existing *facilities* subject to the barrier removal requirement is solely within the discretion of the Department of Justice and is effective only to the extent required by regulations issued by the Department of Justice.		**DIVISION 1 CALIFORNIA ADMINISTRATION** **SECTION 1.1 GENERAL** **...** **1.1.3. Scope.** The provisions of this code shall apply to the construction, alteration, ... of every building or structure or any appurtenances connected or attached to such buildings or structures throughout the State of California. **SECTION 1.9 DIVISION OF THE STATE ARCHITECT** **1.9.1. Division of the State Architect – Access Compliance.** **General.** ... alterations... in all buildings and facilities shall comply with these provisions for new buildings, except as otherwise provided and specified herein. ... In addition, to incorporate standards at least as restrictive as those required by the federal government for barrier-free design under (1) Title III (Public Accommodations and Commercial Facilities), Subpart D (New Construction and Alteration) and Appendix A (Americans with Disabilities Act Standards for Accessible Design) (see 28 C.F.R., Part 36), ... from the Americans with Disabilities Act of 1990, ... Some of these regulations may be more stringent than state law in order to meet the federal requirement. **CHAPTER 11B - ACCESSIBILITY TO PUBLIC BUILDINGS, PUBLIC ACCOMMODATIONS, COMMERCIAL BUILDINGS AND PUBLICLY FUNDED HOUSING** **Division I – NEW BUILDINGS** **SECTION 1101B SCOPE** See Chapter 1, Section 1.9.1.5 **1101B.1 General.** **1.** Buildings or facilities or portions of buildings shall be accessible to persons with disabilities as required by this chapter. **...**	2010 CBC provides **greater access** than 2010 ADA.	It appears as though the CBC considers barrier removal to be a type of alteration, and that when such work is undertaken, it shall comply with the CBC. The 2010 Standards indicate that barrier removal is addressed by the Title III regulations. The Title III regulations require barrier removal to meet the alteration requirements unless doing so is not "readily achievable". The CBHC spaeks to existing facilities that meet the criteria of *qualified historical buildings*. It provides *alternative minimum standards* when those in the *regular code* cannot be met without threatening or destroying the historical significance of a building or facility. The CBHC referenced altenative minimum standards in Section 4.1.7(3) of the 1991 ADA Standards for Accessible Design, as incorporated and set forth in federal regulation 28 C.F.R Pt. 36. With respect to qualified historical facilities the two standards are equivalent. However, because the CBC applies new construction standards to barrier removal (alterations) it provides greater access.	
21	**102 Dimensions for Adults and Children** The technical requirements are based on adult dimensions and anthropometrics. In addition, this document includes technical requirements based on children's dimensions and anthropometrics for drinking fountains, water closets, toilet compartments, lavatories and sinks, dining surfaces, and work surfaces.		**1101B.7 Provisions for adults.** Unless otherwise indicated, the dimensions and specifications in these regulations are based upon adult dimensions and anthropometrics. **SECTION 1115B** **BATHING AND TOILET FACILITIES (SANITARY FACILITIES)** **1115B.1.2 Where used by children.** Where facilities are to be used solely by small children, the specific heights and clearances may be adjusted to meet their accessibility needs. See Table 1115B-1 for suggested mounting heights and clearances.	2010 CBC provides **less access** than 2010 ADA.	Both standards state that they are based on adult dimensions, but that they also allow for adjustments to be made when facilities are to be used by (small) children. The CBC provides alternative dimensions only for specific elements within toilet rooms. The 2010 ADA Stds. provides alternative dimensions for toilet room elements as well, but also for dining and work surfaces, reach ranges (308.1), and handrails (505.4) to name a few. Because it provides a greater degree of flexibility in more areas in recognition of specific users, the 2010 ADA Stds. provides greater access.	

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
22	**103 Equivalent Facilitation** Nothing in these requirements prevents the use of designs, products, or technologies as alternatives to those prescribed, provided they result in substantially equivalent or greater *accessibility* and usability.		**1101B.1 General.** **...** **2.** Departures from particular technical and scoping requirements of this chapter by the use of other designs and technologies are permitted where the alternative designs and technologies used will provide equivalent or greater access to and usability of the building or facility. **3.** In determining equivalent facilitation, consideration shall be given to means that provide for the maximum independence of persons with disabilities while presenting the least risk of harm, injury or other hazard to such persons or others. **2010 CALIFORNIA HISTORICAL BUILDING CODE** **California Code of Regulations - Title 24, Part 8** **SECTION 8-602 BASIC PROVISIONS** **8-602.1 Regular code.** The regular code for access for people with disabilities (Title 24, Part 2, Vol.1, Chapter 11B) shall be applied to qualified historical buildings or properties unless strict compliance with the regular code will threaten or destroy the historical significance or character-defining features of the building or property. **8-602.2 Alternative provisions.** If the historical significance or character-defining features are threatened, alternative provisions for access may be applied pursuant to this chapter provided the following conditions are met: **...** **SECTION 8-603 ALTERNATIVES** **8-603.1 Alternative minimum standards.** The alternative minimum standards for alterations of qualified historical buildings or facilities are contained in Section 4.1.7(3) of ADA Standards for Accessible Design, as incorporated and set forth in federal regulation 28 C.F.R Pt. 36. **SECTION 8-604** **EQUIVALENT FACILITATION** Use of other designs and technologies, or deviation from particular technical and scoping requirements, are permitted if the application of the alternative provisions	2010 CBC is **equivalent** to 2010 ADA.	The standards contain similar language regarding equivalent facilitation. CBHC 8-602 and 8-603 speak to existing facilities that meet the criteria of *qualified historical buildings* . It provides *alternative minimum standards* when those in the regular code cannot be met without threatening or destroying the historical significance of a building or facility. The CBHC references altenative minimum standards in Section 4.1.7(3) of the 1991 ADA Standards for Accessible Design, as incorporated and set forth in federal regulation 28 C.F.R Pt. 36. The 2010 ADA Stds. incorporates similar exceptions in its scoping sections (see 202.5). CBHC 8-604 speaks directly to equivalent facilitation in a fashion similar to 103.	

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23	**Advisory 103 Equivalent Facilitation.** The responsibility for demonstrating equivalent facilitation in the event of a challenge rests with the covered entity. With the exception of transit facilities, which are covered by regulations issued by the Department of Transportation, there is no process for certifying that an alternative design provides equivalent facilitation.		**1101B.1 General.** **....** **2.** Departures from particular technical and scoping requirements of this chapter by the use of other designs and technologies are permitted where the alternative designs and technologies used will provide equivalent or greater access to and usability of the building or facility. **3.** In determining equivalent facilitation, consideration shall be given to means that provide for the maximum independence of persons with disabilities while presenting the least risk of harm, injury or other hazard to such persons or others. **2010 CALIFORNIA HISTORICAL BUILDING CODE** **SECTION 8-604** **EQUIVALENT FACILITATION** ... **2.** Access provided by experiences, services, functions, materials and resources through methods including, but not limited to, maps, plans, videos, virtual reality, and related equipment, at accessible levels. The alternative design and/or technologies used will provide substantially equivalent or greater accessibility to, and usability of, the facility. **3.** The official charged with the enforcement of the standards shall document the reasons for the application of the design and/or technologies and their effect on the historical significance or character-defining features. Such documentation shall be in accordance with Section 8-602.2, Item 2, and shall include the opinion and comments of state or local accessibility officials, and the opinion and comments of representative local groups of people with disabilities. Such documentation shall be retained in the permanent file of the enforcing agency. Copies of the required documentation should be available at the facility upon request. **Note:** For commercial facilities and places of public accommodation (Title III entities). Equivalent facilitation for an element of a building or	NA	Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b)	
24	**104 Conventions**			2010 CBC is **equivalent** to 2010 ADA.	2010 CBC addresses conventions.	
25	**104.1 Dimensions.** Dimensions that are not stated as "maximum" or "minimum" are absolute.		***1101B.4 Dimension conventions***. *Dimensions that are not stated as "maximum" or "minimum" are absolute.*	2010 CBC is **equivalent** to 2010 ADA.		
26	**104.1.1 Construction and Manufacturing Tolerances.** All dimensions are subject to conventional industry tolerances except where the requirement is stated as a range with specific minimum and maximum end points.		***1101B.5 Construction and manufacturing tolerances***. *All dimensions are subject to conventional industry tolerances except where the requirement is stated as a range with specific minimum and maximum end points.*	2010 CBC is **equivalent** to 2010 ADA.		

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27	**Advisory 104.1.1 Construction and Manufacturing Tolerances.** Conventional industry tolerances recognized by this provision include those for field conditions and those that may be a necessary consequence of a particular manufacturing process. Recognized tolerances are not intended to apply to design work. It is good practice when specifying dimensions to avoid specifying a tolerance where dimensions are absolute. For example, if this document requires "1 1/2 inches," avoid specifying "1 1/2 inches plus or minus X inches." Where the requirement states a specified range, such as in Section 609.4 where grab bars must be installed between 33 inches and 36 inches above the floor, the range provides an adequate tolerance and therefore no tolerance outside of the range at either end point is permitted. Where a requirement is a minimum or a maximum dimension that does not have two specific minimum and maximum end points, tolerances may apply. Where an element is to be installed at the minimum or maximum permitted dimension, such as "15 inches minimum" or "5 pounds maximum", it would not be good practice to specify "5 pounds (plus X pounds) or 15 inches (minus X inches)." Rather, it would be good practice to specify a dimension less than the required maximum (or more than the required minimum) by the amount of the expected field or manufacturing tolerance and not to state any tolerance in conjunction with the specified dimension. Specifying dimensions in design in the manner described above will better ensure that facilities and elements accomplish the level of accessibility intended by these requirements. It will also more often produce an end result of strict and literal compliance with the stated requirements and eliminate enforcement difficulties and issues that might otherwise arise. Information on specific tolerances may be available from industry or trade organizations, code groups and building officials, and published references.					
28	**104.2 Calculation of Percentages.** Where the required number of *elements* or *facilities* to be provided is determined by calculations of ratios or percentages and remainders or fractions result, the next greater whole number of such *elements* or *facilities* shall be provided. Where the determination of the required size or dimension of an *element* or *facility* involves ratios or percentages, rounding down for values less than one half shall be permitted.			2010 CBC **does not address** 2010 ADA req.	The CBC addresses these requirements in the individual tables for the respective sections. For clarity, and to assure minimum requirements are met, it is advisable to address it Section 1101B Scope as defined by the ADA.	1) Recommend the inclusion of this provision in the 2010 CBC in Section 1101B Scope.
29	**104.3 Figures.** Unless specifically stated otherwise, figures are provided for informational purposes only.			2010 CBC **does not address** 2010 ADA req.	The CBC provides figures, but does not address this requirement. It is advisable to address this requirment in Section 1101 B Scope, as defined in the ADA.	1) Recommend the inclusion of this provision in the 2010 CBC in Section 1101B Scope.
30	**105 Referenced Standards**	**CHAPTER 35 – REFERENCED STANDARDS** **DIVISION 1 CALIFORNIA ADMINISTRATION** **SECTION 1.1 GENERAL** **1.1.5. Referenced codes.**		2010 CBC is **equivalent** to 2010 ADA.		

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
31	**105.1 General.** The standards listed in 105.2 are incorporated by reference in this document and are part of the requirements to the prescribed extent of each such reference. The Director of the Federal Register has approved these standards for incorporation by reference in accordance with 5 U.S.C. 552(a) and 1 CFR part 51. Copies of the referenced standards may be inspected at the Architectural and Transportation Barriers Compliance Board, 1331 F Street, NW, Suite 1000, Washington, DC 20004; at the Department of Justice, Civil Rights Division, Disability Rights Section, 1425 New York Avenue, NW, Washington, DC; at the Department of Transportation, 400 Seventh Street, SW, Room 10424, Washington, DC; or at the National Archives and Records Administration (NARA). For information on the availability of this material at NARA, call (202) 741-6030, or go to http://www.archives.gov/federal_register/code_of_federal_regulations/ibr_locations.html .		**CHAPTER 35 – REFERENCED STANDARDS** This chapter lists the standards that are referenced in various sections of this document. The standards are listed herein by the promulgating agency of the standard, the standard identification, the effective date and title, and the section or sections of this document that reference the standard. The application of the referenced standards shall be as specified in sections 101.5 and 101.7 and in Section 1.1.5, 1.1.7 and 102.4. **DIVISION 1 CALIFORNIA ADMINISTRATION** **SECTION 1.1 GENERAL** **1.1.5. Referenced codes.** The codes, standards and publications adopted and set forth in this code, including other codes, standards and publications referred to therein are, by title and date of publication, hereby adopted as standard reference documents of this code. When this code does not specifically cover any subject related to building design and construction, recognized architectural or engineering practices shall be employed. The National Fire Codes, standards, and the Fire Protection Handbook of the National Fire Protection Association are permitted to be used as authoritative guides in determining recognized fire prevention engineering practices. **1.1.7. Order of precedence and use.** **1.1.7.1. Differences.** In the event of any differences between these building standards and the standard reference documents, the text of these building standards shall govern. **1.1.7.2. Specific provisions.** Where a specific provision varies from a general provision, the specific provision shall apply. **1.1.7.3. Conflicts.** When the requirements of this code conflict with the requirements of any other part of the California Building Standards Code, Title 24, the most restrictive requirements shall prevail	Which Std.provides greater access **depends** on circumstances.	Both standards incorporate other standards by reference. Any differences in those referenced standards are detailed below.	
32	**105.2 Referenced Standards.** The specific edition of the standards listed below are referenced in this document. Where differences occur between this document and the referenced standards, this document applies.		**CHAPTER 35 – REFERENCED STANDARDS** This chapter lists the standards that are referenced in various sections of this document. The standards are listed herein by the promulgating agency of the standard, the standard identification, the effective date and title, and the section or sections of this document that reference the standard. The application of the referenced standards shall be as specified in sections 101.5 and 101.7 and in Section 1.1.5, 1.1.7 and 102.4. **DIVISION 1 CALIFORNIA ADMINISTRATION** **SECTION 1.1 GENERAL** **1.1.5. Referenced codes.** The codes, standards and publications adopted and set forth in this code, including other codes, standards and publications referred to therein are, by title and date of publication, hereby adopted as standard reference documents of this code. ... standards, and the... **1.1.7. Order of precedence and use.** **1.1.7.1. Differences.** In the event of any differences between these building standards and the standard reference documents, the text of these building standards shall govern. **...**	2010 CBC is **equivalent** to 2010 ADA.	Both standards state that they (the 2010 ADA Stds. and the 2010 CBC) shall govern in the instances where there are differences between the them and the referenced standards.	

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
33	**105.2.1 ANSI/BHMA.** Copies of the referenced standards may be obtained from the Builders Hardware Manufacturers Association, 355 Lexington Avenue, 17th floor, New York, NY 10017 (http://www.buildershardware.com). ANSI/BHMA A156.10-1999 American National Standard for Power Operated Pedestrian Doors (see 404.3). ...		**CHAPTER 35 – REFERENCED STANDARDS** **BHMA** Builders Hardware Manufacturers' Association 355 Lexington Avenue, 17th Floor New York, NY 10017-6603 A 156.10--06 Power Operated Pedestrian Doors Referenced in code section number 1008.1.4.2, 1133B.2.3.2, 1133B.2.5 ...	Which Std.provides greater access **depends** on circumstances.	Both standards reference (ANSI/)BHMA, but the CBC references a later edition. The CBC references A156.10-2006; the 2010 ADA Stds. references A156.10-1999. It is not possible without doing a thourough review of each of these referenced standards, to say whether or not the CBC or the ADA Stds. provides greater access.	
34	**105.2.1 ANSI/BHMA.** Copies of the referenced standards may be obtained from the Builders Hardware Manufacturers Association, 355 Lexington Avenue, 17th floor, New York, NY 10017 (http://www.buildershardware.com). ... ANSI/BHMA A156.19-1997 American National Standard for Power Assist and Low Energy Power Operated Doors (see 404.3, 408.3.2.1, and 409.3.1). ANSI/BHMA A156.19-2002 American National Standard for Power Assist and Low Energy Power Operated Doors (see 404.3, 408.3.2.1, and 409.3.1).		**CHAPTER 35 – REFERENCED STANDARDS** **BHMA** Builders Hardware Manufacturers' Association 355 Lexington Avenue, 17th Floor New York, NY 10017-6603 ... A 156.190--02 Standard for Power Assist and Low Energy Operated Doors Referenced in code section number 1008.1.4.2, 1133B.2.3.2,1133B.2.5	Which Std.provides greater access **depends** on circumstances.	Both standards reference (ANSI/)BHMA, but the CBC references the 2002 edition; the 2010 ADA Stds. references the 1997 and the 2002 editions. It is not possible without doing a thourough review of each of these referenced standards, to say whether or not the CBC or the ADA Stds. provides greater access.	
35	**Advisory 105.2.1 ANSI/BHMA.** ANSI/BHMA A156.10-1999 applies to power operated doors for pedestrian use which open automatically when approached by pedestrians. Included are provisions intended to reduce the chance of user injury or entrapment. ANSI/BHMA A156.19-1997 and A156.19-2002 applies to power assist doors, low energy power operated doors or low energy power open doors for pedestrian use not provided for in ANSI/BHMA A156.10 for Power Operated Pedestrian Doors. Included are provisions intended to reduce the chance of user injury or entrapment			NA	Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b)	
36	**105.2.2 ASME.** Copies of the referenced standards may be obtained from the American Society of Mechanical Engineers, Three Park Avenue, New York, New York 10016 (http://www.asme.org). ASME A17.1- 2000 Safety Code for Elevators and Escalators, including ASME A17.1a-2002 Addenda and ASME A17.1b-2003 Addenda (see 407.1, 408.1, 409.1, and 810.9). ...		**ASME** American Society of Mechanical Engineers Three Park Avenue New York, NY 10016-5990 A17.1/CSA B44--2007 Safety Code for Elevators and Escalators Referenced in code section number 907.3.3, 911.1.5, 1007.4, 1607.8.1, 1613.6.5, 3001.2, 3001.4, 3002.5, 3003.2, 3007.1, 3008.3, 3008.12, 3008.14.1, 3411.8.2 ...	Which Std.provides greater access **depends** on circumstances.	Both standards reference ASME, but the CBC references a later edition. The CBC references A17.1/CSA B44-2007; the 2010 ADA Stds. references A17.1-2000 including the A17.1a-2002 Addenda, and the A17.1b-2003 Addenda. It is not possible without doing a thourough review of each of these referenced standards, to say whether or not the CBC or the ADA Stds. provides greater access.	
37	105.2.2 ASME. Copies of the referenced standards may be obtained from the American Society of Mechanical Engineers, Three Park Avenue, New York, New York 10016 (http://www.asme.org). ASME ... ASME A18.1-1999 Safety Standard for Platform Lifts and Stairway Chairlifts, including ASME A18.1a-2001 Addenda and ASME A18.1b-2001 Addenda (see 410.1). ASME A18.1-2003 Safety Standard for Platform Lifts and Stairway Chairlifts, (see 410.1).		**ASME** American Society of Mechanical Engineers Three Park Avenue New York, NY 10016-5990 ... A18.1--2005 Safety Standard for Platform Lifts and Stairway Chairlifts Referenced in code section number 116B.2.1, 2702.2.6, 3411.8.3	Which Std.provides greater access **depends** on circumstances.	Both standards reference ASME, but the CBC references a later edition. The CBC references A18.1-2005; the 2010 ADA Stds. references A18.1-1999 including the A18.1a-2001 Addenda, the A18.1b-2001 Addenda, and A18.1-2003 It is not possible without doing a thourough review of each of these referenced standards, to say whether or not the CBC or the ADA Stds. provides greater access.	

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
38	**Advisory 105.2.2 ASME.** ASME A17.1-2000 is used by local jurisdictions throughout the United States for the design, construction, installation, operation, inspection, testing, maintenance, alteration, and repair of elevators and escalators. The majority of the requirements apply to the operational machinery not seen or used by elevator passengers. ASME A17.1 requires a two-way means of emergency communications in passenger elevators. This means of communication must connect with emergency or authorized personnel and not an automated answering system. The communication system must be push button activated. The activation button must be permanently identified with the word "HELP." A visual indication acknowledging the establishment of a communications link to authorized personnel must be provided. The visual indication must remain on until the call is terminated by authorized personnel. The building location, the elevator car number, and the need for assistance must be provided to authorized personnel answering the emergency call. The use of a handset by the communications system is prohibited. Only the authorized personnel answering the call can terminate the call. Operating instructions for the communications system must be provided in the elevator car. The provisions for escalators require that at least two flat steps be provided at the entrance and exit of every escalator and that steps on escalators be demarcated by yellow lines 2 inches wide maximum along the back and sides of steps. ASME A18.1-1999 and ASME A18.1-2003 address the design, construction, installation, operation, inspection, testing, maintenance and repair of lifts that are intended for transportation of persons with disabilities. Lifts are classified as: vertical platform lifts, inclined platform lifts, inclined stairway chairlifts, private residence vertical platform lifts, private residence inclined platform lifts, and private residence inclined stairway chairlifts. This document does not permit the use of inclined stairway chairlifts which do not provide platforms because such lifts require the user to transfer to a seat. ASME A18.1 contains requirements for runways, which are the spaces in which platforms or seats move. The standard includes additional provisions for runway enclosures, electrical equipment and wiring, structural support, headroom clearance (which is 80 inches minimum), lower level access ramps and pits. The enclosure walls not used for entry or exit are required to have a grab bar the full length of the wall on platform lifts. Access ramps are required to meet requirements similar to those for ramps in Chapter 4 of this document. Each of the lift types addressed in ASME A18.1 must meet requirements for capacity, load, speed, travel, operating devices, and control equipment. The maximum permitted height for operable parts is consistent with Section 308 of this document. The standard also addresses attendant operation. However, Section 410.1 of this document does not permit attendant operation.			NA	Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b)	
39	**105.2.3 ASTM.** Copies of the referenced standards may be obtained from the American Society for Testing and Materials, 100 Bar Harbor Drive, West Conshohocken, Pennsylvania 19428 (http://www.astm.org). ASTM F 1292-99 Standard Specification for Impact Attenuation of Surface Systems Under and Around Playground Equipment (see 1008.2.6.2). ASTM F 1292-04 Standard Specification for Impact Attenuation of Surfacing Materials Within the Use Zone of Playground Equipment (see 1008.2.6.2). ASTM F 1487-01 Standard Consumer Safety Performance Specification for Playground Equipment for Public Use (see 106.5). ASTM F 1951-99 Standard Specification for Determination of Accessibility of Surface Systems Under and Around Playground Equipment (see 1008.2.6.1).			2010 CBC provides **less access** than 2010 ADA.	The 2010 ADA Stds. References ASTM F1292 as it applies to surfaces under playground equipment. The CBC does not speak to surfaces under palyground equipment, nor does it reference ASTM F 1292.	1) Modify the CBC to include standards for surfaces under playground equipment similar to those found in 2010 ADA Stds. Section 1008.2.6.2.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
40	**Advisory 105.2.3 ASTM.** ASTM F 1292-99 and ASTM F 1292-04 establish a uniform means to measure and compare characteristics of surfacing materials to determine whether materials provide a safe surface under and around playground equipment. These standards are referenced in the play areas requirements of this document when an accessible surface is required inside a play area use zone where a fall attenuating surface is also required. The standards cover the minimum impact attenuation requirements, when tested in accordance with Test Method F 355, for surface systems to be used under and around any piece of playground equipment from which a person may fall. ASTM F 1487-01 establishes a nationally recognized safety standard for public playground equipment to address injuries identified by the U.S. Consumer Product Safety Commission. It defines the use zone, which is the ground area beneath and immediately adjacent to a play structure or play equipment designed for unrestricted circulation around the equipment and on whose surface it is predicted that a user would land when falling from or exiting a play structure or equipment. The play areas requirements in this document reference the ASTM F 1487 standard when defining accessible routes that overlap use zones requiring fall attenuating surfaces. If the use zone of a playground is not entirely surfaced with an accessible material, at least one accessible route within the use zone must be provided from the perimeter to all accessible play structures or components within the playground. ASTM F 1951-99 establishes a uniform means to measure the characteristics of surface systems in order to provide performance specifications to select materials for use as an accessible surface under and around playground equipment. Surface materials that comply with this standard and are located in the use zone must also comply with ASTM F 1292. The test methods in this standard address access for children and adults who may traverse the surfacing to aid children who are playing. When a surface is tested it must have an average work per foot value for straight propulsion and for turning less than the average work per foot values for straight propulsion and for turning, respectively, on a hard, smooth surface with a grade of 7% (1:14).			NA	Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b)	

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
41	**105.2.4 ICC/IBC.** Copies of the referenced standard may be obtained from the International Code Council, 5203 Leesburg Pike, Suite 600, Falls Church, Virginia 22041 (www.iccsafe.org). International Building Code, 2000 Edition (see 207.1, 207.2, 216.4.2, 216.4.3, and 1005.2.1). International Building Code, 2001 Supplement (see 207.1 and 207.2). International Building Code, 2003 Edition (see 207.1, 207.2, 216.4.2, 216.4.3, and 1005.2.1).		**2010 CALIFORNIA BUILDING CODE** **California Code of Regulations - Title 24, Part 2** **Based on the 2009 International Building Code** Effective Date: January 1, 2011 **DIVISION 1 CALIFORNIA ADMINISTRATION** **SECTION 1.1 GENERAL** **1.1.1. Title.** These regulations shall be known as the California Building Code, may be cited as such and will be referred to herein as "this code." The California Building Code is Part 2 of twelve parts of the official compilation and publication of the adoption amendment and repeal of building regulations to the California Code of Regulations, Title 24, also referred to as the California Building Standards Code. This part incorporates by adoption the 2009 International Building Code of the International Code Council with necessary California amendments. **1.1.6. Nonbuilding standards, orders and regulations.** Requirements contained in the International Building Code, or in any other referenced standard, code or document, which are not building standards as defined in Health and Safety Code Section 18909, shall not be construed as part of the provisions of this code. For nonbuilding standards, orders, and regulations, see other titles of the California Code of Regulations **1.1.11. Format.** This part fundamentally adopts the International Building Code by reference on a chapter-by-chapter basis. Such adoption is reflected in the Matrix Adoption Table of each chapter of this part. When the Matrix Adoption Tables make no reference to a specific chapter of the International Building Code such chapter of the International Building Code is not adopted as a portion of this code.	Which Std.provides greater access **depends** on circumstances.	The CBC is based on the 2009 IBC with *necessary California ammendments*. 2010 ADA Stds. 105.2.4 references muktiple editions of the IBC - the 2000 Edition, the 2001 Supplement, and the 2003 Edition. It is not possible without doing a thourough review of each of these referenced standards, to say whether or not the CBC or the ADA Stds. provides greater access.	
42	**Advisory 105.2.4 ICC/IBC.** International Building Code (IBC)-2000 (including 2001 Supplement to the International Codes) and IBC-2003 are referenced for means of egress, areas of refuge, and railings provided on fishing piers and platforms. At least one accessible means of egress is required for every accessible space and at least two accessible means of egress are required where more than one means of egress is required. The technical criteria for accessible means of egress allow the use of exit stairways and evacuation elevators when provided in conjunction with horizontal exits or areas of refuge. While typical elevators are not designed to be used during an emergency evacuation, evacuation elevators are designed with standby power and other features according to the elevator safety standard and can be used for the evacuation of individuals with disabilities. The IBC also provides requirements for areas of refuge, which are fire-rated spaces on levels above or below the exit discharge levels where people unable to use stairs can go to register a call for assistance and wait for evacuation. The recreation facilities requirements of this document references two sections in the IBC for fishing piers and platforms. An exception addresses the height of the railings, guards, or handrails where a fishing pier or platform is required to include a guard, railing, or handrail higher than 34 inches (865 mm) above the ground or deck surface.			NA	Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b)	

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
43	**105.2.5 NFPA.** Copies of the referenced standards may be obtained from the National Fire Protection Association, 1 Batterymarch Park, Quincy, Massachusetts 02169-7471, (http://www.nfpa.org). NFPA 72 National Fire Alarm Code, 1999 Edition (see 702.1 and 809.5.2). NFPA 72 National Fire Alarm Code, 2002 Edition (see 702.1 and 809.5.2).		**NFPA** National Fire Protection Association 1 Battery march Park Quincy, MA 02269-9101 72-10 National Fire Alarm Code, as amended* Referenced in code section number901.6, 903.4.1, 904.3.5, 907.2, 907.2.5, 907.2.11, 907.2.13.2, 907.3, 907.3.3, 907.3.4, 907.5.2.1.2, 907.5.2.2, 907.6, 907.6.1, 907.6.5, 907.7, 907.7.1, 907.7.2, 911.1.5, 3006.5, 3007.6		Both standards reference NFPA 72, but the CBC references a later edition. The CBC references NFPA 72, 2010 Edition, while the 2010 ADA Stds. references NFPA 72, 1999 Edition, and NFPA 72, 2000 Edition. It is not possible without doing a thourough review of each of these referenced standards, to say whether or not the CBC or the ADA Stds. provides greater access.	
44	**Advisory 105.2.5 NFPA.** NFPA 72-1999 and NFPA 72-2002 address the application, installation, performance, and maintenance of protective signaling systems and their components. The NFPA 72 incorporates Underwriters Laboratory (UL) 1971 by reference. The standard specifies the characteristics of audible alarms, such as placement and sound levels. However, Section 702 of these requirements limits the volume of an audible alarm to 110 dBA, rather than the maximum 120 dBA permitted by NFPA 72-1999. NFPA 72 specifies characteristics for visible alarms, such as flash frequency, color, intensity, placement, and synchronization. However, Section 702 of this document requires that visual alarm appliances be permanently installed. UL 1971 specifies intensity dispersion requirements for visible alarms. In particular, NFPA 72 requires visible alarms to have a light source that is clear or white and has polar dispersion complying with UL 1971.			NA	Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b)	
45	**106 Definitions** **§ 35.104 Definitions** **§ 36.104 Definitions**	***ETA Editor's Note*** The Title II Regulations at 35.104 "Definitions" and the Title III Regulations at 36.104 "Definitions" include the following: ***1991 Standards means requirements set forth in the ADA Standards for Accessible Design, codified at 28 CFR part 36, app. A (2009).*** ***2004 ADAAG means the requirements set forth in appendices B and D to 36 CFR part 1191 (2009).*** ***2010 Standard*** (Title II definition) ***means the 2010 ADA Standards for Accessible Design, which consist of the 2004 ADAAG and the requirements contained in § 35.151.*** ***2010 Standard*** (Title III definition) ***means the 2010 ADA Standards for Accessible Design, which consist of the 2004 ADAAG and the requirements contained in subpart D of 28 CFR part 36.***	***1102B DEFINITIONS*** ***1107A DEFINITIONS*** ***1002 DEFINITIONS*** ***8-201 DEFINITIONS*** ***202 DEFINITIONS***	2010 CBC is **equivalent** to 2010 ADA.		

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46	**106.1 General.** For the purpose of this document, the terms defined in 106.5 have the indicated meaning.		***1102B DEFINITIONS*** *For additional definitions pertinent to the Division of the State Architect-Access Compliance accessibility requirements, see Chapter 2, Section 202.* *For the purpose of the chapter, certain terms are defined as follows:*	2010 CBC is **equivalent** to 2010 ADA.		
47	**Advisory 106.1 General.** Terms defined in Section 106.5 are italicized in the text of this document.					
48	**106.2 Terms Defined in Referenced Standards.** Terms not defined in 106.5 or in regulations issued by the Department of Justice and the Department of Transportation to implement the Americans with Disabilities Act, but specifically defined in a referenced standard, shall have the specified meaning from the referenced standard unless otherwise stated.		***201.3 Terms defined in other codes.*** *Where terms are not defined in this code and are defined in the California Fuel Gas Code, California Fire Code, California Mechanical Code or California Plumbing Code, such terms shall have the meanings ascribed to them as in those codes.*	2010 CBC **does not address** 2010 ADA req.	CBC 1102B does not address that terms specifically defined in a referenced standard, shall have the specified meaning from the referenced standard unless otherwise stated.	1) Include this provision in CBC 1102B.
49	**106.3 Undefined Terms.** The meaning of terms not specifically defined in 106.5 or in regulations issued by the Department of Justice and the Department of Transportation to implement the Americans with Disabilities Act or in referenced standards shall be as defined by collegiate dictionaries in the sense that the context implies.		***201.4 Terms not defined.*** Where terms are not defined through the methods authorized by this section, such terms shall have ordinarily accepted meanings such as the context implies.	2010 CBC provides **less access** than 2010 ADA.	"Ordinarily accepted meanings" is too vague. Recommend using the requirement "as defined by collegiate dictionaries" instead as stated in the 2010 ADA.	1) In CBC 1102B, recommend using the requirement "as defined by collegiate dictionaries" instead of the term " ordinarily accepted meanings".
50	**106.4 Interchangeability.** Words, terms and phrases used in the singular include the plural and those used in the plural include the singular.			2010 CBC **does not address** 2010 ADA req.	Include this provision in CBC 1102.	1) Include this provision in CBC 1102.
51	**106.5 Defined Terms.**		***1102B DEFINITIONS*** *For additional definitions pertinent to the Division of the State Architect-Access Compliance accessibility requirements, see Chapter 2, Section 202.* *For the purpose of the chapter, certain terms are defined as follows:*	2010 CBC is **equivalent** to 2010 ADA.		
52	**106.5 Defined Terms.**					
53	**106.5 Defined Terms.**					
54	**§ 35.104 Definitions.** *1991 Standards* means the requirements set forth in the ADA Standards for Accessible Design originally published on July 26, 1991, and republished as Appendix D to 28 CFR part 36. **§ 36.104 Definitions** *1991 Standards* means requirements set forth in the ADA Standards for Accessible Design, originally published on July 26, 1991, and republished as Appendix D to this part.					
55	**§ 35.104 Definitions.** 2004 ADAAG means the requirements set forth in appendices B and D to 36 CFR part 1191 (2009). **§ 36.104 Definitions** 2004 ADAAG means the requirements set forth in appendices B and D to 36 CFR part 1191 (2009).					
56	**§ 35.104 Definitions** *2010 Standard* means the 2010 ADA Standards for Accessible Design, which consist of the 2004 ADAAG and the requirements contained in § 35.151 **§ 36.104 Definitions** *2010 Standards* means the 2010 ADA Standards for Accessible Design, which consist of the 2004 ADAAG and the requirements contained in subpart D of this part.					

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
57	**Accessible.** A site, building, facility, or portion thereof that complies with this part.		***1102B ACCESSIBLE*** *is approachable and usable by persons with disabilities in compliance with this code.* ***1102B ACCESSIBILITY*** *is the combination of various elements in a building, facility, site, or area, or portion thereof which allows access, circulation and the full use of the building and facilities by persons with disabilities in conformance with this chapter.*	2010 CBC provides **greater access** than 2010 ADA.	Retain original CBC definitions.	
58	**Accessible Means of Egress.** A continuous and unobstructed way of egress travel from any point in a building or facility that provides an accessible route to an area of refuge, a horizontal exit, or a public way.		***1102B ACCESSIBLE MEANS OF EGRESS.*** *See Section 1002.1* ***1102B ACCESSIBLE MEANS OF EGRESS.*** *A continuous and unobstructed way of egress travel from any accessible point in a building or facility to a public way.*	2010 CBC provides **less access** than 2010 ADA.	In CBC 1102B, use ADA definition as it specifically addresses an area of refuge, and a horizontal exit.	1) In CBC 1102B, use ADA definition as it specifically addresses an area of refuge, and a horizontal exit.
59	**Addition.** An expansion, extension, or increase in the gross floor area or height of a building or facility.		***202 ADDITION.*** *An extension or increase in floor area or height of a building or structure.* ***8-201 ADDITION.*** *A non-historical extension or increase in floor area or height of a building or property.*	2010 CBC is **equivalent** to 2010 ADA.		
60	**Administrative Authority.** A governmental agency that adopts or enforces regulations and guidelines for the design, construction, or alteration of buildings and facilities.		***1102B ADMINISTRATIVE AUTHORITY*** *is a governmental agency that adopts or enforces regulations and guidelines for the design, construction, or alteration of buildings and facilities.*	2010 CBC is **equivalent** to 2010 ADA.		
61	**Alteration.** A change to a building or facility that affects or could affect the usability of the building or facility or portion thereof. Alterations include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historic restoration, resurfacing of circulation paths or vehicular ways, changes or rearrangement of the structural parts or elements, and changes or rearrangement in the plan configuration of walls and full-height partitions. Normal maintenance, reroofing, painting or wallpapering, or changes to mechanical and electrical systems are not alterations unless they affect the usability of the building or facility.		***202 ALTERATION or ALTER.*** *Any construction or renovation to an existing structure other than repair or addition.* *[DSA-AC] "Alteration or Alter" is any change, addition or modification in construction or occupancy or structural repair or change in primary function to an existing structure made by, on behalf of, or for the use of a public accommodation or commercial facility. Alterations include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historic restoration, changes or rearrangement of the structural parts or elements, and changes or rearrangement in the plan configuration of walls and full-height partitions.* ***8-201ALTERATION.*** *A modification to a qualified historical building or property that affects the usability of the building or property, or part thereof. Alterations include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historical restoration, changes or rearrangement of the structural parts or elements, and changes or rearrangements in the plan configuration of walls and full-height partitions.*	2010 CBC provides **less access** than 2010 ADA.	ADA definition includes "resurfacing of circulation paths or vehicular ways".	1) Revise CBC definition to include "resurfacing of circulation paths or vehicular ways" in both CBC 202 and CBC 8-201.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
62	**Amusement Attraction.** Any facility, or portion of a facility, located within an amusement park or theme park which provides amusement without the use of an amusement device. Amusement attractions include, but are not limited to, fun houses, barrels, and other attractions without seats.		***411.1 SPECIAL AMUSEMENT BUILDING***. *A special amusement building is any temporary or permanent building or portion thereof that is occupied for amusement, entertainment or educational purposes and that contains a device or system that conveys passengers or provides a walkway along, around or over a course in any direction so arranged that the means of egress path is not readily apparent due to visual or audio distractions or is intentionally confounded or is not readily available because of the nature of the attraction or mode of conveyance through the building or structure.*	2010 CBC **does not address** 2010 ADA req.	CBC definition for "special amusement building" is not the same as the definition of "amusement attraction" for purposes of accessibility.	1) Include the definition of "amusement attraction" in CBC 1102B as defined in the 2010 ADA.
63	**Amusement Ride.** A system that moves persons through a fixed course within a defined area for the purpose of amusement.			2010 CBC **does not address** 2010 ADA req.	CBC does not include "amusement ride" in its definitions.	1) Include the definition of "amusement ride" in CBC 1102B as defined in the 2010 ADA.
64	**Amusement Ride Seat.** A seat that is built-in or mechanically fastened to an amusement ride intended to be occupied by one or more passengers.			2010 CBC **does not address** 2010 ADA req.	CBC does not include "amusement ride seat" in its definitions.	1) Include the definition of "amusement ride seat" in CBC 1102B as defined in the 2010 ADA.
65	**Area of Sport Activity.** That portion of a room or space where the play or practice of a sport occurs.			2010 CBC **does not address** 2010 ADA req.	CBC does not include "area of sport activity" in its definitions. While the CBC 1104B.4 does address "stadiums, grandstands, bleachers, athletic pavilions, gymnasiums and miscellaneous sport-related facilities" it is for purposes of viewing and not the actual area where the play or practice of a sport occurs.	1) Include the definition of "area of sport activity" in CBC 1102B as defined in the 2010 ADA.
66	**Assembly Area.** A building or facility, or portion thereof, used for the purpose of entertainment, educational or civic gatherings, or similar purposes. For the purposes of these requirements, assembly areas include, but are not limited to, classrooms, lecture halls, courtrooms, public meeting rooms, public hearing rooms, legislative chambers, motion picture houses, auditoria, theaters, playhouses, dinner theaters, concert halls, centers for the performing arts, amphitheaters, arenas, stadiums, grandstands, or convention centers.		***1102B ASSEMBLY AREA*** *is a room or space accommodating a group of individuals for recreational, educational, political, social or amusement purposes, or for the consumption of food and drink.* ***1.1.3.2 State-regulated buildings, structures, and applications... .Note 14.1 #3*** *Theater, dancehall, skating rink, auditorium, assembly hall, meeting hall, nightclub, fair building, or similar place of assemblage where 50 or more persons may gather together in a building, room or structure for the purpose of amusement, entertainment, instruction, deliberation, worship, drinking or dining, awaiting transportation, or education.* ***1104B.3.3 Variety of locations.*** *Accessible seating or accommodations in places of public amusement and resort, including theaters, concert halls and stadiums, shall be provided in a variety of locations so as to provide persons with disabilities a choice of admission prices otherwise available to members of the general public.*	Which Std.provides greater access **depends** on circumstances.	The definition lists in 1102B, 1104B.3.3, and 1.1.3.2 do not match. CBC defines assembly areas in terms of occupancy classifications which the ADA does not. Coordination with other requirements for each occupancy classification is important under the CBC. CBC includes spaces "for consumption of food or drink" which the ADA does not except for dinner theaters. The ADA specifically includes legislative and judicial rooms which the CBC arguably does not. Since convention centers have many uses, it makes sense to list them specifically like the ADA does.	1. Although the CBC language appears to include all of the function types included in the broader list in the 2010 ADA Stds, consider expanding the CBC list to include all of the function types listed in the ADA and adding any others that exceed the ADA requirements where needed such as worship facilities. Where a facility type is specifically included in a section of the standard, it should be listed in the definitions (1104B.6 Religious). Religious facilities in 2012 do not all have the purpose of worship. 2. Consider the possibility of decoupling the definitions for occupancy classifications used elsewhere within the building code for life safety purposes and the definitions used in the accessibility code sections to simplify coordination and harmonizing between the ADA and CBC definitions. There is not a direct comparison of the relative needs for life safety and accessibility by space and occupancy types.
67	**Assistive Listening System (ALS).** An amplification system utilizing transmitters, receivers, and coupling devices to bypass the acoustical space between a sound source and a listener by means of induction loop, radio frequency, infrared, or direct-wired equipment.		***1107A.1-A ASSISTIVE DEVICE*** *is an aid, tool or instrument used by persons with disabilities to assist in activities of daily living.*	2010 CBC provides **less access** than 2010 ADA.	While an assistive listening system is addressed in the CBC, it is not defined. The Chapter 11A definition does not specifically address an assistive listening system in its definition of an assistive device.	1) Include the definition of "Assistive Listening System" in CBC 1102B as defined in the 2010 ADA.
68	**Boarding Pier.** A portion of a pier where a boat is temporarily secured for the purpose of embarking or disembarking.			2010 CBC **does not address** 2010 ADA req.	CBC does not include "boarding pier" in its definitions.	1) Include the definition of "boarding pier" in CBC 1102B as defined in the 2010 ADA.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
69	**Boat Launch Ramp.** A sloped surface designed for launching and retrieving trailered boats and other water craft to and from a body of water.			2010 CBC **does not address** 2010 ADA req.	CBC does not include "boat launch ramp" in its definitions.	1) Include the definition of "boat launch ramp" in CBC 1102B as defined in the 2010 ADA.
70	**Boat Slip.** That portion of a pier, main pier, finger pier, or float where a boat is moored for the purpose of berthing, embarking, or disembarking.			2010 CBC **does not address** 2010 ADA req.	CBC does not include "boat slip" in its definitions.	1) Include the definition of "boat slip" in CBC 1102B as defined in the 2010 ADA.
71	**Building.** Any structure used or intended for supporting or sheltering any use or occupancy.		***202 BUILDING.*** *Any structure used or intended for supporting or sheltering any use or occupancy.*	2010 CBC is **equivalent** to 2010 ADA.		
72	**Catch Pool.** A pool or designated section of a pool used as a terminus for water slide flumes.			2010 CBC **does not address** 2010 ADA req.	CBC does not include "catch pool" in its definitions.	1) Include the definition of "catch pool" in CBC 1102B as defined in the 2010 ADA.
73	**Characters.** Letters, numbers, punctuation marks and typographic symbols.			2010 CBC **does not address** 2010 ADA req.	CBC does not include "characters" in its definitions.	1) Include the definition of "characters" in CBC 1102B as defined in the 2010 ADA.
74	**Children's Use.** Describes spaces and elements specifically designed for use primarily by people 12 years old and younger.			2010 CBC **does not address** 2010 ADA req.	While the CBC does address facilities to be used by children, a definition is not provided.	1) Include the definition of "children's use" in CBC 1102B as defined in the 2010 ADA.
75	**Circulation Path.** An exterior or interior way of passage provided for pedestrian travel, including but not limited to, walks, hallways, courtyards, elevators, platform lifts, ramps, stairways, and landings.		***1102B CIRCULATION PATH*** *is an exterior or interior way of passage from one place to another for pedestrians, including, but not limited to, walks, hallways, courtyards, stairways and stair landings.*	2010 CBC provides **less access** than 2010 ADA.	The CBC definition does not include elevators, platform lifts, and ramps.	1) Include in the CBC definition of circulation path the words, "elevators, platform lifts, and ramps" as is included in the ADA definition.
76	**Closed-Circuit Telephone.** A telephone with a dedicated line such as a house phone, courtesy phone or phone that must be used to gain entry to a facility.		***1102B CLOSED-CIRCUIT TELEPHONE*** *is a telephone with dedicated line(s) such as a house phone, courtesy phone or phone that must be used to gain entrance to a facility.*	2010 CBC is **equivalent** to 2010 ADA.		
77	**Common Use.** Interior or exterior circulation paths, rooms, spaces, or elements that are not for public use and are made available for the shared use of two or more people.		***1102B COMMON USE AREAS*** *are those interior and exterior rooms, spaces or elements that are made available for the use of a restricted group of people (for example, occupants of a homeless shelter, the occupants of an office building or the guests of such occupants).* ***1107A COMMON USE AREAS*** *are private use areas within multifamily residential facilities where the use of these areas is limited exclusively to owners, residents and their guests. The areas may be defined as rooms or spaces or elements inside or outside of a building.*	2010 CBC provides **less access** than 2010 ADA.	The CBC 1102B definition does not include "paths" in its definition. The ADA definition states "not for public use", the CBC 1102B definition states "use of a restricted group of people" and the CBC 1107A definition states "private use". Technically, these terms are equal.	1) Include in the CBC definition of circulation path the word "paths" as is included in the ADA definition.
78	**Cross Slope.** The slope that is perpendicular to the direction of travel (see running slope).		***1102B CROSS SLOPE*** *is the slope that is perpendicular to the direction of travel (as differentiated from running slope).* ***1107A.3-C CROSS SLOPE*** *is the slope that is perpendicular to the direction of travel.*	2010 CBC is **equivalent** to 2010 ADA.		

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
78.1			***1133B.8 Hazards.*** ***1133B.8.1 Warning curbs.*** *Abrupt changes in level, except between a walk or sidewalk and an adjacent street or driveway, exceeding 4 inches (102 mm) in a vertical dimension, such as at planters or fountains located in or adjacent to walks, sidewalks or other pedestrian ways, shall be identified by curbs projecting at least 6 inches (152 mm) in height above the walk or sidewalk surface to warn the blind of a potential drop off.* *When a guard or handrail is provided, no curb is required when a guide rail is provided centered 3 inches (76 mm) plus or minus 1 inch (25 mm) above the surface of the walk or sidewalk, the walk is 5 percent or less gradient or no adjacent hazard exists.*	NA	Although "warning curbs" are specified and referred to in the CBC, "**Curb**" is not defined by the CBC or ADA. There is inconsistnecy between plan reviewers for DSA and local officials as to what minimum and maximum heights might qualify as a curb. Therefore, the application of the curb ramp definition is inconsistently interpreted and applied. Is a 3/4" vertical rise at the joint between a pedestrian walk and adjacent asphalt pavement a curb? At what height is a curb cane-detectable? Does a cut through a curb that then rises 30" through a grassy area qualify as a curb ramp? Nationally, a sloped surface that cuts through a curb or built up to one that rises a total of more than 8"-12" is usually considered to be a ramp but that is not spelled out anywhere.	Suggest adding a definition for "Curb" or expanding the definittion for "curb ramp" to clarify this issue.
79	**Curb Ramp.** A short ramp cutting through a curb or built up to it.		***1102 B CURB RAMP*** *is a sloping pedestrian way, intended for pedestrian traffic, which provides access between a walk or sidewalk and a surface located above or below an adjacent curb face, as differentiated from a ramp.* ***1107A.3-C CURB RAMP*** *is a sloping pedestrian way, intended for pedestrian traffic, which provides access between a walk or sidewalk and a surface located above or below an adjacent curb face.*	2010 CBC is **equivalent** to 2010 ADA.		
80	**Detectable Warning.** A standardized surface feature built in or applied to walking surfaces or other elements to warn of hazards on a circulation path.		***1102B DETECTABLE WARNING*** *is a standardized surface or feature built into or applied to walking surfaces or other elements to warn visually impaired persons of hazards in the path of travel. Only approved DSA-AC detectable warning products and directional surfaces shall be installed as provided in the California Code of Regulations (CCR). Title 24, Part 1, Articles 2, 3 and 4. Refer to CCR Title 24, Part 12, Chapter 12-11A and B, for building and facility access specifications for product approval for detectable warning products and directional surfaces.* ***1107A.4-D DETECTABLE WARNING*** *is a standardized surface or feature built into or applied to walking surfaces or other elements to warn visually impaired persons of hazards in the path of travel. Only approved DSA-AC detectable warning products and directional surfaces shall be installed as provided in the CCR, Title 24, Part 1, Articles 2, 3 and 4. Refer to CCR Title 24, Part 12, Chapter 12-11A and B for building and facility access specifications for product approval for detectable warning products and directional surfaces.*	2010 CBC is **equivalent** to 2010 ADA.	CBC designates that detectable warning surfaces are for visually impaired persons, where the ADA does not make such distinction. Since this is actually the purpose of detectable warning surfaces, retain in CBC definition.	
81	**Element.** An architectural or mechanical component of a building, facility, space, or site.		***1102B ELEMENT*** *is an architectural or mechanical component of a building, facility, space or site; for example, a telephone, curb ramp, door, drinking fountain, seating or water closet.* ***1102B ACCESSIBLE ELEMENT*** *is an element specified by the regulations adopted by the Division of the State Architect-Access Compliance.*	2010 CBC is **equivalent** to 2010 ADA.		

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
82	**Elevated Play Component.** A play component that is approached above or below grade and that is part of a composite play structure consisting of two or more play components attached or functionally linked to create an integrated unit providing more than one play activity.			2010 CBC **does not address** 2010 ADA req.	CBC does not include "elevated play component" in its definitions.	1) Include the definition of "elevated play component" in CBC 1102B as defined in the 2010 ADA.
83	**Employee Work Area.** All or any portion of a space used only by employees and used only for work. Corridors, toilet rooms, kitchenettes and break rooms are not employee work areas.		***1102B WORK STATION*** *is an area defined by equipment and/or work surfaces intended for use by employees only, and generally for one or a small number of employees at a time. Examples include ticket booths; the employee side of grocery store checkstands; the bartender area behind a bar; the employee side of snack bars, sales counters and public counters; guardhouses; toll booths; kiosk vending stands; lifeguard stations; maintenance equipment closets; counter and equipment areas in restaurant kitchens; file rooms; storage areas; etc.*	2010 CBC is **equivalent** to 2010 ADA.	ADA terminology of "Employee Work Area" as work station is not as definitive to areas of work. Suggest including the verbiage in the CBC definition that "corridors, toilet rooms, kitchenettes and break rooms are not employee work areas".	1) Recommend using ADA terminology of "Employee Work Area" instead of "work station". 2) Recommend including the verbiage in the CBC definition that "corridors, toilet rooms, kitchenettes and break rooms are not employee work areas".
84	**Entrance.** Any access point to a building or portion of a building or facility used for the purpose of entering. An entrance includes the approach walk, the vertical access leading to the entrance platform, the entrance platform itself, vestibule if provided, the entry door or gate, and the hardware of the entry door or gate.		***1102B ENTRANCE*** *means any access point to a building or portion of a building or facility used for the purpose of entering. An entrance includes the approach walk, the vertical access leading to the entrance platform, the entrance platform itself, vestibules if provided, the entry door(s) or gate(s), and the hardware of the entry door(s) or gate(s).*	2010 CBC provides **greater access** than 2010 ADA.	Using the plural for doors and gates provides greater access.	
84.1	**103 Equivalent Facilitation** Nothing in these requirements prevents the use of designs, products, or technologies as alternatives to those prescribed, provided they result in substantially equivalent or greater accessibility and usability.	**NA**	***1102B EQUIVALENT FACILITATION*** *is an alternate means of complying with the literal requirements of these standards and specifications that provides access in terms of the purpose of these standards and specifications. See Section 1.9.1.5. (immediately below)* ***1.9.1.5.*** *Special conditions for persons with disabilities requiring appeals action ratification. Whenever reference is made in these regulations to this section, the findings and determinations required to be rendered by the local enforcing agency shall be subject to ratification through an appeals process.*	Which Std.provides greater access **depends** on circumstances.	The ADA does not provide an EF appeals process except through the courts. CBC's EF appeals process should be reviewed by legal counsel to determine if it would be certifiable under the ADA as equivalent.	???
85	**§ 35.104 Definitions** *Existing facility* means a facility in existence on any given date, without regard to whether the facility may also be considered newly constructed or altered under this part. **§ 36.104 Definitions** *Existing facility* means a facility in existence on any given date, without regard to whether the facility may also be considered newly constructed or altered under this part.	***ETA Editor's Note*** The Title II Regulations at 35.104 "Definitions" and the Title III Regulations at 36.104 "Definitions" include the following: Existing facility means a facility in existence on any given date, without regard to whether the facility may also be considered newly constructed or altered under this part.				

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
86	**Facility.** All or any portion of buildings, structures, site improvements, elements, and pedestrian routes or vehicular ways located on a site.		***1102B FACILITY (or FACILITIES)*** *is a building, structure, room, site, complex or any portion thereof that is built, altered, improved or developed to serve a particular purpose. Facilities shall include all or any portion of buildings, structures, site developments, complexes, equipment, roads, walks, sidewalks, passageways, parking lots or other real or personal property located on a site.* ***1107A.6-F FACILITY (or FACILITIES)*** *is a building, structure, room, site, complex or any portion thereof that is built, altered, improved or developed to serve a particular purpose.*	2010 CBC provides **greater access** than 2010 ADA.		
87	**Gangway.** A variable-sloped pedestrian walkway that links a fixed structure or land with a floating structure. Gangways that connect to vessels are not addressed by this document.			2010 CBC **does not address** 2010 ADA req.	CBC does not include "gangway" in its definitions.	1) Include the definition of "gangway" in CBC 1102B as defined in the 2010 ADA.
88	**Golf Car Passage.** A continuous passage on which a motorized golf car can operate.			2010 CBC **does not address** 2010 ADA req.	CBC does not include "golf car passage" in its definitions.	1) Include the definition of "golf car passage" in CBC 1102B as defined in the 2010 ADA.
89	**Ground Level Play Component.** A play component that is approached and exited at the ground level.			2010 CBC **does not address** 2010 ADA req.	CBC does not include "ground level play component" in its definitions.	1) Include the definition of "ground level play component" in CBC 1102B as defined in the 2010 ADA.
90	**Key Station.** Rapid and light rail stations, and commuter rail stations, as defined under criteria established by the Department of Transportation in 49 CFR 37.47 and 49 CFR 37.51, respectively.			2010 CBC **does not address** 2010 ADA req.	CBC does not include "key station" in its definitions.	1) Include the definition of "key station" in CBC 1102B as defined in the 2010 ADA.
91	**Mail Boxes.** Receptacles for the receipt of documents, packages, or other deliverable matter. Mail boxes include, but are not limited to, post office boxes and receptacles provided by commercial mailreceiving agencies, apartment facilities, or schools.			2010 CBC **does not address** 2010 ADA req.	CBC does not include "mail boxes" in its definitions.	1) Include the definition of "mail boxes" in CBC 1102B as defined in the 2010 ADA.
92	**Marked Crossing.** A crosswalk or other identified path intended for pedestrian use in crossing a vehicular way.		***1102B MARKED CROSSING*** *is a crosswalk or other identified path intended for pedestrian use in crossing a vehicular way.* ***1107A13-M MARKED CROSSING*** *is a crosswalk or other identified path intended for pedestrian use in crossing a vehicular way.*	2010 CBC is **equivalent** to 2010 ADA.		
93	**Mezzanine.** An intermediate level or levels between the floor and ceiling of any story with an aggregate floor area of not more than one-third of the area of the room or space in which the level or levels are located. Mezzanines have sufficient elevation that space for human occupancy can be provided on the floor below.		***502 MEZZANINE.*** *An intermediate level or levels between the floor and ceiling of any story and in accordance with Section 505.*	2010 CBC provides **less access** than 2010 ADA.	Include the ADA definition for mezzanine in CBC 1102B.	1) Include the ADA definition for mezzanine in CBC 1102B.
94	**Occupant Load.** The number of persons for which the means of egress of a building or portion of a building is designed.		***1002 OCCUPANT LOAD.*** *The number of persons for which the means of egress of a building or portion thereof is designed.*	2010 CBC is **equivalent** to 2010 ADA.		
95	**Operable Part.** A component of an element used to insert or withdraw objects, or to activate, deactivate, or adjust the element.		***1102B OPERABLE PART*** *is a part of a piece of equipment or appliance used to insert or withdraw objects, or to activate, deactivate or adjust the equipment or appliance (for example, coin slot, pushbutton, handle).*	2010 CBC is **equivalent** to 2010 ADA.		

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96	**Pictogram.** A pictorial symbol that represents activities, facilities, or concepts.			2010 CBC **does not address** 2010 ADA req.	CBC does not include "pictogram" in its definitions.	1) Include the definition of "pictogram" in CBC 1102B as defined in the 2010 ADA.
97	**§ 36.104 Definitions** *Place of public accommodation* means a facility operated by a private entity whose operations affect commerce and fall within at least one of the following categories— (1) Place of lodging, except for an establishment located within a facility that contains not more than five rooms for rent or hire and that actually is occupied by the proprietor of the establishment as the residence of the proprietor. For purposes of this part, a facility is a ''place of lodging'' if it is— (i) An inn, hotel, or motel; or (ii) A facility that— (A) Provides guest rooms for sleeping for stays that primarily are short-term in nature (generally 30 days or less) where the occupant does not have the right to return to a specific room or unit after the conclusion of his or her stay; and (B) Provides guest rooms under conditions and with amenities similar to a hotel, motel, or inn, including the following— (1) On- or off-site management and reservations service; (2) Rooms available on a walk-up or call-in basis; (3) Availability of housekeeping or linen service; and (4) Acceptance of reservations for a guest room type without guaranteeing a particular unit or room until check-in, and without a prior lease or security deposit.	***ETA Editor's Note*** The Title III Regulations at 36.104 "Definitions" under "Place of public accommodation" include the following: (1) Place of lodging, except for an establishment located within a facility that contains not more than five rooms for rent or hire and that actually is occupied by the proprietor of the establishment as the residence of the proprietor. For purposes of this part, a facility is a "place of lodging" if it is (i) an inn, hotel, or motel; or (ii) a facility that (A) provides guest rooms for sleeping for stays that primarily are short-term in nature (generally 30 days or less) where the occupant does not have the right to return to a specific room or unit after the conclusion of his or her stay; and (B) provides guest rooms under conditions and with amenities similar to a hotel, motel, or inn, including the following: (1) on- or off-site management and reservations service:				

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98	**§ 36.104 Definitions** *Place of public accommodation* means a facility operated by a private entity whose operations affect commerce and fall within at least one of the following categories— (1) Place of lodging, except for an establishment located within a facility that contains not more than five rooms for rent or hire and that actually is occupied by the proprietor of the establishment as the residence of the proprietor. For purposes of this part, a facility is a ''place of lodging'' if it is— (i) An inn, hotel, or motel; or (ii) A facility that— (A) Provides guest rooms for sleeping for stays that primarily are short-term in nature (generally 30 days or less) where the occupant does not have the right to return to a specific room or unit after the conclusion of his or her stay; and (B) Provides guest rooms under conditions and with amenities similar to a hotel, motel, or inn, including the following— (1) On- or off-site management and reservations service; (2) Rooms available on a walk-up or call-in basis; (3) Availability of housekeeping or linen service; and (4) Acceptance of reservations for a guest room type without guaranteeing a particular unit or room until check-in, and without a prior lease or security deposit.	***ETA Editor's Note*** The Title III Regulations at 36.104 "Definitions" under "Place of public accommodation" include the following: (1) Place of lodging, except for an establishment located within a facility that contains not more than five rooms for rent or hire and that actually is occupied by the proprietor of the establishment as the residence of the proprietor. For purposes of this part, a facility is a "place of lodging" if it is (i) an inn, hotel, or motel; or (ii) a facility that (A) provides guest rooms for sleeping for stays that primarily are short-term in nature (generally 30 days or less) where the occupant does not have the right to return to a specific room or unit after the conclusion of his or her stay; and (B) provides guest rooms under conditions and with amenities similar to a hotel, motel, or inn, including the following: (1) on- or off-site management and reservations service;				
99	**Play Area.** A portion of a site containing play components designed and constructed for children.		2010 CBC **does not address** 2010 ADA req.	CBC does not include "play area" in its definitions.	1) Include the definition of "play area" in CBC 1102B as defined in the 2010 ADA.	
100	**Play Component.** An element intended to generate specific opportunities for play, socialization, or learning. Play components are manufactured or natural; and are stand-alone or part of a composite play structure.		2010 CBC **does not address** 2010 ADA req.	CBC does not include "play component" in its definitions.	1) Include the definition of "play component" in CBC 1102B as defined in the 2010 ADA.	
101	**Private Building or Facility.** A place of public accommodation or a commercial building or facility subject to title III of the ADA and 28 CFR part 36 or a transportation building or facility subject to title III of the ADA and 49 CFR 37.45.		2010 CBC **does not address** 2010 ADA req.	Since the CBC does not specifically address the ADA in its provisions, this definition is not applicable. The CBC instead uses "public accommodation" when addressing accessibility.	1) Retain the definition for "public accommmodation" which is more specific to the use of the CBC.	
102	**Public Building or Facility.** A building or facility or portion of a building or facility designed, constructed, or altered by, on behalf of, or for the use of a public entity subject to title II of the ADA and 28 CFR part 35 or to title II of the ADA and 49 CFR 37.41 or 37.43.		2010 CBC **does not address** 2010 ADA req.	The title of Chapter 11B addresses public buildings, so for clarity this definition should be included, but it does not have to address the ADA.	1) Provide a definition for "public building" that states: "A building or facility or portion of a building or facility designed, constructed, or altered by, on behalf of, or for the use of a public entity."	

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103	**§ 35.104 Definitions** *Public entity* means -- (1) Any State or local government; (2) Any department, agency, special purpose district, or other instrumentality of a State or States or local government; and (3) The National Railroad Passenger Corporation, and any commuter authority (as defined in section 103(8) of the Rail Passenger Service Act). (45 U.S.C. 541) **§ 36.104 Definitions** *Public entity* means -- (1) Any State or local government; (2) Any department, agency, special purpose district, or other instrumentality of a State or States or local government; and (3) The National Railroad Passenger Corporation, and any commuter authority (as defined in section 103(8) of the Rail Passenger Service Act). (45 U.S.C. 541)	***ETA Editor's Note*** The Title II Regulations at 35.104 "Definitions" and the Title III Regulations at 36.104 "Definitions" include the following: *Public entity* means -- (1) Any State or local government; (2) Any department, agency, special purpose district, or other instrumentality of a State or States or local government; and (3) The National Railroad Passenger Corporation, and any commuter authority (as defined in section 103(8) of the Rail Passenger Service Act). (45 U.S.C. 541)				
104	**Public Entrance.** An entrance that is not a service entrance or a restricted entrance.		***202 PUBLIC ENTRANCE*** *[DSA-AC, HCD I-AC] An entrance that is not a service entrance or a restricted entrance.*	2010 CBC is **equivalent** to 2010 ADA.		
105	**Public Use.** Interior or exterior rooms, spaces, or elements that are made available to the public. Public use may be provided at a building or facility that is privately or publicly owned.		***1102B PUBLIC USE AREA*** *means interior or exterior rooms or spaces of a building that are made available to the general public and does not include common use areas. Public use areas may be provided at a building that is privately or publicly owned.* ***1107A.16-P PUBLIC USE AREA*** *means interior or exterior rooms or spaces of a building that are made available to the general public and does not include common use areas. Public use areas may be provided at a building that is privately or publicly owned.*	2010 CBC provides **less access** than 2010 ADA.	The CBC definition should change the definition to "public use" and and the word "element". Revise the wording to include "and does not include areas for common use".	1) Change defined word to "public use" and add the word "element." 2) Revise the wording to include "and does not include areas for common use".
106	**Public Way.** Any street, alley or other parcel of land open to the outside air leading to a public street, which has been deeded, dedicated or otherwise permanently appropriated to the public for public use and which has a clear width and height of not less than 10 feet (3050 mm).		***1002 PUBLIC WAY.*** *A street, alley or other parcel of land open to the outside air leading to a street, that has been deeded, dedicated or otherwise permanently appropriated to the public for public use and which has a clear width and height of not less than 10 feet (3048 mm).*	2010 CBC is **equivalent** to 2010 ADA.		

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107	**Qualified Historic Building or Facility.** A building or facility that is listed in or eligible for listing in the National Register of Historic Places, or designated as historic under an appropriate State or local law.		***8-201 QUALIFIED HISTORICAL BUILDING OR PROPERTY.*** *As defined in Health and Safety Code Section 18955 as "Qualified Historical Building or Property." Any building, site, object, place, location, district or collection of structures, and their associated sites, deemed of importance to the history, architecture, or culture of an area by an appropriate local, state or federal governmental jurisdiction. This shall include historical buildings or properties on, or determined eligible for, national, state or local qualified historical registers or inventories, such as the National Register of Historic Places, California Register of Historical Resources, State Historical Landmarks, State Points of Historical Interest, and city or county registers, inventories or surveys of historical or architecturally significant sites, places or landmarks.*	2010 CBC is **equivalent** to 2010 ADA.	CBC language is more comprehensive, so retain CBC language.	
108	**Ramp.** A walking surface that has a running slope steeper than 1:20.		***1102B RAMP*** *is a walking surface which has a running slope greater than one unit vertical in 20 units horizontal (5-percent slope) intended for pedestrian traffic and as differentiated from a curb ramp.* ***1107A.16-P PEDESTRIAN RAMP*** *is a sloping accessible route intednded for pedestrian traffic and is differentiated from a curb ramp.*	2010 CBC is **equivalent** to 2010 ADA.	CBC language is more comprehensive, so retain CBC language.	
109	**Residential Dwelling Unit.** A unit intended to be used as a residence, that is primarily long-term in nature. Residential dwelling units do not include transient lodging, inpatient medical care, licensed long-term care, and detention or correctional facilities.		***1102B DWELLING UNIT*** *is a single unit of residence for a family of one or more persons. Examples of dwelling units covered by this chapter include condominiums, an apartment unit within an apartment building and other types of dwellings in which sleeping accommodations are provided but toileting or cooking facilities are shared by occupants of more than one room or portion of the dwelling. Examples of the latter include dormitory rooms and sleeping accommodations in shelters intended for occupancy as residences for homeless persons.* ***1107A.4-D DWELLING UNIT*** *is a single unit of residence for a family of one or more persons. Examples of dwelling units covered by this chapter include condominiums, an apartment unit within an apartment building and other types of dwellings in which sleeping accommodations are provided but toileting or cooking facilities are shared by occupants of more than one room or portion of the dwelling. Examples of the latter include dormitory rooms and sleeping accommodations in shelters intended for occupancy as residences for homeless persons.*	2010 CBC **conflicts with** 2010 ADA.	It has been recommended through this analysis to replace the CBC definition with the ADA definition because of the classification of facilities and its respective requirements.	1) Replace the CBC definition with the ADA definition.
110	**Restricted Entrance.** An entrance that is made available for common use on a controlled basis but not public use and that is not a service entrance.		***202 RESTRICTED ENTRANCE*** *[HCD I, HCD 2 & HCD I-AC] is an entrance that is made available for common use on a controlled basis, but is not public use, and that is not a service entrance.*	2010 CBC is **equivalent** to 2010 ADA.		
111	**Running Slope.** The slope that is parallel to the direction of travel (see cross slope).		***1102B RUNNING SLOPE*** *is the slope that is parallel to the direction of travel (as differentiated from cross slope).*	2010 CBC is **equivalent** to 2010 ADA.		

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112	**Self-Service Storage.** Building or facility designed and used for the purpose of renting or leasing individual storage spaces to customers for the purpose of storing and removing personal property on a self-service basis.			2010 CBC **does not address** 2010 ADA req.	CBC does not include "self-service storage" in its definitions.	1) Include the definition of "self-service storage" in CBC 1102B as defined in the 2010 ADA.
113	**Service Entrance.** An entrance intended primarily for delivery of goods or services.		***202 SERVICE ENTRANCE. [*** *DSA-AC & HCD I-AC] An entrance intended primarily for the delivery of goods or services.*	2010 CBC is **equivalent** to 2010 ADA.		
114	**Site.** A parcel of land bounded by a property line or a designated portion of a public right-of-way.		***202 SITE.*** *[DSA-AC, HCD 1 & HCD 2] A parcel of land bounded by a property line or a designated portion of a public right-of-way.*	2010 CBC is **equivalent** to 2010 ADA.		
115	**Soft Contained Play Structure.** A play structure made up of one or more play components where the user enters a fully enclosed play environment that utilizes pliable materials, such as plastic, netting, or fabric.			2010 CBC **does not address** 2010 ADA req.	CBC does not include "soft contained play structure" in its definitions.	1) Include the definition of "soft contained play structure" in CBC 1102B as defined in the 2010 ADA.
116	**Space.** A definable area, such as a room, toilet room, hall, assembly area, entrance, storage room, alcove, courtyard, or lobby.		***202 SPACE.*** *[DSA-AC &,HCD 2] A definable area, e.g., a room, toilet room, hall, assembly area, entrance, storage room, alcove, courtyard, or lobby.*	2010 CBC is **equivalent** to 2010 ADA.		
117	**§ 35.104 Definitions** *State* means each of the several States, the District of Columbia, the Commonwealth of Puerto Rico, Guam, American Samoa, the Virgin Islands, the Trust Territory of the Pacific Islands, and the Commonwealth of the Northern Mariana Islands. **§ 36.104 Definitions** *State* means each of the several States, the District of Columbia, the Commonwealth of Puerto Rico, Guam, American Samoa, the Virgin Islands, the Trust Territory of the Pacific Islands, and the Commonwealth of the Northern Mariana Islands.	***ETA Editor's Note*** The Title II Regulations at 35.104 "Definitions" and the Title III Regulations at 36.104 "Definitions" include the following: *State* means each of the several States, the District of Columbia, the Commonwealth of Puerto Rico, Guam, American Samoa, the Virgin Islands, the Trust Territory of the Pacific Islands, and the Commonwealth of the Northern Mariana Islands.				
118	**Story.** That portion of a building or facility designed for human occupancy included between the upper surface of a floor and upper surface of the floor or roof next above. A story containing one or more mezzanines has more than one floor level.		***1102B STORY*** *means that portion of a building included between the upper surface of any floor and the upper surface of the floor next above, except that the topmost story shall be that portion of a building included between the upper surface of the topmost floor and the ceiling or roof above. If the finished floor level directly above a basement or unused under-floor space is more than six feet (1829 mm) above grade for more than 50 percent of the total perimeter or is more than 12 feet (3658 mm) above grade at any point, the basement or unused under-floor space shall be considered as a story. There may be more than one floor level within a story as in the case of a mezzanine or mezzanines.*	2010 CBC is **equivalent** to 2010 ADA.	The CBC definition is more comprehensive, so retain the CBC definition.	
119	**Structural Frame.** The columns and the girders, beams, and trusses having direct connections to the columns and all other members that are essential to the stability of the building or facility as a whole.		***1102B STRUCTURAL FRAME*** *is considered to be the columns and the girders, beams, trusses and spandrels having direct connections to the columns and all other members which are essential to the stability of the building as a whole.*	2010 CBC is **equivalent** to 2010 ADA.	The CBC definition adds "spandrels" so retain the CBC definition.	

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120	**Tactile.** An object that can be perceived using the sense of touch.		***202 TACTILE.*** *[DSA-AC & HCD I-AC] Describes an object that can be perceived using the sense of touch.*	2010 CBC is **equivalent** to 2010 ADA.		
121	**Technically Infeasible.** With respect to an alteration of a building or a facility, something that has little likelihood of being accomplished because existing structural conditions would require removing or altering a load-bearing member that is an essential part of the structural frame; or because other existing physical or site constraints prohibit modification or addition of elements, spaces, or features that are in full and strict compliance with the minimum requirements.		***202 TECHNICALLY INFEASIBLE.*** *See Section 3402.1. [DSA-AC] "Technically infeasible" means, with respect to an alteration of a building or a facility, that it has little likelihood of being accomplished because existing structural conditions would require removing or altering a load-bearing member which is an essential part of the structural frame; or because other existing physical or site constraints prohibit modification or addition of elements, spaces or features which are infull and strict compliance with the minimum requirements for new construction and which are necessary to provide accessibility.*	2010 CBC is **equivalent** to 2010 ADA.		
122	**Teeing Ground.** In golf, the starting place for the hole to be played.			2010 CBC **does not address** 2010 ADA req.	CBC does not include "teeing ground" in its definitions.	1) Include the definition of "teeing ground" in CBC 1102B as defined in the 2010 ADA.
123	**Transfer Device.** Equipment designed to facilitate the transfer of a person from a wheelchair or other mobility aid to and from an amusement ride seat.			2010 CBC **does not address** 2010 ADA req.	CBC does not include "transfer device" in its definitions.	1) Include the definition of "transfer device" in CBC 1102B as defined in the 2010 ADA.
124	**Transient Lodging.** A building or facility containing one or more guest room(s) for sleeping that provides accommodations that are primarily short-term in nature. Transient lodging does not include residential dwelling units intended to be used as a residence, inpatient medical care facilities, licensed long-term care facilities, detention or correctional facilities, or private buildings or facilities that contain not more than five rooms for rent or hire and that are actually occupied by the proprietor as the residence of such proprietor. (See also 36.104, 36.406(c), 36.406(e), and 35.151(f).)	**ETA Editor's Note:** *Place of lodging. For purposes of this part, a facility is a place of lodging if it -* *(1) Provides guestrooms for sleeping for stays that are primarily short-term in nature (generally two weeks or less) where the occupant does not have the right or intent to return to a specific room or unit after the conclusion of his or her stay;* *(2) Under conditions and with amenities similar to a hotel, motel, or inn, including (i) An on-site proprietor and reservations desk, (ii) Rooms available on a walk-up basis, (iii) Linen service, and (iv) Accepting reservations for a room type without guaranteeing a particular unit or room until check-in, without a prior lease or security deposit.* ***Note also that the regulations expand this definition.***	***1102B TRANSIENT LODGING*** *is a building, facility or portion thereof, excluding inpatient medical care facilities, that contains one or more dwelling units or sleeping accommodations. Transient lodging may include, but is not limited to, resorts, group homes, hotels, motels and dormitories.*	2010 CBC **conflicts with** 2010 ADA.	It has been recommended through this analysis to replace the CBC definition with the ADA definition because of the classification of facilities and its respective requirements.	1) Replace the CBC definition with the ADA definition.

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125	**Transition Plate.** A sloping pedestrian walking surface located at the end(s) of a gangway.			2010 CBC **does not address** 2010 ADA req.	CBC does not include "transfer device" in its definitions.	1) Include the definition of "transfer device" in CBC 1102B as defined in the 2010 ADA.
126	**Use Zone.** The ground level area beneath and immediately adjacent to a play structure or play equipment that is designated by ASTM F 1487 (incorporated by reference, see “Referenced Standards” in Chapter 1) for unrestricted circulation around the play equipment and where it is predicted that a user would land when falling from or exiting the play equipment.			2010 CBC **does not address** 2010 ADA req.	CBC does not include "use zone" in its definitions.	1) Include the definition of "use zone" in CBC 1102B as defined in the 2010 ADA.
127	**TTY.** An abbreviation for teletypewriter. Machinery that employs interactive text-based communication through the transmission of coded signals across the telephone network. TTYs may include, for example, devices known as TDDs (telecommunication display devices or telecommunication devices for deaf persons) or computers with special modems. TTYs are also called text telephones.		***1102B TEXT TELEPHONE*** *is machinery or equipment that employs interactive text-based communications through the transmission of coded signals across the standard telephone network. Text telephones can include, for example, devices known as TTYs (teletypewriters) or computers.*	2010 CBC is **equivalent** to 2010 ADA.	The CBC uses both "text telephone" and "TTY" in addressing text telephones in the body of the text. "Text telephone is more comprehensive since TTY only describes one type. The ADA language includes "devices known as TDDs (telecommunication display devices or telecommunication devices for deaf persons) or computers with special modems."	1) Retain "text telephone" since it is more comprehensive. 1) Add "TDDs (telecommunication display devices or telecommunication devices for deaf persons) or computers with special modems." in place of "or computers".
127.1	**NA**	**NA**	***202 UNREASONABLE HARDSHIP [DSA-AC]*** *exists when the enforcing agency finds that compliance with the building standard would make the specific work of the project affected by the building standard unfeasible, based on an overall evaluation of the following factors:* *1. The cost of providing access.* *2. The cost of all construction contemplated.* *3. The impact of proposed improvements on financial feasibility of the project.* *4. The nature of the accessibility which would be gained or lost.* *5. The nature of the use of the facility under construction and its availability to persons with disabilities.* *The details of any finding of unreasonable hardship shall be recorded and entered in the files of the enforcing agency.*	2010 CBC provides **less access** than 2010 ADA.	"Unreasonable Hardship" is often interpreted in California to be roughly equal to the ADA's "technically infeasible" which it is not. The ADA Standard's exception for technical infeasibility does not consider costs.	To minimize misapplication of the Unreasonable Hardship exceptions, they should be eliminated where possible and only be allowed where the CBC requirements are stricter than the ADA requirements.
128	**Vehicular Way.** A route provided for vehicular traffic, such as in a street, driveway, or parking facility.		***1102B VEHICULAR WAY*** *is a route intended for vehicular traffic, such as a street, driveway or parking lot.*	2010 CBC **conflicts with** 2010 ADA.	Use ADA language of "parking facility" instead of "parking lot."	1) Use ADA language of "parking facility" instead of "parking lot."
129	**Walk.** An exterior prepared surface for pedestrian use, including pedestrian areas such as plazas and courts.		***1102B WALK*** *is a surfaced pedestrian way not located contiguous to a street used by the public. (As differentiated from the definition of “Sidewalk” in Section 202.)*	2010 CBC **conflicts with** 2010 ADA.	Because it is more comprehensive, add to the CBC definition "including pedestrian areas such as plazas and courts."	1) Add to the CBC definition "including pedestrian areas such as plazas and courts."
130	**Wheelchair Space.** Space for a single wheelchair and its occupant.		***202 WHEELCHAIR SPACE*** *[HCD I-AC] Space for a single wheelchair and its occupant.*	2010 CBC is **equivalent** to 2010 ADA.		
131	**Work Area Equipment.** Any machine, instrument, engine, motor, pump, conveyor, or other apparatus used to perform work. As used in this document, this term shall apply only to equipment that is permanently installed or built-in in employee work areas. Work area equipment does not include passenger elevators and other accessible means of vertical transportation.			2010 CBC **does not address** 2010 ADA req.	CBC does not include "work area equipment" in its definitions.	1) Include the definition of "work area equipment" in CBC 1102B as defined in the 2010 ADA.
132	**ADA CHAPTER 2: SCOPING REQUIREMENTS**	N/A		NA	NA	NA
133	**201 Application**	**SECTION 1101B** **SCOPE**		NA	This is just the section heading	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
134	**§ 35.151 New construction and alterations.** (c) Accessibility standards and compliance date. (1) If physical construction or alterations commence after July 26, 1992, but prior to the September 15, 2010, then new construction and alterations subject to this section must comply with either UFAS or the 1991 Standards except that the elevator exemption contained at section 4.1.3(5) and section 4.1.6(1)(k) of the 1991 Standards shall not apply. Departures from particular requirements of either standard by the use of other methods shall be permitted when it is clearly evident that equivalent access to the facility or part of the facility is thereby provided. (2) If physical construction or alterations commence on or after September 15, 2010 and before March 15, 2012, then new construction and alterations subject to this section may comply with one of the following: The 2010 Standards, UFAS, or the 1991 Standards except that the elevator exemption contained at section 4.1.3(5) and section 4.1.6(1)(k) of the 1991 Standards shall not apply. Departures from particular requirements of either standard by the use of other methods shall be permitted when it is clearly evident that equivalent access to the facility or part of the facility is thereby provided. (3) If physical construction or alterations commence on or after March 15, 2012, then new construction and alterations subject to this section shall comply with the 2010 Standards. (4) For the purposes of this section, ceremonial groundbreaking or razing of structures prior to site preparation do not commence physical construction or alterations. (5) Noncomplying new construction and alterations. (i) Newly constructed or altered facilities or elements covered by §§ 35.151(a) or (b) that were constructed or altered before March 15, 2012, and that do not comply with the 1991 Standards or with UFAS shall before March 15, 2012, be made accessible in accordance with either the 1991 Standards, UFAS, or the 2010 Standards. (ii) Newly constructed or altered facilities or elements covered by §§ 35.151(a) or (b) that were constructed or altered before March 15, 2012 and that do not comply with the 1991 Standards or with UFAS shall, on or after March 15, 2012, be made accessible in accordance with the 2010 Standards.	N/A		NA	Analysis and comments on 2010 CBC figures are covered in individual respective sections.	n/a
	§ 36.406 Standards for new construction and alterations. (a) *Accessibility standards and compliance date.* (1) New construction and alterations subject to §§ 36.401 or 36.402 shall comply with the 1991 Standards if the date when the last application for a building permit or permit extension is certified to be complete by a State, county, or local government (or, in those jurisdictions where the government does not certify completion of applications, if the date when the last application for a building permit or permit extension is received by the State, county, or local government) is before September 15, 2010, or if no permit is required, if the start of physical construction or alterations occurs before September 15, 2010.					
135	**201.1 Scope.** All areas of newly designed and newly constructed *buildings* and *facilities* and *altered* portions of existing *buildings* and *facilities* shall comply with these requirements.		**1.1.3 Scope**. The provisions of this code shall apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal and demolition of every building or structure or any appurtenances connected or attached to such buildings or structures throughout the State of California.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is essentially equivalent to ADA Stds., but CBC as a building code covers use and occupancy, location, demolition, etc., that ADA does not cover.	2010 CBC need not be amended.
135.1	**201.1 Scope.** All areas of newly designed and newly constructed *buildings* and *facilities* … shall comply with these requirements.		**1101B.1.1**. Buildings or facilities or portions of buildings shall be accessible to persons with disabilities as required by this chapter.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC 1101B.1.1 is under Division I and covers new buildings. Existing buildings are covered under 2010 CBC Division IV.	2010 CBC need not be amended.

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135.2	**201.1 Scope.** All areas of newly designed and newly constructed *buildings* and *facilities* and *altered* portions of existing *buildings* and *facilities* shall comply with these requirements.		**1134B.1 Scope**. The provisions of this division apply to renovation, structural repair, alteration and additions to existing buildings, including those identified as historic buildings. This division identifies minimum standards for removing architectural barriers, and providing and maintaining accessibility to existing buildings and their related facilities. No renovation, structural repair, alteration or addition shall be undertaken which decreases or has the effect of decreasing accessibility or usability of a building or facility below the requirements for new construction at the time of renovation, structural repair, alteration or addition.	2010 CBC is **equivalent** to 2010 ADA.	Although worded very differently, 2010 CBC and 2010 ADA Stds. are equivalent.	2010 CBC need not be amended.
136	**Advisory 201.1 Scope.** These requirements are to be applied to all areas of a facility unless exempted, or where scoping limits the number of multiple elements required to be accessible. For example, not all medical care patient rooms are required to be accessible; those that are not required to be accessible are not required to comply with these requirements. However, common use and public use spaces such as recovery rooms, examination rooms, and cafeterias are not exempt from these requirements and must be accessible.		N/A	NA	There is no comparable advisory in the 2010 CBC.	2010 CBC need not be amended, as advisory notes are not enforceable.
137	**§ 35.151 New construction and alterations.** (d) Scope of coverage. The 1991 Standards and the 2010 Standards apply to fixed or built-in elements of buildings, structures, site improvements, and pedestrian routes or vehicular ways located on a site. Unless specifically stated otherwise, the advisory notes, appendix notes, and figures contained in the 1991 Standards and the 2010 Standards explain or illustrate the requirements of the rule; they do not establish enforceable requirements. **§ 36.406 Standards for new construction and alterations.** (b) Scope of coverage. The 1991 Standards and the 2010 Standards apply to fixed or built-in elements of buildings, structures, site improvements, and pedestrian routes or vehicular ways located on a site. Unless specifically stated otherwise, the advisory notes, appendix notes, and figures contained in the 1991 Standards and 2010 Standards explain or illustrate the requirements of the rule; they do not establish enforceable requirements.	**ETA Editor's Note** The Title II Regulations at 35.151(d) and Title III Regulations at 36.406(b) give additional information: ***Scope of coverage*. The 1991 Standards and the 2010 Standards apply to fixed or built-in elements of buildings, structures, site improvements, and pedestrian routes or vehicular ways located on a site. Unless specifically stated otherwise, the advisory notes, appendix notes, and figures contained in the 1991 Standards and 2010 Standards explain or illustrate the requirements of the rule; they do not establish enforceable requirements.**	N/A	NA	Analysis and comments for §35.151 are addressed elsewhere.	n/a

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138	**201.2 Application Based on Building or Facility Use.** Where a *site*, *building*, *facility*, room, or *space* contains more than one use, each portion shall comply with the applicable requirements for that use.		**1103B.1** **Scope**. Accessibility to buildings or portions of buildings shall be provided for all occupancy classifications except as modified or enhanced by this chapter. Occupancy requirements in this chapter may modify general requirements, but never to the exclusion of them. When a building or facility contains more than one use, the occupancy specific accessibility provisions for each portion of the building or facility shall apply. ...	2010 CBC provides **less access** than 2010 ADA.	2010 CBC is generally equivalent to ADA Stds., but the specific wording pertaining to multiple uses has some moderate variances from the ADA Stds. that could be addressed. ADA Stds. specifically lists site, room, and space in addition to CBC's listing of just building and facility. 2010 CBC uses the term "occupancy" vs. ADA Stds. use of "use" for the purposes of this section.	2010 CBC should be amended to be consistent with ADA Stds.
139	**201.2 Application Based on Building or Facility Use.** Where a *site*, *building*, *facility*, room, or *space* contains more than one use, each portion shall comply with the applicable requirements for that use.		N/A	NA	n/a	n/a
140	**§ 35.150 Existing facilities.** (b)(2)(i) *Safe harbor*. Elements that have not been altered in existing facilities on or after March 15, 2012 and that comply with the corresponding technical and scoping specifications for those elements in either the 1991 Standards or in the Uniform Federal Accessibility Standards (UFAS), Appendix A to 41 CFR part 101–19.6 (July 1, 2002 ed.), 49 FR 31528, app. A (Aug. 7, 1984) are not required to be modified in order to comply with the requirements set forth in the 2010 Standards. (ii) The safe harbor provided in § 35.150(b)(2)(i) does not apply to those elements in existing facilities that are subject to supplemental requirements (i.e., elements for which there are neither technical nor scoping specifications in the 1991 Standards). Elements in the 2010 Standards not eligible for the element-by-element safe harbor are identified as follows— (A) Residential facilities dwelling units, sections 233 and 809. (B) Amusement rides, sections 234 and 1002; 206.2.9; 216.12. (C) Recreational boating facilities, sections 235 and 1003; 206.2.10. (D) Exercise machines and equipment, sections 236 and 1004; 206.2.13. (E) Fishing piers and platforms, sections 237 and 1005; 206.2.14. (F) Golf facilities, sections 238 and 1006; 206.2.15. (G) Miniature golf facilities, sections 239 and 1007; 206.2.16. (H) Play areas, sections 240 and 1008; 206.2.17. (I) Saunas and steam rooms, sections 241 and 612. (J) Swimming pools, wading pools, and spas, sections 242 and 1009. (K) Shooting facilities with firing positions, sections 243 and 1010. (L) Miscellaneous. (1) Team or player seating, section 221.2.1.4. (2) Accessible route to bowling lanes, section 206.2.11. (3) Accessible route in court sports facilities, section 206.2.12. **§ 36.304 Removal of barriers**. (d)(2)(i) *Safe harbor*. Elements that have not been altered in existing facilities on or after March 15, 2012 and that comply with the corresponding technical and scoping specifications for those elements in the 1991 Standards are not required to be modified in order to comply with the requirements set forth in the 2010 Standards. (ii)(A) Before March 15, 2012, elements in existing facilities that do not comply with the corresponding technical and scoping specifications for those elements in the 1991 Standards must be modified to the extent readily achievable to comply with either the 1991 Standards or the 2010 Standards. Noncomplying newly constructed and altered elements may also be subject to the requirements of § 36.406(a)(5). (B) On or after March 15, 2012, elements in existing facilities that do not comply with the corresponding technical and scoping specifications for those elements in the 1991		N/A	NA	Analysis and comments for §35.151 are addressed elsewhere.	n/a

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141	**201.3 Temporary and Permanent Structures.** These requirements shall apply to temporary and permanent *buildings* and *facilities*.		**1.9.1** **General**. The purpose of this code is to ensure that barrier-free design is incorporated in all buildings, facilities, site work and other improvements to which this code applies in compliance with state law to ensure that these improvements are accessible to and usable by persons with disabilities. Additions, alterations and structural repairs in all buildings and facilities shall comply with these provisions for new buildings, except as otherwise provided and specified herein. The provisions of these regulations shall apply to any portable buildings leased or owned by a school district, and shall also apply to temporary and emergency buildings and facilities. Temporary buildings and facilities are not of permanent construction but are extensively used or are essential for public use for a period of time. Examples of temporary buildings or facilities covered include, but are not limited to: reviewing stands, temporary classrooms, bleacher areas, exhibit areas, temporary banking facilities, temporary health screening services, or temporary safe pedestrian passageways around a construction site. ... and (2) ...	Which Std.provides greater access **depends** on circumstances.		
142	**201.3 Temporary and Permanent Structures.** These requirements shall apply to temporary and permanent *buildings* and *facilities*.		**202** TEMPORARY [DSA-AC] shall mean buildings and facilities intended for use at one location for not more than one year and seats intended for use at one location for not more than 90 days.	Which Std.provides greater access **depends** on circumstances.	2010 CBC provides a definition of temporary building but ADA Stds. do not. 2010 CBC provides greater clarity as to what constitutes a temporary building.	2010 CBC need not be amended.
143	**Advisory 201.3 Temporary and Permanent Structures.** Temporary buildings or facilities covered by these requirements include, but are not limited to, reviewing stands, temporary classrooms, bleacher areas, stages, platforms and daises, fixed furniture systems, wall systems, and exhibit areas, temporary banking facilities, and temporary health screening facilities. Structures and equipment directly associated with the actual processes of construction are not required to be accessible as permitted in 203.2.		**1.9.1** **...** Examples of temporary buildings or facilities covered include, but are not limited to: reviewing stands, temporary classrooms, bleacher areas, exhibit areas, temporary banking facilities, temporary health screening services, or temporary safe pedestrian passageways around a construction site. ..., and (2) ...	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC lists many examples of temporary facilites similar to the 2010 ADA Stds. Advisory. 2010 CBC omits the ADA Stds. examples of stages, platforms and daises, fixed furnituresystems, wall systems, but adds safe pedestrian passageways around a construction site.	1. 2010 CBC need not be amended since a list of examples is not exhaustive by nature and does not preclude the other types of temporary facilities listed in the ADA Stds. Advisory. or 2. 2010 CBC should be amended to expand the list of examples to be consistent with the ADA Stds. Advisory. or 3. 2010 CBC should be amended to be consistent with the regulatory language of the ADA Stds. and not include the list of examples in the Advisory.
144	**202 Existing Buildings and Facilities**		**1134B** **ACCESSIBILITY FOR EXISTING BUILDINGS**	2010 CBC is **equivalent** to 2010 ADA.	This is just a section heading	2010 CBC need not be amended.

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145	**202.1 General.** *Additions* ... to existing *buildings* or *facilities* shall comply with 202.		**1134B.1** **Scope**. The provisions of this division apply to ... additions to existing buildings, including those identified as historic buildings. This division identifies minimum standards for removing architectural barriers, and providing and maintaining accessibility to existing buildings and their related facilities. No ... addition shall be undertaken which decreases or has the effect of decreasing accessibility or usability of a building or facility below the requirements for new construction at the time of renovation, structural repair, alteration or addition.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC scoping for existing buildings addresses additions and alterations, as do the ADA Stds.	2010 CBC need not be amended.
146	**202.1 General.** ... *alterations* to existing *buildings* or *facilities* shall comply with 202.		**1134B.1** **Scope**. The provisions of this division apply to renovation, structural repair, alteration ... to existing buildings, including those identified as historic buildings. This division identifies minimum standards for removing architectural barriers, and providing and maintaining accessibility to existing buildings and their related facilities. No renovation, structural repair, alteration ... shall be undertaken which decreases or has the effect of decreasing accessibility or usability of a building or facility below the requirements for new construction at the time of renovation, structural repair, alteration or addition.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC scoping for existing buildings addresses additions and alterations, as do the ADA Stds.	2010 CBC need not be amended.
147	**202.2 Additions.** Each *addition* to an existing *building* or *facility* shall comply with the requirements for new construction. Each *addition* that affects or could affect the usability of or access to an area containing a primary function shall comply with 202.4.		**1134B.2** **General**. When ... additions are made to existing buildings or facilities, they shall comply with all provisions of Division I – New Buildings, except as modified by this division. These requirements shall apply only to the area of ... addition and shall include those areas listed below:	2010 CBC is **equivalent** to 2010 ADA.	Both 2010 CBC and ADA Stds. require additions to comply with requirements for new construction. 2010 CBC addresses alterations, structual repairs, and additions in one section. ADA Stds. addresses alterations and additions in seaparate sections.	2010 CBC need not be amended except to conform to ADA Stds. formatting if adopted.
147.1	**202.2 Additions.** ... Each *addition* that affects or could affect the usability of or access to an area containing a primary function shall comply with 202.4.		**1134B.2.1** A primary entrance to the building or facility and the primary path of travel to the specific area of ... addition, and sanitary facilities, drinking fountains, signs and public telephones serving the area.	2010 CBC is **equivalent** to 2010 ADA.	Both 2010 CBC and ADA Stds. require additions that are primary function areas comply with path of travel requirements to that area. 2010 CBC addresses alterations, structual repairs, and additions in one section. ADA Stds. addresses alterations and additions in seaparate sections.	2010 CBC need not be amended except to conform to ADA Stds. formatting if adopted.
148	**202.3 Alterations.** Where existing *elements* or *spaces* are *altered*, each *altered element* or *space* shall comply with the applicable requirements of Chapter 2.		**1134B.2.3** If alterations of single elements, when considered together, amount to an alteration of a room or space in a building or facility, the entire room or space shall be made accessible.	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC has in the past often been interpreted to mean that if even a single element in a room or space is altered (except as provided in 1134B2.1 Exception 3), even if it is not accessibility related such as upgrading a fire alarm device, then the entire room or space needs to be made accessible, including the accessible route. The 2010 ADA Stds. is clear that element by element barrier removal does not trigger the requirement to make the entire room or space accessible, except as required by 202.4	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
148.1	**202.3 Alterations.** Where existing *elements* ... are *altered*, each *altered element* ... shall comply with the applicable requirements of Chapter 2.		**1134B.2.1, Exc.3** Alterations, structural repairs or additions consisting of one or more of the following shall be limited to the actual work of the project:	Which Std.provides greater access **depends** on circumstances.	2010 CBC has a list of barrier removal elements (1134B.2.1, Exc. 3.1-3.7) that do not trigger the requirement to make the entire room or space accessible.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.

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148.2	**202.3 Alterations.** Where existing ... *spaces* are *altered*, each *altered* ... *space* shall comply with the applicable requirements of Chapter 2.		N/A	Which Std.provides greater access **depends** on circumstances.	2010 CBC does not directly address as a separate subject the general requirement that altered spaces comply with applicable requirements for new buildings. This can be easily inferred from various paragraphs in CBC 1134B.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to add clarifying language that is consistent with ADA Stds.
149	**202.3 Alterations. EXCEPTIONS: 1.** Unless required by 202.4, where *elements* or *spaces* are *altered* and the *circulation path* to the *altered element* or *space* is not *altered*, an *accessible* route shall not be required. **...**		**1134B.2.1** A primary entrance to the building or facility and the primary path of travel to the specific area of alteration, structural repair or addition, and sanitary facilities, drinking fountains, signs and public telephones serving the area.	2010 CBC provides **greater access** than 2010 ADA.	2010 ADA Stds. generally do not trigger providing an accessible path of travel to an area of alteration, unless the altered area is a primary function area. 2010 CBC does not make the general distinction of an alteration to a primary function area only requiring an accessible primary path of travel and primary entrance, as well as an accessible route to sanitary facilities, drinking fountains, signs and public telephones, serving the area of alteration.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
150	**Advisory 202.3 Alterations.** Although covered entities are permitted to limit the scope of an alteration to individual elements, the alteration of multiple elements within a room or space may provide a cost-effective opportunity to make the entire room or space accessible. Any elements or spaces of the building or facility that are required to comply with these requirements must be made accessible within the scope of the alteration, to the maximum extent feasible. If providing accessibility in compliance with these requirements for people with one type of disability (e.g., people who use wheelchairs) is not feasible, accessibility must still be provided in compliance with the requirements for people with other types of disabilities (e.g., people who have hearing impairments or who have vision impairments) to the extent that such accessibility is feasible.		N/A	NA	This ADA advisory provides recommendations beyond the minimum compliance with the Stds., but recommendations per se are not suitable for code language.	2010 CBC need not be amended.
151	**§ 35.133 Maintenance of accessible features.** (c) If the 2010 Standards reduce the technical requirements or the number of required accessible elements below the number required by the 1991 Standards, the technical requirements or the number of accessible elements in a facility subject to this part may be reduced in accordance with the requirements of the 2010 Standards. **§ 36.211 Maintenance of accessible features.** (c) If the 2010 Standards reduce the technical requirements or the number of required accessible elements below the number required by the 1991 Standards, the technical requirements or the number of accessible elements in a facility subject to this part may be reduced in accordance with the requirements of the 2010 Standards.	***ETA Editor's Note*** The Title II Regulations at 35.133(c) and Title III Regulations at 36.211(c) under "Maintenance of accessible features" allow the following: **(c)** If the 2010 Standards reduce the technical requirements or the number of required accessible elements below the number required by the 1991 Standards, the technical requirements or the number of accessible elements in a facility subject to this part may be reduced in accordance with the requirements of the 2010 Standards.	N/A	NA	n/a	n/a

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152	**202.3.1 Prohibited Reduction in Access.** An *alteration* that decreases or has the effect of decreasing the *accessibility* of a *building* or *facility* below the requirements for new construction at the time of the *alteration* is prohibited.		**1134B.1** **Scope**. The provisions of this division apply to renovation, structural repair, alteration ... to existing buildings, including those identified as historic buildings. This division identifies minimum standards for removing architectural barriers, and providing and maintaining accessibility to existing buildings and their related facilities. No renovation, structural repair, alteration ... shall be undertaken which decreases or has the effect of decreasing accessibility or usability of a building or facility below the requirements for new construction at the time of renovation, structural repair, alteration or addition.	2010 CBC is **equivalent** to 2010 ADA.	Although worded somewhat differently, 2010 CBC and ADA Stds. both prohibit alterations that decrease accessibilty below the requirements for new construction. 2010 CBC's wording addresses renovation, structural repair, and additions, in addition to alterations; ADA Stds. 202.3.1 only addresses alterations.	1. 2010 CBC need not be amended.
153	**202.3.2 Extent of Application.** An *alteration* of an existing *element*, *space*, or area of a *building* or *facility* shall not impose a requirement for *accessibility* greater than required for new construction.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not specifically have a section that states that an alteration shall not impose a greater requirement for accessibility than required for new construction.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
154	**202.3 Alterations. EXCEPTIONS: ...** **2.** In *alterations*, where compliance with applicable requirements is *technically infeasible*, the *alteration* shall comply with the requirements to the maximum extent feasible. **...**		**1134B.2.2** Where it is technically infeasible in the area of an alteration to make existing toilet facilities code compliant and to install separate toilet facilities for each sex, then the installation of at least one unisex toilet facility per floor being altered, located in the same area as existing toilet facilities, will be permitted. Such a facility shall meet the requirements of Section 1115B.3.2.	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC only adresses an exception to full compliance where it is technically infeasible to make existing toilet facilites compliant vs. 2010 ADA Stds. that has a general exception for technical infeasibility. 2010 CBC does not specifically allow an alteration to comply with the requirements to the maximum extent feasible in a technically infeasible situation.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
155			N/A	NA	n/a	n/a
156	**202.3 Alterations. EXCEPTIONS: ...** **3.** *Residential dwelling units* not required to be a*ccessible* in compliance with a standard issued pursuant to the Americans with Disabilities Act or Section 504 of the Rehabilitation Act of 1973, as amended, shall not be required to comply with 202.3.		**1111B.4.2.4** Alterations in existing facilities. When guest rooms are being altered in an existing facility, or portion thereof, subject to the requirements of this section, at least one guest room or suite that complies with the accessibility requirements of this code as modified by this chapter shall be provided for each 25 guest rooms, or fraction thereof, of rooms being altered until the number of such rooms provided equals the number required to be accessible in Table 11B-3. In addition, at least one guest room or suite that complies with the requirements of Section 1111B.4.5 shall be provided for each 25 guest rooms, or fraction thereof, of rooms being altered until the number of such rooms equals the number required to be accessible in Table 11B-4.	Which Std.provides greater access **depends** on circumstances.	2010 CBC only implies that alterations in guest rooms that are not required to be accessible are not required to comply with accessibility regulations. CBC 1111B.4.2.4 does not specifically reference residential dwelling units in general, just guest rooms.	2010 CBC should be amended to state that alterations to residential dwelling units that are not required to be accessible under Chapter 11B shall not be required to comply with accessiblity regulations for alterations.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
157	**202.4 Alterations Affecting Primary Function Areas.** In addition to the requirements of 202.3, an alteration that affects or could affect the usability of or access to an area containing a primary function shall be made so as to ensure that, to the maximum extent feasible, the path of travel to the altered area, including ..., telephones, ... serving the altered area, are readily accessible to and usable by individuals with disabilities, ... **§ 35.151 New construction and alterations.** (b)(4) Path of travel. An alteration that affects or could affect the usability of or access to an area of a facility that contains a primary function shall be made so as to ensure that, to the maximum extent feasible, the path of travel to the altered area and the restrooms, telephones, and drinking fountains serving the altered area are readily accessible to and usable by individuals with disabilities, including individuals who use wheelchairs, unless the cost and scope of such alterations is disproportionate to the cost of the overall alteration. **§ 36.403 Alterations: Path of travel.** (a) General. (1) An alteration that affects or could affect the usability of or access to an area of a facility that contains a primary function shall be made so as to ensure that, to the maximum extent feasible, the path of travel to the altered area and the restrooms, telephones, and drinking fountains serving the altered area, are readily accessible to and usable by individuals with disabilities, including individuals who use wheelchairs, unless the cost and scope of such alterations is disproportionate to the cost of the overall alteration. (2) If a private entity has constructed or altered required elements of a path of travel at a place of public accommodation or commercial facility in accordance with the specifications in the 1991 Standards, the private entity is not required to retrofit such elements to reflect the incremental changes in the 2010 Standards solely because of an alteration to a primary function area served by that path of travel.		**1134B.2.1** A primary entrance to the building or facility and the primary path of travel to the specific area of alteration, structural repair or addition, and sanitary facilities, drinking fountains, signs and public telephones serving the area.	2010 CBC is **equivalent** to 2010 ADA.	Although the 2010 CBC requirement for an accessible path of travel is broader in application than the ADA Stds., the two are equivalent in their application to primary function areas.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to include the definition and use of the term "primary function area."
158	**202.4 Alterations Affecting Primary Function Areas.** In addition to the requirements of 202.3, an *alteration* that affects or could affect the usability of or access to an area containing a primary function shall be made so as to ensure that, to the maximum extent feasible, the path of travel to the *altered* area, including the rest rooms, telephones, and drinking fountains serving the *altered* area, are readily *accessible* to and usable by individuals with disabilities, unless such *alterations* are disproportionate to the overall *alterations* in terms of cost and scope as determined under criteria established by the Attorney General. In existing transportation *facilities*, an area of primary function shall be as defined under regulations published by the Secretary of the Department of Transportation or the Attorney General. **§ 35.151 New construction and alterations.** (b)(4) Path of travel. An alteration that affects or could affect the usability of or access to an area of a facility that contains a primary function shall be made so as to ensure that, to the maximum extent feasible, the path of travel to the altered area and the restrooms, telephones, and drinking fountains serving the altered area are readily accessible to and usable by individuals with disabilities, including individuals who use wheelchairs, unless the cost and scope of such alterations is disproportionate to the cost of the overall alteration. **§ 36.403 Alterations: Path of travel.** (a) General. (1) An alteration that affects or could affect the usability of or access to an area of a facility that contains a primary function shall be made so as to ensure that, to the maximum extent feasible, the path of travel to the altered area and the restrooms, telephones, and drinking fountains serving the altered area, are readily accessible to and usable by individuals with disabilities, including individuals who use wheelchairs, unless the cost and scope of such alterations is disproportionate to the cost of the overall alteration. (2) If a private entity has constructed or altered required elements of a path of travel at a place of public accommodation or commercial facility in accordance with the specifications in the 1991 Standards, the private entity is not required to retrofit such elements to reflect the incremental changes in the 2010 Standards solely because of an alteration to a primary function area served by that path of travel.		**1134B.2.1, Exc.1** 1. When the total construction cost of alterations, structural repairs or additions does not exceed a valuation threshold of $50,000, based on January 1981, “ENR US 20 Cities” Average construction cost index of 3372.02 (Engineering News Record, McGraw Hill Publishing Company), and the enforcing agency finds that compliance with this code creates an unreasonable hardship, compliance shall be limited to the actual work of the project. The enforcing agency shall annually update the valuation threshold to a current amount based on the increase in the index since the last figure used. (For example, the January 2011 amount is $132,536.28.) For purposes of this exception, an unreasonable hardship exists where the cost of providing an accessible entrance, path of travel, sanitary facilities, public phones and drinking fountains, is disproportionate to the cost of the project; that is, where it exceeds 20 percent of the cost of the project without these features. Where the cost of alterations necessary to make these features fully accessible is disproportionate, access shall be provided to the extent that it can be without incurring disproportionate cost. In choosing which accessible elements to provide, priority should be given to those elements that will provide the greatest access in the following order:	Which Std.provides greater access **depends** on circumstances.	The ADA Stds. definition of disproportionate cost and scope is stated to be as determined by the Attorney General. The DOJ "Guidance on the 2010 Standards" states that "the path of travel…must be made accessible, but only to the extent that the cost of doing so does not exceed twnety percent (20%) of the cost of the alterations to the primary function area." 2010 CBC defines disporportionate cost more narrowly. First, the total cost of the alterations must not exceed a specific valuation threshold. Over that threshold cost, the alteration project is not deemed to allow a determination of disproportionate cost. Second, the enforcing agency must make a determination of unreasonable hardship.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with the ADA Stds. broader application of disproportionate cost.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
159	**202.4 Alterations Affecting Primary Function Areas.** In addition to the requirements of 202.3, an alteration that affects or could affect the usability of or access to an area containing a primary function shall be made so as to ensure that, to the maximum extent feasible, the path of travel to the altered area, including ..., telephones, ... serving the altered area, are readily accessible to and usable by individuals with disabilities, ... **§ 35.151 New construction and alterations.** (b)(4) Path of travel. An alteration that affects or could affect the usability of or access to an area of a facility that contains a primary function shall be made so as to ensure that, to the maximum extent feasible, the path of travel to the altered area and the restrooms, telephones, and drinking fountains serving the altered area are readily accessible to and usable by individuals with disabilities, including individuals who use wheelchairs, unless the cost and scope of such alterations is disproportionate to the cost of the overall alteration. **§ 36.403 Alterations: Path of travel.** (a) General. (1) An alteration that affects or could affect the usability of or access to an area of a facility that contains a primary function shall be made so as to ensure that, to the maximum extent feasible, the path of travel to the altered area and the restrooms, telephones, and drinking fountains serving the altered area, are readily accessible to and usable by individuals with disabilities, including individuals who use wheelchairs, unless the cost and scope of such alterations is disproportionate to the cost of the overall alteration. (2) If a private entity has constructed or altered required elements of a path of travel at a place of public accommodation or commercial facility in accordance with the specifications in the 1991 Standards, the private entity is not required to retrofit such elements to reflect the incremental changes in the 2010 Standards solely because of an alteration to a primary function area served by that path of travel.		1121B.3.2 Existing facilities—alterations. Alterations of transportation facilities shall comply with Section 1134B.	Which Std.provides greater access **depends** on circumstances.	ADA Stds. 202.4 addresses alterations to primary function areas in existing transportation facilities. 2010 CBC also addresses alterations to transportation facilities, but does not make the distinction of primary function area, and also does not reference regulations published by the Secretary of the Department of Transportation or the Attorney General.	1. 2010 CBC neednot be amended. Or 2. Consideration could be given to incorporate the ADA Stds. term "primary function area" but it is probably impractical to reference the US DOT or US Attorney General regulations for purposes of state building code compliance and enforcement.
160	**202.4 Alterations Affecting Primary Function Areas.** ... **§ 35.151 New construction and alterations.** (b)(4) Path of travel. An alteration that affects or could affect the usability of or access to an area of a facility that contains a primary function shall be made so as to ensure that, to the maximum extent feasible, the path of travel to the altered area and the restrooms, telephones, and drinking fountains serving the altered area are readily accessible to and usable by individuals with disabilities, including individuals who use wheelchairs, unless the cost and scope of such alterations is disproportionate to the cost of the overall alteration. **§ 36.403 Alterations: Path of travel.** (a) General. (1) An alteration that affects or could affect the usability of or access to an area of a facility that contains a primary function shall be made so as to ensure that, to the maximum extent feasible, the path of travel to the altered area and the restrooms, telephones, and drinking fountains serving the altered area, are readily accessible to and usable by individuals with disabilities, including individuals who use wheelchairs, unless the cost and scope of such alterations is disproportionate to the cost of the overall alteration. (2) If a private entity has constructed or altered required elements of a path of travel at a place of public accommodation or commercial facility in accordance with the specifications in the 1991 Standards, the private entity is not required to retrofit such elements to reflect the incremental changes in the 2010 Standards solely because of an alteration to a primary function area served by that path of travel.		N/A	NA	n/a	n/a

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC		Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
161	**Advisory 202.4 Alterations Affecting Primary Function Areas.** An area of a building or facility containing a major activity for which the building or facility is intended is a primary function area. Department of Justice ADA regulations state, “Alterations made to provide an accessible path of travel to the altered area will be deemed disproportionate to the overall alteration when the cost exceeds 20% of the cost of the alteration to the primary function area.” (28 CFR 36.403 (f)(1)). See also Department of Transportation ADA regulations, which use similar concepts in the context of public sector transportation facilities (49 CFR 37.43(e)(1)). There can be multiple areas containing a primary function in a single building. Primary function areas are not limited to public use areas. For example, both a bank lobby and the bank’s employee areas such as the teller areas and walk-in safe are primary function areas. Also, mixed use facilities may include numerous primary function areas for each use. Areas containing a primary function do not include: mechanical rooms, boiler rooms, supply storage rooms, employee lounges or locker rooms, janitorial closets, entrances, corridors, or restrooms.	N/A		NA	n/a		n/a
162	**§ 35.151 New construction and alterations.** (C) Safe harbor. If a public entity has constructed or altered required elements of a path of travel in accordance with the specifications in either the 1991 Standards or the Uniform Federal Accessibility Standards before March 15, 2012, the public entity is not required to retrofit such elements to reflect incremental changes in the 2010 Standards solely because of an alteration to a primary function area served by that path of travel. **§ 36.403 Alterations: Path of travel.** ... (2) If a private entity has constructed or altered required elements of a path of travel at a place of public accommodation or commercial facility in accordance with the specifications in the 1991 Standards, the private entity is not required to retrofit such elements to reflect the incremental changes in the 2010 Standards solely because of an alteration to a primary function area served by that path of travel.	***ETA Editor’s Note*** Note the additional information at the beginning of this publication in the Title II Regulations at 35.151(b)(4) and in the Title III Regulations at 36.403(a)(1) re alterations and path of travel.	N/A	NA	n/a		n/a
163	**202.4 EXCEPTION:** *Residential dwelling units* shall not be required to comply with 202.4.		N/A	2010 CBC **does not address** 2010 ADA req.		2010 CBC does not specifically state that alterations to residential dwelling units are not required to comply with path of travel to primary function areas.	2010 CBC should be amended to state that alterations to residential dwelling units are not required to comply with path of travel requirements to primary function areas.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
164	**202.5 Alterations to Qualified Historic Buildings and Facilities.** *Alterations* to a *qualified historic building* or *facility* shall comply with 202.3 and 202.4.		**1135B.1** **General.** Qualified historical buildings shall comply with the State Historical Building Code, Part 8, Title 24, of the California Code of Regulations. [**CHBC** **8-601.3** **Scope**. The CHBC shall apply to every qualified historical building or property that is required to provide access to people with disabilities. **8-601.3.2** Where provisions of this chapter apply to alteration of qualified historical buildings or properties, alteration is defined in California Building Code (CBC), Chapter 2, Definitions and Abbreviations. 202 – A. Alter or Alteration. **8-602.1** **Regular code**. The regular code for access for people with disabilities (Title 24, Part 2, Vol.1, Chapter 11B) shall be applied to qualified historical buildings or properties unless strict compliance with the regular code will threaten or destroy the historical significance or character-defining features of the building or property.**]**	2010 CBC is **equivalent** to 2010 ADA.	Both 2010 CBC and ADA Stds. require alterations to qualified historic buildings to comply with requirements for new construction and to provide an accessible path of travel to primary function areas (although CBC does not use the term "primary function area).	
165	**§ 35.151 New construction and alterations.** (3)(i) Alterations to historic properties shall comply, to the maximum extent feasible, with the provisions applicable to historic properties in the design standards specified in § 35.151(c). (ii) If it is not feasible to provide physical access to an historic property in a manner that will not threaten or destroy the historic significance of the building or facility, alternative methods of access shall be provided pursuant to the requirements of § 35.150. **§ 36.405 Alterations: Historic preservation.** (a) Alterations to buildings or facilities that are eligible for listing in the National Register of Historic Places under the National Historic Preservation Act, 16 U.S.C. 470 et seq., or are designated as historic under State or local law, shall comply to the maximum extent feasible with this part. (b) If it is determined that it is not feasible to provide physical access to an historic property that is a place of public accommodation in a manner that will not threaten or destroy the historic significance of the building or the facility, alternative methods of access shall be provided pursuant to the requirements of subpart C of this part.		N/A	NA	n/a	n/a

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
166	**§ 35.151 New construction and alterations.** (3)(i) Alterations to historic properties shall comply, to the maximum extent feasible, with the provisions applicable to historic properties in the design standards specified in § 35.151(c). (ii) If it is not feasible to provide physical access to an historic property in a manner that will not threaten or destroy the historic significance of the building or facility, alternative methods of access shall be provided pursuant to the requirements of § 35.150. **§ 36.405 Alterations: Historic preservation.** (a) Alterations to buildings or facilities that are eligible for listing in the National Register of Historic Places under the National Historic Preservation Act, 16 U.S.C. 470 et seq., or are designated as historic under State or local law, shall comply to the maximum extent feasible with this part. (b) If it is determined that it is not feasible to provide physical access to an historic property that is a place of public accommodation in a manner that will not threaten or destroy the historic significance of the building or the facility, alternative methods of access shall be provided pursuant to the requirements of subpart C of this part.		N/A	NA	n/a	n/a
167	**EXCEPTION:** Where the State Historic Preservation Officer or Advisory Council on Historic Preservation determines that compliance with the requirements for *accessible* routes, *entrances* , or toilet *facilities* would threaten or destroy the historic significance of the *building* or *facility* , the exceptions for *alterations* to *qualified historic buildings* or *facilities* for that *element* shall be permitted to apply.		**[CHBC] 8-602.1** **Regular code**. The regular code for access for people with disabilities (Title 24, Part 2, Vol.1, Chapter 11B) shall be applied to qualified historical buildings or properties unless strict compliance with the regular code will threaten or destroy the historical significance or character-defining features of the building or property.	Which Std.provides greater access **depends** on circumstances.	2010 ADA Stds. limits the exceptions for accessibility compiance for alterations to qualified historic buildings to the elements requirements for accessible routes, entrances, and toilet facilities. 2010 CHBC does not specify that the exception to strict compliance is limited to specific elements.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC		Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
168	**Advisory 202.5 Alterations to Qualified Historic Buildings and Facilities Exception.** State Historic Preservation Officers are State appointed officials who carry out certain responsibilities under the National Historic Preservation Act. State Historic Preservation Officers consult with Federal and State agencies, local governments, and private entities on providing access and protecting significant elements of qualified historic buildings and facilities. There are exceptions for alterations to qualified historic buildings and facilities for accessible routes (206.2.1 Exception 1 and 206.2.3 Exception 7); entrances (206.4 Exception 2); and toilet facilities (213.2 Exception 2). When an entity believes that compliance with the requirements for any of these elements would threaten or destroy the historic significance of the building or facility, the entity should consult with the State Historic Preservation Officer. If the State Historic Preservation Officer agrees that compliance with the requirements for a specific element would threaten or destroy the historic significance of the building or facility, use of the exception is permitted. Public entities have an additional obligation to achieve program accessibility under the Department of Justice ADA regulations. See 28 CFR 35.150. These regulations require public entities that operate historic preservation programs to give priority to methods that provide physical access to individuals with disabilities. If alterations to a qualified historic building or facility to achieve program accessibility would threaten or destroy the historic significance of the building or facility, fundamentally alter the program, or result in undue financial or administrative burdens, the Department of Justice ADA regulations allow alternative methods to be used to achieve program accessibility. In the case of historic preservation programs, such as an historic house museum, alternative methods include using audio-visual materials to depict portions of the house that cannot otherwise be made accessible. In the case of other qualified historic properties, such as an historic government office building, alternative methods include relocating programs and services to accessible locations. The Department of Justice ADA regulations also allow public entities to use alternative methods when altering qualified historic buildings or facilities in the rare situations where the State Historic Preservation Officer determines that it is not feasible to provide physical access using the exceptions permitted in Section 202.5 without threatening or destroying the historic significance of the building or facility. See 28 CFR 35.151(d). The Accessibility Office at the National Endowment for the Arts (NEA) provides a variety of resources for museum operators and historic properties including: the Design for Accessibility Guide and the Disability Symbols. Contact NEA about these and other resources at (202) 682-5532 or www.arts.gov.	**ETA Editor's Note** See the Title II Regulations exception for historic properties at 35.151(b)(3) "Alteration" under "New construction and alterations" at the beginning of this publication.	N/A	NA	n/a		n/a
169	**203 General Exceptions**		N/A	NA		There is no 2010 CBC section that organizes general exceptions into one section.	2010 CBC need not be amended except to conform to ADA Stds. formatting if adopted.

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170	**203.1 General.** *Sites*, *buildings*, *facilities*, and *elements* are exempt from these requirements to the extent specified by 203. **§ 35.151 New construction and alterations.** (2) Exception for structural impracticability. (i) Full compliance with the requirements of this section is not required where a public entity can demonstrate that it is structurally impracticable to meet the requirements. Full compliance will be considered structurally impracticable only in those rare circumstances when the unique characteristics of terrain prevent the incorporation of accessibility features. (ii) If full compliance with this section would be structurally impracticable, compliance with this section is required to the extent that it is not structurally impracticable. In that case, any portion of the facility that can be made accessible shall be made accessible to the extent that it is not structurally impracticable. (iii) If providing accessibility in conformance with this section to individuals with certain disabilities (e.g., those who use wheelchairs) would be structurally impracticable, accessibility shall nonetheless be ensured to persons with other types of disabilities, (e.g., those who use crutches or who have sight, hearing, or mental impairments) in accordance with this section. **§ 36.401 New construction.** (c) Exception for structural impracticability (1) Full compliance with the requirements of this section is not required where an entity can demonstrate that it is structurally impracticable to meet the requirements. Full compliance will be considered structurally impracticable only in those rare circumstances when the unique characteristics of terrain prevent the incorporation of accessibility features. (2) If full compliance with this section would be structurally impracticable, compliance with this section is required to the extent that it is not structurally impracticable. In that case, any portion of the facility that can be made accessible shall be made accessible to the extent that it is not structurally impracticable. (3) If providing accessibility in conformance with this section to individuals with certain disabilities (e.g., those who use wheelchairs) would be structurally impracticable, accessibility shall nonetheless be ensured to persons with other types of disabilities (e.g., those who use crutches or who have sight, hearing, or mental impairments) in accordance with this section.	***ETA Editor's Note*** See the added Title II Regulations "Exception for structural impracticability" at 35.151(a)(2) under "New construction and alterations - Design and construction" at the beginning of this publication. This language matches the language already in the Title III regulations at 36.401(c).	N/A	NA	There is no 2010 CBC section that organizes general exceptions into one section.	2010 CBC need not be amended except to conform to ADA Stds. formatting if adopted.
171	**203.2 Construction Sites.** Structures and *sites* directly associated with the actual processes of construction, including but not limited to, scaffolding, bridging, materials hoists, materials storage, and construction trailers shall not be required to comply with these requirements or to be on an *accessible* route. ...	N/A	2010 CBC **does not address** 2010 ADA req.	There is no comparable section in the 2010 CBC that excepts construction sites from accessibility requirements. Presumably, since buildings and facilities under construction are not to be occupied by the general public, this may very well be a moot point as far a the buildng code is concerned.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
172	**203.2 Construction Sites.** ... Portable toilet units provided for use exclusively by construction personnel on a construction *site* shall not be required to comply with 213 or to be on an *accessible* route.	N/A	2010 CBC **does not address** 2010 ADA req.	There is no comparable section in the 2010 CBC that excepts portable toilets on construction sites from accessibility requirements. Presumably, since buildings and facilities under construction are not to be occupied by the general public, this may very well be a moot point as far a the buildng code is concerned.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
173	**203.3 Raised Areas.** Areas raised primarily for purposes of security, life safety, or fire safety, including but not limited to, observation or lookout galleries, prison guard towers, fire towers, or life guard stands shall not be required to comply with these requirements or to be on an *accessible* route.	**1123B.2, Exc.** **Exception**: Accessibility is not required to (1) observation galleries used primarily for security purposes; …	Which Std.provides greater access **depends** on circumstances.	Although both CBC and ADA sections are essentially the same in intent, i.e., accessibility is not required for areas used primarily for security purposes, the ADA Stds. description of such areas is more detailed and thus probably easier to interpret. 2010 CBC 1013.3, Exc. 7 has a specific requirement for guard openings discussed in another line item below.	1. 2010 CBC should be amended to adopt ADA Stds. language so that it is clear that the exception applies to "raised" areas used primarily for security purposes and to expand the examples of what constitutes security purposes. Or 2. In addition to recommendation #1 above, adopt a separate exception for machinery spaces per 2010 ADA Stds. 203.5, as a general exception and not necessarily under employee areas.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
173.1	**203.3 Raised Areas.** ...r life guard stands shall not be required to comply with these requirements or to be on an *accessible* route.		**1013.3, Exc. 7** Lifeguard towers not open to the public, guards shall not have openings which allow passage of a sphere 21 inches (533 mm) in diameter.	Which Std.provides greater access **depends** on circumstances.	While ADA Stds. excepts life guard stands from accessibilty requirements, and while it can be reasonably inferred that CBC also excepts life guard stands, 2010 CBC has one requirement in Chapter 10 that a sphere 21 inches in diameter cannot pass through a guard of a life guard tower. ADA Stds. do not address openings in guards, except for edge protection at ramps. DSA ACS does address openings in guards. If 2010 CBC is to be amended to be consistent with ADA Stds., then care should be taken to avoid conflict with CBC 1010.3, Exc. 7.	1. 2010 CBC should be amended to adopt ADA Stds. language so that it is clear that the exception applies to life guard stands and towers, except that CBC 1010.3, Exc. 7 still applies regulating the opening size of the guards.
174	**203.4 Limited Access Spaces.** *Spaces* accessed only by ladders, catwalks, crawl *spaces*, or very narrow passageways shall not be required to comply with these requirements or to be on an *accessible* route.		**1103B.1, Exc. 1** Floors or portions of floors not customarily occupied, including, but not limited to, nonoccupiable or employee spaces accessed only by ladders, catwalks, crawl spaces, very narrow passageways or freight (nonpassenger) elevators, and frequented only by service personnel for repair or maintenance purposes, including, but not limited to, elevator pits and elevator penthouses, piping and equipment catwalks, and machinery rooms.	Which Std.provides greater access **depends** on circumstances.	2010 CBC is seemingly narrower than the ADA Stds. in its exception for spaces with limited access. ADA Stds. simply state that spaces accessed only by ladders, etc. shall not be required to comply. 2010 CBC qualifies that its exception applies to floors or portions of floors not customarily occupied...nonoccupiable or employee spaces accessed only by ladders, etc. 2010 CBC further qualifies that the exception applies to spaces frequented only by service personnel for repair or maintenance purposes. It is not clear whether "service personnel" means only outside vendors or can include occupants/employees of the owner/tenant. Also, CBC seems to exclude from the exception those personnel who access the space for operational purposes (occasional adjusting/monitoring of equipment, etc.) as opposed to only repair or maintenance purposes. In reality, the CBC limitations to the exception are probably too fussy to plan check and inspect in a meaningful manner.	1. 2010 CBC should be amended to be consistent with ADA Stds.
174.1	**203.4 Limited Access Spaces.** *Spaces* accessed only by ladders, catwalks, crawl *spaces*, or very narrow passageways shall not be required to comply with these requirements or to be on an *accessible* route.		**1123B.2, Exc.** **Exception**: Accessibility is not required to ... (2) in nonoccupiable spaces accessed only by ladders, catwalks, crawl spaces, very narrow passageways or freight (nonpassenger) elevators, and frequented only by service personnel for repair purposes; such spaces include, but are not limited to, elevator pits, elevator penthouses, mechanical rooms, piping or equipment catwalks.	Which Std.provides greater access **depends** on circumstances.	This CBC section comes under the heading of "Access to Employee Work Areas," whereas the ADA Stds section is a general exception. This is an awkward place in the CBC for this exception since it can apply to nonoccupiable spaces and spaces accessed by non-employee service personnel, not just employee areas.	2010 CBC should be amended to make this a general exception, consistent with ADA Stds.
175	**203.5 Machinery Spaces.** *Spaces* frequented only by service personnel for maintenance, repair, or occasional monitoring of equipment shall not be required to comply with these requirements or to be on an *accessible* route. Machinery *spaces* include, but are not limited to, elevator pits or elevator penthouses; mechanical, electrical or communications equipment rooms; piping or equipment catwalks; water or sewage treatment pump rooms and stations; electric substations and transformer vaults; and highway and tunnel utility *facilities*.		**1103B.1, Exc. 1** Floors or portions of floors not customarily occupied, including, but not limited to, nonoccupiable or employee spaces accessed only by ladders, catwalks, crawl spaces, very narrow passageways or freight (nonpassenger) elevators, and frequented only by service personnel for repair or maintenance purposes, including, but not limited to, elevator pits and elevator penthouses, piping and equipment catwalks, and machinery rooms.	Which Std.provides greater access **depends** on circumstances.	Although 2010 CBC and the ADA Stds. are similar in this regard, ADA Stds. has more examples of what constitutes a machinery space, thus making interpretation and application of the regulation somewhat easier than CBC. Also, the ADA Stds. includes the occasional monitoring of equipment as a service function, and 2010 CBC does not explicitly include this, though it could be inferred.	2010 CBC should be amended to be consistent with ADA Stds.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
175.1	**203.5 Machinery Spaces.** *Spaces* frequented only by service personnel for maintenance, repair, or occasional monitoring of equipment shall not be required to comply with these requirements or to be on an *accessible* route. Machinery *spaces* include, but are not limited to, elevator pits or elevator penthouses; mechanical, electrical or communications equipment rooms; piping or equipment catwalks; water or sewage treatment pump rooms and stations; electric substations and transformer vaults; and highway and tunnel utility *facilities*.		**1123B.2, Exc.** **Exception**: Accessibility is not required to ... (2) in nonoccupiable spaces accessed only by ladders, catwalks, crawl spaces, very narrow passageways or freight (nonpassenger) elevators, and frequented only by service personnel for repair purposes; such spaces include, but are not limited to, elevator pits, elevator penthouses, mechanical rooms, piping or equipment catwalks.	Which Std.provides greater access **depends** on circumstances.	This CBC section is essentially the same as CBC 1103B.1, Exc. 1, thus is redundant to address this in both the general scope and specifically in employee work areas.	2010 CBC should be amended to remove the redunancy and address this as a general exception, not just an exception at employee areas.
175.2	**203.5 Machinery Spaces.** *Spaces* frequented only by service personnel for maintenance, repair, or occasional monitoring of equipment shall not be required to comply with these requirements or to be on an *accessible* route. Machinery *spaces* include, but are not limited to, elevator pits or elevator penthouses; mechanical, electrical or communications equipment rooms; piping or equipment catwalks; water or sewage treatment pump rooms and stations; electric substations and transformer vaults; and highway and tunnel utility *facilities*.		**1117B.5.8.1.2, Exc. 2** An International Symbol of Accessibility is not required at entrances to machinery spaces frequented only by service personnel for maintenance, repair, or occasional monitoring of equipment; for example, elevator pits or elevator penthouses; mechanical, electrical or communications equipment rooms; piping or equipment catwalks; electric substations and transformer vaults; and highway and tunnel utility facilities.	2010 CBC is **equivalent** to 2010 ADA.	Although 2010 CBC and the ADA Stds. are equivalent in not requiring an ISA sign at the entrances to machinery spaces, 2010 CBC specifically addresses this sign exception, while ADA Stds. just states that machinery spaces are not required to be on an accessible route.	2010 CBC need not be amended.
175.3	**203.5 Machinery Spaces.** *Spaces* frequented only by service personnel for maintenance, repair, or occasional monitoring of equipment shall not be required to comply with these requirements or to be on an *accessible* route. Machinery *spaces* include, but are not limited to, elevator pits or elevator penthouses; mechanical, electrical or communications equipment rooms; piping or equipment catwalks; water or sewage treatment pump rooms and stations; electric substations and transformer vaults; and highway and tunnel utility *facilities*.		**1133B.2.5, Exc. 1** Exterior doors to machinery spaces including, but not limited to, elevator pits or elevator penthouses; mechanical, electrical or communications equipment rooms; piping or equipment catwalks; electric substations and transformer vaults; and highway and tunnel utility facilities.	2010 CBC is **equivalent** to 2010 ADA.	Although 2010 CBC and the ADA Stds. are equivalent in not requiring compliance with door opening force at entrances to machinery spaces, 2010 CBC specifically addresses this exception, while ADA Stds. just states that machinery spaces are not required to be on an accessible route.	2010 CBC need not be amended.
176	**203.6 Single Occupant Structures.** Single occupant structures accessed only by passageways below grade or elevated above standard curb height, including but not limited to, toll booths that are accessed only by underground tunnels, shall not be required to comply with these requirements or to be on an *accessible* route.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not specifically address exception to single occupant structures such as the toll booth example given in the ADA Stds. It is not clear that the 2010 CBC work station exception 1123B.2, Exc. could be interpreted or inferred to include single occupant structures.	1. 2010 CBC need not be amended if the intent is to not except access to single occupant structures accessed only by passageways below grade or elevated above standard curb height. Or 2. 2010 CBC should be amended to except single occupant structures accessed only by passageways below grade or elevated above standard curb height from required compliance with the regulations or to be on an accessible route.
177	**203.7 Detention and Correctional Facilities.** In detention and correctional *facilities*, *common use* areas that are used only by inmates or detainees and security personnel and that do not serve holding cells or housing cells required to comply with 232, shall not be required to comply with these requirements or to be on an *accessible* route.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not have provisions to except common use areas that do not serve accessible holding or housing cells from accessibilty requirements.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to add the exception per the ADA Stds.
178	**203.8 Residential Facilities.** In residential *facilities*, *common use* areas that do not serve *residential dwelling units* required to provide mobility features complying with 809.2 through 809.4 shall not be required to comply with these requirements or to be on an *accessible* route.		N/A	NA	2010 CBC Chapter 11B does not have any provisions addressing common use areas in residential facilities.	1. 2010 CBC need not be amended.
179	**203.8 Residential Facilities.** In residential *facilities*, *common use* areas that do not serve *residential dwelling units* required to provide mobility features complying with 809.2 through 809.4 shall not be required to comply with these requirements or to be on an *accessible* route.		N/A	NA	2010 CBC Chapter 11B does not have any provisions addressing common use areas in residential facilities.	1. 2010 CBC need not be amended.
180	**203.8 Residential Facilities.** …		N/A	NA	2010 CBC Chapter 11B does not have any provisions addressing common use areas in residential facilities.	1. 2010 CBC need not be amended.
181	**203.9 Employee Work Areas.** *Spaces* and *elements* within *employee work areas* shall only be required to comply with 206.2.8, 207.1, and 215.3 and shall be designed and constructed so that individuals with disabilities can approach, enter, and exit the *employee work area*. ...		**1123B.2** **Work stations**. Specific work stations need only comply with aisle width (Sections 1133B.6.1 and 1133B.6.2) and floors and levels (Section 1120B), and entryways shall be 32 inches (813 mm) in clear width.	2010 CBC is **equivalent** to 2010 ADA.	Although worded and referenced differently, 2010 CBC and ADA Stds. are equivalent in their requirement for accessible floor levels, common use circulation paths/aisles, and entryway clear width.	1. 2010 CBC need not be amended. Or 2. 2010 CBC need not be amended except to conform to ADA Stds. formatting.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
181.1	**203.9 Employee Work Areas.** *Spaces* and *elements* within *employee work areas* shall only be required to comply with ... 215.3 and shall be designed and constructed so that individuals with disabilities can approach, enter, and exit the *employee work area.* ...		**907.5.2.3.2** **Employee work areas**. Where employee work areas have audible alarm coverage, the notification appliance circuits serving the employee work areas shall be initially designed with a minimum of 20-percent spare capacity to account for the potential of adding visible notification appliances in the future to accommodate hearing impaired employee(s).	Which Std.provides greater access **depends** on circumstances.	2010 CBC explicitly states that 20% spare capacity be provided to allow for future added visible notification appliances; ADA Stds. merely requires that the wiring system can integrate visible alarms. ADA Stds. does not state a specific minimum additional capacity, leaving too much room for interpretation.	2010 CBC need not be amended.
181.2	**203.9 Employee Work Areas.** *Spaces* and *elements* within *employee work areas* shall only be required to comply with 206.2.8, ... and shall be designed and constructed so that individuals with disabilities can approach, enter, and exit the *employee work area.* ...		**1105B.3.2.3** Employee work areas shall have a minimum of 36 inches (914 mm) clear width access, except as modified in other portions of these regulations. See Sections 1133B.6.1 and 1133B.6.2.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and ADA Stds. are equivalent in clear width access.	2010 CBC need not be amended.
181.3	**203.9 Employee Work Areas.** *Spaces* and *elements* within *employee work areas* shall only be required to comply with 206.2.8, ... and shall be designed and constructed so that individuals with disabilities can approach, enter, and exit the *employee work area.* ...		**1108B.5** **Employee work areas**. Employee work areas shall be accessible by means of a 36-inch (914 mm) minimum aisle width and a 32-inch (813 mm) minimum clear opening door width, as specified in Sections 1133B.6.1 and 1133B.6.2.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and ADA Stds. are equivalent in clear width access. ADA Stds. does not address this requirement for Group H occupancies separately.	2010 CBC need not be amended.
181.4	**203.9 Employee Work Areas.** *Spaces* and *elements* within *employee work areas* shall only be required to comply with ...207.1, ... and shall be designed and constructed so that individuals with disabilities can ... exit the *employee work area.* …		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not separately address accessible means of egress for employee areas. Under 2010 CBC general requirements for accessible means of egress would apply to employee areas.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
181.5	**203.9 Employee Work Areas.** ... *Employee work areas* , or portions of *employee work areas* , that are less than 300 square feet (28 m2) and elevated 7 inches (180 mm) or more above the finish floor or ground where the elevation is essential to the function of the *space* shall not be required to comply with these requirements or to be on an *accessible* route.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not have an equivalent exception for areas less than 300 square feet and elevated 7 inches or more.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
181.6			**1106B.4.2** **Open book stacks**. ... In existing buildings, multitiered, closed book stacks (those restricted to employee use) are exempt from these accessibility standards.	Which Std.provides greater access **depends** on circumstances.	ADA Stds. does not address book stacks restricted to employee use in E occupancies.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
182	**203.9 Employee Work Areas.** ... *Employee work areas* , or portions of *employee work areas,* that are less than 300 square feet (28 m2) and elevated 7 inches (180 mm) or more above the finish floor or ground where the elevation is essential to the function of the *space* shall not be required to comply with these requirements or to be on an *accessible* route.		N/A	2010 CBC **does not address** 2010 ADA req.		
183	**Advisory 203.9 Employee Work Areas.** Although areas used exclusively by employees for work are not required to be fully accessible, consider designing such areas to include non-required turning spaces, and provide accessible elements whenever possible. Under the ADA, employees with disabilities are entitled to reasonable accommodations in the workplace; accommodations can include alterations to spaces within the facility. Designing employee work areas to be more accessible at the outset will avoid more costly retrofits when current employees become temporarily or permanently disabled, or when new employees with disabilities are hired. Contact the Equal Employment Opportunity Commission (EEOC) at www.eeoc.gov for information about title I of the ADA prohibiting discrimination against people with disabilities in the workplace.		N/A	NA	The ADA Stds. Advisory does not establish enforceable requirements.	n/a

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
184	**203.10 Raised Refereeing, Judging, and Scoring Areas.** Raised structures used solely for refereeing, judging, or scoring a sport shall not be required to comply with these requirements or to be on an *accessible* route.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not separately nor explicitly address requirements for raised refereeing, judging, and scoring areas. Thus, an extreme interpretation of the 2010 CBC could require such areas to be accessible.	1. 2010 CBC should be amended to incorporate separate provisions for raised refereeing, judging, and scoring areas. Or 2. 2010 CBC need not be amended if the intent is to require that raised refereeing, judging, and scoring areas be accessible and be on an accessible route.
185	**203.11 Water Slides.** Water slides shall not be required to comply with these requirements or to be on an *accessible* route.		**3113B.1** **General**. A minimum continuous and unobstructed 4-foot wide (1219 mm) slip-resistant, nonabrasive deck area of concrete or like material ... shall further extend 4 feet (1219 mm) on both sides and rear of any ... slide and their appurtenances. ...	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC does not specifically address requirements for water slides, other than deck clearance around a slide and appurtenances. CBC is not clear whether the deck clearance is intended to provide an accessible route to the slide or merely to avoid obstructing the general accessible route on the deck.	1. 2010 CBC should be amended to incorporate an exception for water slides consistent with ADA Stds. Or 2. 2010 CBC need not be amended if the intent is to require that water slides be on an accessible route (but not necessarily comply with other accessibility requirements).
186	**203.12 Animal Containment Areas.** Animal containment areas that are not for public use shall not be required to comply with these requirements or to be on an *accessible* route.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not specifically address requirements for animal containment areas.	1. 2010 CBC should be amended to incorporate separate provisions for animal containment areas. Or 2. 2010 CBC need not be amended if the intent is to require that all animal containment areas be accessible and be on an accessible route.
187	**Advisory 203.12 Animal Containment Areas.** Public circulation routes where animals may travel, such as in petting zoos and passageways alongside animal pens in State fairs, are not eligible for the exception.		N/A	2010 CBC **does not address** 2010 ADA req.	Although the ADA Stds. Advisory does not establish enforceable requirements, a form of this particular advisory could be incorporated into the CBC, provided the requirements of ADA Stds. 203.12 are also similarly adopted, to aid in clarification of the regulation that the exception does not apply to public circulation routes in animal containment areas.	If the provisions of ADA Stds. 203.12 are incorporated into amendments to the 2010 CBC, then it would be helpful to also include language similar to Advisory 203.13 that public circulation routes where animals may travel, such as in petting zoos and passageways alongside animal pens in State fairs shall be accessible and be on an accessible route.
188	**203.13 Raised Boxing or Wrestling Rings.** Raised boxing or wrestling rings shall not be required to comply with these requirements or to be on an *accessible* route.		**1104B.3.12** **Stages, enclosed and unenclosed platforms, and orchestra pits.** ..., enclosed and unenclosed platforms ... shall be made accessible to persons with disabilities.	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC includes "boxing and wrestling rings" under the definition of "PLATFORM" in Section 410.2. In turn, 2010 CBC 1104B.3.12 requires that enclosed and unenclosed platforms be accessible, unless the enforcing agency finds that compliance would create an unreasonable hardship.	1. 2010 CBC should be amended to incorporate the exception for raised boxing and wrestling rings. Or 2. 2010 CBC need not be amended if the intent is to require that all raised boxing and wrestling rings be accessible and be on an accessible route.
189	**203.14 Raised Diving Boards and Diving Platforms.** Raised diving boards and diving platforms shall not be required to comply with these requirements or to be on an *accessible* route.		**3113B.1** **General**. A minimum continuous and unobstructed 4-foot wide (1219 mm) slip-resistant, nonabrasive deck area of concrete or like material ... shall further extend 4 feet (1219 mm) on both sides and rear of any diving board ... and their appurtenances. ...	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC does not specifically address requirements for diving boards, other than deck clearance around a diving board and appurtenances. CBC is not clear whether the deck clearance is intended to provide an accessible route to the diving board or merely to avoid obstructing the general accessible route on the deck.	1. 2010 CBC should be amended to incorporate an exception for diving boards and diving platforms consistent with ADA Stds. Or 2. 2010 CBC need not be amended if the intent is to require that diving boards be on an accessible route (but not necessarily comply with other accessibility requirements). or 3. 2010 CBC should be amended to include both diving boards and diving platforms in the requirements for deck clearance around obstructions.
190	**204 Protruding Objects**		**1133B.8.6 Protruding objects.**	2010 CBC is **equivalent** to 2010 ADA.	NA	NA

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
191	**204.1 General.** Protruding objects on *circulation paths* shall comply with 307.		**1117B.1#3. Alcoves.** Protruding objects located in alcoves, located between wing walls or otherwise positioned so as to limit encroachment into pedestrian ways are permitted to project 4 inches (102 mm) into walks, halls, corridors, passageways or aisles. **1117B.2#4. Protruding telephone enclosures.** Where telephone enclosures protrude into walks, halls, corridors or aisles, they shall also comply with Section 1133B.8.6. **1133B.8.6.1 General.** Objects projecting from walls (for example, telephones) with their leading edges between 27 inches (686 mm) and 80 inches (2032 mm) above the finished floor shall protrude no more than 4 inches (102 mm) into walks, halls, corridors, passageways or aisles. Objects mounted with their leading edges at or below 27 inches (686 mm) above the finished floor may protrude any amount. Free-standing objects mounted on posts or pylons may overhang 12 inches (305 mm) maximum from 27 inches (686 mm) to 80 inches (2032 mm) above the ground or finished floor. Protruding objects shall not reduce the clear width of an accessible route or maneuvering space. See Figure 11B-7A. **1133B.8.6.2 Head room.** Walks, halls, corridors, passageways, aisles or other circulation spaces shall have 80 inches (2032 mm) minimum clear head room. If vertical clearance of an area adjoining an accessible route is reduced to less than 80 inches (nominal dimension), a barrier to warn blind or visually-impaired persons shall be provided. See Figures 11B-7A and 11B-7C. **1133B.8.6.3 Free-standing signs**. Wherever signs mounted on posts or pylons protrude from the posts or pylons and the bottom edge of the sign is at less than 80 inches (2032 mm) above the finished floor or ground level, the edges of such signs shall be rounded or eased and the corners shall have a minimum radius of 0.125 inches (3.2 mm).	2010 CBC is **equivalent** to 2010 ADA.	CBC 1117B.2#4 refers to CBC Section 1133B.8.6 for technical requirements. CBC does not have a separate section for scoping.	1. If the CBC version is adopted, no change Is necessary. 2. Adopt the 2010 ADA Stds. version verbatim.
191.1	**204.1 General.** Protruding objects on circulation paths shall comply with 307.		**1133B.8.6.1 General.** Objects projecting from walls (for example, telephones) with their leading edges between 27 inches (686 mm) and 80 inches (2032 mm) above the finished floor shall protrude no more than 4 inches (102 mm) into walks, halls, corridors, passageways or aisles. Free-standing objects mounted on posts or pylons may overhang 12 inches (305 mm) maximum from 27 inches (686 mm) to 80 inches (2032 mm) above the ground or finished floor.		I would suggest adding a code item that prohibits the installation of any protruding object, even less than four inches in depth, within the location mandated for the installation of braille and raised character signs. The installation of pull boxes, climate controls, light switches, fire extinguishers, conduit, etc. often obstructs the area where the signs should be installed, and consequently, I hear complaints from people who are blind that they never know where the signs will be located.	Do not allow any protruding objects in a designated area reserved for the installation of tactile room identification signs. Even window frames often protrude too far to allow correct placement of signs, which need to be able to be approached very closely by people who have severely impaired vision. The entire 18 inch area adjacent to the latch side of the door needs to be kept free of protrusions of more than 3 inches, and between the area from approximately 36 inches to 72 inches, there should be no protrusions.
192	**EXCEPTIONS: 1.** Within areas of *sport activity* , protruding objects on *circulation paths* shall not be required to comply with 307. **2.** Within *play areas* , protruding objects on *circulation paths* shall not be required to comply with 307 provided that ground level *accessible* routes provide vertical clearance in compliance with 1008.2.		CBC does not have an equivalent exception.	2010 CBC provides **greater access** than 2010 ADA.	CBC does not provide the 2 exceptions per 2010 ADA Stds.	1. If the CBC version is adopted, include the 2010 ADA Stdsexceptions. 2. If the CBC version is adopted, include one but not both exceptions. 3. If the CBC version is adopted, do not include eithe 2010 ADA Stds.exception. 4. Adopt the 2010 ADA Stds. version verbatim.

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193	**204.1 General.** Protruding objects on circulation paths shall comply with 307.		**1117B.1#3. Alcoves.** Protruding objects located in alcoves, located between wing walls or otherwise positioned so as to limit encroachment into pedestrian ways are permitted to project 4 inches (102 mm) into walks, halls, corridors, passageways or aisles. **1117B.2#4. Protruding telephone enclosures.** Where telephone enclosures protrude into walks, halls, corridors or aisles, they shall also comply with Section 1133B.8.6. **1133B.8.6.1 General.** Objects projecting from walls (for example, telephones) with their leading edges between 27 inches (686 mm) and 80 inches (2032 mm) above the finished floor shall protrude no more than 4 inches (102 mm) into walks, halls, corridors, passageways or aisles. Objects mounted with their leading edges at or below 27 inches (686 mm) above the finished floor may protrude any amount. Free-standing objects mounted on posts or pylons may overhang 12 inches (305 mm) maximum from 27 inches (686 mm) to 80 inches (2032 mm) above the ground or finished floor. Protruding objects shall not reduce the clear width of an accessible route or maneuvering space. See Figure 11B-7A. **1133B.8.6.2 Head room.** Walks, halls, corridors, passageways, aisles or other circulation spaces shall have 80 inches (2032 mm) minimum clear head room. If vertical clearance of an area adjoining an accessible route is reduced to less than 80 inches (nominal dimension), a barrier to warn blind or visually-impaired persons shall be provided. See Figures 11B-7A and 11B-7C. **1133B.8.6.3 Free-standing signs**. Wherever signs mounted on posts or pylons protrude from the posts or pylons and the bottom edge of the sign is at less than 80 inches (2032 mm) above the finished floor or ground level, the edges of such signs shall be rounded or eased and the corners shall have a minimum radius of 0.125 inches (3.2 mm).	2010 CBC is **equivalent** to 2010 ADA.	CBC 1117B.2#4 refers to CBC Section 1133B.8.6 for technical requirements. CBC does not have a separate section for scoping.	1. If the CBC version is adopted, no change Is necessary. 2. Adopt the 2010 ADA Stds. version verbatim.
194	**205 Operable Parts**		**1117B.6 Controls and operating mechanisms.**	2010 CBC is **equivalent** to 2010 ADA.		

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195	**205.1 General.** *Operable parts* on *accessible elements*, *accessible* routes, and in *accessible* rooms and *spaces* shall comply with 309.		**1117B.6 Controls and operating mechanisms.** **1. General.** Controls and operating mechanisms in accessible spaces, along accessible routes or as parts of accessible elements (for example, light switches and dispenser controls) and those required to be accessible by Section 1.9.1 shall comply with the requirements of this section. **2. Clear floor space.** Clear floor space complying with Section 1118B.4 that allows a forward or parallel approach by a person using a wheelchair shall be provided at controls, dispensers, receptacles and other operable equipment. **3. Height.** The highest operable part of all controls, dispensers, receptacles and other operable equipment shall be placed within at least one of the reach ranges specified in Sections 1118B.5 and 1118B.6. **Exception:** These requirements do not apply where the use of special equipment dictates otherwise or where electrical and communication systems receptacles are not normally intended for use by building occupants. **4. Operation.** Controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 pounds (22.2 N) of force. **5. Installation heights of electrical switches and receptacle outlets.** **5.1 Electrical switches.** Controls and switches intended to be used by the occupant of the room or area to control lighting and receptacle outlets, appliances or cooling, heating and ventilating equipment, shall be located no more than 48 inches (1219 mm) measured from the top of the outlet box nor less than 15 inches (381 mm) measured from the bottom of the outlet box to the level of the finish floor or working platform. **5.2 Electrical receptacle outlets.** Electrical receptacle outlets on branch circuits of 30 amperes or less and communication system receptacles shall be located no more than 48 inches (1219 mm) measured from the top of	Which Std.provides greater access **depends** on circumstances.	Similar to 205, 1117B.6 requires controls and operatinhg mechanisms in accessible spaces , along accessible routes, or as parts of accessible elements to comply with requirements for clear floor space, height, and operation. There are a few cases where requirements for specific elements differ, however. 1) 1117B.6 provides specific height requirements for electrical switches and receptacle outlets that are stricter than the standard mounting height requirements of 1118B.5 & 6 as well as 308. As such teh CBC provides greater access. 2) 907.4.2.2 requires manual fire alarm boxes to be mounted a minimum of 42" AFF. This is lower than the standard maximum allowed height of 48" (308 through 309.3, and 1118B.5 & 1118B.6 through 1117B, Item 3). The CBC provides greater access. 3) 907.4.2.2 also states that manual fire alarm boxes shall comply with 1111B.6, Item 4 (Operation). Item 1 above spoeaks to height. Although unlikely, does the fact that clear floor space (1117B.6, Item 2) is not mentioned, mean that a complinat clear floor space is not required at these devices.? The mentioning of two requirements, and the exclusion of the third, could lead one to believe that it does. If this is the case, the CBC provides less access than the 2010 ADA Stds. 4) 1115B.8.3 requires a broad range of toilet room accessories to be mounted no higher than 40" AFF measured to thier highest operable parts. This is lower than the standard maximum allowed height of 48" (308 through 309.3, and 1118B.5 & 1118B.6 through 1117B, Item 3). The CBC provides greater access. 5) Similar to item 2 above, 1116B.1.8 states that hardware on any emergency communication compartment doors shall comply with 1117B.6, Item 4 (operation), but height of door hardware and clear floor space are not mentioned. Although unlikely, does the fact that these two standard requirements are not mentioned, mean that they are not required at these devices? The mentioning of one requirement, and the exclusion of the other two, could lead one to believe that it does. If this is the case, the CBC provides less access than the 2010 ADA Stds. 6) 1117B.7 requires all walk-up ATMs to comply with the clear flkoor space and operation (of controls) requirements of	1) No action required. 2 No action required. 3) Consider stating in 907.4.2.2 that manual fire alarm boxes shall also comply with Section 1117B.6, Items 2 and 4. 4) No action required. 5) Consider stating in 1116B.1.8 that the compartment door hardware shall comply with section 1117B.6. 6) No action required. 7) No action required.

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196	**205.1 General.** *Operable parts* on *accessible elements*, *accessible* routes, and in *accessible* rooms and *spaces* shall comply with 309.		**1117B.6 Controls and operating mechanisms.** **1. General.** Controls and operating mechanisms in accessible spaces, along accessible routes or as parts of accessible elements (for example, light switches and dispenser controls) and those required to be accessible by Section 1.9.1 shall comply with the requirements of this section. **...** **SECTION 1111B** **ACCESSIBILITY FOR GROUP R OCCUPANCIES** **1111B.4.6** Bathrooms in hotels, motels, inns, dormitories, resorts, homeless shelters, halfway houses, transient group homes and similar places of transient lodging. Required accessible bathrooms for places of transient lodging shall comply with the following provisions: **5. Controls and dispensers.** If controls, dispensers, receptacles or other types of equipment are provided, then at least one of each shall be on an accessible route and shall comply with Section 1117B.6, Controls and Operating Mechanisms. **SECTION 1115B** **BATHING AND TOILET FACILITIES (SANITARY FACILITIES)** **1115B.3.2 Single-accommodation toilet facilities.** Single-accommodation toilet facilities shall have the following: **7. Privacy latch.** The entrance door shall contain a privacy latch which complies with Section 1117B.6, Controls and Operating Mechanisms. **1115B.8.3 Towel, sanitary napkins, waste receptacles, dispensers and controls.** Where towel, sanitary napkins, waste receptacles, dispensers, other equipment and controls are provided, at least one of each type shall be located on an accessible route, with all operable parts, including coin slots, within 40 inches (1016 mm) from the finished floor and shall comply with Section 1117B.6,	2010 CBC is **equivalent** to 2010 ADA.	The issue here is operable parts in accessible transient lodging rooms. Both standards require controls and operatinhg mechanisms in accessible spaces , along accessible routes, or as parts of accessible elements to comply with requirements for clear floor space, height, and operation.	

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197	**EXCEPTIONS: 1.** *Operable parts* that are intended for use only by service or maintenance personnel shall not be required to comply with 309. **2.** Electrical or communication receptacles serving a dedicated use shall not be required to comply with 309.		**1117B.6 Controls and operating mechanisms.** **1. General.** Controls and operating mechanisms in accessible spaces, along accessible routes or as parts of accessible elements (for example, light switches and dispenser controls) and those required to be accessible by Section 1.9.1 shall comply with the requirements of this section. **...** **Exception:** These requirements do not apply where the use of special equipment dictates otherwise or where electrical and communication systems receptacles are not normally intended for use by building occupants. **...** **5. Installation heights of electrical switches and receptacle outlets.** **...** **Exceptions:** **1.** Receptacle outlets installed as part of permanently installed baseboard heaters are exempt. **2.** Required receptacle outlets shall be permitted in floors when adjacent to sliding panels or walls. **3.** Baseboard electrical outlets used in relocatable partitions, window walls or other electrical convenience floor outlets are not subject to the minimum height requirements. **4.** This section shall not apply to existing buildings when the enforcing agency determines that compliance with these standards would create an unreasonable hardship.	Which Std.provides greater access **depends** on circumstances.	205.1 Exceptions 1 and 2 state that requirements for clear floor space, height, and operation do not apply to operable parts only used only by service or maintenance personnel, and to electrical or communications receptacles serving a dedicated use. 1117B.6 includes exceptions, but they are different. The 1117B.6, Item 3(?) Exception differs on 2 accounts: 1) It excludeds items not intended for use by building ocupants, but it limits the exclusion to electrical and communication systems receptacles only. Because the CBC has greater litations on the exclusions, it provides greater access. 2) Also, because the exclusion is placed below 1117B.6, Item 3, it appears to only apply to the height requirement. It may also exclude requirements for clear floor space, since 1117B.6, Item 2 is also above the exception, and the Exception says "These requirements do not apply...", but one can't be certain. Undoubtedly, however, the exception does not apply to 1117B.6, Item 4 Operation, as the 205.1 exceptions do. Because the CBC has greater litations on the exclusions, it provides greater access. Nonetheless, the text is confusing regarding the application of the exception. 3) The 1117B.6 , Item 3(?) Exception likely applies to 205.1 Exception 2 as well. *Recptacles serving a dedicated use* (205.1) lilely would *not normally be intended for use by building occupants* (1117B.6). Again, since 1117B.6 does not include Item 4, Operation isn the exclusion, as 205.1 does, The CBC provides greater access. 4) Regarding the operation of electrical or communication receptacles, it is difficult to imagine how utilizing them - inserting a plug of some sort, for instance - wouldn't involve some sort of grasping or pinching.	1) No action required. 2) Clarify whether 1117B.6, Item 3(?) Exception also applies to Item 2, Clear floor space. 3) No action required. 4) Modify 1117B.6 so that the exception alpplies to Items 1-3 (clear floor space, height, and operation), as 205.1 Exception 2 does.

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198	**EXCEPTIONS (Continued): 3.** Where two or more outlets are provided in a kitchen above a length of counter top that is uninterrupted by a sink or appliance, one outlet shall not be required to comply with 309. **4.** Floor electrical receptacles shall not be required to comply with 309. **5.** HVAC diffusers shall not be required to comply with 309. **6.** Except for light switches, where redundant controls are provided for a single *element,* one control in each *space* shall not be required to comply with 309. **7.** Cleats and other boat securement devices shall not be required to comply with 309.3. **8.** Exercise machines and exercise equipment shall not be required to comply with 309.		**1117B.6 Controls and operating mechanisms.** **1. General.** Controls and operating mechanisms in accessible spaces, along accessible routes or as parts of accessible elements (for example, light switches and dispenser controls) and those required to be accessible by Section 1.9.1 shall comply with the requirements of this section. **...** **Exception:** These requirements do not apply where the use of special equipment dictates otherwise or where electrical and communication systems receptacles are not normally intended for use by building occupants. **...** **5. Installation heights of electrical switches and receptacle outlets.** **...** **Exceptions:** **1.** Receptacle outlets installed as part of permanently installed baseboard heaters are exempt. **2.** Required receptacle outlets shall be permitted in floors when adjacent to sliding panels or walls. **3.** Baseboard electrical outlets used in relocatable partitions, window walls or other electrical convenience floor outlets are not subject to the minimum height requirements. **4.** This section shall not apply to existing buildings when the enforcing agency determines that compliance with these standards would create an unreasonable hardship.	Which Std.provides greater access **depends** on circumstances.	205.1 Exceptions 3 - 8 are different than the 1117B.6 exceptions. 1) 205.1 Exception 3 has no corresponding 1117B.6 esclusion. As such, the CBC provides greater access. 2) 205.1 Exception 4 excludes all floor receptacles; 1117B.6, Item 5 Exception 2 allows required receptacles to be placed in floors on a limited basis. As such, the CBC provides greater access. 3) 205.1 Exception 5 has no corresponding 1117B.6 esclusion. As such, the CBC provides greater access. 4) 205.1 Exception 6 has no corresponding 1117B.6 esclusion. As such, the CBC provides greater access. 5) 205.1 Exception 7 has no corresponding 1117B.6 esclusion. As such, the CBC provides greater access. 6) 205.1 Exception 8 has no corresponding 1117B.6 esclusion, but it is likely that the CBC does not cover exercise machines and equipment. In this case th two standards probably are equivalent. 7) 1117B.6, Item 5 Exceptions 1 & 3, both regarding baseboard electrical outlets, have no directly corresponding 205.1 exception, except that Exception 4 excludes floor electrical receptacles. One might conclude that these are equivalent. 8) 1117B.6, Item 5 Exception 4 applies to existing buildings, which are not covered by 205.1. As such, the standards are equivalent. 9) Regarding all of the exceptions, since they are so different, it is difficult to compare them.	For the most part 205.1 offers more exclusions than 1117B.6 does, although one can argue that the 1117B.6 exclusions are not correspondingly excluded in 205.1. 1) No action required. 2) No action required. 3) No action required. 4) No action required. 5) No action required. 6) No action required. 7a) No action required. 7b) Given that one could argue that 205.1 does not offer an exception for baseboard electrical outlets, eliminate 1117B.6, Item 5 Exceptions 1 $ 3. 8) No action required. 9a) Modify 1117B.6 to include the 205.1 exceptions. 9b) Modify the language of the 1117B.6 exceptions that have similar 205.1 exceptions so that they are clearly in agreement. 9c) Leave the CBC exceoptions as they are.
199	**Advisory 205.1 General.** Controls covered by 205.1 include, but are not limited to, light switches, circuit breakers, duplexes and other convenience receptacles, environmental and appliance controls, plumbing fixture controls, and security and intercom systems.		**1117B.6 Controls and operating mechanisms.** **1. General.** Controls and operating mechanisms in accessible spaces, along accessible routes or as parts of accessible elements (for example, light switches and dispenser controls) and those required to be accessible by Section 1.9.1 shall comply with the requirements of this section.	**NA**	Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b)	
200	**206 Accessible Routes**		**SECTION 1127B** **EXTERIOR ROUTES OF TRAVEL**	NA	This is just the section heading. CBC addresses exterior and interior accessible routes in separate sections.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
200.1	**206 Accessible Routes**		**SECTION 1133B** **GENERAL ACCESSIBILITY FOR ENTRANCES, EXITS AND PATHS OF TRAVEL**	NA	This is just the section heading. CBC addresses exterior and interior accessible routes in separate sections.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
201	**206.1 General.** *Accessible* routes shall be provided in accordance with 206 and shall comply with Chapter 4.		**1127B.2** **Design and construction**. When accessibility is required by this section, it shall be designed and constructed in accordance with this Building Code. See Section 1114B.1 for a list of applicable sections.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC scoping for exterior and interior accessible routes are addressed in separate sections, whereas in ADA Stds. the scoping both is under one section.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
201.1	**206.1 General.** *Accessible* routes shall be provided in accordance with 206 and shall comply with Chapter 4.		**1133B.1** **Building accessibility**. See this chapter	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC scoping for exterior and interior accessible routes are addressed in separate sections, whereas in ADA Stds. the scoping both is under one section.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
202	**206.2 Where Required.** *Accessible* routes shall be provided where required by 206.2.		**1127B.2** **Design and construction**. When accessibility is required by this section, it shall be designed and constructed in accordance with this Building Code. See Section 1114B.1 for a list of applicable sections.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC scoping for exterior and interior accessible routes are addressed in separate sections, whereas in ADA Stds. the scoping both is under one section.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.

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202.1	**206.2 Where Required.** *Accessible* routes shall be provided where required by 206.2.		**1133B.1** **Building accessibility**. See this chapter	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC scoping for exterior and interior accessible routes are addressed in separate sections, whereas in ADA Stds. the scoping both is under one section.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
203	**206.2.1 Site Arrival Points.** At least one *accessible* route shall be provided within the *site* from *accessible* parking spaces and *accessible* passenger loading zones; public streets and sidewalks; and public transportation stops to the *accessible building* or *facility entrance* they serve.		**1127B.1** **General**. Site development and grading shall be designed to provide access to all entrances ... Access shall be provided within the boundary of the site from public transportation stops, accessible parking spaces, passenger loading zones if provided, and public streets or sidewalks. ...	2010 CBC is **equivalent** to 2010 ADA.	There is one minor semantic difference. 2010CBC requires an accessible route from passenger loading zones and ADA Stds. requires an accessible route from *accessible* passenger loading zones. Since 2010 CBC requires each passenger loading zone to have at least the minimum specified accesible aisle and features, it complies with the ADA Stds. The only interpretation/intent question would be does the 2010 CBC wording mean that an accessible route is required from all portions of a passenger loading zone, not just the accessible portions?	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with wording of ADA Stds.
204	**EXCEPTIONS: 1.** Where exceptions for *alterations* to *qualified historic buildings* or *facilities* are permitted by 202.5, no more than one *accessible* route from a *site* arrival point to an *accessible entrance* shall be required. **...**		N/A	Which Std.provides greater access **depends** on circumstances.	2010 CBC and the CHBC do not specifically provide that qualified historic buildings may provide no more than one accessible route from a site arrival point to an accessible entrance. Alternatives to the regular code for access for people with disabilities are applied only on an item-by-item or case-by-case basis by the enforcing agency.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
205			N/A	NA	N/A	N/A
206	**Advisory 206.2.1 Site Arrival Points.** Each site arrival point must be connected by an accessible route to the accessible building entrance or entrances served. Where two or more similar site arrival points, such as bus stops, serve the same accessible entrance or entrances, both bus stops must be on accessible routes. In addition, the accessible routes must serve all of the accessible entrances on the site.		N/A	NA	The advisory does not establish enforcable requirements.	n/a
207	**...** **2.** An *accessible* route shall not be required between *site* arrival points and the *building* or *facility entrance* if the only means of access between them is a *vehicular way* not providing pedestrian access.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not have an exception that an accessible route is not required if the only means of access between a site arrival point and building or facility access is a vehicular way. Although rare in populated areas, there are sites in rural or semi-rural areas where vehicular access is the only practical means of proceeding from the site arrival point .	2010 CBC should be amended to incorporate the ADA Stds. exception.
208	**Advisory 206.2.1 Site Arrival Points Exception 2.** Access from site arrival points may include vehicular ways. Where a vehicular way, or a portion of a vehicular way, is provided for pedestrian travel, such as within a shopping center or shopping mall parking lot, this exception does not apply.		N/A	2010 CBC **does not address** 2010 ADA req.	If 2010 CBC is amended to incorporate the provisions of ADA Stds. 206.2.1, Exc. 2, then language similar to this advisory should also be incoporated to clarify that it does not apply where the vehicular way is also used for pedestrian travel.	See 206.2.1, Exc. 2, above.
209	**§ 35.151(i) Curb ramps.** (1) Newly constructed or altered streets, roads, and highways must contain curb ramps or other sloped areas at any intersection having curbs or other barriers to entry from a street level pedestrian walkway. (2) Newly constructed or altered street level pedestrian walkways must contain curb ramps or other sloped areas at intersections to streets, roads, or highways.	***ETA Editor's Note*** See 35.151(i) in the Title II Regulations at the beginning of this publication for curb ramp requirements at newly constructed or altered streets, roads, and highways.	N/A	NA	n/a	n/a

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210	**206.2.2 Within a Site.** At least one *accessible* route shall connect *accessible buildings*, *accessible facilities, accessible elements*, and *accessible spaces* that are on the same *site*.	***ETA Editor's Note*** Requirements for curb ramps, sidewalks and other elements in the public right of way may be covered by other Federal, State or local standards and regulations. The U.S. Department of Transportation and most State departments of transportation are revising their design standards and regulations for the public right of way based on recent research and guidelines being developed by the U.S. Access Board and the Federal Highway Administration. It is the responsibility of the design professional to comply with these public right of way requirements.	**1127B.1** **General**. ... When more than one building or facility is located on a site, accessible routes of travel complying with Section 1114B.1.2 shall be provided between buildings and accessible site facilities, accessible elements, and accessible spaces that are on the same site. ...	2010 CBC is **equivalent** to 2010 ADA.	Although 2010 CBC and ADA Stds. are essentially equivalent in intent, the ADA Stds. language "at least one" is more definitve that the 2010 CBC's use of the plural "accessble routes."	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
211	**EXCEPTION:** An *accessible* route shall not be required between *accessible buildings*, *accessible facilities*, *accessible elements*, and *accessible spaces* if the only means of access between them is a *vehicular way* not providing pedestrian access.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not have an exception that an accessible route is not required if the only means of access between buildings, etc., is a vehicular way not providing pedestrian access. If this ADA Stds. provision is to be adopted by 2010 CBC, language should be included to clarify that vehicular ways that also provide pedestrian access are not subject to this exception. It's quite possible that applicants will try to invoke this exception in situations where the vehicular way truly and/or obviously does provide pedestrian access despite what an applicant may claim.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
212	**Advisory 206.2.2 Within a Site.** An accessible route is required to connect to the boundary of each area of sport activity. Examples of areas of sport activity include: soccer fields, basketball courts, baseball fields, running tracks, skating rinks, and the area surrounding a piece of gymnastic equipment. While the size of an area of sport activity may vary from sport to sport, each includes only the space needed to play. Where multiple sports fields or courts are provided, an accessible route is required to each field or area of sport activity.		N/A	NA	This ADA advisory does not establish enforceable requirements.	n/a
213	**206.2.3 Multi-Story Buildings and Facilities.** At least one *accessible* route shall connect each *story* and *mezzanine* in multi-story *buildings* and *facilities*.		**1103B.1** **Scope.** ... Multistory buildings and facilities must provide access to each level, including mezzanines, by ramp or passenger elevator complying with Section 1116B. …	Which Std.provides greater access **depends** on circumstances.	Although 2010 CBC and ADA Stds. are essentially equivalent in intent, 2010 CBC is presciptive in requiring an elevator or ramp to facilitate access between levels/floors, and also does not use the term "accessible route." ADA Stds. only requires an "accessible route" without prescribing how to provide it.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.

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214	**EXCEPTIONS: 1.** In *private buildings* or *facilities* that are less than three *stories* or that have less than 3000 square feet (279 m2) per *story* , an *accessible* route shall not be required to connect *stories* provided that the *building* or *facility* is not a shopping center, a shopping mall, the professional office of a health care provider, ... or another type of *facility* as determined by the Attorney General. **...** **§ 35.151 New construction and alterations.** (c) *Accessibility standards and compliance date* . (1) If physical construction or alterations commence after July 26, 1992, but prior to the September 15, 2010, then new construction and alterations subject to this section must comply with either UFAS or the 1991 Standards except that the elevator exemption contained at section 4.1.3(5) and section 4.1.6(1)(k) of the 1991 Standards shall not apply. Departures from particular requirements of either standard by the use of other methods shall be permitted when it is clearly evident that equivalent access to the facility or part of the facility is thereby provided. (2) If physical construction or alterations commence on or after September 15, 2010 and before March 15, 2012, then new construction and alterations subject to this section may comply with one of the following: The 2010 Standards, UFAS, or the 1991 Standards except that the elevator exemption contained at section 4.1.3(5) and section 4.1.6(1)(k) of the 1991 Standards shall not apply. Departures from particular requirements of either standard by the use of other methods shall be permitted when it is clearly evident that equivalent access to the facility or part of the facility is thereby provided. **§ 36.401 New construction.** (d) Elevator exemption. (1) For purposes of this paragraph (d) -- (i) Professional office of a health care provider means a location where a person or entity regulated by a State to provide professional services related to the physical or mental health of an individual makes such services available to the public. The facility housing the "professional office of a health care provider" only includes floor levels housing at least one health care provider, or any floor level designed or intended for use by at least one health care provider. (ii) Shopping center or shopping mall means -- (A) A building housing five or more sales or rental establishments; or (B) A series of buildings on a common site, either under common ownership or common control or developed either as one project or as a series of related projects, housing five or more sales or rental establishments. For purposes of this section, places of public accommodation of the types listed in paragraph (5) of the definition of "place of public accommodation" in section § 36.104 are considered sales or rental establishments. The facility housing a "shopping center or shopping mall" only includes floor levels housing at		**1103B.1, Exc. 2-2.2** Any other privately funded multistoried building that is not a shopping center, shopping mall or the professional office of a health care provider, ... and that is less than three stories high or less than 3,000 square feet (279 m2) per story...	2010 CBC is **equivalent** to 2010 ADA.	Although 2010 CBC and ADA Stds. are essentially equivalent, there is a slight difference in wording between the two. 2010 CBC uses the term "privately funded multistoried building" vs. ADA Stds. which uses "private buildings or facilities."	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
215	EXCEPTIONS: 1. In private buildings or facilities that are less than three stories or that have less than 3000 square feet (279 m2) per story, an accessible route shall not be required to connect stories provided that the building or facility is not a shopping center, a shopping mall, the professional office of a health care provider, a terminal, depot or other station used for specified public transportation, an airport passenger terminal, or another type of facility as determined by the Attorney General.		**1103B.1, Exc. 2-2.2** Any other privately funded multistoried building that is not a shopping center, shopping mall or the professional office of a health care provider, or a terminal, depot or other station used for specified public transportation, or an airport passenger terminal and that is less than three stories high or less than 3,000 square feet (279 m2) per story if a reasonable portion of all facilities and accommodations normally sought and used by the public in such a building are accessible to and usable by persons with disabilities.	2010 CBC is **equivalent** to 2010 ADA.	Although 2010 CBC and ADA Stds. are essentially equivalent, there is a slight difference in wording between the two. 2010 CBC uses the term "privately funded multistoried building" vs. ADA Stds. which uses "private buildings or facilities."	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.

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216	**EXCEPTIONS: 1.** In *private buildings* or *facilities* that are less than three *stories* or that have less than 3000 square feet (279 m2) per *story* , an *accessible* route shall not be required to connect stories provided that the *building* or *facility* is not a ...terminal, depot or other station used for specified public transportation, an airport passenger terminal, or another type of f*acility* as determined by the Attorney General. **§ 36.401 New construction.** (d)(2) This section does not require the installation of an elevator in a facility that is less than three stories or has less than 3000 square feet per story, except with respect to any facility that houses one or more of the following: (ii) A terminal, depot, or other station used for specified public transportation, or an airport passenger terminal. In such a facility, any area housing passenger services, including boarding and debarking, loading and unloading, baggage claim, dining facilities, and other common areas open to the public, must be on an accessible route from an accessible entrance.		**1103B.1, Exc. 2-2.2** Any other privately funded multistoried building that is not a ... a terminal, depot or other station used for specified public transportation, or an airport passenger terminal and that is less than three stories high or less than 3,000 square feet (279 m2) per story...	2010 CBC is **equivalent** to 2010 ADA.	Although 2010 CBC and ADA Stds. are essentially equivalent, there is a slight difference in wording between the two. 2010 CBC uses the term "privately funded multistoried building" vs. ADA Stds. which uses "private buildings or facilities."	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
216.1	**EXCEPTIONS: 1.** In private buildings or facilities that are less than three stories or that have less than 3000 square feet (279 m2) per story, an accessible route shall not be required to connect stories provided that the building or facility is not a shopping center, a shopping mall, the professional office of a health care provider, a terminal, depot or other station used for specified public transportation, an airport passenger terminal, or another type of facility as determined by the Attorney General.		**1103B, Exc. 2-2.1** Multistoried office buildings (other than the professional office of a health care provider) and passenger vehicle service stations less than three stories high or less than 3,000 square feet (279 m2) per story.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC addresses privately funded multistoried office buildings and passenger vehicle service stations in a separate exception from other privately funded multistoried buildings. 2010 ADA Stds. addresses this in one exception.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
217	**EXCEPTIONS: 2.** Where a two *story public building* or *facility* has one *story* with an *occupant load* of five or fewer persons that does not contain *public use space* , that *story* shall not be required to be connected to the *story* above or below.		N/A	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC does not except certain public buildings from providing an accessible route between floors.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
218	**EXCEPTIONS: 3.** In detention and correctional *facilities* , an *accessible* route shall not be required to connect *stories* where cells with mobility features required to comply with 807.2, all *common use* areas serving cells with mobility features required to comply with 807.2, and all *public use* areas are on an *accessible* route.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 does not have an exception to providing an accessible route between stories in detention facilities.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
219	**EXCEPTIONS: 4.** In residential *facilities* , an *accessible* route shall not be required to connect *stories* where *residential dwelling units* with mobility features required to comply with 809.2 through 809.4, all *common use* areas serving *residential dwelling units* with mobility features required to comply with 809.2 through 809.4, and *public use* areas serving *residential dwelling units* are on an *accessible* route.		**1102A.3.1 #1** 1. The primary entry to the dwelling unit shall be on an accessible route …	Which Std.provides greater access **depends** on circumstances.	2010 CBC requires that in multistory residential buildings with no elevator the primary entrance to accessible dwelling units shall be on an accessible route. ADA Stds. states that if residential dwelling units with moblity features are on an accessible route, then an accessible route connecting stories is not required. It's two different ways of saying similar things. The main difference is that 2010 CBC is prescriptive in specifying "elevator" whereas ADA Stds. uses a more inclusive term "accessible route" when describing the connection between stories.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
220	**EXCEPTIONS: 5.** Within multi-story transient lodging guest rooms with mobility features required to comply with 806.2, an *accessible* route shall not be required to connect *stories* provided that *spaces* complying with 806.2 are on an *accessible* route and sleeping accommodations for two persons minimum are provided on a *story* served by an *accessible* route.		**1111B.4.2.2** **Accessible route**. Guest rooms and suites shall be on an accessible route complying with Section 1114B.1.2. An accessible route shall also connect all accessible spaces and elements, including telephones, within the unit, sleeping room or suite.	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not have a separate exception regarding accessible routes connecting stories in transient lodging. By referencing other sections, general requirements for connecting stories with an accessible route would apply to transient lodging as well.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
221	**EXCEPTIONS: 6.** In air traffic control towers, an *accessible* route shall not be required to serve the cab and the floor immediately below the cab.		**412.3.6** **Accessibility. [DSA-AC]** In air traffic control towers, an accessible route shall not be required to serve the cab and the equipment areas on the floor immediately below the cab.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and ADA Stds. requirements are the same.	1. 2010 CBC need not be amended.

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222	**EXCEPTIONS: 7.** Where exceptions for *alterations* to *qualified historic buildings* or *facilities* are permitted by 202.5, an *accessible* route shall not be required to *stories* located above or below the *accessible story*.		**8-603.1** **Alternative minimum standards**. The alternative minimum standards for alterations of qualified historical buildings or facilities are contained in Section 4.1.7(3) of ADA Standards for Accessible Design, as incorporated and set forth in federal regulation 28 C.F.R Pt. 36.	2010 CBC **does not address** 2010 ADA req.	2010 CHBC generally references the 1991 ADA Stds. regarding alternative minimum standards for accessibility in qualified historical buildings, but does not have a separate section specifically addressing stories above or below the acessible story.	1. 2010 CHBC should be amended to reference the 2010 ADA Stds.
223	**Advisory 206.2.3 Multi-Story Buildings and Facilities.** Spaces and elements located on a level not required to be served by an accessible route must fully comply with this document. While a mezzanine may be a change in level, it is not a story. If an accessible route is required to connect stories within a building or facility, the accessible route must serve all mezzanines.		N/A	NA	The ADA Advisory does not establish enforceable requirements	n/a
224	**Advisory 206.2.3 Multi-Story Buildings and Facilities Exception 4.** Where common use areas are provided for the use of residents, it is presumed that all such common use areas “serve” accessible dwelling units unless use is restricted to residents occupying certain dwelling units. For example, if all residents are permitted to use all laundry rooms, then all laundry rooms "serve" accessible dwelling units. However, if the laundry room on the first floor is restricted to use by residents on the first floor, and the second floor laundry room is for use by occupants of the second floor, then first floor accessible units are “served” only by laundry rooms on the first floor. In this example, an accessible route is not required to the second floor provided that all accessible units and all common use areas serving them are on the first floor.		N/A	NA	The ADA Advisory does not establish enforceable requirements	n/a
225			N/A	NA	n/a	n/a
226	**206.2.3.1 Stairs and Escalators in Existing Buildings.** In *alterations* and *additions*, where an escalator or stair is provided where none existed previously and major structural modifications are necessary for the installation, an *accessible* route shall be provided between the levels served by the escalator or stair unless exempted by 206.2.3 Exceptions 1 through 7.		**1103B.1** **Scope**. ... In existing buildings, where elevators are required by Section 1134B.2 or 1103B.1, if an escalator or stair is installed where none existed previously and major structural modifications are necessary for such installation, then a means of accessible vertical access via ramp, elevator or lift shall be provided.	2010 CBC is **equivalent** to 2010 ADA.	Although 2010 CBC and ADA Stds. are equivalent in intent, they are worded somewhat differently from each other, and reference different sections.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
227	**206.2.4 Spaces and Elements.** At least one *accessible* route shall connect accessible *building* or *facility entrances* with all *accessible spaces* and *elements* within the *building* or *facility* which are otherwise connected by a *circulation path* unless exempted by 206.2.3 Exceptions 1 through 7.		**1114B.1.2** **Accessible route of travel.** ... At least one accessible route shall connect accessible building or facility entrances with all accessible spaces and elements and with all accessible dwelling units within the building or facility. ...	Which Std.provides greater access **depends** on circumstances.	Although similar in intent, there is sufficient difference in wording between 2010 CBC and ADA Stds. that it is somewht convoluted to make a comparison. 2010 CBC makes direct reference to accessible dwelling units connected by an accessible route; ADA Stds. do not specifically list accessible dwelling units but don't exclude them from the application of scope. ADA Stds. qualifies the connection by an accessible route to state "which are otherwise connected by a circulation path" and 2010 CBC does not include this phrase in the description of applicable entrances, spaces and elements. ADA Stds. also references exceptions in multistory buildings in defining the scope of application; 2010 CBC does not reference multistory building exceptions in this section.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
227.1	**206.2.4 Spaces and Elements.** At least one *accessible* route shall connect accessible *building* or *facility entrances* with all *accessible spaces* and *elements* within the *building* or *facility* which are otherwise connected by a *circulation path* unless exempted by 206.2.3 Exceptions 1 through 7.		**1133B.1.1.1.1** ... Entrances shall be connected by an accessible route to all accessible spaces or elements within the building or facility. …	Which Std.provides greater access **depends** on circumstances.	2010 CBC and ADA Stds. are similar in intent, but are worded somewhat differently, and the ADA Stds. futher reference multistory building exceptions.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
228	**EXCEPTIONS: 1.** Raised courtroom stations, including judges' benches, clerks' stations, bailiffs' stations, deputy clerks' stations, and court reporters' stations shall not be required to provide vertical access provided that the required clear floor *space*, maneuvering *space*, and, if appropriate, electrical service are installed at the time of initial construction to allow future installation of a means of vertical access complying with 405, 407, 408, or 410 without requiring substantial reconstruction of the *space*.		**1105B.3.5.4** Courtroom areas, including the judge’s chambers and bench, counsel tables, jury box, witness stand and public seating area shall be made accessible.	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC does not have an exception to not require raised courtroom stations to have accessible means of vertical access, provided certain accessible clearances are constructed and provisions for future installation of accessible means of vertical access are constructed.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.

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229	**EXCEPTIONS: 2.** In *assembly areas* with fixed seating required to comply with 221, an *accessible* route shall not be required to serve fixed seating where *wheelchair spaces* required to be on an *accessible* route are not provided.		**1104B.3.5, Exc. 2** Where it is determined that dispersing accessible seating throughout an existing assembly area would create an unreasonable hardship, accessible seating areas may be clustered. Each accessible seating area shall have provisions for companion seating and shall be located on an accessible route that also serves as a means of emergency egress.	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC has a different exception to providing accessible seating than ADA Stds. Under the 2010 CBC a determination of unreasonable hardship is required to allow clustering accessible seating, and by inferrence the areas without accessible seating would not need to be on an accessible route. Coordinate the final wording of this exception (everywhere it occurs) with the language in other sections, like 1104B, where it is different. ADA Stds. merely says that an accessible route is not required to areas where wheelchair spaces are not provided	2010 CBC should be amended to be consistent with ADA Stds. with stricter CA requirements.
230	**EXCEPTIONS: 3.** *Accessible* routes shall not be required to connect *mezzanines* where *buildings* or *facilities* have no more than one *story*. In addition, *accessible* routes shall not be required to connect stories or *mezzanines* where multi-story *buildings* or facilities are exempted by 206.2.3 Exceptions 1 through 7.		**1103B.1** **Scope**. ... Multistory buildings and facilities must provide access to each level, including mezzanines, by ramp or passenger elevator complying with Section 1116B. ...	Which Std.provides greater access **depends** on circumstances.	By inference, 2010 CBC does not require ann accessible route to a mezzanine in a one-story building, since the requirement to connect the mezzanine is required specifically in multistory buildings. The multistory building exceptions are addressed elsewhere in this comparison.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
231	**Advisory 206.2.4 Spaces and Elements.** Accessible routes must connect all spaces and elements required to be accessible including, but not limited to, raised areas and speaker platforms.		N/A	NA	Advisory does not establish enforceable requirements.	n/a
232	**Advisory 206.2.4 Spaces and Elements Exception 1.** The exception does not apply to areas that are likely to be used by members of the public who are not employees of the court such as jury areas, attorney areas, or witness stands.		N/A	NA	Advisory does not establish enforceable requirements.	n/a
233	**206.2.5 Restaurants and Cafeterias.** In restaurants and cafeterias, an accessible route shall be provided to all dining areas, including raised or sunken dining areas, and outdoor dining areas.		**1104B.5.1** **General**. Dining, banquet, and bar facilities shall be made accessible to persons with disabilities as provided in this section. All areas where each type of functional activity occurs shall be made accessible.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and ADA Stds. are essentially equivalent, with slightly different wording.	2010 CBC need not be amended.
234	**206.2.5 Restaurants and Cafeterias.** In restaurants and cafeterias, an *accessible* route shall be provided to all dining areas, including raised or sunken dining areas, and outdoor dining areas.		**1104B.5.1.3** **Raised or sunken areas**. All raised or sunken areas, including dining areas, loggias and outdoor seating areas, shall be accessible. A raised platform where a head table or speaker's lectern is located shall be accessible. ...	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and ADA Stds. are essentially equivalent, with slightly different wording.	2010 CBC need not be amended.
235	**206.2.5 Restaurants and Cafeterias.** In restaurants and cafeterias, an *accessible* route shall be provided to all dining areas, including raised or sunken dining areas, and outdoor dining areas.		N/A	NA	n/a	n/a
236	**206.2.5 Restaurants and Cafeterias. EXCEPTIONS: 1.** In *buildings* or *facilities* not required to provide an *accessible* route between *stories,* an *accessible* route shall not be required to a *mezzanine* dining area where the *mezzanine* contains less than 25 percent of the total combined area for seating and dining and where the same decor and services are provided in the *accessible* area.		N/A	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC does not have a specific exception for mezzanine dining areas where an accessible route is not required between stories.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
237	**206.2.5 Restaurants and Cafeterias. EXCEPTIONS: 2.** In *alterations*, an *accessible* route shall not be required to existing raised or sunken dining areas, or to all parts of existing outdoor dining areas where the same services and decor are provided in an *accessible space* usable by the public and not restricted to use by people with disabilities.		**1120B.1.2** In existing dining, banquet and bar facilities, when the enforcing agency determines that compliance with this section would create an unreasonable hardship, an exception shall be granted, provided that a minimum of 75 percent of the dining, banquet and bar area shall be a common level throughout or shall be connected by pedestrian ramps, passenger elevators or special lifts and provided that the same services and décor are provided in an accessible space usable by the general public and are not restricted to use by people with disabilities.	Which Std.provides greater access **depends** on circumstances.	2010 CBC exception applies only upon determination of unreasonable hardship. Although parts of the 2010 CBC exception share similar language with the ADA Stds., the CBC places more restrictions on the basic physical characteristics of the exception. However, the ADA Stds. requires that the same services and decor be provided in the accessible space, and 2010 CBC does not address this.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.

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238	**206.2.5 Restaurants and Cafeterias.EXCEPTIONS: 3.** In sports *facilities*, tiered dining areas providing seating required to comply with 221 shall be required to have *accessible* routes serving at least 25 percent of the dining area provided that *accessible* routes serve seating complying with 221 and each tier is provided with the same services.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not separately address tiered dining areas in sports facilities.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
239	**Advisory 206.2.5 Restaurants and Cafeterias Exception 2.** Examples of “same services” include, but are not limited to, bar service, rooms having smoking and non-smoking sections, lotto and other table games, carry-out, and buffet service. Examples of “same decor” include, but are not limited to, seating at or near windows and railings with views, areas designed with a certain theme, party and banquet rooms, and rooms where entertainment is provided.		N/A	NA	Advisory does not establish enforceable requirements.	n/a
240	**206.2.6 Performance Areas.** Where a *circulation path* directly connects a performance area to an *assembly* seating *area,* an *accessible* route shall directly connect the *assembly* seating *area* with the performance area. An *accessible* route shall be provided from performance areas to ancillary areas or *facilities* used by performers unless exempted by 206.2.3 Exceptions 1 through 7.		**1104B.3.11** **Access to performing areas**. An accessible route shall connect wheelchair seating locations with performing areas, including stages, arena floors, dressing rooms, locker rooms and other spaces used by performers.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is essentially equivalent to ADA Stds. with somewhat different wording. 2010 CBC lists examples of spaces used by performers but also inlcudes "other spaces" used by performers. ADA Stds. just states ancillary areas used by performers.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
241	**206.2.6 Performance Areas.** Where a *circulation path* directly connects a performance area to an *assembly* seating *area,* an *accessible* route shall directly connect the *assembly* seating *area* with the performance area. An *accessible* route shall be provided from performance areas to ancillary areas or *facilities* used by performers unless exempted by 206.2.3 Exceptions 1 through 7.		**1104B.3.12, Exc.1** When the enforcing agency finds that requiring compliance with this code, for an enclosed or unenclosed platform or depressed area not more than 24 inches (610 mm) above or below an adjacent accessible level, would create an unreasonable hardship, the enclosed and unenclosed platform or depressed area shall be made accessible by a portable ramp with a slope not exceeding 1 unit vertical in 12 units horizontal (8.33 percent slope).	Which Std.provides greater access **depends** on circumstances.	2010 CBC exception applies only upon determination of unreasonable hardship, and the exception is different from the multistory exceptions in the ADA Stds.	1. 2010 CBC need not be amended. or 2. 2010 CBC should be amended to be consistent with ADA Stds. or 3. 2010 CBC should be amended to be consistent with ADA Stds. but retain the CBC exceptions.
241.1	**206.2.6 Performance Areas.** Where a *circulation path* directly connects a performance area to an *assembly* seating *area,* an *accessible* route shall directly connect the *assembly* seating *area* with the performance area. An *accessible* route shall be provided from performance areas to ancillary areas or *facilities* used by performers unless exempted by 206.2.3 Exceptions 1 through 7.		**1104B.3.12, Exc..2** In existing buildings and facilities, all stages, enclosed or unenclosed platforms, and orchestra pits need not be accessible when the enforcing agency determines that compliance with this code would create an unreasonable hardship.	Which Std.provides greater access **depends** on circumstances.	2010 CBC exception applies only upon determination of unreasonable hardship, and the exception is different from the multistory exceptions in the ADA Stds.	1. 2010 CBC need not be amended. or 2. 2010 CBC should be amended to be consistent with ADA Stds. or 3. 2010 CBC should be amended to be consistent with ADA Stds. but retain the CBC exceptions.
242	**206.2.7 Press Boxes.** Press boxes in *assembly areas* shall be on an *accessible* route.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not specifically address press boxes.	2010 CBC should be amended to be consistent with ADA Stds. requirements for press boxes.
243	**EXCEPTIONS: 1.** An *accessible* route shall not be required to press boxes in bleachers that have points of entry at only one level provided that the aggregate area of all press boxes is 500 square feet (46 m2) maximum. **2.** An *accessible* route shall not be required to free-standing press boxes that are elevated above grade 12 feet (3660 mm) minimum provided that the aggregate area of all press boxes is 500 square feet (46 m2) maximum.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not specifically address press boxes.	2010 CBC should be amended to be consistent with ADA Stds. requirements for press boxes.

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244	**Advisory 206.2.7 Press Boxes Exception 2.** Where a facility contains multiple assembly areas, the aggregate area of the press boxes in each assembly area is to be calculated separately. For example, if a university has a soccer stadium with three press boxes elevated 12 feet (3660 mm) or more above grade and each press box is 150 square feet (14 m2), then the aggregate area of the soccer stadium press boxes is less than 500 square feet (46 m2) and Exception 2 applies to the soccer stadium. If that same university also has a football stadium with two press boxes elevated 12 feet (3660 mm) or more above grade and one press box is 250 square feet (23 m2), and the second is 275 square feet (26 m2), then the aggregate area of the football stadium press boxes is more than 500 square feet (46 m2) and Exception 2 does not apply to the football stadium.		N/A	NA	The ADA Advisory does not establish enforceable requirements	n/a
245	**206.2.8 Employee Work Areas.** *Common use circulation paths* within *employee work areas* shall comply with 402.		**1123B.2** **Work stations**. Specific work stations need only comply with aisle width (Sections 1133B.6.1 and 1133B.6.2) and floors and levels (Section 1120B), and entryways shall be 32 inches (813 mm) in clear width.	2010 CBC provides **less access** than 2010 ADA.	2010 CBC addresses accessible route elements of aisle width and floor levels being on a coomon level or connected with ramps, elevators or lifts; and width of entryways. ADA Stds. addresses accessible route elements covered in 402 and all components covered in Chapter 4. By referencing all compnents of Chapter 4, ADA Stds. would seem to more comprehensively address accessible routes to employee work areas.	2010 CBC should be amended to be consistent with ADA Stds.
246	**EXCEPTIONS: 1.** *Common use circulation paths* located within *employee work areas* that are less than 1000 square feet (93 m2) and defined by permanently installed partitions, counters, casework, or furnishings shall not be required to comply with 402. **2.** *Common use circulation paths* located within *employee work areas* that are an integral component of *work area equipment* shall not be required to comply with 402. **3.** *Common use circulation paths* located within exterior *employee work areas* that are fully exposed to the weather shall not be required to comply with 402.		**1103B.1, Exc.1** Floors or portions of floors not customarily occupied, including,...equipment catwalks, ...	Which Std.provides greater access **depends** on circumstances.	2010 CBC does not address most of the ADA Stds. exception, except that 2010 CBC does not require an accessible route to equipment catwalks. On this point ADA Stds. describes this perhaps more comprehensively as circulation paths that are integral to the equipment.	1. 2010 CBC need not be amended. or 2. 2010 CBC should only adopt the ADA Stds. exception language pertaining to circulation paths integral to equipment. or 3. 2010 CBC should be amended to adopt the entire exception.
246.1	**EXCEPTIONS: 1.** *Common use circulation paths* located within *employee work areas* that are less than 1000 square feet (93 m2) and defined by permanently installed partitions, counters, casework, or furnishings shall not be required to comply with 402. **2.** *Common use circulation paths* located within *employee work areas* that are an integral component of *work area equipment* shall not be required to comply with 402. **3.** *Common use circulation paths* located within exterior *employee work areas* that are fully exposed to the weather shall not be required to comply with 402.		**1123B.2, Exc.** Accessibility is not required to ... equipment catwalks.	Which Std.provides greater access **depends** on circumstances.	2010 CBC does not address most of the ADA Stds. exception, except that 2010 CBC does not require an accessible route to equipment catwalks. On this point ADA Stds. describes this perhaps more comprehensively as circulation paths that are integral to the equipment.	1. 2010 CBC need not be amended. or 2. 2010 CBC should only adopt the ADA Stds. exception language pertaining to circulation paths integral to equipment. or 3. 2010 CBC should be amended to adopt the entire exception.
247	**Advisory 206.2.8 Employee Work Areas. Exception 1.** Modular furniture that is not permanently installed is not directly subject to these requirements. The Department of Justice ADA regulations provide additional guidance regarding the relationship between these requirements and elements that are not part of the built environment. Additionally, the Equal Employment Opportunity Commission (EEOC) implements title I of the ADA which requires non-discrimination in the workplace. EEOC can provide guidance regarding employers' obligations to provide reasonable accommodations for employees with disabilities.		N/A	NA	The ADA Advisory does not establish enforceable requirements	n/a
248	**Advisory 206.2.8 Employee Work Areas. Exception 2.** Large pieces of equipment, such as electric turbines or water pumping apparatus, may have stairs and elevated walkways used for overseeing or monitoring purposes which are physically part of the turbine or pump. However, passenger elevators used for vertical transportation between stories are not considered "work area equipment" as defined in Section 106.5.		N/A	NA	The ADA Advisory does not establish enforceable requirements	n/a

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
249	**206.2.9 Amusement Rides.** *Amusement rides* required to comply with 234 shall provide *accessible* routes in accordance with 206.2.9. *Accessible* routes serving *amusement rides* shall comply with Chapter 4 except as modified by 1002.2.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not specifically address amusement rides	2010 CBC should be amended to adopt ADA Stds. requirements for amusement rides.
250	**206.2.9.1 Load and Unload Areas.** Load and unload areas shall be on an *accessible* route. Where load and unload areas have more than one loading or unloading position, at least one loading and unloading position shall be on an *accessible* route.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not specifically address amusement rides	2010 CBC should be amended to adopt ADA Stds. requirements for amusement rides.
251	**206.2.9.2 Wheelchair Spaces, Ride Seats Designed for Transfer, and Transfer Devices.** When *amusement rides* are in the load and unload position, *wheelchair spaces* complying with 1002.4, *amusement ride seats* designed for transfer complying with 1002.5, and *transfer devices* complying with 1002.6 shall be on an *accessible* route.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not specifically address amusement rides	2010 CBC should be amended to adopt ADA Stds. requirements for amusement rides.
252	**206.2.10 Recreational Boating Facilities.** *Boat slips* required to comply with 235.2 and *boarding piers* at boat launch ramps required to comply with 235.3 shall be on an *accessible* route. Accessible routes serving recreational boating *facilities* shall comply with Chapter 4, except as modified by 1003.2.		**1132B.2.4** **Boat docks**. Boat docks, ... shall be accessible.	Which Std.provides greater access **depends** on circumstances.	Although both CBC and ADA require boat docks to be accessible, the ADA Stds. are more complete in their description and referencing.	2010 CBC should be amended to be consistent with ADA Stds.
253	**206.2.11 Bowling Lanes.** Where bowling lanes are provided, at least 5 percent, but no fewer than one of each type of bowling lane, shall be on an *accessible* route.		**1104B.4.3.3** ... bowling lanes.	Which Std.provides greater access **depends** on circumstances.	2010 CBC simply states that bowling lanes shall be accessible. ADA Stds. are specific as to the minimum quantity of lanes to be on an accessible route.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
254	**206.2.12 Court Sports.** In court sports, at least one *accessible* route shall directly connect both sides of the court.		**1104B.4.3.1** Tennis, racquetball and handball courts.	Which Std.provides greater access **depends** on circumstances.	2010 CBC simply states that tennis, racquetball and handball courts and similar activity areas shall be accessible. ADA Stds. are specific that at least one accessible route connect both sides of the court, and covers all court sports.	2010 CBC should be amended to be consistent with ADA Stds.
254.1	**206.2.12 Court Sports.** In court sports, at least one *accessible* route shall directly connect both sides of the court.		**1104B.4.3.3** Basketball, volleyball and badminton courts, ...	Which Std.provides greater access **depends** on circumstances.	2010 CBC simply states that basketball, volleyball and badminton courts and similar activity areas shall be accessible. ADA Stds. are specific that at least one accessible route connect both sides of the court, and covers all court sports.	2010 CBC should be amended to be consistent with ADA Stds.
255	**206.2.13 Exercise Machines and Equipment.** Exercise machines and equipment required to comply with 236 shall be on an *accessible* route.		**1104B.4.3.2** ... general exercise rooms.	Which Std.provides greater access **depends** on circumstances.	2010 CBC simply states that a participation area such as an excercis room shall be accessible, but does not specifically address exercise equipment to be on an accessible route with clear floor space to transfer onto the equipment.	2010 CBC should be amended to be consistent with ADA Stds.
256	**206.2.14 Fishing Piers and Platforms.** Fishing piers and platforms shall be on an *accessible* route. *Accessible* routes serving fishing piers and platforms shall comply with Chapter 4 except as modified by 1005.1.		**1132B.2.4** **...** fishing piers, ..., shall be accessible.	Which Std.provides greater access **depends** on circumstances.	Although both CBC and ADA require boat docks to be accessible, the ADA Stds. are more complete in their description and referencing.	2010 CBC should be amended to be consistent with ADA Stds., and be under its own heading rather than addressed under boat docks.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
257	**206.2.15 Golf Facilities.** At least one *accessible* route shall connect *accessible elements* and *spaces* within the boundary of the golf course. In addition, *accessible* routes serving golf car rental areas; bag drop areas; course weather shelters complying with 238.2.3; course toilet rooms; and practice putting greens, practice *teeing grounds*, and teeing stations at driving ranges complying with 238.3 shall comply with Chapter 4 except as modified by 1006.2.		**SECTION 202, DEFINITIONS, PUBLIC ACCOMMODATION [DSA-AC], 11** A ..., golf course	2010 CBC provides **less access** than 2010 ADA.	2010 merely defines a golf course as a public accommodation, but does not address specific requirements.	2010 CBC should be amended to be consistent with ADA Stds.
258	**EXCEPTION:** *Golf car passages* complying with 1006.3 shall be permitted to be used for all or part of *accessible* routes required by 206.2.15.		**SECTION 202, DEFINITIONS, PUBLIC ACCOMMODATION [DSA-AC], 11** A..., golf course …	2010 CBC provides **less access** than 2010 ADA.	2010 merely defines a golf course as a public accommodation, but does not address specific requirements.	2010 CBC should be amended to be consistent with ADA Stds.
259	**206.2.16 Miniature Golf Facilities.** Holes required to comply with 239.2, including the start of play, shall be on an *accessible* route. *Accessible* routes serving miniature golf *facilities* shall comply with Chapter 4 except as modified by 1007.2.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not have any requirements specific to miniature golf courses.	2010 CBC should be amended to be consistent with ADA Stds.
260	**206.2.17 Play Areas.** *Play areas* shall provide *accessible* routes in accordance with 206.2.17. *Accessible* routes serving *play areas* shall comply with Chapter 4 except as modified by 1008.2.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not specifically address play areas.	2010 CBC should be amended to be consistent with ADA Stds.
261	**206.2.17.1 Ground Level and Elevated Play Components.** At least one *accessible* route shall be provided within the *play area*. The *accessible* route shall connect *ground level play components* required to comply with 240.2.1 and *elevated play components* required to comply with 240.2.2, including entry and exit points of the *play components*.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not specifically address play areas.	2010 CBC should be amended to be consistent with ADA Stds.
262	**206.2.17.2 Soft Contained Play Structures.** Where three or fewer entry points are provided for *soft contained play structures*, at least one entry point shall be on an *accessible* route. Where four or more entry points are provided for *soft contained play structures*, at least two entry points shall be on an *accessible* route.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not specifically address play areas.	2010 CBC should be amended to be consistent with ADA Stds.

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263	**206.3 Location.** *Accessible* routes shall coincide with or be located in the same area as general *circulation paths*. Where *circulation paths* are interior, required *accessible* routes shall also be interior.	***ETA Editor's Note*** The Department of Transportation in Appendix F of 36 CFR Part 1191 has modified 206.3 as follows: **206.3 Location.** Accessible routes shall coincide with, or be located in the same area as general circulation paths. Where circulation paths are interior, required accessible routes shall also be interior. Elements such as ramps, elevators, or other circulation devices, fare vending or other ticketing areas, and fare collection areas shall be placed to minimize the distance which wheelchair users and other persons who cannot negotiate steps may have to travel compared to the general public.	**1114B.1.2** **Accessible route of travel**. ... The accessible route shall, to the maximum extent feasible, coincide with the route for the general public. ...	2010 CBC provides **less access** than 2010 ADA.	2010 CBC and ADA Stds. both require the accessible route to coincide with the general circulation path, but ADA Stds. go further to require that where circulation paths are interior, required accessible routes shall also be interior.	2010 CBC should be amended to be consistent with ADA Stds.
263.1	**206.3 Location.** *Accessible* routes shall coincide with or be located in the same area as general *circulation paths*. Where *circulation paths* are interior, required *accessible* routes shall also be interior.		**1121B.3.1.1** ... The circulation paths, each including an accessible entrance and an accessible route, for persons with disabilities shall, to the maximum extent practicable, coincide with the circulation path for the general public. …	2010 CBC provides **less access** than 2010 ADA.	2010 CBC and ADA Stds. both require the accessible route to coincide with the general circulation path, but ADA Stds. go further to require that where circulation paths are interior, required accessible routes shall also be interior.	2010 CBC should be amended to be consistent with ADA Stds.
263.2	**206.3 Location.** *Accessible* routes shall coincide with or be located in the same area as general *circulation paths*. Where *circulation paths* are interior, required *accessible* routes shall also be interior.		**1121B.4.1.2** The circulation paths, each including an accessible entrance and an accessible route, for persons with disabilities shall, to the maximum extent practicable, coincide with the circulation path for the general public. …	2010 CBC provides **less access** than 2010 ADA.	2010 CBC and ADA Stds. both require the accessible route to coincide with the general circulation path, but ADA Stds. go further to require that where circulation paths are interior, required accessible routes shall also be interior.	2010 CBC should be amended to be consistent with ADA Stds.
263.3	**206.3 Location.** Accessible routes shall coincide with or be located in the same areas as general circulation paths. Where circulation paths are interior, required accessible routes shall also be interior.		**1133B.1.1.1.1** .... 2. Exits in excess of those required by Chapter 10, and which are more than 24 inches (610 mm) above grade are not required to be accessible. Such doors shall have signs warning that they are not accessible. Warning signs shall comply with Section 1117B.5.1 Item 2		What is actually needed here, is a sign directing people to the nearest accessible exit. If the exit is not accessible because of steps or a stair, the "Exit Stair Down" sign is adequate information that the exit is not accessible. If there is another reason, then the sign should just say "Exit," but a directional sign placed at the decision point will aid the person in finding an accessible exit.	Expand the code item to give a better purpose and description of the content of the sign. A "warning" sign is not enough instruction. Also, the portion of this standard for exits should really be included with the scoping for means of egress signs, in Chapter 2, Section 216.
264	**Advisory 206.3 Location.** The accessible route must be in the same area as the general circulation path. This means that circulation paths, such as vehicular ways designed for pedestrian traffic, walks, and unpaved paths that are designed to be routinely used by pedestrians must be accessible or have an accessible route nearby. Additionally, accessible vertical interior circulation must be in the same area as stairs and escalators, not isolated in the back of the facility.		N/A	NA	Advisory does not establish enforceable requirements.	n/a

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265	**206.4 Entrances.** *Entrances* shall be provided in accordance with 206.4. *Entrance* doors, doorways, and gates shall comply with 404 and shall be on an *accessible* route complying with 402.		**1114B.1.3** **Primary entry access**. All entrances ... shall be accessible in compliance with Section 1133B.1.1.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and ADA Stds. are equivalent, but reference the requirements differently.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
265.1	**206.4 Entrances.** *Entrances* shall be provided in accordance with 206.4. *Entrance* doors, doorways, and gates shall comply with 404 and shall be on an *accessible* route complying with 402.		**1133B.1.1.1.1** All entrances ... to buildings and facilities shall be made accessible to persons with disabilities. Such entrances shall be connected by an accessible route (complying with Section 1114B.1.2)... Entrances shall be connected by an accessible route...	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and ADA Stds. are equivalent, but reference the requirements differently.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
266	**206.4 Entrances.** *Entrances* shall be provided in accordance with 206.4. *Entrance* doors, doorways, and gates shall comply with 404 and shall be on an *accessible route* complying with 402. …		N/A	NA	n/a	n/a
267	**206.4.1 Public Entrances.** In addition to *entrances* required by 206.4.2 through 206.4.9, at least 60 percent of all *public entrances* shall comply with 404.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does have provsions to only require 60 percent of entrances to be accessible, in addition to the entrances in ADA Stds. 206.4.2 through 206.4.9,	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
268	**EXCEPTIONS: 1.** Where an *alteration* includes *alterations* to an *entrance*, and the *building* or f*acility* has another *entrance* complying with 404 that is on an *accessible* route, the *altered entrance* shall not be required to comply with 206.4 unless required by 202.4. **...**		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not have an exception that is similar to the ADA Stds. exception.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
269	**EXCEPTIONS: ...** **2.** Where exceptions for alterations to *qualified historic buildings* or *facilities* are permitted by 202.5, no more than one *public entrance* shall be required to comply with 206.4. Where no *public entrance* can comply with 206.4 under criteria established in 202.5 Exception, then either an unlocked *entrance* not used by the public shall comply with 206.4; or a locked *entrance* complying with 206.4 with a notification system or remote monitoring shall be provided.		**CHBC 8-603.2** **Entry**. These alternatives do not allow exceptions for the requirement of level landings in front of doors, except as provided in Section 8-603.4. ... **2**. Access at any entrance not used by general public but open and unlocked with directional signs at the primary entrance and as close as possible to, but no further than 200 feet (60 960 mm) from, the primary entrance. **3**. The accessible entrance shall have a notification system. Where security is a problem, remote monitoring may be used.	Which Std.provides greater access **depends** on circumstances.	ADA Stds. more clearly states the exception for qualified historic buildings than does 2010 CBC. 2010 CBC provides dimensional limits for the distance the alternate entrance can be from the public entrance.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
270	**206.4.2 Parking Structure Entrances.** Where direct access is provided for pedestrians from a parking structure to a *building* or *facility entrance*, each direct access to the *building* or *facility entrance* shall comply with 404.		**1130B.2** When direct access is provided for pedestrians from a parking garage to a building, each direct entrance from the garage to the building must be accessible.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and ADA Stds. are equivalent in intent, but are stated slightly differently.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
271	**206.4.2 Parking Structure Entrances.** Where direct access is provided for pedestrians from a parking structure to a *building* or *facility entrance*, each direct access to the *building* or *facility entrance* shall comply with 404.		N/A	NA	n/a	n/a
272	**206.4.3 Entrances from Tunnels or Elevated Walkways.** Where direct access is provided for pedestrians from a pedestrian tunnel or elevated walkway to a *building* or *facility*, at least one direct *entrance* to the *building* or *facility* from each tunnel or walkway shall comply with 404.		**1127B.1** **General**. ... If access is provided for pedestrians from a pedestrian tunnel or elevated walkway, entrances to the building from each tunnel or walkway must be accessible.	Which Std.provides greater access **depends** on circumstances.	2010 CBC infers that all entrances from each tunnel or walkway must be accessible, and ADA Stds. is explicit that at least one direct entrance shall be accessible.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.

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273	**206.4.3 Entrances from Tunnels or Elevated Walkways.** Where direct access is provided for pedestrians from a pedestrian tunnel or elevated walkway to a *building* or *facility*, at least one direct *entrance* to the *building* or *facility* from each tunnel or walkway shall comply with 404.		N/A	NA	n/a	n/a
274	**206.4.4 Transportation Facilities.** In addition to the requirements of 206.4.2, 206.4.3, and 206.4.5 through 206.4.9, transportation *facilities* shall provide *entrances* in accordance with 206.4.4.		**1121B.1 General.** Every station, bus stop, bus stop pad, terminal, building or other transportation facility shall incorporate the accessibility requirements of this code as modified by this chapter. ... In such a facility, any area housing passenger services, including boarding and debarking, loading and unloading, baggage claim, dining facilities, and other common areas open to the public must be on an accessible route from an accessible entrance.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC in this section addresses more than just entrances, but does require entrances to be accessible.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
275	**206.4.4.1 Location.** In transportation *facilities*, where different *entrances* serve different transportation fixed routes or groups of fixed routes, at least one *public entrance* serving each fixed route or group of fixed routes shall comply with 404.		**1121B.3.1.2** If different entrances to a station serve different transportation fixed routes or groups of fixed routes, entrances serving each group or route shall comply with Section 1133B.1.	2010 CBC is **equivalent** to 2010 ADA.	It is inferred from 2010 CBC that the entrances are or include public entrances. ADA Stds. is specific that at least one public entrance be accessible.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
276	**206.4.4.1 Location.** In transportation *facilities*, where different *entrances* serve different transportation fixed routes or groups of fixed routes, at least one *public entrance* serving each fixed route or group of fixed routes shall comply with 404.		N/A	NA	n/a	n/a
277	**EXCEPTION:** *Entrances* to *key stations* and existing intercity rail stations retrofitted in accordance with 49 CFR 37.49 or 49 CFR 37.51 shall not be required to comply with 206.4.4.1.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not have a comparable exception. 2010 CBC does not specifically or separately address stations that are required to be altered by US DOT rule.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
278	**EXCEPTION:** *Entrances* to *key stations* and existing intercity rail stations retrofitted in accordance with 49 CFR 37.49 or 49 CFR 37.51 shall not be required to comply with 206.4.4.1.		N/A	NA	n/a	n/a
279	**EXCEPTION:** *Entrances* to *key stations* and existing intercity rail stations retrofitted in accordance with 49 CFR 37.49 or 49 CFR 37.51 shall not be required to comply with 206.4.4.1.		N/A	NA	n/a	n/a
280	**EXCEPTION:** *Entrances* to *key stations* and existing intercity rail stations retrofitted in accordance with 49 CFR 37.49 or 49 CFR 37.51 shall not be required to comply with 206.4.4.1.		N/A	NA	n/a	n/a
281	**206.4.4.2 Direct Connections.** Direct connections to other *facilities* shall provide an *accessible* route complying with 404 from the point of connection to boarding platforms and all transportation system *elements* required to be *accessible*. Any *elements* provided to facilitate future direct connections shall be on an accessible route connecting boarding platforms and all transportation system *elements* required to be *accessible*.		**1121B.3.1.3.** Direct connections to commercial, retail or residential facilities shall have an accessible route complying with Section 1114B.1.2 from the point of connection to boarding platforms and all transportation system elements used by the public. Any elements provided to facilitate future direct connections shall be on an accessible route connecting boarding platforms and all transportation system elements used by the public.	2010 CBC is **equivalent** to 2010 ADA.	Although 2010 CBC and ADA Stds. are essentially equivalent, the ADA STds. terms regarding "other facilities" and "required to be accessible" are perhaps more encompassing than the 2010 CBC terminology.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
282	**EXCEPTION:** In *key stations* and existing intercity rail stations, existing direct connections shall not be required to comply with 404.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not have a comparable exception.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
283	**206.4.4.3 Key Stations and Intercity Rail Stations.** *Key stations* and existing intercity rail stations required by Subpart C of 49 CFR part 37 to be *altered*, shall have at least one *entrance* complying with 404.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not specifically or separately address stations that are required to be altered by US DOT rule.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.

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284	**206.4.5 Tenant Spaces.** At least one *accessible entrance* to each tenancy in a *facility* shall comply with 404.		N/A	Which Std.provides greater access **depends** on circumstances.	2010 CBC does not have a comparable specific and separate provision for tenant spaces.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
285			N/A	NA	n/a	n/a
286	**EXCEPTION:** *Self-service storage facilities* not required to comply with 225.3 shall not be required to be on an *accessible* route.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not have a comparable specific and separate provision for self-storage facilities.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
287	**206.4.6 Residential Dwelling Unit Primary Entrance.** In *residential dwelling units* , at least one primary *entrance* shall comply with 404. The primary *entrance* to a r*esidential dwelling unit* shall not be to a bedroom.		**1117A.2** **Primary entrances and exterior exit doors**. All primary entrances and exterior ground floor exit doors to buildings and facilities on accessible routes shall be accessible to persons with disabilities.	Which Std.provides greater access **depends** on circumstances.	2010 CBC does not single out primary entrance doors, nor does it require at least one promary entrance to dwelling units to comply with accessible door requirements. 2010 CBC also does not specifcally prohibit the primary entrance to be to a bedroom.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
288	**206.4.7 Restricted Entrances.** Where *restricted entrances* are provided to a *building* or *facility* , at least one *restricted entrance* to the *building* or *facility* shall comply with 404.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not separately address restricted entrances.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
289	**206.4.8 Service Entrances.** If a *service entrance* is the only *entrance* to a *building* or to a tenancy in a *facility* , that *entrance* shall comply with 404.		**1133B.1.1.1.5** **Service Entrances**. In existing buildings and facilities, a service entrance shall not be the sole accessible entrance unless it is the only entrance to a building or facility (for example, in a factory or garage).	Which Std.provides greater access **depends** on circumstances.	2010 CBC addresses accessible service entrances as the sole entrance from a different perspective than ADA Stds. CBC 1133B.1.1.1.5 does not itself require that the service entrance as the sole entrance be accessible, but one has to infer that it is required to be accessible.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
290	**206.4.8 Service Entrances.** If a *service entrance* is the only *entrance* to a *building* or to a tenancy in a *facility,* that *entrance* shall comply with 404.		N/A	NA	n/a	n/a
291	**206.4.9 Entrances for Inmates or Detainees.** Where *entrances* used only by inmates or detainees and security personnel are provided at judicial *facilities* , detention *facilities* , or correctional *facilities* , at least one such *entrance* shall comply with 404.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not seprately address entrances used only by inmates or detainees and security personnel.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
292	**206.5 Doors, Doorways, and Gates.** Doors, doorways, and gates providing user passage shall be provided in accordance with 206.5.		**1133B.1.1.1.4** **Gates**. All gates, including ticket gates, shall meet all applicable specifications for doors.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC addresses scoping for gates in a separate section from doors.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
292.1	**206.5 Doors, Doorways, and Gates.** Doors, doorways, and gates providing user passage shall be provided in accordance with 206.5.		**1133B.2** **Doors.**	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC just provides a heading above the specific requirements for doors.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
293	**206.5.1 Entrances.** Each *entrance* to a *building* or *facility* required to comply with 206.4 shall have at least one door, doorway, or gate complying with 404.		**SECTION 1102B** **DEFINITIONS** **ENTRANCE** ... An entrance includes ... the entry door(s) or gate(s), and the hardware of the entry door(s) or gate(s).	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC language is not a declatory as ADA Stds. that entrances shall have at least one door, doorway, or gate that is accessible.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.

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294	**206.5.2 Rooms and Spaces.** Within a *building* or *facility*, at least one door, doorway, or gate serving each room or space complying with these requirements shall comply with 404.		N/A	Which Std.provides greater access **depends** on circumstances.	2010 CBC does not explicitly address requiring doors, etc. "serving a room or space" to meet the requirements for doors, nor does it specifcally allow "at least one" door to meet the requirements.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
295	**206.5.3 Transient Lodging Facilities.** In *transient lodging facilities*, *entrances*, doors, and doorways providing user passage into and within guest rooms that are not required to provide mobility features complying with 806.2 shall comply with 404.2.3.		**1111B.4** **Hotels, motels, inns, dormitories, resorts, homeless shelters, halfway houses, transient group homes and similar places of transient lodging**. Hotels, motels, inns, dormitories, resorts, homeless shelters, halfway houses, transient group homes and similar places of transient lodging shall provide access for persons with disabilities in accordance with the provisions of the accessibility requirements of this California Building Code, except as herein provided.	Which Std.provides greater access **depends** on circumstances.		1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
296	**206.5.3 Transient Lodging Facilities.** In *transient lodging facilities*, *entrances*, doors, and doorways providing user passage into and within guest rooms that are not required to provide mobility features complying with 806.2 shall comply with 404.2.3.		***1111B.4.2.3 Doors.*** ***1111B.4.2.3.1 Doors into and within covered rooms and suites.*** *Doors and doorways designed to allow passage into and within all sleeping rooms, suites or other covered units shall comply with Section 1133B.2.* ***1111B.4.2.3.2 Doors into and within all other rooms and suites****. Doors and doorways designed to allow passage into and within all other sleeping rooms and suites shall comply with Section 1133B.2.2.* ***1111B.4.6 Bathrooms in hotels, motels, inns, dormitories, resorts, homeless shelters, halfway houses, transient group homes and similar places of transient lodgin****g. Required accessible bathrooms for places of transient lodging shall comply with the following provisions:* ***...*** *Hotel and motel bathrooms beyond those specified in Section 1111B.4 shall provide the following features:* *All bathroom fixtures shall be in a location that allows a person using a wheelchair measuring 30 inches by 48 inches (762 mm by 1219 mm) to touch the wheelchair to any lavatory, urinal, water closet, tub, sauna, shower stall and any other similar sanitary installation, if provided.* *All bathroom entrance doors shall have a clear opening width of 32 inches (813 mm) and shall be either sliding doors or shall be hung to swing in the direction of egress from the bathroom.*	2010 CBC provides **greater access** than 2010 ADA.	The CBC requirements provide a 36" wide door and a route to get to a point where a 30" by 48" wide wheelchair can touch the wheelchair to any lavatory, urinal, water closet, tub, sauna, shower stall and any other similar sanitary installation, if provided. Also, under the CBC, all bathroom entrance doors must be sliding doors or hung to swing in the direction of egress from the bathroom.	No change required to CBC.
297	**EXCEPTION:** Shower and sauna doors in guest rooms that are not required to provide mobility features complying with 806.2 shall not be required to comply with 404.2.3.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not have an equivalent exception.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.

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298	**206.5.4 Residential Dwelling Units.** In *residential dwelling units* required to provide mobility features complying with 809.2 through 809.4, all doors and doorways providing user passage shall comply with 404.		**1132A.2** **Interior doors and secondary exterior doors**. Except as allowed by Section 1109A.2, doors intended for user passage and secondary exterior doors shall comply with this section. The provisions of this section shall apply to the dwelling unit side of doors leading from the interior of the dwelling unit to an unfinished basement or an attached garage.	Which Std.provides greater access **depends** on circumstances.	ADA Stds. limits the application to units required to provide mobility features, and simply inlcudes all doors and doorways providing user passage. 2010 CBC 1132A.2 implies that it is applicable to covered dwelling units and awkwardly describes its application to which doors.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
299	**206.6 Elevators.** Elevators provided for passengers shall comply with 407. Where multiple elevators are provided, each elevator shall comply with 407.		**1116B.1** **Elevators**. Passenger elevators shall be accessible. Elevators required to be accessible shall be designed and constructed to comply with this section …	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and ADA Stds. are equivalent.	2010 CBC need not be amended.
299.1	**206.6 Elevators.** ... Where multiple elevators are provided, each elevator shall comply with 407.		**1103B.1** **Scope.** ... ... If more than one elevator is provided, each passenger elevator shall comply with Section 1116B.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and ADA Stds. are equivalent.	2010 CBC need not be amended.
299.2	**206.6 Elevators.** ... Where multiple elevators are provided, each elevator shall comply with 407.		**1114B.1.2, Exc.** ... Where more than one elevator is provided, all elevators shall be accessible. …	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and ADA Stds. are equivalent.	2010 CBC need not be amended.
300	**EXCEPTIONS: 1.** In a *building* or *facility* permitted to use the exceptions to 206.2.3 or permitted by 206.7 to use a platform lift, elevators complying with 408 shall be permitted. **2.** Elevators complying with 408 or 409 shall be permitted in multi-story *residential dwelling units*.		**1124A.1, Exc.** Private elevators serving only one dwelling unit.	Which Std.provides greater access **depends** on circumstances.	2010 CBC does not address the use of LULA elevators, except that private elevators serving one dwelling unit are excepted from general elevator accessibilty requirements.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
301	**206.6.1 Existing Elevators.** Where *elements* of existing elevators are *altered*, the same *element* shall also be *altered* in all elevators that are programmed to respond to the same hall call control as the *altered* elevator and shall comply with the requirements of 407 for the *altered element*.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not address this requirement.	2010 CBC should be amended to be consistent with ADA Stds.
302	**206.7 Platform Lifts.** Platform lifts shall comply with 410. Platform lifts shall be permitted as a component of an *accessible* route in new construction in accordance with 206.7. …		**1116B.2** **Platform (wheelchair) lifts**. Platform (wheelchair) lifts shall comply with this section. Platform (wheelchair) lifts may be provided as part of an accessible route only for the following conditions:	2010 CBC is **equivalent** to 2010 ADA.	This 2010 CBC scoping preface is equivalent to ADA Stds., but worded slightly differently.	2010 CBC need not be amended.
303	**206.7 Platform Lifts.** Platform lifts shall comply with 410. ... Platform lifts shall be permitted as a component of an *accessible* route in an existing *building* or *facility*.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not specifically permit or not permit platform lifts as a component of an accessible route in an existing building.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
304	**206.7.1 Performance Areas and Speakers' Platforms.** Platform lifts shall be permitted to provide *accessible* routes to performance areas and speakers' platforms.		**1116B.2.1** To provide an accessible route to a performing area in an assembly occupancy, or to a speaking area or similar place (such as a dais or "head table") in an assembly or Group B Occupancy.	Which Std.provides greater access **depends** on circumstances.	2010 CBC specifically limits the application of platform lifts to assembly occupancy for performing areas, and to assembly or Group B occupancies for speaking areas. ADA Stds. does not specify occupancy group limits.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
305	**206.7.2 Wheelchair Spaces.** Platform lifts shall be permitted to provide an *accessible* route to comply with the *wheelchair space* dispersion and line-of-sight requirements of 221 and 802.		**1116B.2.2** To comply with the wheelchair viewing position line-of-sight and dispersion requirements of Section 1104B.3.5.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and ADA Stds. are equivalent.	2010 CBC need not be amended.

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306	**206.7.3 Incidental Spaces.** Platform lifts shall be permitted to provide an *accessible* route to incidental *spaces* which are not *public use spaces* and which are occupied by five persons maximum.		**1116B.2.3** To provide access to incidental occupiable spaces and rooms which are not open to the general public and which house no more than five persons, including, but not limited to, equipment control rooms and projection booths.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and ADA Stds. are equivalent, although CBC is worded slightly differently and includes examples of what is not a public use space, which is a helpful clarification.	2010 CBC need not be amended.
307	**206.7.4 Judicial Spaces.** Platform lifts shall be permitted to provide an *accessible* route to: jury boxes and witness stands; raised courtroom stations including, judges' benches, clerks' stations, bailiffs' stations, deputy clerks' stations, and court reporters' stations; and to depressed areas such as the well of a court.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not specifcally permit or not permit platform lifts to provide an accessible route to judicial spaces.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
308	**206.7.5 Existing Site Constraints.** Platform lifts shall be permitted where existing exterior site constraints make use of a *ramp* or elevator infeasible.		**1116B.2.4** To provide access where existing site constraints or other constraints make use of a ramp or an elevator infeasible.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC adds "other constraints" to the conditions where a platform lift is allowed.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
309	**Advisory 206.7.5 Existing Site Constraints.** This exception applies where topography or other similar existing site constraints necessitate the use of a platform lift as the only feasible alternative. While the site constraint must reflect exterior conditions, the lift can be installed in the interior of a building. For example, a new building constructed between and connected to two existing buildings may have insufficient space to coordinate floor levels and also to provide ramped entry from the public way. In this example, an exterior or interior platform lift could be used to provide an accessible entrance or to coordinate one or more interior floor levels.		N/A	NA	Advisory does not establish enforceable requirements.	n/a
310	**206.7.6 Guest Rooms and Residential Dwelling Units.** Platform lifts shall be permitted to connect levels within *transient lodging* guest rooms required to provide mobility features complying with 806.2 or *residential dwelling units* required to provide mobility features complying with 809.2 through 809.4.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not specifcally address permitting platform lifts to provide an accessible route within guest rooms and dwelling units.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
311	**206.7.7 Amusement Rides.** Platform lifts shall be permitted to provide *accessible* routes to load and unload areas serving *amusement rides* .		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not specifcally address permitting platform lifts to provide an accessible route to load and unload amusement rides.	2010 CBC should be amended to be consistent with ADA Stds.
312	**206.7.8 Play Areas.** Platform lifts shall be permitted to provide *accessible* routes to *play components* or *soft contained play structures.*		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not specifcally address permitting platform lifts to provide an accessible route to play areas.	2010 CBC should be amended to be consistent with ADA Stds.
313	**206.7.9 Team or Player Seating.** Platform lifts shall be permitted to provide *accessible* routes to team or player seating areas serving *areas of sport activity* .		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not specifcally address permitting platform lifts to provide an accessible route to team or player seating.	2010 CBC should be amended to be consistent with ADA Stds.
314	**Advisory 206.7.9 Team or Player Seating.** While the use of platform lifts is allowed, ramps are recommended to provide access to player seating areas serving an area of sport activity.		N/A	NA	Advisory does not establish enforceable requirements.	n/a
315	**206.7.10 Recreational Boating Facilities and Fishing Piers and Platforms.** Platform lifts shall be permitted to be used instead of *gangways* that are part of *accessible* routes serving recreational boating *facilities* and fishing piers and platforms.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not specifcally address permitting platform lifts to provide an accessible route to recreational boating facilities and fishing piers and platforms.	2010 CBC should be amended to be consistent with ADA Stds.

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316	**206.8 Security Barriers.** Security barriers, including but not limited to, security bollards and security check points, shall not obstruct a required *accessible* route or *accessible means of egress*.		**1121B.3.1.19** ... If unattended security barriers are provided, at least one gate shall comply with Sections 1133B.1 and 1133B.2. Passageways containing security barriers shall comply with Section 1133B.2.3.4. ...	Which Std.provides greater access **depends** on circumstances.	The application of this CBC section is limited to trasportation facilities. ADA Stds. does not have scope limitation on where the security barriers are located. 2010 CBC also distinguishes unattended security barriers to have at least one gate. ADA Stds. are similarly prescriptive.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
316.1	**206.8 Security Barriers.** Security barriers, including but not limited to, security bollards and security check points, shall not obstruct a required *accessible* route or *accessible means of egress*.		**1121B.4.5** ... If unattended security barriers are provided, at least one gate shall comply with Sections 1133B.1 and 1133B.2. Passageways containing security barriers shall comply with Section 1133B.2.3.4. ...	Which Std.provides greater access **depends** on circumstances.	The application of this CBC section is limited to airports. ADA Stds. does not have scope limitation on where the security barriers are located. 2010 CBC also distinguishes unattended security barriers to have at least one gate. ADA Stds. are similarly prescriptive.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
317	**EXCEPTION:** Where security barriers incorporate *elements* that cannot comply with these requirements such as certain metal detectors, fluoroscopes, or other similar devices, the *accessible* route shall be permitted to be located adjacent to security screening devices. The *accessible* route shall permit persons with disabilities passing around security barriers to maintain visual contact with their personal items to the same extent provided others passing through the security barrier.					
318	**207 Accessible Means of Egress**		**1007 Accessible Means of Egress**	2010 CBC is **equivalent** to 2010 ADA.	Although the accessible means of egress requirements both refer to the IBC means of egress chapters which are very similar, a detailed analysis of the means of egress differences between the various referenced versions of these standards is beyond the scope of this comparison contract.	
319	**207.1 General.** Means of egress shall comply with section 1003.2.13 of the International Building Code (2000 edition and 2001 Supplement) or section 1007 of the International Building Code (2003 edition) (incorporated by reference, see “Referenced Standards” in Chapter 1).		**1114B.2.1 General.** In buildings or facilities or portions of buildings or facilities required to be accessible, accessible means of egress shall be provided as required by Chapter 10.	2010 CBC is **equivalent** to 2010 ADA.		
320						
321	**207.1 General.** Means of egress shall comply with section 1003.2.13 of the International Building Code (2000 edition and 2001 Supplement) or section 1007 of the International Building Code (2003 edition) (incorporated by reference, see “Referenced Standards” in Chapter 1).					
322	**EXCEPTIONS: 1.** Where means of egress are permitted by local building or life safety codes to share a common path of egress travel, accessible means of egress shall be permitted to share a common path of egress travel. **...**		N/A	2010 CBC **does not address** 2010 ADA req.	The CBC does not specifically address what is permitteded in the body of the code	
323	**EXCEPTIONS: 2.** Areas of refuge shall not be required in detention and correctional *facilities*.		N/A	2010 CBC **does not address** 2010 ADA req.	The CBC would require areas of refuge in I occupancies because it does not contain this exception	Include this exception because it makes sense not to require an area of refuge in detention and correctional facilities
324	**207.2 Platform Lifts.** Standby power shall be provided for platform lifts permitted by section 1003.2.13.4 of the International Building Code (2000 edition and 2001 Supplement) or section 1007.5 of the International Building Code (2003 edition) (incorporated by reference, see “Referenced Standards” in Chapter 1) to serve as a part of an *accessible means of egress*.		**1116B.2.5.1 Standby power**. To ensure continued operation in case of primary power loss, platform (wheelchair) lifts shall be provided with standby power or with self-rechargeable battery power that provides sufficient power to operate all platform lift functions for a minimum of five upward and downward trips.	2010 CBC provides **greater access** than 2010 ADA.	The CBC provides greater access because it specifies a "self-rechargeable battery power" for a minimum of five upward and downward trips.	

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325	**208 Parking Spaces**		**SECTION 1129B ACCESSIBLE PARKING REQUIRED**	2010 CBC is **equivalent** to 2010 ADA.	The 2010 ADA Stds. section is titled "Parking Spaces" while the CBC is "Accessible Parking Required"	1. If the CBC version is adopted, no change is necessary. 2. Adopt the 2010 ADA Stds. version verbatim.
326	**208.1 General.** Where parking *spaces* are provided, parking *spaces* shall be provided in accordance with 208.		**1129B.1 General**. Each lot or parking structure where parking is provided for the public as clients, guests or employees, shall provide accessible parking as required by this section. …	2010 CBC provides **greater access** than 2010 ADA.	CBC 1129B.1 requires that each lot or parking structure provide accessible parking required by Section 1129B.1. 2010 ADA Stds. includes a simlar requirement in Section 208.2.	No change is necessary.
327	**EXCEPTION:** Parking *spaces* used exclusively for buses, trucks, other delivery vehicles, law enforcement vehicles, or vehicular impound shall not be required to comply with 208 provided that lots accessed by the public are provided with a passenger loading zone complying with 503.		CBC does not have an equivalent exception.	2010 CBC **does not address** 2010 ADA req.	The 2010 ADA Stds does not require the parking spaces that serve delivery trucks, buses, law enforcement vehicles, etc. to have accessible spaces if a passenger loading zone is provided.	1. Adopt the CBC version with the 2010 ADA Stds. exception. 2. Adopt the CBC version without the 2010 ADA Stds. excetion. 3. Adopt the 2010 ADA Stds. version.
328	**208.2 Minimum Number.** Parking *spaces* complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2, and 208.2.3. Where more than one parking *facility* is provided on a *site* , the number of *accessible spaces* provided on the *site* shall be calculated according to the number of *spaces* required for each parking *facility* .		**1129B.1 General**. Each lot or parking structure where parking is provided for the public as clients, guests or employees, shall provide accessible parking as required by this section. ...Table 11B-6 establishes the number of accessible parking spaces required.	2010 CBC is **equivalent** to 2010 ADA.	2010 ADA Stds Table 208.2 and CBC Table 11B-6 are identical.	No change is necessary.
329	**Advisory 208.2 Minimum Number.** The term “parking facility” is used Section 208.2 instead of the term “parking lot” so that it is clear that both parking lots and parking structures are required to comply with this section. The number of parking spaces required to be accessible is to be calculated separately for each parking facility; the required number is not to be based on the total number of parking spaces provided in all of the parking facilities provided on the site.		NA	NA	NA	NA
330	**208.2.1 Hospital Outpatient Facilities.** Ten percent of patient and visitor parking *spaces* provided to serve hospital outpatient *facilities* shall comply with 502.		**1129B.2 Medical Care Outpatient Facilities.** At facilities providing medical care and other services for persons with mobility impairments, parking spaces complying with this section shall be provided in accordance with Table 11B-6 except as follows: **1. Outpatient units and facilities.** Ten percent of the total number of parking spaces provided shall serve each such outpatient unit or facility. **...**	2010 CBC is **equivalent** to 2010 ADA.	2010 ADA Stds. uses the term "hospital outpatient facilities" whereas CBC uses the term "medical care outpatient facilities". CBC term would appear to be more inclusive.	No change is necessary.
331	**Advisory 208.2.1 Hospital Outpatient Facilities.** The term “outpatient facility” is not defined in this document but is intended to cover facilities or units that are located in hospitals and that provide regular and continuing medical treatment without an overnight stay. Doctors' offices, independent clinics, or other facilities not located in hospitals are not considered hospital outpatient facilities for purposes of this document.		NA	NA	NA	NA
332	**208.2.2 Rehabilitation Facilities and Outpatient Physical Therapy Facilities.** Twenty percent of patient and visitor parking *spaces* provided to serve rehabilitation *facilities* specializing in treating conditions that affect mobility and outpatient physical therapy *facilities* shall comply with 502.		**1129B.2 Medical Care Outpatient Facilities.** At facilities providing medical care and other services for persons with mobility impairments, parking spaces complying with this section shall be provided in accordance with Table 11B-6 except as follows: **...2. Units and facilities that specialize in treatment or services for persons with mobility impairments.** Twenty percent of the total number of parking spaces provided shall serve each such unit or facility.	2010 CBC provides **less access** than 2010 ADA.	2010 ADA Stds. uses the term "rehabilitation facilities and outpatient physical therapy facilities" whereas CBC uses the term "units and facilities that specialize in treatment or services for persons with mobility impairments". 2010 ADA Stds. would appear to be more inclusive since the requirement applies to facilities that provide outpatient physical therapy, which is not mentioned in the CBC.	1. If the CBC version is adopted, incorporate the 2010 ADA Stds. requirement that this section also applies to outpatient physical therapy facilities. 2. Adopt the 2010 ADA Stds. version verbatim.
333	**Advisory 208.2.2 Rehabilitation Facilities and Outpatient Physical Therapy Facilities.** Conditions that affect mobility include conditions requiring the use or assistance of a brace, cane, crutch, prosthetic device, wheelchair, or powered mobility aid; arthritic, neurological, or orthopedic conditions that severely limit one's ability to walk; respiratory diseases and other conditions which may require the use of portable oxygen; and cardiac conditions that impose significant functional limitations.		NA	NA	NA	NA

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334	**208.2.3 Residential Facilities.** Parking spaces provided to serve residential *facilities* shall comply with 208.2.3.		**SECTION 1109A PARKING FACILITIES 1109A.1 Accessible parking required**. Each parking facility provided for covered multifamily dwellings and facilities (e.g., swimming pools, club houses, recreation areas, and laundry rooms) that serve covered multifamily dwellings shall provide accessible parking as required by this section.	2010 CBC **does not address** 2010 ADA req.	CBC requirements only apply to covered multifamily dwellings and facilities that serve covered multifamil dwwellings. 2010 ADA Stds. applies to publicly-funded residential facilities, including single- and multifamily dwellings. However, CBC 11A requirements apply to privately-funded multifamily dwelling units and contain the majority of the accessible parking requirements for facilities with residential dwelling units.	1. If the CBC version is adopted, incorporate the 2010 ADA Stds. requirement that this section also applies to all publicly-funded dwelling units. 2. Adopt the 2010 ADA Stds. version verbatim.
335	**208.2.3.1 Parking for Residents.** Where at least one parking *space* is provided for each *residential dwelling unit* , at least one parking *space* complying with 502 shall be provided for each *residential dwelling unit* required to provide mobility features complying with 809.2 through 809.4.		**1109A.3 Required accessible parking spaces.** Accessible parking spaces shall be provided at a minimum rate of 2 percent of the covered multifamily dwelling units. At least one space of each type of parking facility shall be made accessible even if the total number exceeds 2 percent. ... **1109A.4 Assigned accessible parking spaces.** When assigned parking spaces are provided for a resident or a group of residents, at least 2 percent of the assigned parking spaces serving covered multifamily dwelling units shall be accessible in each type of parking facility. At least one space of each type of parking facility shall be made accessible even if the total number exceeds 2 percent. ... **1109A.5 Unassigned and visitor parking spaces.** When parking is provided for covered multifamily dwellings and is not assigned to a resident or a group of residents at least 5 percent of the parking spaces shall be accessible ...	2010 CBC **does not address** 2010 ADA req.	1. 2010 ADA Stds. and CBC have different criteria to determine the required number of accessible parking spaces for residents. 2. 2010 ADA Stds. requirements are based upon where at least one parking space is provided for each dwelling unit, an accessible parking space is required for each dwelling unit required to provide mobility features. 3. CBC requirements are a minimum number of accessible parking spaces equal to 2% of the covered dwelling units. 4. CBC has separate requirements for the minimum number of assigned and unassigned and visitor parking spaces, which 2010 ADA Stds. does not.	1. If the CBC version is adopted, incorporate the 2010 ADA Stds. requirement of 208.2.3.1 for publicly-funded dwelling units. 2. Adopt the 2010 ADA Stds. version verbatim for publicly-funded dwelling units.
336	**208.2.3.2 Additional Parking Spaces for Residents.** Where the total number of parking *spaces* provided for each *residential dwelling unit* exceeds one parking *space* per *residential dwelling unit* , 2 percent, but no fewer than one *space* , of all the parking *spaces* not covered by 208.2.3.1 shall comply with 502.		**1109A.3 Required accessible parking spaces.** Accessible parking spaces shall be provided at a minimum rate of 2 percent of the covered multifamily dwelling units. At least one space of each type of parking facility shall be made accessible even if the total number exceeds 2 percent. ... **1109A.4 Assigned accessible parking spaces.** When assigned parking spaces are provided for a resident or a group of residents, at least 2 percent of the assigned parking spaces serving covered multifamily dwelling units shall be accessible in each type of parking facility. At least one space of each type of parking facility shall be made accessible even if the total number exceeds 2 percent. ... **1109A.5 Unassigned and visitor parking spaces.** When parking is provided for covered multifamily dwellings and is not assigned to a resident or a group of residents at least 5 percent of the parking spaces shall be accessible ...	2010 CBC **does not address** 2010 ADA req.	1. 2010 ADA Stds. and CBC have different criteria to determine the required number of additional accessible parking spaces for residents. 2. 2010 ADA Stds. requirements are based upon where the total number of parking spaces provided for each dwelling unit exceeds one space per dwelling unit, 2% (but no fewer than one) of all the additional parking spaces shall be accessible. 3. CBC requirements are a minimum number of accessible parking spaces equal to 2% of the covered dwelling units. 4. CBC has separate requirements for the minimum number of assigned and unassigned and visitor parking spaces, which 2010 ADA Stds. does not. 5. CBC requires 2% of all assigned parking spaces to be accessible and 5% of all unassigned and visitor parking spaces to be accessible.	1. If the CBC version is adopted, incorporate the 2010 ADA Stds. requirements of 208.2.3.2 for publicly-funded dwelling units. 2. Adopt the 2010 ADA Stds. version verbatim for publicly-funded dwelling units.
337	**208.2.3.3 Parking for Guests, Employees, and Other Non-Residents.** Where parking *spaces* are provided for persons other than residents, parking shall be provided in accordance with Table 208.2.		**1109A.3 Required accessible parking spaces.** Accessible parking spaces shall be provided at a minimum rate of 2 percent of the covered multifamily dwelling units. At least one space of each type of parking facility shall be made accessible even if the total number exceeds 2 percent. ... **1109A.5 Unassigned and visitor parking spaces.** When parking is provided for covered multifamily dwellings and is not assigned to a resident or a group of residents at least 5 percent of the parking spaces shall be accessible ...	2010 CBC provides **greater access** than 2010 ADA.	1. 2010 ADA Stds. and CBC have different criteria to determine the required number of accessible parking spaces for guests, employees and other non-residents. 2. 2010 ADA Stds. requirements for parking spaces serving these populations are per Table 208.2 and have decreasing percentages for larger parking facilities. 3. CBC requirements are a minimum number of accessible parking spaces equal to 5% of the parking spaces not assigned to residents. 5% will always exceed the percentages required by 2010 ADA Stds. Table 208.2.	1. If the CBC version is adopted, incorporate the 2010 ADA Stds. requirements of 208.2.3.3 for publicly-funded dwelling units only. 2. Adopt the 2010 ADA Stds. version verbatim for publicly-funded dwelling units.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
338	**208.2.4 Van Parking Spaces.** For every six or fraction of six parking *spaces* required by 208.2 to comply with 502, at least one shall be a van parking *space* complying with 502.		**1109A.8.6 Van accessible parking space.** One in every eight accessible spaces, but not less than one, shall be van accessible and shall be constructed in accordance with the following: …	2010 CBC is **equivalent** to 2010 ADA.	2010 ADA Stds. requires 1 of every 6 accessible parking spaces to be van accessible. Since CBC 1129B.3.2 requires 1 of every 6 accessible parking spaces to be van accessible and applies to publicly-funded housing, it is equivalent to 2010 ADA Stds. .	No change is necessary.
339	**208.2.4 Van Parking Spaces.** …		**1109A.8.6 Van accessible parking space.** …	NA	NA	NA
340	**208.3 Location.** Parking *facilities* shall comply with 208.3		**1129B.1 General**. ... Accessible parking spaces serving a particular building shall be located on the shortest accessible route of travel (complying with Section 1114B.1.2) from adjacent parking to an accessible entrance. In parking facilities that do not serve a particular building, accessible parking shall be located on the shortest accessible route of travel to an accessible pedestrian entrance of the parking facility. In buildings with multiple accessible entrances with adjacent parking, accessible parking spaces shall be dispersed and located closest to the accessible entrances. ...	2010 CBC is **equivalent** to 2010 ADA.	CBC 1129B.1 applies to publicfly-funded housing.	No change is necessary.
341	**208.3.1 General.** Parking *spaces* complying with 502 that serve a particular *building* or *facility* shall be located on the shortest *accessible* route from parking to an *entrance* complying with 206.4. Where parking serves more than one *accessible entrance*, parking *spaces* complying with 502 shall be dispersed and located on the shortest *accessible* route to the *accessible entrances*. In parking *facilities* that do not serve a particular *building* or *facility*, parking *spaces* complying with 502 shall be located on the shortest *accessible* route to an *accessible* pedestrian *entrance* of the parking *facility*.		**1129B.1 General**. .... Accessible parking spaces serving a particular building shall be located on the shortest accessible route of travel (complying with Section 1114B.1.2) from adjacent parking to an accessible entrance. In parking facilities that do not serve a particular building, accessible parking shall be located on the shortest accessible route of travel to an accessible pedestrian entrance of the parking facility. In buildings with multiple accessible entrances with adjacent parking, accessible parking spaces shall be dispersed and located closest to the accessible entrances. ...	2010 CBC is **equivalent** to 2010 ADA.	CBC 1129B.1 applies to publicfly-funded housing.	No change is necessary.
342	**EXCEPTIONS: 1.** All van parking *spaces* shall be permitted to be grouped on one level within a multi-story parking *facility*. **…**		**1.** **Van space(s).** ... All such spaces may be grouped on one level of a parking structure. …	2010 CBC **does not address** 2010 ADA req.	CBC does not address if the exception applies to a single-story parking structure or facility.	1. If the CBC version is adopted, replace "parking structure" with "multi-story parking facility". 2. Adopt the 2010 ADA Stds. version verbatim.
343	**EXCEPTIONS: ...** **2.** Parking *spaces* shall be permitted to be located in different parking *facilities* if substantially equivalent or greater *accessibility* is provided in terms of distance from an *accessible entrance* or *entrances*, parking fee, and user convenience.		CBC does not have an equivalent exception.	2010 CBC **does not address** 2010 ADA req.		1. If the CBC version is adopted, include the exception. 2. Adopt the 2010 ADA Stds.version verbatim.
344	**Advisory 208.3.1 General Exception 2.** Factors that could affect "user convenience" include, but are not limited to, protection from the weather, security, lighting, and comparative maintenance of the alternative parking site.		NA	NA	NA	NA
345	**208.3.2 Residential Facilities.** In residential *facilities* containing *residential dwelling units* required to provide mobility features complying with 809.2 through 809.4, parking *spaces* provided in accordance with 208.2.3.1 shall be located on the shortest *accessible* route to the *residential dwelling unit entrance* they serve. *Spaces* provided in accordance with 208.2.3.2 shall be dispersed throughout all types of parking provided for the *residential dwelling units*.		**1109A.7 Location of accessible parking spaces.** The location of accessible parking spaces shall comply with the following: 1. Accessible parking spaces shall be located on the shortest possible accessible route to an accessible building, or covered multifamily dwelling unit entrance. All van accessible spaces may be grouped on one level of a parking facility. 2. When parking facilities are located adjacent to a building with multiple accessible entrances, accessible parking spaces shall be dispersed and located near the accessible building entrances.	2010 CBC **does not address** 2010 ADA req.	1. Since the CBC requirement is for covered multifamily dwellings and the 2010 ADA Stds. requirement is for dwelling units required to provide mobility features, they refer to different types of dwelling units. 2. 2010 ADA Stds. requires the shortest accessible route be to the dwelling unit the accessible parking space serves, while CBC is not that specific. 3. 2010 ADA Stds. dispersal requirement is required throughout all types of parking provided, whereas CBC dispersal requirement is where multiple building entrances are provided.	1. If the CBC version is adopted, incorporate the 2010 ADA Stds. requirements of 208.3.2 for publicly-funded dwelling units only. 2. Adopt the 2010 ADA Stds. version verbatim for publicly-funded dwelling units.
346	**EXCEPTION:** Parking *spaces* provided in accordance with 208.2.3.2 shall not be required to be dispersed throughout all types of parking if substantially equivalent or greater *accessibility* is provided in terms of distance from an *accessible entrance*, parking fee, and user convenience.		CBC does not have an equivalent exception.	2010 CBC **does not address** 2010 ADA req.		1. If the CBC version is adopted, incorporate the 2010 ADA Stds. exception to 208.2.3.3 for publicly-funded units only. 2. Adopt the 2010 ADA Stds. version verbatim for publicly-funded dwelling units.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
347	**Advisory 208.3.2 Residential Facilities Exception.** Factors that could affect "user convenience" include, but are not limited to, protection from the weather, security, lighting, and comparative maintenance of the alternative parking site.		NA	NA	NA	NA
348	**209 Passenger Loading Zones and Bus Stops**		**SECTION 1131B PASSENGER DROP-OFF AND LOADING ZONES 1131B.2 Passenger loading zones.** **SECTION 1121B TRANSPORTATION FACILITIES 1121B.2 Bus stops and terminals.**	2010 CBC is **equivalent** to 2010 ADA.		
349	**209 Passenger Loading Zones and Bus Stops**		**SECTION 1131B PASSENGER DROP-OFF AND LOADING ZONES 1131B.2 Passenger loading zones.** **SECTION 1121B TRANSPORTATION FACILITIES 1121B.2 Bus stops and terminals.**	2010 CBC is **equivalent** to 2010 ADA.		
350	**209.1 General.** Passenger loading zones shall be provided in accordance with 209.		**1131B.2 Passenger loading zones.** **1. General.** Where provided, one passenger drop-off and loading zone shall provide an access aisle at least 60 inches (1524 mm) wide and 20 feet (6096 mm) long adjacent and parallel to the vehicle pull-up space. ...	2010 CBC provides **less access** than 2010 ADA.	1131B.2, Item 1 requires that where passenger loading zones are provided, at least one (area within it) shall meet the stipulated requirements. 209.2.1 requires that where passenger loading zones are provided, at least one area complying with 503 shall be provided for every continuous 100 feet of loading zone space.	Modify 1131B.2, Item 1 to include language requiring at least one accessible loading zone for every continuous 100 feet of continuous loading zone space.
351	**209.2 Type.** Where provided, passenger loading zones shall comply with 209.2.		**1131B.2 Passenger loading zones.** **1. General.** Where provided, one passenger drop-off and loading zone shall provide an access aisle at least 60 inches (1524 mm) wide and 20 feet (6096 mm) long adjacent and parallel to the vehicle pull-up space. ...	2010 CBC is **equivalent** to 2010 ADA.	The issue here for both standards is that where passenger loading zones are provided, they shall comply with the referenced section/stated requirements.	
352	**209.2.1 Passenger Loading Zones.** Passenger loading zones, except those required to comply with 209.2.2 and 209.2.3, shall provide at least one passenger loading zone complying with 503 in every continuous 100 linear feet (30 m) of loading zone *space* , or fraction thereof.		**1131B.2 Passenger loading zones.** **1. General.** Where provided, one passenger drop-off and loading zone shall provide an access aisle at least 60 inches (1524 mm) wide and 20 feet (6096 mm) long adjacent and parallel to the vehicle pull-up space. …	2010 CBC provides **less access** than 2010 ADA.	1131B.2, Item 1 requires that where passenger loading zones are provided, at least one (area within it) shall meet the stipulated requirements. 209.2.1 requires that where passenger loading zones are provided, at least one area complying with 503 shall be provided for every continuous 100 feet of loading zone space.	Modify 1131B.2, Item 1 to include language requiring at least one accessible loading zone for every continuous 100 feet of continuous loading zone space.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
353	**209.2.2 Bus Loading Zones.** In bus loading zones restricted to use by designated or specified public transportation vehicles, each bus bay, bus stop, or other area designated for lift or *ramp* deployment shall comply with 810.2.		**SECTION 1121B** **TRANSPORTATION FACILITIES** **1121B.1 General.** Every station, bus stop, bus stop pad, terminal, building or other transportation facility shall incorporate the accessibility requirements of this code as modified by this chapter. ... **1121B.2 Bus stops and terminals.** **1121B.2.1 New construction.** Where provided, bus stop pads shall have a firm, stable surface with a minimum clear length of 96 inches (2438 mm) (measured from the curb or vehicle roadway edge) and a minimum clear width of 60 inches (1524 mm) (measured parallel to the vehicle roadway) to the maximum extent allowed by legal or site constraints. ... **1121B.2.2 Bus stop siting and alterations.** **1.** Bus stop sites shall be chosen such that the areas where lifts or ramps are to be deployed comply with Section 1121B.2.1. **SECTION 1131B** **PASSENGER DROP-OFF AND LOADING ZONES** **1131B.4** Bus stop pads and shelters. See Section 1121B.2.1.	2010 CBC provides **less access** than 2010 ADA.	1121.2.1 only requires a compliant bus stop pad to be compliant (when) where they are provided; 209.2.2 requires each bus bay, bus stop, or other area designated for lift or ramp deployment to be compliant.	Remove the language "Where provided" from 1121B.2.1. Require all bus stops to provide a compliant pad.
354	**Advisory 209.2.2 Bus Loading Zones.** The terms “designated public transportation” and “specified public transportation” are defined by the Department of Transportation at 49 CFR 37.3 in regulations implementing the Americans with Disabilities Act. These terms refer to public transportation services provided by public or private entities, respectively. For example, designated public transportation vehicles include buses and vans operated by public transit agencies, while specified public transportation vehicles include tour and charter buses, taxis and limousines, and hotel shuttles operated by private entities.		**SECTION 1102B DEFINITIONS** **SPECIFIED PUBLIC TRANSPORTATION** is transportation by bus, rail or any other conveyance (other than by aircraft) that provides the general public with general or special service (including charter service) on a regular and continuing basis.	2010 CBC **conflicts with** 2010 ADA.	Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b). In this case the advisory does not state a(n unenforceable) requirement, it provides definitions that are derived from Department of Transportation regulations. The CBC does not define "designated public transportation", and it defines "specified public transportation" in a manner that differs significantly from the ADA/DOT definition.	1a) Redefine "specified public transportation" in the CBC so that it agrees with the ADA/DOT definition. Adjust the language of sections CBC sections that currently use the term accordingly. 1b) include a definition of "designated public transportation" in the CBC that agrees with the ADA/DOT definition.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
355	**209.2.3 On-Street Bus Stops.** On-street bus stops shall comply with 810.2 to the maximum extent practicable.		**SECTION 1121B** **TRANSPORTATION FACILITIES** **1121B.1 General.** Every station, bus stop, bus stop pad, terminal, building or other transportation facility shall incorporate the accessibility requirements of this code as modified by this chapter. ... **1121B.2 Bus stops and terminals.** **1121B.2.1 New construction.** Where provided, bus stop pads shall have a firm, stable surface with a minimum clear length of 96 inches (2438 mm) (measured from the curb or vehicle roadway edge) and a minimum clear width of 60 inches (1524 mm) (measured parallel to the vehicle roadway) to the maximum extent allowed by legal or site constraints. ... **1121B.2.2 Bus stop siting and alterations.** **1.** Bus stop sites shall be chosen such that the areas where lifts or ramps are to be deployed comply with Section 1121B.2.1. **SECTION 1131B** **PASSENGER DROP-OFF AND LOADING ZONES** **1131B.4** Bus stop pads and shelters. See Section 1121B.2.1.	2010 CBC provides **less access** than 2010 ADA.	1121.2.1 only requires a compliant bus stop pad to be compliant (when) where they are provided. 209.2.3 requires each bus bay, bus stop, or other area designated for lift or ramp deployment to be compliant. It contains the mitigating phrase "to the maximum extent practicable", but it still requires a pad at every bus stop.	1) Remove the language "Where provided" from 1121B.2.1. Require all bus stops to provide a compliant pad. 2) Add "to the maximum extent practicable "language to 1121B.2.2 in regard to on-street bus stops.
356	**209.3 Medical Care and Long-Term Care Facilities.** At least one passenger loading zone complying with 503 shall be provided at an *accessible entrance* to licensed medical care and licensed long-term care f*acilities* where the period of stay exceeds twenty-four hours.		**SECTION 1109B** **ACCESSIBILITY FOR GROUP I OCCUPANCIES** **1109B.2 Entrance.** At medical care facilities in which people receive physical or medical treatment or care and where persons may need assistance in responding to an emergency and where the period of stay may exceed twenty-four hours, at least one accessible entrance shall be protected from the weather by canopy or roof overhang. Such entrances shall incorporate a passenger loading zone complying with Section 11131B.2.	Which Std.provides greater access **depends** on circumstances.	1) 1109B.2 requires a passenger loading zone (PLZ) complying with 1131B.2 at a covered entrance. The text appears to say that the PLZ must also be covered, but that is debatable. 209.3 does not require the PLZ to be located at or incorporated within a covered entrance. The CBC provides greater access. 2) 1131B.2, Item 1 requires that where passenger loading zones are provided, at least one (area within it) shall meet the stipulated requirements. 209.2.1 requires that where passenger loading zones are provided, at least one area complying with 503 shall be provided for every continuous 100 feet of loading zone space. The 2010 ADA Stds. provides greater access.	1) Add language to 1109B.2 that clarifies whether or not the PLZ has to also be covered. If it does, also clarify whether or not the vehicle pull-up space also has to be covered. 2)Modify 1131B.2, Item 1 to include language requiring at least one accessible loading zone for every continuous 100 feet of continuous loading zone space. Clarify, where the loading area exceeds 100 feet, and there is more than one accessible PLZ, whether or not all of them have to be covered.
357	**UNDER REVIEW** **209.3 Medical Care and Long-Term Care Facilities.** At least one passenger loading zone complying with 503 shall be provided at an *accessible entrance* to licensed medical care and licensed long-term care *facilities* where the period of stay exceeds twenty-four hours.	**UNDER REVIEW** This is a row comparison scrambling error in the original 1991/2010 ADA Comparison. The CBC comments are duplicated in the row above.	**SECTION 1109B** **ACCESSIBILITY FOR GROUP I OCCUPANCIES** **1109B.2 Entrance.** At medical care facilities in which people receive physical or medical treatment or care and where persons may need assistance in responding to an emergency and where the period of stay may exceed twenty-four hours, at least one accessible entrance shall be protected from the weather by canopy or roof overhang. Such entrances shall incorporate a passenger loading zone complying with Section 11131B.2.	Which Std.provides greater access **depends** on circumstances.	1) 1109B.2 requires a passenger loading zone (PLZ) complying with 1131B.2 at a covered entrance. The text appears to say that the PLZ must also be covered, but that is debatable. 209.3 does not require the PLZ to be located at or incorporated within a covered entrance. The CBC provides greater access. 2) 1131B.2, Item 1 requires that where passenger loading zones are provided, at least one (area within it) shall meet the stipulated requirements. 209.2.1 requires that where passenger loading zones are provided, at least one area complying with 503 shall be provided for every continuous 100 feet of loading zone space. The 2010 ADA Stds. provides greater access.	1) Add language to 1109B.2 that clarifies whether or not the PLZ has to also be covered. If it does, also clarify whether or not the vehicle pull-up space also has to be covered. 2)Modify 1131B.2, Item 1 to include language requiring at least one accessible loading zone for every continuous 100 feet of continuous loading zone space. Clarify, where the loading area exceeds 100 feet, and there is more than one accessible PLZ, whether or not all of them have to be covered.
358	**209.4 Valet Parking.** Parking *facilities* that provide valet parking services shall provide at least one passenger loading zone complying with 503.		**1131B.3 Valet parking.** Valet parking facilities shall provide a passenger loading zone complying with Section 1131B.2 above and shall be located on an accessible route of travel (complying with Section 1114B.1.2) to the entrance of the facility. …	2010 CBC is **equivalent** to 2010 ADA.	Both standards require an accessible passenger loading zone at a valet parking facility.	

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359	**209.5 Mechanical Access Parking Garages.** Mechanical access parking garages shall provide at least one passenger loading zone complying with 503 at vehicle drop-off and vehicle pick-up areas.		**1131B.2 Passenger loading zones.** **1. General.** Where provided, one passenger drop-off and loading zone shall provide an access aisle at least 60 inches (1524 mm) wide and 20 feet (6096 mm) long adjacent and parallel to the vehicle pull-up space. ...	Which Std.provides greater access **depends** on circumstances.	Which standard provides greater access depends on how one reads the standards, 209.5 requires an accessible passenger loading zone at vehicle drop-off and pick-up areas in mechanical access parking garages. 1) The CBC does not mention mechanical access parking garages, but a vehicle drop-off and pick-up area is a passenger loading zone (PLZ). As such, the CBC would also require it to be accessible (per 1131B.2). 2) But the CBC does not state clearly that vehicle drop-off and pick-up areas (in mechanical access parking garages) must provide a passenger loading zone complying with 1131B.2. One might argue that by not providing language that specifically calls for an accessible PLZ in these locations, that they aren't required. But a place where passengers load and unload, that isn't a parking space, is a PLZ. To call for them to be accessible in specific locations could be interpreted to mean that they aren't required in other unnamed locations.	1) The CBC addresses PLZs wherever they are provided. No action is required, or 2a) Add language to the CBC specifically calling for a PLZ complying with 1131B.2 at vehicle drop-off and pick-up areas in mechanical access parking garages. 2b) The CBC addresses PLZs wherever they are provided. No action is required.
360	**210 Stairways**		**1133B.4 Stairways.** Stairways shall conform to the provisions of this section.	2010 CBC is **equivalent** to 2010 ADA.		
361	**210.1 General.** Interior and exterior stairs that are part of a means of egress shall comply with 504.		**1127B.4 Outside stairways**. See Section 1133B.4	2010 CBC is **equivalent** to 2010 ADA.	The CBC does not differenciate between interior and exterior stairs as to wether they must be accessible	
362	**EXCEPTIONS: 1.** In detention and correctional *facilities* , stairs that are not located in *public use* areas shall not be required to comply with 504. **2.** In *alterations* , stairs between levels that are connected by an *accessible* route shall not be required to comply with 504, except that handrails complying with 505 shall be provided when the stairs are *altered* . **3.** In *assembly areas* , aisle stairs shall not be required to comply with 504. **4.** Stairs that connect *play components* shall not be required to comply with 504.		N/A	2010 CBC provides **greater access** than 2010 ADA.	The CBC does not include an exception for common use stairs in detention and correctional facilities.	
362.1	**EXCEPTIONS:** ... 2. In alterations, stairs between levels that are connected by an accessible route shall not be required to comply with 504, …		**1134B.2.1** A primary entrance to the building or facility and the primary path of travel to the specific area of alteration, structural repair or addition, and sanitary facilities, drinking fountains, signs and public telephones serving the area.	2010 CBC is **equivalent** to 2010 ADA.	The CBC only requires one accessible route to the alteration which could be any means of vertical access.	
363	**Advisory 210.1 General.** Although these requirements do not mandate handrails on stairs that are not part of a means of egress, State or local building codes may require handrails or guards.					
364	**211 Drinking Fountains**		**1117B.1 Accessible drinking fountains.**	2010 CBC is **equivalent** to 2010 ADA.	NA	NA
365	**211 Drinking Fountains**		**1117B.1 Accessible drinking fountains.**	2010 CBC is **equivalent** to 2010 ADA.	NA	NA

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
366	**211.1 General.** Where drinking fountains are provided on an exterior *site* , on a floor, or within a secured area they shall be provided in accordance with 211.		**1117B.1 Accessible drinking fountains.** Where drinking fountains are provided, they shall comply with this section: **1117B.1#1. General.** Where only one drinking fountain area is provided on a floor, there shall be a drinking fountain that is accessible to individuals who use wheelchairs in accordance with this section and one accessible to those who have difficulty bending or stooping. This can be accommodated by the use of “hi-low” fountains, or by such other means as would achieve the required accessibility for each group on each floor. **1132B.3.1 Permanent facilities.** At least one kind of permanent functional area or facility, as applicable, shall be accessible to persons with disabilities, including:**1132B.3.1#4.** Drinking fountains.	2010 CBC **does not address** 2010 ADA req.	CBC does not specifically indicate the requirements to provide accessible drinking fountains on a site (except within permanent facilities at highway rest areas) or within a secured area.	1. If the CBC version is adopted, incorporate the requirement that a minimum of one drinking fountain be provided for wheelchair users and one for standing persons on a site and within a secured area. 2. Adopt the 2010 ADA Stds. version verbatim.
367	**EXCEPTION:** In detention or correctional *facilities* , drinking fountains only serving holding or housing cells not required to comply with 232 shall not be required to comply with 211.		CBC does not have an equivalent section for detention and correction facilities.	2010 CBC **does not address** 2010 ADA req.		1. If the CBC version is adopted, incorporate the 2010 ADA Stds. exception for detention and correction facilities. 2. If the CBC version is adopted, do not incorporate the 2010 ADA Stds. exception for detention and correction facilities. 3. Adopt the 2010 ADA Stds. exception verbatim.
368	**211.2 Minimum Number.** No fewer than two drinking fountains shall be provided. One drinking fountain shall comply with 602.1 through 602.6 and one drinking fountain shall comply with 602.7.		**1117B.1#1. General.** Where only one drinking fountain area is provided on a floor, there shall be a drinking fountain that is accessible to individuals who use wheelchairs in accordance with this section and one accessible to those who have difficulty bending or stooping. This can be accommodated by the use of “hi-low” fountains, or by such other means as would achieve the required accessibility for each group on each floor.	2010 CBC is **equivalent** to 2010 ADA.	Although 2010 ADA Stds. requires two drinking fountains and CBC requires only one, per CBC the one drinking fountain must accommodate both wheelchair users and standing persons (2010 ADA Stds.) / those who have difficulty bending or stooping (CBC).	1. If the CBC version is adopted, incorporate the 2010 ADA Stds. language for "standing persons." 2. Adopt the 2010 ADA Stds. version verbatim.
369	**EXCEPTION:** Where a single drinking fountain complies with 602.1 through 602.6 and 602.7, it shall be permitted to be substituted for two separate drinking fountains.		**1117B.1#1. General.** Where only one drinking fountain area is provided on a floor, there shall be a drinking fountain that is accessible to individuals who use wheelchairs in accordance with this section and one accessible to those who have difficulty bending or stooping. This can be accommodated by the use of “hi-low” fountains, or by such other means as would achieve the required accessibility for each group on each floor.	2010 CBC is **equivalent** to 2010 ADA.	Although 2010 ADA Stds. requires two drinking fountains and CBC requires only one, per CBC the one drinking fountain must accommodate both wheelchair users and standing persons (2010 ADA Stds.) / those who have difficulty bending or stooping (CBC).	1. If the CBC version is adopted, no change is necessary 2. Adopt the 2010 ADA Stds. version verbatim.
370	**211.3 More Than Minimum Number.** Where more than the minimum number of drinking fountains specified in 211.2 are provided, 50 percent of the total number of drinking fountains provided shall comply with 602.1 through 602.6, and 50 percent of the total number of drinking fountains provided shall comply with 602.7.		**1117B.1 Accessible drinking fountains.** ...Where more than one drinking fountain is provided on a floor, 50 percent of those provided shall comply with Items 1, 2, 4 and 5 of this section and shall be on an accessible route complying with 1114B.1.2. All drinking fountains shall comply with Item 3 of this section.	2010 CBC **does not address** 2010 ADA req.	1. CBC does not specifically require that 50% of the drinking fountains that do not comply with Items 1, 2, 4 and 5 must be for those who have difficulty bending or stooping.	1. If the CBC version is adopted, incorporate the requirement that when more than the required minimum number of drinking fountains are provided, they shall be "hi-low" fountains. 2. Adopt the 2010 ADA Stds. version verbatim.
371	**EXCEPTION:** Where 50 percent of the drinking fountains yields a fraction, 50 percent shall be permitted to be rounded up or down provided that the total number of drinking fountains complying with 211 equals 100 percent of drinking fountains.		**1117B.1 Accessible drinking fountains.** ... Where more than one drinking fountain is provided on a floor, 50 percent of those provided shall comply with Items 1, 2, 4 and 5 of this section and shall be on an accessible route complying with 1114B.1.2. All drinking fountains shall comply with Item 3 of this section.	2010 CBC **conflicts with** 2010 ADA.	CBC does not have an exception for when 50% of the drinking fountains yields a fraction. The intent of the exception is confusing but appears to require that all drinking fountains be accessible and that there is always at least one "high" and one "low" drinking fountain required, and if more are provided one of each is required.	1. If the CBC version is adopted, incorporate the requirement that when more than the required minimum number of drinking fountains are provided, each additional drinking fountain shall be a "hi-low" drinking fountain. 2. Adopt the 2010 ADA Stds. version verbatim.
372	**212 Kitchens, Kitchenettes, and Sinks**		***1117B.3 Kitchens.*** ... ***1117B.9 Accessible sinks.*** ... ***1111B.4.4 Kitchens, kitchenettes or wet bar facilities.*** …	2010 CBC **conflicts with** 2010 ADA.	2010 ADA Scoping provisions addresses kitchens, kitchenettes, and sinks. 2010 CBC addresses kitchens only. 2010 CBC addresses kitchenettes and wet bar facilities in transient lodging facilities only. 2010 CBC addresses accessible sinks in a separate section.	1) In Section 1102B establish definitions for kitchenettes and wet bars. 1) In the 2010 CBC, provide a section on Kitchens, Kitchenettes, and Wet Bars in Chapter 11B. 2) In this new section, provide reference to accessible sinks, CBC 1117B.9.

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373	**212.1 General.** Where provided, kitchens, kitchenettes, and sinks shall comply with 212.		***1133A.1 General.*** *Kitchens shall be on an accessible route and shall comply with this section.* ***1117B.9 Accessible sinks.*** *Sinks required to be accessible shall comply with this subsection.* ***1111B.4.4 Kitchens, kitchenettes or wet bar facilities.*** *When accommodations are provided with kitchens, kitchenettes, wet bar units or similar amenities, they shall be accessible and meet the requirements of Section 1133A. ...*	2010 CBC **conflicts with** 2010 ADA.	2010 ADA Scoping provisions addresses kitchens, kitchenettes, and sinks. 2010 CBC addresses kitchens only. 2010 CBC addresses kitchenettes and wet bar facilities in transient lodging facilities only. 2010 CBC addresses accessible sinks in a separate section.	1) In Section 1102B establish definitions for kitchenettes and wet bars. 1) In the 2010 CBC, provide a section on Kitchens, Kitchenettes, and Wet Bars in Chapter 11B. 2) In this new section, provide reference to accessible sinks, CBC 1117B.9.
374	**212.2 Kitchens and Kitchenettes.** Kitchens and kitchenettes shall comply with 804.		***1133A.1 General.*** *Kitchens shall be on an accessible route and shall comply with this section.*	2010 CBC **conflicts with** 2010 ADA.	ADA Scoping provisions apply to kitchens and kitchenettes. CBC provisions apply to kitchens only.	1) In the 2010 CBC, provide a section on Kitchens, Kitchenettes, and Wet Bars in Chapter 11B. 2) In this new section define requirements for kitchens and kitchenettes, and then define requirements for wet bars. 2) In this new section, provide reference to accessible sinks, CBC Section 1117B.9.
375	**212.3 Sinks.** Where sinks are provided, at least 5 percent, but no fewer than one, of each type provided in each *accessible* room or *space* shall comply with 606.		***1117B.9 Accessible sinks.*** *Sinks required to be accessible shall comply with this subsection.*	2010 CBC provides **less access** than 2010 ADA.	A determination of the amount of accessible sinks is not provided in this section of the 2010 CBC. In other portions of the CBC, one sink is required to be accessible, with the exception of lavatory sinks in bathrooms, which is 5%.	1) Include in the CBC that where sinks are provided, at least 5 percent, but no fewer than one, of each type provided in each accessible room or space shall be accessible as per 1117B.9.
376	**EXCEPTION:** Mop or service sinks shall not be required to comply with 212.3.			2010 CBC **does not address** 2010 ADA req.	While not expressly stated, the 2010 CBC does not require mop sinks or service sinks to be accessible.	1. Include the clarification in the 2010 CBC that mop or service sinks are not required to be accessible.
377	**213 Toilet Facilities and Bathing Facilities**		**SECTION 1115B** **BATHING AND TOILET FACILITIES (SANITARY FACILITIES)**	2010 CBC is **equivalent** to 2010 ADA.	This is just a section heading	2010 CBC need not be amended.
378	**213 Toilet Facilities and Bathing Facilities**		N/A	NA	n/a	n/a
379	**213.1 General.** Where toilet *facilities* and bathing *facilities* are provided, they shall comply with 213. Where toilet *facilities* and bathing *facilities* are provided in *facilities* permitted by 206.2.3 Exceptions 1 and 2 not to connect stories by an *accessible* route, toilet *facilities* and bathing *facilities* shall be provided on a *story* connected by an *accessible* route to an *accessible entrance*.		**1115B.1** **General.** Bathing and toilet facilities that serve buildings, facilities or portions of buildings or facilities that are required by these standards to be accessible to persons with disabilities, shall be on an accessible route and shall conform to the following requirements. ... See Section 1111B.4.6 and Chapter 11A for bathrooms in residential occupancies.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and ADA Stds. are essentially equivalent, with somewhat different wording.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
380	**213.1 General.** Where toilet *facilities* and bathing *facilities* are provided, they shall comply with 213. Where toilet *facilities* and bathing *facilities* are provided in *facilities* permitted by 206.2.3 Exceptions 1 and 2 not to connect stories by an *accessible* route, toilet *facilities* and bathing *facilities* shall be provided on a *story* connected by an *accessible* route to an *accessible entrance*.		**1103B.1** **Scope**. ... If toilet or bathing facilities are provided on a level not served by an elevator, then toilet or bathing facilities must be provided on the accessible ground floor. ...	Which Std.provides greater access **depends** on circumstances.	2010 CBC is narrower in its application of scope in that in non-elevatored buildings, accessible toilets and bathing facilites are required specifically on the accessible ground floor. ADA Stds. does not assume that only the ground floor would be accessible.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
381	**213.2 Toilet Rooms and Bathing Rooms.** Where toilet rooms are provided, each toilet room shall comply with 603. Where bathing rooms are provided, each bathing room shall comply with 603.		**1115B.3.1** **Multiple-accommodation toilet facilities**. See Figure 11B-1B. Multiple-accommodation toilet facilities shall have the following:	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and ADA Stds. are equivalent in that they reference the requirements elsewhere in the regulations.	2010 CBC need not be amended.
382	**213.2 Toilet Rooms and Bathing Rooms.** Where toilet rooms are provided, each toilet room shall comply with 603. Where bathing rooms are provided, each bathing room shall comply with 603.		**1115B.3.2** **Single-accommodation toilet facilities**. Single-accommodation toilet facilities shall have the following:	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and ADA Stds. are equivalent in that they reference the requirements elsewhere in the regulations.	2010 CBC need not be amended.

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383	**EXCEPTIONS: 1.** In alterations where it is *technically infeasible* to comply with 603, altering existing toilet or bathing rooms shall not be required where a single unisex toilet room or bathing room complying with 213.2.1 is provided and located in the same area and on the same floor as existing inaccessible toilet or bathing rooms. **...**		**1134B.2.2** Where it is technically infeasible in the area of an alteration to make existing toilet facilities code compliant and to install separate toilet facilities for each sex, then the installation of at least one unisex toilet facility per floor being altered, located in the same area as existing toilet facilities, will be permitted. Such a facility shall meet the requirements of Section 1115B.3.2.	2010 CBC provides **less access** than 2010 ADA.	2010 CBC does not address bathing rooms along with toilet rooms. ADA Stds. also requires that the unisex room be on the same floor as the existing inaccessible room.	2010 CBC should be amended to be consistent with ADA Stds.
384	**EXCEPTIONS: 2.** Where exceptions for alterations to qualified historic buildings or facilities are permitted by 202.5, no fewer than one toilet room for each sex complying with 603 or one unisex toilet room complying with 213.2.1 shall be provided.		**CHBC 8-603.5** **Toilet rooms.** In lieu of separate-gender toilet facilities as required in the regular code, an accessible unisex toilet may be designated.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to ADA Stds., although the two are worded slighlty differently.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
385	**EXCEPTIONS: 3.** Where multiple single user portable toilet or bathing units are clustered at a single location, no more than 5 percent of the toilet units and bathing units at each cluster shall be required to comply with 603. Portable toilet units and bathing units complying with 603 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not have and equivalent exception.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
385.1	**213 Toilet Facilities and** Bathing Facilities 3. Where multiple single user portable toilet or bathing units are clustered at a single location, no more than 5 percent of the toilet units and bathing units at each cluster shall be required to comply with 603. Portable toilet units and bathing units complying with 603 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1.		**1127A.7 Signs. 1127A.7.1 General.** All accessible toilet and bathing facilities shall be identified by the "International Symbol of Accessibility." Signs need not be provided for facilities within a dwelling unit or guestroom.		California has a standard that accessible restrooms shall be identified with the ISA, but this requirement is strangely only included in Chapter 11A, for residential facilities. The assumption has been, that it is omitted from 11B because of an error and consequently it is practiced and enforced for all facilities, not just residential facilities.	Suggest adding this to the other scoping for restroom signs. If the opinion is that all accessible restrooms in California, regardless if they are all accessible, should have an ISA, then that should be added. On the other hand, if California wants to follow the federal scoping, it would not be required in facilities where all sanitary facilities are accessible, except for those specified in 213.
386	**EXCEPTIONS: 4.** Where multiple single user toilet rooms are clustered at a single location, no more than 50 percent of the single user toilet rooms for each use at each cluster shall be required to comply with 603.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not have and equivalent exception.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
387	**Advisory 213.2 Toilet Rooms and Bathing Rooms.** These requirements allow the use of unisex (or single-user) toilet rooms in alterations when technical infeasibility can be demonstrated. Unisex toilet rooms benefit people who use opposite sex personal care assistants. For this reason, it is advantageous to install unisex toilet rooms in addition to accessible single-sex toilet rooms in new facilities.		N/A	NA	Advisory does not establish enforceable requirements.	n/a
388	**Advisory 213.2 Toilet Rooms and Bathing Rooms Exceptions 3 and 4.** A “cluster” is a group of toilet rooms proximate to one another. Generally, toilet rooms in a cluster are within sight of, or adjacent to, one another.		N/A	NA	Advisory does not establish enforceable requirements.	n/a
389	**213.2.1 Unisex (Single-Use or Family) Toilet and Unisex Bathing Rooms.** Unisex toilet rooms shall contain not more than one lavatory, and two water closets without urinals or one water closet and one urinal. Unisex bathing rooms shall contain one shower or one shower and one bathtub, one lavatory, and one water closet. Doors to unisex toilet rooms and unisex bathing rooms shall have privacy latches.		**1115B.3.2.3** **Accessible water closet**. Provide one accessible water closet …	2010 CBC **does not address** 2010 ADA req.	2010 CBC specifies that a single-accomodation toilet room have one water closet. 2010 CBC indicates that one accessible water closet must be provided, but doesn't address the two additional scenarios addressed by 2010 ADA Stds. ADA Stds. allows up to two water closets or one water closet and one urinal. 2010 CBC also does not address family toilet rooms.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
389.1	**213.2.1 Unisex (Single-Use or Family) Toilet and Unisex Bathing Rooms.** Unisex toilet rooms shall contain not more than one lavatory, …		**1115B.3.2.6** **Accessible lavatory**. Provide one accessible lavatory in compliance with Section 1115B.4.3.	Which Std.provides greater access **depends** on circumstances.	2010 CBC and ADA Stds. specify that a single-accomodation toilet room have one lavatory. 2010 CBC does not address family toilet rooms.	2010 CBC should be amended to be consistent with ADA Stds.

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389.2	**213.2.1 Unisex (Single-Use or Family) Toilet and Unisex Bathing Rooms. ...** Doors to unisex toilet rooms and unisex bathing rooms shall have privacy latches.		**1115B.3.2.7** **Privacy latch.** The entrance door shall contain a privacy latch which complies with Section 1117B.6, Controls and Operating Mechanisms.	2010 CBC **conflicts with** 2010 ADA.	2010 CBC only addresses toilet rooms, while ADA Stds. address both toilet and bathing rooms.	2010 CBC should be amended to be consistent with ADA Stds.
389.3	**213.2.1 ... Unisex Bathing Rooms.** ... Unisex bathing rooms shall contain one shower or one shower and one bathtub, one lavatory, and one water closet. Doors to ... unisex bathing rooms shall have privacy latches.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not address unisex or single-accommodation bathing rooms.	2010 CBC should be amended to be consistent with ADA Stds.
390	**213.3 Plumbing Fixtures and Accessories.** Plumbing fixtures and accessories provided in a toilet room or bathing room required to comply with 213.2 shall comply with 213.3.		**1115B.4 Accessible fixtures.**	2010 CBC is **equivalent** to 2010 ADA.	The 2010 CBC referencing of technical requirements for accessible plumbing fixtures is via the heading for Section 1115B.4, while ADA Stds. includes text to reference the requirements.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
391	**213.3.1 Toilet Compartments.** Where toilet compartments are provided, at least one toilet compartment shall comply with 604.8.1. …		**1111B.4.6.3.** **Water closets**. If a toilet compartment is provided, it shall comply with Section 1115B.3.1 or 1115B.3.2; its water closet shall comply with Section 1115B.4.1 of this code.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC does not explicitly state that where toilet compartments are provided, at least one shall be accessible.	1. 2010 CBC need not be amended. Or 2. 2010 CBC should be amended to be consistent with ADA Stds.
392	**213.3.1 Toilet Compartments.** ... In addition to the compartment required to comply with 604.8.1, at least one compartment shall comply with 604.8.2 where six or more toilet compartments are provided, or where the combination of urinals and water closets totals six or more fixtures.		**1115B.3.1.5.** **Large toilet rooms.** Where six or more compartments are provided within a multiple-accommodation toilet room, in addition to the water closet and compartment required by Items 3 and 4 above, provide at least one ambulatory accessible compartment. The ambulatory accessible compartment shall be 36 inches (914 mm) wide with an outward swinging self-closing door and parallel grab bars complying with Section 1115B.4.1, Item 3.	2010 CBC **conflicts with** 2010 ADA.	2010 CBC does not require an ambulatory accessible compartment where the combination of urinals and water closets totals six or more fixtures.	2010 CBC should be amended to be consistent with ADA Stds.
393	**Advisory 213.3.1 Toilet Compartments.** A toilet compartment is a partitioned space that is located within a toilet room, and that normally contains no more than one water closet. A toilet compartment may also contain a lavatory. A lavatory is a sink provided for hand washing. Full-height partitions and door assemblies can comprise toilet compartments where the minimum required spaces are provided within the compartment.		N/A	NA	Advisory does not establish enforceable requirements.	n/a
394	**213.3.2 Water Closets.** Where water closets are provided, at least one shall comply with 604.		**1115B.3.1.3** **Accessible fixtures**. Provide a minimum of one accessible water closet in compliance with Section 1115B.4.1. …	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and ADA Stds. are equivalent.	2010 CBC need not be amended.
395	**213.3.2 Water Closets.** Where water closets are provided, at least one shall comply with 604.		N/A	NA	NA	NA
396	**213.3.2 Water Closets.** Where water closets are provided, at least one shall comply with 604.		N/A	NA	NA	NA
397	**213.3.3 Urinals.** Where more than one urinal is provided, at least one shall comply with 605.		**1115B.4.2.1** .... Where one or more wall-hung urinals are provided, at least one with an elongated rim projecting a minimum of 14 inches (356 mm) from the wall and a maximum of 17 inches (432 mm) from the wall and a maximum of 17 inches (432 mm) above the floor shall be provided.	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC requires at least one urinal to comply in every toilet room. 2010 ADA Std. requires only the second urinal to comply.	2010 CBC need not be amended.
398	**213.3.3 Urinals.** Where more than one urinal is provided, at least one shall comply with 605.		**1115B.4.2.3** Where urinals are provided, at least one shall have a clear floor space 30 inches by 48 inches (762 mm by 1219 mm) in front of the urinal to allow forward approach. This clear space shall comply with Section 1118B.4.	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC requires at least one urinal to comply in every toilet room. 2010 ADA Std. requires only the second urinal to comply.	2010 CBC need not be amended.

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399	**213.3.4 Lavatories.** Where lavatories are provided, at least one shall comply with 606 and shall not be located in a toilet compartment.		**1115B.3.1.3.** **Accessible fixtures**. ... At least 5 percent of lavatories, but not less than one lavatory, shall be accessible in compliance with Section 1115B.4.3.	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC and ADA Stds. both require at least one lavatory to comply, but CBC goes further to require at least 5% but not less than one.	2010 CBC need not be amended.
400	**213.3.5 Mirrors.** Where mirrors are provided, at least one shall comply with 603.3.		**1115B.8.1.1** All mirrors located above accessible lavatories or countertops shall be installed with the bottom edge of the reflecting surface 40 inches (1016 mm) maximum above the finish floor or ground.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC implies that at least one mirror shall comply because elsewhere CBC specifies the minimum number of lavatories in multiple accommodation toilet rooms.	2010 CBC need not be amended.
400.1	**213.3.5 Mirrors.** Where mirrors are provided, at least one shall comply with 603.3.		**1115B.8.1.2** When mirrors are provided at locations other than above lavatories or countertops, at least one shall be installed with the bottom edge of the reflecting surface 35 inches (890 mm) maximum above the finish floor or ground.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is explicit that a mirror at an other location shall have at least one accessible mirror installed. ADA Stds. is not clear if an accessible mirror is installed at a lavatory or countertop, that a mirror in an other location would also have to be accessible.	2010 CBC need not be amended.
401	**213.3.6 Bathing Facilities.** Where bathtubs or showers are provided, at least one bathtub complying with 607 or at least one shower complying with 608 shall be provided.		**1111B.4.2.1.5** Where full bathrooms are provided, at least one full bathroom (that is, one with a water closet, a lavatory and a bathtub or shower)	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and ADA Stds. are eqivalent.	2010 CBC need not be amended.
401.1	**213.3.6 Bathing Facilities.** Where bathtubs or showers are provided, at least one bathtub complying with 607 or at least one shower complying with 608 shall be provided.		**1115B.2** **Bathing and shower facilities**. Where facilities for bathing are provided for the public, clients or employees, including showers or bathtubs, at least one shower or bathtub ... shall be accessible.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and ADA Stds. are eqivalent.	2010 CBC need not be amended.
402	**213.3.7 Coat Hooks and Shelves.** Where coat hooks or shelves are provided in toilet rooms without toilet compartments, at least one of each type shall comply with 603.4. Where coat hooks or shelves are provided in toilet compartments, at least one of each type complying with 604.8.3 shall be provided in toilet compartments required to comply with 213.3.1. Where coat hooks or shelves are provided in bathing *facilities* , at least one of each type complying with 603.4 shall serve fixtures required to comply with 213.3.6.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not scope the number of coat hoos or shelves.	2010 CBC should be amended to be consistent with ADA Stds.
403	**214 Washing Machines and Clothes Dryers**		NA	2010 CBC **does not address** 2010 ADA req.		1. Create section addressing washer dryers under 1126B
403.1			SECTION 1135A LAUNDRY ROOMS 1135A.1 General. If clothes washing machines and clothes dryers are provided in covered multifamily dwelling units, one of each type of appliance shall be provided. Where front-loading clothes washers are not provided, management shall provide assistive devices, on request of the occupant, to permit the use of top-loading clothes washers	2010 CBC provides **less access** than 2010 ADA.		1. Create section addressing washer dryers under 1126B

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404	**214.1 General.** Where provided, washing machines and clothes dryers shall comply with 214.		***SECTION 1111B*** ***ACCESSIBILITY FOR GROUP R OCCUPANCIES*** **1111B.1 General**. .... Public-use and common-use areas serving adaptable guest and/or dwelling units shall be accessible. See also the general accessibility requirements in Section 1114B.1.1. ... 1111B.2 Public and common use rooms or areas. Public- and common-use rooms and similar areas shall be made accessible to persons with disabilities, subject to specific provisions contained in other portions of these regulations. See also general requirements in Section 1114B.1.1. At least one of each type of amenity (such as washers, dryers and similar equipment installed for the use of occupants) in each common area shall be accessible and shall be located on an accessible route to any accessible unit or sleeping accommodation. ... SECTION 1105B ACCESSIBILITY FOR GROUP B OCCUPANCIES Group B occupancies shall be accessible as provided in this chapter. See also the general requirements in Section 1114B.1.1. ... 1105B.3 Office buildings and personal and public service facilities. Office buildings and personal and public service facilities shall conform to the provisions of this section. 1105B.3.1 Facilities covered. Facilities covered in this section are those that are used by the public as customers, clients, visitors or which are potentially places of employment and shall include, but not be limited to, the following requirements: ... All personal and public service facilities, including... launder mats, cleaning and laundry outlets, ...	2010 CBC provides **less access** than 2010 ADA.	CBC only addresses washers & dryers in R occupancies - it does not address transient lodging, laundromats, or other areas - it does allude in B occupancies to laundermats and cleaning & laundry outlets	1. Create section addressing washer dryers under 1126B and remove from R occupancies
405	**214.2 Washing Machines.** Where three or fewer washing machines are provided, at least one shall comply with 611. Where more than three washing machines are provided, at least two shall comply with 611.		1111B.2 Public and common use rooms or areas. ... At least one of each type of amenity (such as washers, dryers and similar equipment installed for the use of occupants) in each common area shall be accessible and shall be located on an accessible route to any accessible unit or sleeping accommodation. ...	2010 CBC provides **less access** than 2010 ADA.		1. Adopt ADA language and criteria
406	**214.3 Clothes Dryers.** Where three or fewer clothes dryers are provided, at least one shall comply with 611. Where more than three clothes dryers are provided, at least two shall comply with 611.		1111B.2 Public and common use rooms or areas. ... At least one of each type of amenity (such as washers, dryers and similar equipment installed for the use of occupants) in each common area shall be accessible and shall be located on an accessible route to any accessible unit or sleeping accommodation. ...	2010 CBC provides **less access** than 2010 ADA.		1. Adopt ADA language and criteria
407	**215 Fire Alarm Systems**		There is no equivalent heading in the CBC	NA		
408	**215.1 General.** Where fire alarm systems provide audible alarm coverage, alarms shall comply with 215.		There is no equivalent heading in the CBC	NA		

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409	**EXCEPTION:** In existing *facilities* , visible alarms shall not be required except where an existing fire alarm system is upgraded or replaced, or a new fire alarm system is installed.		**CBC 907.5.2.3 Visable Alarms. Exception 1.** In other than Group I-2 and I-2.1, visable alarm motification appliances are not required in alterations, except where an existing fire alarm system is upgraded or replaced, or a new fire alarm system is installed.	2010 CBC provides **less access** than 2010 ADA.	CBC provides less access because it excempts !-2 and I-2.1.	remove the exception for I-2 and I-2.1
410	**Advisory 215.1 General.** Unlike audible alarms, visible alarms must be located within the space they serve so that the signal is visible. Facility alarm systems (other than fire alarm systems) such as those used for tornado warnings and other emergencies are not required to comply with the technical criteria for alarms in Section 702. Every effort should be made to ensure that such alarms can be differentiated in their signal from fire alarms systems and that people who need to be notified of emergencies are adequately safeguarded. Consult local fire departments and prepare evacuation plans taking into consideration the needs of every building occupant, including people with disabilities.					
411	**215.2 Public and Common Use Areas.** Alarms in *public use* areas and *common use* areas shall comply with 702.		**907.5.2.3.1 Public and common use areas.** Visible alarm notification appliances shall be provided in public use areas and common use areas, including but not limited to: [F] 1. Sanitary facilities including restrooms, bathrooms and shower rooms 2. Corridors 3. Music practice rooms 4. Band rooms 5. Gymnasiums 6. Multipurpose rooms 7. Occupational shops 8. Occupied rooms where ambient noise impairs hearing of the fire alarm 9. Lobbies 10. Meeting rooms 11. Classrooms	2010 CBC is **equivalent** to 2010 ADA.		
412	**215.3 Employee Work Areas.** Where *employee work areas* have audible alarm coverage, the wiring system shall be designed so that visible alarms complying with 702 can be integrated into the alarm system.		**907.5.2.3.2 Employee work areas.** Where employee work areas have audible alarm coverage, the notification appliance circuits serving the employee work areas shall be initially designed with a minimum of 20-percent spare capacity to account for the potential of adding visible notification appliances in the future to accommodate hearing impaired employee(s). [F]	2010 CBC provides **greater access** than 2010 ADA.	The CBC provides better access because of greater clarity in the design considerations.	
413	**215.4 Transient Lodging.** Guest rooms required to comply with 224.4 shall provide alarms complying with 702.		See analysis of 702	NA		
414	**215.4 Transient Lodging.** Guest rooms required to comply with 224.4 shall provide alarms complying with 702.		See analysis of 702	NA		
415			See analysis of 702	NA		
416	**215.5 Residential Facilities.** Where provided in *residential dwelling units* required to comply with 809.5, alarms shall comply with 702.		See analysis of 702	NA		
417	**216 Signs**		**1117B.5 Signs and identification.** ... **Section 4.30** …	2010 CBC is **equivalent** to 2010 ADA.	California does not have a separate scoping section for signs, but does address scoping for signs in section 1117B.5 Signs and identification. California's scope is actually broader than the 2010 ADA's scope, but this particular item, which is only a general title, does not address that, and the note is no longer accurate, since some of the California standards are now less rigorous than the ADA standards, and some are equivalent. California does not distinguish between interior and exterior signs, because many interior spaces are entered from building exteriors.	I recommend keeping the designation "Identification devices," because that is how all formal specifications refer to architectural signs, as "Identification devices."

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418	**216 Signs**		**1117B.5 Signs and identification.** ... **Section 4.30** …	2010 CBC is **equivalent** to 2010 ADA.	California does not have a separate scoping section for signs, but does address scoping for signs in section 1117B.5 Signs and identification. California's scope is actually broader than the 2010 ADA's scope, but this particular item, which is only a general title, does not address that, and the note is no longer accurate, since some of the California standards are now less rigorous than the ADA standards, and some are equivalent. _____ California does not distinguish between interior and exterior signs, because many interior spaces are entered from building exteriors.	I recommend keeping the designation "Identification devices," because that is how all formal specifications refer to architectural signs, as "Identification devices."
419	**216.1 General.** Signs shall be provided in accordance with 216 and shall comply with 703.		**1117B.5.1 General.** When new or additional signs and/or identification devices are provided, ... the new or altered signs and/or identification devices shall comply with Section 1117B.5. …	Which Std.provides greater access **depends** on circumstances.	CBC makes no distinction between exterior and interior signs.	This section needs to be moved to a new Chapter 2 - Scoping. Suggest retaining term "identification devices" to comply with specification language.
420	**216.1 General.** Signs shall be provided in accordance with 216 and shall comply with 703.		**1117B.5.1 General.** When new or additional signs and/or identification devices are provided, ... the new or altered signs and/or identification devices shall comply with Section 1117B.5. …	Which Std.provides greater access **depends** on circumstances.	CBC makes no distinction between exterior and interior signs.	This section needs to be moved to a new Chapter 2 - Scoping. Suggest retaining term "identification devices" to comply with specification language.
420.1	**216.1 General.** Signs shall be provided in accordance with 216 and shall comply with 703.		**1117B.5.1 General.** When new or additional signs and/or identification devices are provided, or when existing signs and/or identification devices are replaced or altered ... The addition of or replacement of signs and/or identification devices shall not trigger any additional path of travel requirements	Which Std.provides greater access **depends** on circumstances.	CBC emphasizes the fact that any change or replacement of a sign makes it a new or altered architectural element, which must comply with the most recent accessibility requirements. This is necessary because permits are generally not required to change or replace most architectural signs, particularly door identification signs, which are often thought of as part of the building decoration.	Suggest adding this to the signage scoping section. Current CBC language can be copied.
421	**EXCEPTIONS: 1.** *Building* directories, menus, seat and row designations in *assembly areas* , occupant names, *building* addresses, and company names and logos shall not be required to comply with 216. **2.** In parking *facilities* , signs shall not be required to comply with 216.2, 216.3, and 216.6 through 216.12. **3.** Temporary, 7 days or less, signs shall not be required to comply with 216. **4.** In detention and correctional f*acilities* , signs not located in *public use* areas shall not be required to comply with 216.			2010 CBC provides **greater access** than 2010 ADA.	CBC does not provide for exceptons. It is my opinion that 2010 ADA goes too far with exceptions, so I believe CBC should pick and choose just some areas. For instance, directories that have many entries, such as the ones in many multi-story office buildings, would be much too large for most people to see from a standing position if all text were 5/8 inch minimum height. However, glare should not be allowed, and high dark/light conttrast should be required. The same goes for large menus. Decorative text should not be allowed on menus, and overhead menus ought to have some minimum height requirement for text, or be accompanied by hand-out or eye level menus. Parking facilities in California often do double duty, particularly in shopping malls, and need directional signs and restroom signs that are accessible, for one example. There are individuals who can drive who cannot tolerate glare on signs, and still need high contrast and non-decorative type. Building address signs along pedestrian walkways should be repeated at eye level with tactile and braille designators.	See comment section about which items should be NOT included as exceptions in California. California should not reduce accessibility any more than necessary for persons with vision impairments. However, occupant and company names and logos are not actually identification signs, and are changeable information. Signs that can be turned into weapons should not be used where inmates circulate, and the public is not allowed.

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422	**216.2 Designations.** Interior and exterior signs identifying permanent rooms and *spaces* shall comply with 703.1, 703.2, and 703.5. Where *pictograms* are provided as designations of permanent interior rooms and *spaces*, the *pictograms* shall comply with 703.6 and shall have text descriptors complying with 703.2 and 703.5.		**1117B.5.1.1 Identification signs.** When signs identify permanent rooms and spaces of a building or site, they shall comply with Sections **1117B.5.2, 1117B.5.3, 1117B.5.5, 1117B.5.6 and 1117B.5.7**. …	Which Std.provides greater access **depends** on circumstances.	This section provides scoping for room identification, and references to other chapters and sections of the code. (Note on ANSI Exception: This exception is repeated in 2010 ADA in the scoping chapter 2 (**216.02.01**) It is not included in Title 24) _____The section of 2010 ADA that is closest to this section of Title 24 is **216.2**, which scopes "designations," That is the term used instead of "identification signs." See rows below for exact scoping language in ADA. The ADA reference to pictograms is picked up somewhat in 1117B, but is not as clear. The section on pictograms makes the standards a little more clear, in that it states that the pictogram rules called out in the scoping apply to pictograms that are used as designations.	Since California has chosen to adopt the 2010 ADA as a format, all scoping could be moved to Chapter 2. All special scoping in CBC sign section should be repeated in Chapter 2, to bring the code up to the level of access provided in California.
423	**216.2 Designations.** Interior and exterior signs identifying permanent rooms and *spaces* shall comply with 703.1, 703.2, and 703.5. Where *pictograms* are provided as designations of permanent interior rooms and *spaces*, the *pictograms* shall comply with 703.6 and shall have text descriptors complying with 703.2 and 703.5.		**1117B.5.1.1 Identification signs.** When signs identify permanent rooms and spaces of a building or site, they shall comply with Sections **1117B.5.2, 1117B.5.3, 1117B.5.5, 1117B.5.6 and 1117B.5.7**. …	Which Std.provides greater access **depends** on circumstances.	California applies all sign standards to both interior and exterior elements. If there are exterior restroom buildings, for instance, identified with pictograms, those would have to follow the standards.	Since California has chosen to adopt the 2010 ADA as a format, all scoping could be moved to Chapter 2. All special scoping in CBC sign section should be repeated in Chapter 2, to bring the code up to the level of access provided in California. _____ In California, the scoping for pictograms that identify rooms and spaces should not be confined to "interior rooms and spaces."
424	**EXCEPTION:** Exterior signs that are not located at the door to the *space* they serve shall not be required to comply with 703.2.			2010 CBC **does not address** 2010 ADA req.	California doesn't address cases where there are building identificaitons, for instance, that aren't directly adjacent to the building entrance. On assumes this refers to monument signs, or dimensional letters above doors or higher on buildings. I have asked the Access Board for a clear explanation of what they are referring to, but have not been able to get a really definitive answer. The question is, does the presence of such a sign trigger a requirement for a tactile id sign adjacent to the door?.	Since California has chosen to adopt the 2010 ADA as a format, all scoping could be moved to Chapter 2. All special scoping in CBC sign section should be repeated in Chapter 2, to bring the code up to the level of access provided in California. _____
425	**Advisory 216.2 Designations.** Section 216.2 applies to signs that provide designations, labels, or names for interior rooms or spaces where the sign is not likely to change over time. Examples include interior signs labeling restrooms, room and floor numbers or letters, and room names. Tactile text descriptors are required for pictograms that are provided to label or identify a permanent room or space. Pictograms that provide information about a room or space, such as “no smoking,” occupant logos, and the International Symbol of Accessibility, are not required to have text descriptors.			Which Std.provides greater access **depends** on circumstances.	California doesn't provide advisories, but the standards are comparable in many respects, although the information on the use of the pictogram rules only for designations is implied rather than stated as it is in the ADA.	
426	**216.3 Directional and Informational Signs.** Signs that provide direction to or information about interior *spaces* and *facilities* of the *site* shall comply with 703.5.		**1117B.5.1.2. Directional and informational signs.** When signs direct to or give information about permanent rooms and functional spaces of a building or site, they shall comply with Sections **1117B.5.2, 1117B.5.3 and 1117B.5.4.**	Which Std.provides greater access **depends** on circumstances.	Most of the requirements for visual characters are the same as the 2010 ADA standards, but the requirements for character and stroke width are slightly more stringent in Title 24, and there are added requirements for intercharacter and interline spacing in 2010 ADA. 2010 ADA scoping for these signs is at 216.3. _____ California provides greater access in the general scoping of these signs, because both interior and exterior signs are regulated.	Leave the California requirement as is, but move it to the scoping section, Chapter 2.
427	**Advisory 216.3 Directional and Informational Signs.** Information about interior spaces and facilities includes rules of conduct, occupant load, and similar signs. Signs providing direction to rooms or spaces include those that identify egress routes.			2010 CBC is **equivalent** to 2010 ADA.	Although there is no specific advisory in the CBC, this information is assumed in CBC.	Advisories are helpful additions and should be included in CBC.
428	**216.4 Means of Egress.** Signs for means of egress shall comply with 216.4.		**1117B.5.1.1** ... For other means of egress signs and identification provisions adopted by SFM and DSA-AC, see Chapter 10, Sections 1011.3 for Tactile Exit Signs, 1022.8 for Floor Identification Signs, 1008.1.9.7 for Delayed Egress Locks, 1007.9, 1007.10 and 1007.11 for Accessible Means of Egress, ...	2010 CBC provides **greater access** than 2010 ADA.	Greater access is provided only in that there are more egress signs specifically required in the CBC, and there is special language for different types of egress signs.	Retain additional scoping for egress signs, and include in Chapter 2.

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429	**216.4.1 Exit Doors.** Doors at exit passageways, exit discharge, and exit stairways shall be identified by *tactile* signs complying with 703.1, 703.2, and 703.5.		**1117B.5.1.1** ... For other means of egress signs and identification provisions adopted by SFM and DSA-AC, see Chapter 10, Sections 1011.3 for Tactile Exit Signs, 1022.8 for Floor Identification Signs, 1008.1.9.7 for Delayed Egress Locks, 1007.9, 1007.10 and 1007.11 for Accessible Means of Egress, ...	2010 CBC provides **greater access** than 2010 ADA.	Exit doors require more specific text in CBC than in 2010 ADA, which merely requires the word "Exit" to be used at all types of exit locations.	
429.1			**SECTION 1011 EXIT SIGNS**			
429.2	**216.4.1 Exit Doors.** Doors at exit passageways, exit discharge, and exit stairways shall be identified by *tactile* signs complying with 703.1, 703.2, and 703.5.		**1011.3 Tactile exit signs.** For the purposes of Section 1011.3, the term “Tactile exit signs” shall mean those required signs that comply with Section 1117B.5.1, Item 1. Tactile exit signs shall be required at the following locations. 1. Each grade-level exterior exit door shall be identified by a tactile exit signs with the word: “EXIT. 2. Each exit door that leads directly to a grade-level exterior exit by means of a stairway or ramp shall be identified by a tactile exit sign with the following words as appropriate: A. “EXIT STAIR DOWN” B. “EXIT RAMP DOWN” C. “EXIT STAIR UP” D. “EXIT RAMP UP”	2010 CBC provides **greater access** than 2010 ADA.	The major problem with the specificity decided on by the committee working with the State Fire Marshal, is that there has been no corresponding education of any of the stakeholders -- inspectors, architects, or people who are blind and visually impaired. The signs are often incorrect, sometimes dangerous, and probably not often looked for by people who are functionally blind. Further, too many signs are specified since the code was changed to eliminate the reqirement that the tactile signs be located where visual signs are required. Not only is there not much use for a tactile sign in a classroom with only one door, the signs are often covered by blinds, and are inaccessible anyway.	Eliminate "To Exit," which is confusing, and is not really an identification, and substitute "Exit Route." Retain other special designations. Add prohibition of use of tactile exit signs as directional signs, because of danger of confusion with entrance identification.
429.3			**3.** Each exit door that leads directly to a grade-level exterior exit by means of an exit exclosure that does not utilize a stair or ramp, or by means of an exit passageway, shall be identified by a tactile exit sign with the words “EXIT ROUTE” **4.** Each exit access door from an interior room or area that is required to have a visual exit sign, shall be identified by a tactile exit sign with the words "EXIT ROUTE." **5.** Each exit door through a horizontal exit shall be identified by a tactile exit sign with the words “TO EXIT.”			
430	**Advisory 216.4.1 Exit Doors.** An exit passageway is a horizontal exit component that is separated from the interior spaces of the building by fire-resistance-rated construction and that leads to the exit discharge or public way. The exit discharge is that portion of an egress system between the termination of an exit and a public way.		**1002.1 Definitions. EXIT.** That portion of a means of egress system which is separated from other interior spaces of a building or structure by fire-resistance-rated construction and opening protectives as required to provide a protected path of egress travel between the exit access and the exit discharge. Exits include exterior exit doors at the level of exit discharge, vertical exit enclosures, exit passageways, exterior exit stairways, exterior exit ramps and horizontal exits.	2010 CBC is **equivalent** to 2010 ADA.	I think it would be helpful to integrate the applicable sections of Chapter 10 with the access standards, so they would not be so easily ignored.	it would be helpful to have a layperson's explanation of the path of egress, so it would be clear that the technical definition of an exit doesn't mean any door opening from any space, such as a door leading from a closet.
431	**216.4.2 Areas of Refuge.** Signs required by section 1003.2.13.5.4 of the International Building Code (2000 edition) or section 1007.6.4 of the International Building Code (2003 edition) (incorporated by reference, …		1007.9 Signage. Signage indicating special accessibility provisions shall be provided as shown. Each door providing access to an area of refuge from an adjacent floor area shall be identified by a sign complying with Section 1117B.5.1, item 2 stating AREA OF REFUGE. .... Signage shall comply with Section 1117B.5.1, items 2 and 3, requirements for visual characters and include the International Symbol of Accessibility. Where exit sign illumination is required by Section 1011.2 the signs shall be illuminated. Additionally, tactile signage complying with Section 1117B.5.1, Item 1 and the International Symbol of Accessibility shall be located at each door to an area of refuge ... in accordance with Section 1011.3.	2010 CBC is **equivalent** to 2010 ADA.	Since the scoping and the technical requirements are intertwined in the CBC, it is not easyt to compare them. However, since the A117.1 requirements for signage are more stringent than the CBC requirements in such areas as stroke width and character spacing, that makes the ADA requirements technically more stringent. However, the general requirements are identical.	Once the signage requirements are brought up to the level of the ADA requirements, the two sections will be equivalent.

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431.1	**216.4.2 Areas of Refuge.** ... see “Referenced Standards” in Chapter 1) to provide instructions in areas of refuge shall comply with 703.5.		1007.11 Instructions. In area of refuge and exterior areas for assisted rescue, instructions on the use of the area under emergency conditions shall be posted. The instructions shall include all of the following and shall comply with Section 1117B.5.1 Item 2. 1. Persons able to use the exit stairway do so as soon as possible, unless they are assisting others. 2. Information on planned availability of assistance in the use of stairs or supervised operation of elevators and how to summon such assistance. 3. Directions for use of the two-way communications system where provided.	2010 CBC is **equivalent** to 2010 ADA.		
431.2	**216.4.2 Areas of Refuge.** ... see “Referenced Standards” in Chapter 1) to provide instructions in areas of refuge shall comply with 703.5.		1007.8.2 Directions. Directions for the use of the two-way communication system, instructions for summoning assistance via the two-way communication system and written identification of the location shall be posted adjacent to the two-way communication system.	2010 CBC is **equivalent** to 2010 ADA.	Since the A117.1 requirements for signage are more stringent than the CBC requirements in such areas as stroke width and character spacing, that makes the ADA requirements technically more stringent. However, the general requirements appear to be the same.	Once the signage requirements are brought up to the level of the ADA requirements, the two sections will be equivalent. However, it looks as if this code item is actually repeated in 1007.11. Redundancy should be removed.
431.3	**216.4.2 Areas of Refuge.** ... see “Referenced Standards” in Chapter 1) to provide instructions in areas of refuge shall comply with 703.5.		1007.9 Signage. Signage indicating special accessibility provisions shall be provided as shown.... Each door providing access to an exterior sign for assisted rescue shall be identified by a sign stating EXTERIOR AREA FOR ASSISTED RESCUE. Signage shall comply with Section 1117B.5.1, items 2 and 3, requirements for visual characters and include the International Symbol of Accessibility. Where exit sign illumination is required by Section 1011.2 the signs shall be illuminated. Additionally, tactile signage complying with Section 1117B.5.1, Item 1 and the International Symbol of Accessibility shall be located at each door to an area of refuge and exterior area for assisted rescue in accordance with Section 1011.3.	2010 CBC is **equivalent** to 2010 ADA.	Since the A117.1 requirements for signage are more stringent than the CBC requirements in such areas as stroke width and character spacing, that makes the ADA requirements technically more stringent. However, the general requirements appear to be the same.	Once the signage requirements are brought up to the level of the ADA requirements, the two sections will be equivalent.
432	**216.4.3 Directional Signs.** Signs required by section 1003.2.13.6 of the International Building Code (2000 edition) or section 1007.7 of the International Building Code (2003 edition) (incorporated by reference, see “Referenced Standards” in Chapter 1) to provide directions to *accessible means of egress* shall comply with 703.5.		**1007.10 Directional signage.** Directional signage indicating the location of the other means of egress and which are accessible means of egress shall be provided at the following: 1. At exits serving a required accessible space but not providing an approved accessible means of egress. 2. At elevator landings. 3. Within areas of refuge.	2010 CBC is **equivalent** to 2010 ADA.	This is a redundant item from another section of the California code, which is poorly written, and needs to be revised and moved to this section.	See 1133B.1.1.1.2 for required sign when ground level exit doors are not accessible. That item should be relocated to the Scoping Chapter, under 216, and should be specified as a directional sign.
432.1			**SECTION 1008 DOORS, GATES AND TURNSTILES**			
432.2			**1008.1.9.7 Delayed egress locks.** 5. A sign shall be provided on the door located above and within 12 inches (305 mm) of the release device reading “KEEP PUSHING. THIS DOOR WILL OPEN IN 15 [30] SECONDS. ALARM WILL SOUND” Sign lettering shall be at least 1 inch (25 mm) in height and shall have a stroke of not less than 1/8 inch (3.2 mm).	2010 CBC provides **greater access** than 2010 ADA.	I don't see any corresponding item in the ADA Standards for this sign.	Scoping item for these signs should be added to Chapter 2.
432.3			5.1 A tactile sign shall also be provided in Braille and raised characters, which complies with Section 1117B.5.1, Item 1.	2010 CBC provides **greater access** than 2010 ADA.	There is no scoping for this sign in the ADA Standards.	Add scoping to Chapter 2.
433			SECTION 1129B: ACCESSIBLE PARKING REQUIRED	2010 CBC is **equivalent** to 2010 ADA.	Scoping is essentially the same.	Retain California requirements.

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434			SECTION 1131B: PASSENGER DROP-OFF AND LOADING ZONES	2010 CBC provides **greater access** than 2010 ADA.	ADA no longer requires marking of loading zones, because they maintain that all loading zones are now essentially accessible.	Retain more stringent California requirement.
435	**216.5 Parking.** Parking *spaces* complying with 502 shall be identified by signs complying with 502.6.		1129B.4 Identification of parking spaces for off-street parking facilities. Each parking space reserved for persons with disabilities shall be identified by a reflectorized sign permanently posted immediately adjacent to and visible from each stall or space, ...	2010 CBC provides **greater access** than 2010 ADA.	California requires reflective signs for parking, whereas this is not mentioned in the ADA.	Retain more stringent California requirement. However, I suggest that the word "reflective" which is the normal signage terminology be used rather than "reflectorized." Both are technically correct terms, but most sign companies do not "reflectorize" signs, but purchase "reflective" material to fabricate signs.
436	**EXCEPTIONS: 1.** Where a total of four or fewer parking *spaces* , including *accessible* parking *spaces* , are provided on a *site* , identification of *accessible* parking *spaces* shall not be required. **...**			2010 CBC provides **greater access** than 2010 ADA.	California does not have an exception that I can find.	Retain more stringent California requirement.
437	**EXCEPTIONS: ...** **2.** In residential *facilities* , where parking *spaces* are assigned to specific *residential dwelling units* , identification of *accessible* parking *spaces* shall not be required.		**1109A.4 Assigned accessible parking spaces.** When assigned parking spaces are provided for a resident or a group of residents, ... When assigned parking is provided, signage as required bySection 1 109A.8.8 shall not be required.	2010 CBC is **equivalent** to 2010 ADA.	This is unusual for California, in that residential scoping is included with other scoping. O f course it would be advantageous for California if we would have just one unified code	Reorganize Title 24 to unified document covering architectural elements for all types of occupancies, including residences and hospitals, and including standards currently found in separate code documents.
438	**216.6 Entrances.** Where not all *entrances* comply with 404, *entrances* complying with 404 shall be identified by the International Symbol of *Accessibility* complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest *entrance* complying with 404 shall be provided at *entrances* that do not comply with 404.		**1117B.5.8.1.2 Entrance signs.** Entrances to buildings and facilities that are accessible to and usable by persons with disabilities shall be identified with a minimum of one International Symbol of Accessibility and with additional directional signs, utilizing the symbol, at junctions where the accessible route of travel diverges from the regular circulation path, to be visible to persons along approaching circulation paths. In existing buildings and facilities, entrances which are not accessible shall have directional signage complying with Section 1117B.5.1, Items 2 and 3, which indicates the location of and route to the nearest accessible entrance.	2010 CBC provides **greater access** than 2010 ADA.	The ADA standards do not make any provision for path of travel signs to be provided other than at entrances, while the CBC requires that decision points along the way, when one direction is accessible and the other is not, be marked with the ISA.	CBC should retain the more stringent requirement, although more should be done to educate designers and inspectors about the requirement, so that unnecessary use of signs along accessible paths can be avoided.
439	**216.6 Entrances.** Where not all *entrances* comply with 404, *entrances* complying with 404 shall be identified by the International Symbol of *Accessibility* complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest *entrance* complying with 404 shall be provided at *entrances* that do not comply with 404.		1117B.5.8.1.2 Entrance signs. Entrances to buildings and facilities that are accessible to and usable by persons with disabilities shall be identified with a minimum of one International Symbol of Accessibility ... In existing buildings and facilities, entrances which are not accessible shall have directional signage complying with Section 1117B.5.1, Items 2 and 3, which indicates the location of and route to the nearest accessible entrance.	2010 CBC provides **greater access** than 2010 ADA.	California's code is substantially broader than the ADA. It sets up an entire accessible path of travel requirement, that is not included in the ADA, except tangentially in the Advisory.	Retain California requirements.
440	**216.6 Entrances.** Where not all *entrances* comply with 404, *entrances* complying with 404 shall be identified by the International Symbol of *Accessibility* complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest *entrance* complying with 404 shall be provided at *entrances* that do not comply with 404.		1117B.5.8.1.2 Entrance signs. Entrances to buildings and facilities that are accessible to and usable by persons with disabilities shall be identified ... with additional directional signs, utilizing the symbol, at junctions where the accessible route of travel diverges from the regular circulation path, to be visible to persons ...	2010 CBC provides **greater access** than 2010 ADA.	You could argue that California's requirement that signs be placed at decision points along the path of travel does meet the former requirement that persons with mobility impairments "not be required to retrace the approach route." In my opinion, this requirement should be extended to interior paths of travel that lead from inaccessible exits and restrooms to corresponding accessible elements.	Retain California requirement for path of travel signs.

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440.1	**216.6 Entrances.** …		Exception: 1. An International Symbol of Accessibility is not required at entrances to individual rooms, suites, offices, sales or rental establishments, or other such spaces when all entrances to the building or facility are accessible and persons entering the building or facility have passed through one or more entrances with signage complying with this section. 2. An International Symbol of Accessibility is not required at entrances to machinery spaces frequented only by service personnel for maintenance, repair, or occasional monitoring of equipment; for example, elevator pits or elevator penthouses; mechanical, electrical or communications equipment rooms; piping or equipment catwalks; electric substations and transformer vaults; and highway and tunnel utility facilities.	2010 CBC is **equivalent** to 2010 ADA.	I do not believe that the intent of the federal guideline was ever to provide an ISA at every accessible doorway, but to identify accessible building and facility entrances. However, since California has so many buildings where entrances to individual rooms and suites are along building exteriors, rather than through lobbies or interior corridors, you would find the ISA specified at every doorway from the exterior, although interior entrances were not so identified. This exception was written to try to clarify the requirement. Exception 2 is understood, because federal standards exempt such spaces from accessibility rules. Therefore, they would not require an ISA in any case.	Retain the California exceptions, since they demonstrate the intent of the standard.
441	**Advisory 216.6 Entrances.** Where a directional sign is required, it should be located to minimize backtracking. In some cases, this could mean locating a sign at the beginning of a route, not just at the inaccessible entrances to a building.		1117B.5.8.1.2 Entrance signs. Entrances to buildings and facilities that are accessible to and usable by persons with disabilities shall be identified with ... additional directional signs, utilizing the symbol, at junctions where the accessible route of travel diverges from the regular circulation path, to be visible to persons along approaching circulation paths. ...	2010 CBC provides **greater access** than 2010 ADA.	I say that CBC provides greater access, in that our requirement is included in the code items, whereas the ADA only mentions this as an advisory.	Retain California requirement for directional signs at decision points.
442	**216.7 Elevators.** Where existing elevators do not comply with 407, elevators complying with 407 shall be clearly identified with the International Symbol of *Accessibility* complying with 703.7.2.1.		1117B.5.8.1.3 Information posted. Buildings that provide specific ... elevators for public use that conform to these building standards shall have this information posted in the building directory. The information shall be accompanied by the International Symbol of Accessibility.	Which Std.provides greater access **depends** on circumstances.	This standard may cause considerable "overkill" since the federal standard obviously applies only to elevators that have been added or modified to provide accessibility, when some elevators are not accessible. The way it is now written, this sign would have to be included in every building, even if it is completely accessible. Therefore, the California code should be modified to only include notification when not all elevators are accessible. Depending on the location of the accessible elevators, it may provide better accessibility to notify people when they enter the building, rather than waiting until they get to the elevator to inform them if the elevator is accessible or not. However, in other cases, the directory (if there is one), may be obscure or so crowded with information that the sign will be missed. Furthermore, many buildings do not have directories, and may not even have lobbies or foyers. The elevators may be located outside the buildings. Both the federal and state regulations need to be rewritten.	The language needs to say something like "216.7 Elevators. Where all elevators do not comply with 407, elevators complying with 407 shall be clearly identified with the International Symbol of Accessibility complying with 703.7.2.1. Also, the restroom requirement should be separated from the elevator requirement.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
443	**216.8 Toilet Rooms and Bathing Rooms.** Where existing toilet rooms or bathing rooms do not comply with 603, directional signs indicating the location of the nearest toilet room or bathing room complying with 603 within the *facility* shall be provided. Signs shall comply with 703.5 and shall include the International Symbol of *Accessibility* complying with 703.7.2.1. ...		1117B.5.8.1.3 Information posted. Buildings that provide specific sanitary facilities ... for public use that conform to these building standards shall have this information posted in the building directory. The information shall be accompanied by the International Symbol of Accessibility.	Which Std.provides greater access **depends** on circumstances.	It probably provides better access in most cases to have the information about accessible restrooms, when not all restrooms are accessible, located where people enter the building, or at a decision point. However, in some cases, there is no central building entrance, and no directory. The sign could then be located in an exterior location, but might not be seen, so putting a directional sign near the inaccessible restrooms, at a decision point, would make more sense. There have been objections to that, because the ISA might mislead people into thinking the restroom is actually accessible. Therefore, the code needs to be more specific about the location and wording on the sign. As mentioned above, right now the regulation seems to say that the sign must be provided even when all restrooms are accessible. This is not the intent of the federal standard. California uses the more general term "sanitary facilities." Signs at entrances would actually be appropriate only for restrooms, not shower or bathing rooms. Those would need to be located at decision points.	Separate information on restrooms (i.e. sanitary facilities) from information on elevators. Require that sign be located at building entrance, or at a decision point when all sanitary facilities are not accessible. Wording might be something like this: **216.8 Sanitary Facilities.** Where all sanitary facilities do not comply with 603, directional signs indicating the location of the nearest sanitary facility complying with 603 within the facility shall be provided. Signs shall comply with 703.5 and shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs shall be located in a prominent place at the building or level entrance, or at the decision point where the path of travel to the accessible sanitary facility diverges from the path of travel to the inaccessible sanitary facility . . .. (In this version, we have retained "sanitary facility," and if that is the decision, all code language should use that terminology.)
444	**216.8 Toilet Rooms and Bathing Rooms.** Where existing toilet rooms or bathing rooms do not comply with 603, directional signs indicating the location of the nearest toilet room or bathing room complying with 603 within the *facility* shall be provided. Signs shall comply with 703.5 and shall include the International Symbol of *Accessibility* complying with 703.7.2.1. ...		**UNDER REVIEW** 4.1.2(7)(d) Accessible toilet and bathing facilities when not all are accessible. 4.1.6(3)(e)(iii) When existing toilet or bathing facilities are being altered and are not made accessible, signage complying with 4.30.1,4.30.2, 4.30.3, 4.30.5 and 4.30.7 shall be provided indicating the location of the nearest accessible toilet or bathing facility within the facility.	2010 CBC is **equivalent** to 2010 ADA.	Note that this regulations does not state where the signs should be located. The sign should not be immediately adjacent to the inaccessible restroom door, because it can be confusing at that point. Locate the sign at a decision point prior to reaching the inaccessible restroom. This could be added to the code. Note also the language inconsistence. Other code items refer to "sanitary facilities," and this item changes to the federal language, "toilet and bathing facility." One or the other should be chosen and used throughout the code. Note that the federal language excludes lavatories, unless they are combined with toilet and/or bathing facilities.	Suggested text: 4.1.2(7)(d) Accessible toilet and bathing facilities when not all are accessible. 4.1.6(3)(e)(iii) When existing toilet or bathing facilities are being altered and are not made accessible, signage complying with 4.30.1,4.30.2, 4.30.3, 4.30.5 and 4.30.7 shall be provided indicating the location of the nearest accessible toilet or bathing facility within the facility. The sign shall be located in a prominent location at the building or level entrance, or at a decision point prior to reaching the inaccessible toilet and bathing facilities. (This presumes that we are changing from "sanitary facility")
445	**216.8 Toilet Rooms and Bathing Rooms.** Where existing toilet rooms or bathing rooms do not comply with 603, directional signs indicating the location of the nearest toilet room or bathing room complying with 603 within the *facility* shall be provided. Signs shall comply with 703.5 and shall include the International Symbol of *Accessibility* complying with 703.7.2.1. Where existing toilet rooms or bathing rooms do not comply with 603, the toilet rooms or bathing rooms complying with 603 shall be identified by the International Symbol of *Accessibility* complying with 703.7.2.1. ...		**UNDER REVIEW** 4.1.2(7)(d) Accessible toilet and bathing facilities when not all are accessible. 4.1.6(3)(e)(iii) When existing toilet or bathing facilities are being altered and are not made accessible, signage complying with 4.30.1,4.30.2, 4.30.3, 4.30.5 and 4.30.7 shall be provided indicating the location of the nearest accessible toilet or bathing facility within the facility.	2010 CBC is **equivalent** to 2010 ADA.	A decision should be made on terminology: sanitary facilities versus toilet and bathing rooms, and the possibility that it will not include lavatories that are separate from toilet and bathing facilities.	Choose either "sanitary facilities" or "toilet and bathing rooms." That would exclude some types of sanitary facilities, since in California a room with a lavatory and no other element such as a toilet, shower or bath would still qualify as a "sanitary facility." Remove the conflict between Chapter 11A and 11B, where 11A specifically requires the ISA on all accessible restrooms, even when all are accessible, and Chapter 11B is silent on the topic.
446	**216.9 TTYs.** Identification and directional signs for public *TTYs* shall be provided in accordance with 216.9.		**1117B.2.9.2 General.** Text telephones shall comply with the following requirements: 3. Equivalent facilitation may be substituted for the requirements of this section. For example, a portable text telephone may be made available in a hotel at a registration desk. . . Directional signage shall comply with Section 1117B.5.1 Items 2 and 3. 1117B.2.9.3 Signage. Text telephones shall be identified by the international TTY symbol (see Figure 11B-14A). If a facility has a public text telephone, directional signage indicating the location of the nearest such telephone shall be placed adjacent to all banks of telephones that do not contain a text telephone. Such directional signage shall include the international TTY symbol. If a facility has no banks of telephones, the directional signage shall be provided at the entrance or in a building directory.	2010 CBC is **equivalent** to 2010 ADA.	Now that TTYs are virtually obsolete, it might be wise to write in equivalent facilitiation for the provision of video phones.	

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447	**216.9.1 Identification Signs.** Public *TTYs* shall be identified by the International Symbol of *TTY* complying with 703.7.2.2.		**1117B.2.9.2 General.** Text telephones shall comply with the following requirements: ... 1117B.2.9.3 Signage. Text telephones shall be identified by the international TTY symbol (see Figure 11B-14A). …	2010 CBC is **equivalent** to 2010 ADA.		Move scoping to Chapter 2, rather than including both scoping and technical requirements in signage section.
448	**216.9.2 Directional Signs.** Directional signs indicating the location of the nearest public *TTY* shall be provided at all banks of public pay telephones not containing a public *TTY*. In addition, where signs provide direction to public pay telephones, they shall also provide direction to public *TTYs*. Directional signs shall comply with 703.5 and shall include the International Symbol of *TTY* complying with 703.7.2.2.		**1117B.2.9.2 General.** Text telephones shall comply with the following requirements: ... . Directional signage shall comply with Section 1117B.5.1 Items 2 and 3. ... If a facility has a public text telephone, directional signage indicating the location of the nearest such telephone shall be placed adjacent to all banks of telephones that do not contain a text telephone. Such directional signage shall include the international TTY symbol. If a facility has no banks of telephones, the directional signage shall be provided at the entrance or in a building directory.	2010 CBC is **equivalent** to 2010 ADA.		Move scoping to Chapter 2, rather than including it in the technical section on signs.
449	**216.9.2 Directional Signs.** Directional signs indicating the location of the nearest public *TTY* shall be provided at all banks of public pay telephones not containing a public *TTY*. In addition, where signs provide direction to public pay telephones, they shall also provide direction to public *TTYs*. Directional signs shall comply with 703.5 and shall include the International Symbol of *TTY* complying with 703.7.2.2.		**1117B.2.9.2 General.** ... If a facility has no banks of telephones, the directional signage shall be provided at the entrance or in a building directory.	2010 CBC provides **greater access** than 2010 ADA.	CBC retains the original reference to a building directory for information on TTYs.	Retain reference to providing signage about availability of text telephones at building entrance or directory when no banks of telephones are not provided. Include in Scoping chapter 2.
449.1	**216.9.2 Directional Signs.** …		**1117B.2.9.2 General.** ... 3. Equivalent facilitation may be substituted for the requirements of this section. For example, a portable text telephone may be made available in a hotel at a registration desk if it available on a 24-hour basis for use with nearby public pay phones. In this instance, at least one pay phone shall comply with Item 2 above. In addition, if an acoustic coupler is used, the telephone handset cord shall be sufficiently long to allow connection of the text telephone and the telephone receiver. Directional signage shall comply with Section 1117B.5.1 Items 2 and 3. ...	Which Std.provides greater access **depends** on circumstances.	it's quite unusual to have a specific allowance for equivalent facilition. My thought is that if this is a small hotel with existing facilities, this provides an avenue for barrier removal, that might otherwise be financially out of reach. However, you must just as well say that this provides less access, if it allows a facilitiy to avoid the installation of a TTY when they might be financially capable of providing one. TTYs are, in any case, becoming obsolete, and many people who are deaf would rather have a video phone made available, and some have their own cell phones that are set up to receive text messages, and would not use a TTY.	This seems like a reasonable accommodation so I would recommend retaining it, unless it is deemed to be inferior access. I would suggest adding a video phone as another avenue for equivalent faciitation, that would probably be considered superior by many people. Revise to . . . Or a video phone may be provided in lieu of a TTY.
450	**216.10 Assistive Listening Systems.** Each *assembly area* required by 219 to provide *assistive listening systems* shall provide signs informing patrons of the availability of the *assistive listening system*. Assistive listening signs shall comply with 703.5 and shall include the International Symbol of Access for Hearing Loss complying with 703.7.2.4.		**1104B.2 Assistive-listening systems in assembly areas.** Assembly areas, conference and meeting rooms shall provide assistive-listening systems for persons with hearing impairments as provided in this section. 4. Signage. A sign shall be posted in a prominent place (for example, a customer service counter, ticket booth or assembly area entrance) indicating the availability of assistive-listening devices. The sign complying with Section 1117B.5.1, Items 2 and 3 shall include the International Symbol of Access for Hearing Loss complying with Figure 11B-14C and include wording that states “Assistive-Listening System Available.”	2010 CBC provides **greater access** than 2010 ADA.	CBC requires the words "Assistive Listening System Available" specifically, whereas ADA is more general in its requirement. CBC is also more inclusive in stating where the signs can be installed, whereas ADA lists an exception when the signs are installed in certain locations. However, the words "prominent place" should be more descriptive, because too often, the signs are placed well inside rooms, rather than where they can seen as you enter the room.	Suggest adding: "outside the assembly area entrance" so that the signs will not be hidden inside the area as they often are.
451	**216.10 Assistive Listening Systems.** ... to provide ... Assistive listening signs shall comply with 703.5 and shall include the International Symbol of Access for Hearing Loss complying with 703.7.2.4.		**1117B.5.8.4 Assistive listening systems**. Where assistive listening systems are required to be identified by the International Symbol of Access for Hearing Loss, it shall comply with Figure 11B-14C.	2010 CBC is **equivalent** to 2010 ADA.		All scoping information should be moved to chapter 2, scoping.
452	**EXCEPTION:** Where ticket offices or windows are provided, signs shall not be required at each *assembly area* provided that signs are displayed at each ticket office or window informing patrons of the availability of *assistive listening systems*.		**1104B.2 Assistive-listening systems in assembly areas.** ... 4. Signage. A sign shall be posted in a prominent place (for example, a customer service counter, ticket booth or assembly area entrance) indicating the availability of assistive-listening devices. ...	2010 CBC is **equivalent** to 2010 ADA.	This is essentially equivalent, although in many cases we see inspectors requiring multiple signs, even though the requirement has already been met.	Add more precision to language by stating that signs shall be provide **outside** the entrance.

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453	**216.11 Check-Out Aisles.** Where more than one check-out aisle is provided, check-out aisles complying with 904.3 shall be identified by the International Symbol of *Accessibility* complying with 703.7.2.1. Where check-out aisles are identified by numbers, letters, or functions, signs identifying check-out aisles complying with 904.3 shall be located in the same location as the check-out aisle identification.		**1110B.1.3 Check stands**. ....When not all check stands are accessible, accessible check stands shall be identified by a sign clearly visible to a person in a wheelchair displaying the International Symbol of Accessibility, complying with Section 1117B.5.8. The sign shall be a minimum of 4 inches by 4 inches (102 mm by 102 mm). ...	Which Std.provides greater access **depends** on circumstances.	Although CBC is more stringent in that it requires a specific size for the ISA, it only states that it must be clearly visible to a person in a wheelchair, ADA is more stringent in stating that it must be installed in the same location as the check-out aisle identification. When there is no identification, therefore, CBC is more stringent in all respects.	Add the requirement that when checkstands are identified by number of letter, the ISA should be installed in the same location, since that is probably the most visible location. Keep the other requirements, in case there is no such identificaiton, so the ISA cannot be hidden behind merchandise displays. In addition, add this to the scoping chapter, with technical requirements only in the section on check-stands.
454	**EXCEPTION:** Where all check-out aisles serving a single function comply with 904.3, signs complying with 703.7.2.1 shall not be required.		**1110B.1.3 Check stands**. ... .When not all check stands are accessible, accessible check stands shall be identified by a sign clearly visible to a person in a wheelchair displaying the International Symbol of Accessibility, complying with Section 1117B.5.8. ...	2010 CBC provides **greater access** than 2010 ADA.	CBC has a similar requirement as 2010 ADA, but it is just stated negatively rather than positively.However, CBC is more stringent, because it does not distinguish among various types of checkstands. Either all are accessible, or the signs must be provided for all checkstands that are accessible, no matter what type they are.	Keep the California standard, and include in Chapter 2, scoping.
455	**216.12 Amusement Rides.** Signs identifying the type of access provided on *amusement rides* shall be provided at entries to queues and waiting lines. In addition, where *accessible* unload areas also serve as *accessible* load areas, signs indicating the location of the *accessible* load and unload areas shall be provided at entries to queues and waiting lines.		NA		There are no corresponding sections in CBC.	Add resquirement to CBC. However, there should be a reference to the sign standards that need to be followed for these particular signs. The text should include reference to informational sign rules (visual only), as well as the use of Symbols of Accessibility appropriate to the particular attraction.
456	**Advisory 216.12 Amusement Rides.** Amusement rides designed primarily for children, amusement rides that are controlled or operated by the rider, and amusement rides without seats, are not required to provide wheelchair spaces, transfer seats, or transfer systems, and need not meet the sign requirements in 216.12. The load and unload areas of these rides must, however, be on an accessible route and must provide turning space.		NA		There are no corresponding sections in CBC.	Add appropriate exceptions or advisory information to CBC.
457	**217 Telephones**		**1117B.2 Telephones.**	2010 CBC is **equivalent** to 2010 ADA.	The issue here is public telephones.	
458	**217.1 General.** Where coin-operated public pay telephones, coinless public pay telephones, public *closed-circuit telephones* , public courtesy phones, or other types of public telephones are provided, public telephones shall be provided in accordance with 217 for each type of public telephone provided. ...		**1117B.2 Telephones.** **1117B.2.1 General.** If public pay telephones, public closed-circuit telephones or other public telephones are provided, they shall comply with this section to the extent required by the following table. ...	2010 CBC is **equivalent** to 2010 ADA.	Both standards require a certain number of public telephones to be accessible. The types of phones under consideration are consistent. Any differences in the actual number of accessible public telephones required are addressed on line 461 below.	
459	**217.1 General.** ... For purposes of this section, a bank of telephones shall be considered to be two or more adjacent telephones.		**1117B.2 Telephones.** **1117B.2.1 General.** If public pay telephones, public closed-circuit telephones or other public telephones are provided, they shall comply with this section to the extent required by the following table. ... Number of each type of telephone provided on each floor / Minimum number of telephones required to comply with Section 1117B.2*) 1 or more single units / At least 50 percent of telephone units per floor but not less than one. 1 telephone bank / At least 50 percent of telephone units per bank but not less than one. 2 or more banks / At least 50 percent of telephone units per bank but not less than one. At least 1 telephone per floor shall meet the requirements for a forward reach telephone. *Additional public telephones may be installed at any height.	2010 CBC **does not address** 2010 ADA req.	The CBC does not define telephone *bank* . It isn't clear how many phones at one location constitute a bank.	1) Provide a definition for telephone *bank* , or otherwise indicate the minimum number of telephones are required at one location to constitute a bank. 2) Clarify whether or not, for the purposes of determining the number of required accessible phones, whether *bank* means multiple numbers of the same type of phone at one location, or if it just means multiple phones at one location, regardless of type.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
460	**Advisory 217.1 General.** These requirements apply to all types of public telephones including courtesy phones at airports and rail stations that provide a free direct connection to hotels, transportation services, and tourist attractions.		**1117B.2 Telephones.** **1117B.2.1 General.** If public pay telephones, public closed-circuit telephones or other public telephones are provided, they shall comply with this section to the extent required by the following table. …	**NA**	1117B.2.1 and 217.1 appear to cover all types of public phones. Advisory 217.1 provides further clarification, but it does not provide any new information. Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b)	
461	**217.2 Wheelchair Accessible Telephones.** Where public telephones are provided, wheelchair *accessible* telephones complying with 704.2 shall be provided in accordance with Table 217.2.		**1117B.2 Telephones.** **1117B.2.1 General.** If public pay telephones, public closed-circuit telephones or other public telephones are provided, they shall comply with this section to the extent required by the following table. See Figure 11B-4. Number of each type of telephone provided on each floor / Minimum number of telephones required to comply with Section 1117B.2*) 1 or more single units / At least 50 percent of telephone units per floor but not less than one. 1 telephone bank / At least 50 percent of telephone units per bank but not less than one. 2 or more banks / At least 50 percent of telephone units per bank but not less than one. At least 1 telephone per floor shall meet the requirements for a forward reach telephone. *Additional public telephones may be installed at any height.	Which Std.provides greater access **depends** on circumstances.	1) 217.1 states (indirectly) that Table 2.17.2 shall be applied (separately) to each type of public telephone provided. 1117B.2.1 does not provide similar language. As such, the 2010 ADA Stds. provides greater access. To reduce complication, the following comments are based on the assumption that only one type of public telephone is provided. **Regarding 1 or more single units:** 2) 1117B.2.1 requires 50% of all units per floor, but not less than one. 217.2 only requires 1 per floor. The CBC provides greater access. 3) The 1117B.2.1 Table speaks of *floor(s)*. It does not state whether or not the requirements apply to exterior telephones. 217.2 requires at least 1 be accessible if provided. The 2010 ADA Stds. provides greater access. **Regarding 1 bank:** 4) 117B.2.1 requires 50% of all units per bank, but not less than one. 217.2 only requires 1 per floor (bank). The CBC provides greater access. 5) The 1117B.2.1 Table speaks of *floor(s)*. It does not state whether or not the requirements apply to exterior telephones. 217.2 requires at least 1 be accessible if provided. The 2010 ADA Stds. provides greater access. **Regarding 2 or more banks:** 6) 117B.2.1 requires 50% of all units per bank, but not less than one. 217.2 only requires 1 per bank. The CBC provides greater access. 7) The 1117B.2.1 Table speaks of *floor(s)*. It does not state whether or not the requirements apply to exterior telephones. 217.2 requires at least 1 be accessible if provided. The 2010 ADA Stds. provides greater access. The following comment is based on the assumption that multiple types of public telephones are provided. 8) Because the 217.2 must be applied to each type of public telephone (separately), and 1117B.2 does not contain similar language, in each of the cases above, the 2010 ADA Stds. could end up requiring more accessible telephones than the CBC does.	1a) Add language to 1117B.2 that clarifies that the following table shall apply to each type of public telephone. 1b) Provide a definition for telephone *bank*, or otherwise indicate the minimum number of telephones that are required at one location to constitute a *bank*. 1c) Clarify whether or not, for the purposes of determining the number of required accessible phones, whether *bank* means multiple numbers of the same type of phone at one location, or if it just means multiple phones at one location, regardless of type. 2) maintain the current 1117B.2.1 language. 3) Modify 1117B.2.1 to recognize exterior installations - perhaps treating the exterior as a separate floor. 4) maintain the current 1117B.2.1 language. 5) Modify 1117B.2.1 to recognize exterior installations - perhaps treating the exterior as a separate floor. 6) maintain the current 1117B.2.1 language. 7) Modify 1117B.2.1 to recognize exterior installations - perhaps treating the exterior as a separate floor. 8) See recommendations 1a - 1c above.

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462	**EXCEPTION:** Drive-up only public telephones shall not be required to comply with 217.2.		**1117B.2 Telephones.** **1117B.2.1 General.** If public pay telephones, public closed-circuit telephones or other public telephones are provided, they shall comply with this section to the extent required by the following table. See Figure 11B-4. Number of each type of telephone provided on each floor / Minimum number of telephones required to comply with Section 1117B.2*) 1 or more single units / At least 50 percent of telephone units per floor but not less than one. 1 telephone bank / At least 50 percent of telephone units per bank but not less than one. 2 or more banks / At least 50 percent of telephone units per bank but not less than one. At least 1 telephone per floor shall meet the requirements for a forward reach telephone. *Additional public telephones may be installed at any height.	2010 CBC **does not address** 2010 ADA req.	The CBC does not provide an exception to any provisions of 1117B.2 for drive-up only public telephones.	Consider adding language to 1117B.2 that clarifies that sections 1117B.2.2 through 1117B.2.6 (and possibly 1117B.2.7 and further) do not apply to drive-up only public telephones.
463	**217.3 Volume Controls.** All public telephones shall have volume controls complying with 704.3.		**SECTION 1111B** **ACCESSIBILITY FOR GROUP R OCCUPANCIES** **1111B.4.5 Visible alarms, notification devices and telephones for persons with hearing impairments.** In addition to those accessible sleeping rooms and suites required by Section 1111B.4.2, additional sleeping rooms and suites shall be provided with the following features as required by Table 11B-4 as follows: **1111B.4.5.3 Telephones.** Permanently installed telephones shall have volume controls complying with Section 1117B.2.8; ... **1117B.2 Telephones.** **1117B.2.8 Telephone equipment for hearing impaired persons.** ... All telephones required to be accessible shall be equipped with a volume control. In addition, 25 percent, but never less than one, of all other public telephones provided shall be equipped with a volume control and shall be dispersed among all types of public telephones, including closed circuit telephones, throughout the building or facility. If banks of public telephones are provided, at least one in each bank shall be equipped with a volume control. ...	Which Std.provides greater access **depends** on circumstances.	1) 217.3 requires volume control at all public telephones. 11117B.2.8 requires volume control on all telephones required to be accessible, plus 25% of all others. It also requires that at least one public telephone in each bank shall provide volume control. It is not stated explicitly whether or not these requirements apply to each type of public telephone (separately). The bottom line is that the CBC does not require volume control on all public telephones. As such the 2010 ADA Stds. provides greater access. 2) 1115B.4.5.3 requires permanently installed telephones in Group R sleeping rooms and suites to provide volume control. 224.5 and 806.3.2 require volume control in a limited number of these types of rooms, but the requirement applies to all types of telephones, not just to those permanently installed. Which standard provides greater access depends on circumstances.	1) Modify 1117B.2.8 to require volume control on all public telephones. 2a) Delete the word "permanently" from 1115B.4.5.3. 2b) Modify 1115B.4.5.3 to agree with 224.5 and 806.3.2.

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464	**217.4 TTYs.** *TTYs* complying with 704.4 shall be provided in accordance with 217.4.		**1117B.2 Telephones.** **1117B.2.1 General.** If public pay telephones, public closed-circuit telephones or other public telephones are provided, they shall comply with this section to the extent required by the following table. See Figure 11B-4. Number of each type of telephone provided on each floor / Minimum number of telephones required to comply with Section 1117B.2*) ... **1117B.2.9 Text telephones.** **1117B.2.9.1 Where required.** **1.** If a total of four or more public pay telephones (including both interior and exterior phones) are provided at a site, and if at least one of the total is in an interior location, then at least one interior public text telephone shall be provided. **2.** If an interior public pay telephone is provided in a stadium or arena, in a convention center, in a hotel with a convention center or in a covered mall, at least one interior public text telephone shall be provided in the facility. **3.** If a public pay telephone is located in or adjacent to a hospital emergency room, hospital recovery room or hospital waiting room, one public text telephone shall be provided at each location. **4.** If alterations to existing buildings or facilities with less than four exterior or interior public pay telephones would increase the total number to four or more telephones with at least one in an interior location then a text telephone shall be provided. **5.** If alterations to one or more exterior or interior public pay telephones occur in an existing building or facility with four or more public telephones with at least one in an interior location then a text telephone shall be provided. **1117B.2.9.2 General.** Text telephones shall comply with the following requirements: **...** **SECTION 1121B** **TRANSPORTATION FACILITIES** **1121B.3 Fixed facilities and stations.**		1) 1117B.2.1 Table states: *Minimum number of telephones required to comply with Section 1117B.2*. This table should not apply or be used to determine the number of required text telephones, but since text telephones are covered in section 1117B.2.9 - a subsection of 1117B2 - one could arrive at the conclusion that it does. 2) All other scoping issues are discussed on lines 466-481 below.	1a) Modify the 1117B.2.1 Table to clarify that it is not to be used to determine the required number of TTYs. 1b) Change the text telephone section number so that it is no longer a subsection of 1117B2. 2) No action required here.
465	**Advisory 217.4 TTYs.** Separate requirements are provided based on the number of public pay telephones provided at a bank of telephones, within a floor, a building, or on a site. In some instances one TTY can be used to satisfy more than one of these requirements. For example, a TTY required for a bank can satisfy the requirements for a building. However, the requirement for at least one TTY on an exterior site cannot be met by installing a TTY in a bank inside a building. Consideration should be given to phone systems that can accommodate both digital and analog transmissions for compatibility with digital and analog TTYs.			NA	Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b)	

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466	**217.4.1 Bank Requirement.** Where four or more public pay telephones are provided at a bank of telephones, at least one public *TTY* complying with 704.4 shall be provided at that bank.		**1117B.2.9 Text telephones.** **1117B.2.9.1 Where required.** **1.** If a total of four or more public pay telephones (including both interior and exterior phones) are provided at a site, and if at least one of the total is in an interior location, then at least one interior public text telephone shall be provided. **...** **1117B.2.9.2 General.** Text telephones shall comply with the following requirements: **...** **SECTION 1121B** **TRANSPORTATION FACILITIES** **1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **12. Text Telephones.** The following shall be provided in accordance with Sections 1117B.2.9.2 and 1117B.2.9.3: ... (b) Where four or more public pay telephones serve a particular entrance to a rail station and at least one is in an interior location, at least one interior public text telephone complying with Sections 1117B.2.9.2 and 1117B.2.9.3 shall be provided to serve that entrance. **1121B.4 Airports.** **1121B.4.1 New construction.** **4.** ... if four or more public pay telephones are located in any of the following locations, at least one public text telephone shall also be provided in that location: (a) a main terminal outside the security areas; (b) a concourse within the security areas; or (c) a baggage claim area in a terminal.	Which Std.provides greater access **depends** on circumstances.	217.4 simply requires that at single banks, where 4 or more public pay telephones are provided, at least one public TTY shall be provided at that bank. The number 4 shows up in the CBC as well, but with different results: 1) 1117B.2.9.1 considers all the phones on a site, and if there are 4 or more, at least 1 interior TTY must be provided. If there are 5 public pay phones - 4 in a single exterior bank, and one inside - the 2010 ADA Stds. would require the TTY to be installed at the exterior bank. 1117B.2.9.1 would require it to be installed at the 1 interior phone. In this case the two standards conflict with each other. In order to resolve the conflict, 2 TTYs would have to be installed; one at the exterior bank, and another at the single interior telephone. Other scenarios can be devised where they are in agreement, and others where only the CBC requirement applies. 2) 1121B.3.1, Item 12 is similar to 1117B.2.9.1, except that it applies to a very specific condition - four or more public pay phones that serve a particular entrance to a rail station. It results in the same outcome portrayed in the 1117B.2.9.1 example. 3) 1121B.4.1, Item 4 is actually in agreement with 217.4.1, except that it has a much more limited application.	1) Incorporate the 217.4.1 requirement into 1117B.2.9.1. 2a) Incorporate the 217.4.1 requirement into 1121B.3.1, Item 12 (see line 477 below). 2b) Eliminate 1121B.3.1, Item 12(b); 1117B.2.9.1 creates the same requirement in a much more broadly applicable manner. 2c) Eliminate 1121B.3.1, Item 12 altogether, and add *transit facilities* to the list of facilities covered in 1117B.2.9.1, Item 2. 3a) No action required. 3b) If the 217.4.1 requirement is incorporated into 1117B.2.9.1, add *airports* to the list of facilities covered in 1117B.2.9.1, Item 2, and eliminate 1121B.4.1, Item 4 altogether (see line 478 below).
467	**EXCEPTION:** *TTYs* shall not be required at banks of telephones located within 200 feet (61 m) of, and on the same floor as, a bank containing a public *TTY*.			2010 CBC provides **greater access** than 2010 ADA.	The CBC does not provide a similar exception. As such, it is stricter, and it provides greater access.	

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468	**217.4.2 Floor Requirement.** *TTYs* in *public buildings* shall be provided in accordance with 217.4.2.1. *TTYs* in *private buildings* shall be provided in accordance with 217.4.2.2.		**1117B.2.9 Text telephones.** **1117B.2.9.1 Where required.** **1.** If a total of four or more public pay telephones (including both interior and exterior phones) are provided at a site, and if at least one of the total is in an interior location, then at least one interior public text telephone shall be provided. **2.** If an interior public pay telephone is provided in a stadium or arena, in a convention center, in a hotel with a convention center or in a covered mall, at least one interior public text telephone shall be provided in the facility. **...** **4.** If alterations to existing buildings or facilities with less than four exterior or interior public pay telephones would increase the total number to four or more telephones with at least one in an interior location then a text telephone shall be provided. **5.** If alterations to one or more exterior or interior public pay telephones occur in an existing building or facility with four or more public telephones with at least one in an interior location then a text telephone shall be provided. **SECTION 1121B** **TRANSPORTATION FACILITIES** **1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **12. Text Telephones.** The following shall be provided in accordance with Sections 1117B.2.9.2 and 1117B.2.9.3: (a) If an interior public pay telephone is provided in a transit facility (as defined by the federal Department of Transportation) at least one interior public text telephone shall be provided in the station. (b) Where four or more public pay telephones serve a particular entrance to a rail station and at least one is in an interior location, at least one interior public text telephone complying with Sections 1117B.2.9.2 and 1117B.2.9.3 shall	Which Std.provides greater access **depends** on circumstances.	The pertinent issues are discussed on lines 469 and 470 below.	

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
469	**217.4.2.1 Public Buildings.** Where at least one public pay telephone is provided on a floor of a *public building* , at least one public *TTY* shall be provided on that floor.		**1117B.2.9 Text telephones.** **1117B.2.9.1 Where required.** **1.** If a total of four or more public pay telephones (including both interior and exterior phones) are provided at a site, and if at least one of the total is in an interior location, then at least one interior public text telephone shall be provided. **2.** If an interior public pay telephone is provided in a stadium or arena, in a convention center, in a hotel with a convention center or in a covered mall, at least one interior public text telephone shall be provided in the facility. **...** **4.** If alterations to existing buildings or facilities with less than four exterior or interior public pay telephones would increase the total number to four or more telephones with at least one in an interior location then a text telephone shall be provided. **5.** If alterations to one or more exterior or interior public pay telephones occur in an existing building or facility with four or more public telephones with at least one in an interior location then a text telephone shall be provided. **SECTION 1121B** **TRANSPORTATION FACILITIES** **1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **12. Text Telephones.** The following shall be provided in accordance with Sections 1117B.2.9.2 and 1117B.2.9.3: (a) If an interior public pay telephone is provided in a transit facility (as defined by the federal Department of Transportation) at least one interior public text telephone shall be provided in the station. (b) Where four or more public pay telephones serve a particular entrance to a rail station and at least one is in an interior location, at least one interior public text telephone complying with Sections 1117B.2.9.2 and 1117B.2.9.3 shall	Which Std.provides greater access **depends** on circumstances.	217.4.2.1 requires at least one TTY on a floor in a *public building* when there is at least one public pay telephone on that floor. The pertinent requirements of the CBC do not speak in terms of public or private buildings, but 1117B.2.9.1 requires at least one interior TTY when at least one public pay phone is provided in a stadium or arena, a convention center, a hotel with a convention center, or at a covered mall. 1121B.3.1, Item 12(a) extends the same requirement to transit facilities, and 1121B.4.1, Item 4 extends it to airports. If these are single level public buildings, the standards are equivalent. If they are multi-level public buildings with public pay phones on multiple floors, the 2010 ADA Stds. provides greater access. In all other facilities* the CBC does not require a TTY at a facility, unless it provides 4 or more pay phones, total. If these other facilities are *public buildings* . the 2010 ADA Stds. provide greater access. *Special requirements for hospitals and airports are discussed below on lines 476 and 478, respectively.	1) Incorporate the 217.4.2.1 requirement into 1117B.2.9.1. 2) Create a note similar to the 217.4 Advisory, which states: "*In some instances one TTY can be used to satisfy more than one of these requirements. For example, a TTY required for a bank can satisfy the requirements for a building. However, the requirement for at least one TTY on an exterior site cannot be met by installing a TTY in a bank inside a building* ."

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470	**217.4.2.2 Private Buildings.** Where four or more public pay telephones are provided on a floor of a *private building* , at least one public *TTY* shall be provided on that floor.		**1117B.2.9 Text telephones.** **1117B.2.9.1 Where required.** **1.** If a total of four or more public pay telephones (including both interior and exterior phones) are provided at a site, and if at least one of the total is in an interior location, then at least one interior public text telephone shall be provided. **2.** If an interior public pay telephone is provided in a stadium or arena, in a convention center, in a hotel with a convention center or in a covered mall, at least one interior public text telephone shall be provided in the facility. **...** **4.** If alterations to existing buildings or facilities with less than four exterior or interior public pay telephones would increase the total number to four or more telephones with at least one in an interior location then a text telephone shall be provided. **5.** If alterations to one or more exterior or interior public pay telephones occur in an existing building or facility with four or more public telephones with at least one in an interior location then a text telephone shall be provided. **SECTION 1121B** **TRANSPORTATION FACILITIES** **1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **12. Text Telephones.** The following shall be provided in accordance with Sections 1117B.2.9.2 and 1117B.2.9.3: (a) If an interior public pay telephone is provided in a transit facility (as defined by the federal Department of Transportation) at least one interior public text telephone shall be provided in the station. (b) Where four or more public pay telephones serve a particular entrance to a rail station and at least one is in an interior location, at least one interior public text telephone complying with Sections 1117B.2.9.2 and 1117B.2.9.3 shall	Which Std.provides greater access **depends** on circumstances.	217.4.2.2 requires at least one TTY on a floor in a *private building* when there are four or more public pay phones on that floor. The pertinent requirements of the CBC do not speak in terms of public or private buildings, but: 1) 1117B.2.9.1 requires at least one interior TTY when at least one public pay phone is provided in a stadium or arena, a convention center, a hotel with a convention center, or at a covered mall. 1121B.3.1, Item 12(a) extends the same requirement to transit facilities, and 1121B.4.1, Item 4 extends it to airports. If these are single level *private buildings* , the CBC provides greater access, because it requires a TTY as long as at least one public pay phone is provided. If these are multi-level *private buildings* , which standard provides greater access depends on where the phones are, and how many are provided. In all other facilities* the CBC does not require a TTY at a facility, unless it provides 4 or more pay phones, total. If these other facilities are single level *private buildings* , the standards are equivalent. If they are multi-level *private buildings* , which standard provides greater access depends on where the phones are, and how many are provided. *Special requirements for hospitals and airports are discussed below on lines 476 and 478, respectively.	1) Incorporate the 217.4.2.2 requirement into 1117B.2.9.1. 2) Create a note similar to the 217.4 Advisory, which states: "*In some instances one TTY can be used to satisfy more than one of these requirements. For example, a TTY required for a bank can satisfy the requirements for a building. However, the requirement for at least one TTY on an exterior site cannot be met by installing a TTY in a bank inside a building* ."

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471	**217.4.3 Building Requirement.** *TTYs* in *public buildings* shall be provided in accordance with 217.4.3.1. *TTYs* in *private buildings* shall be provided in accordance with 217.4.3.2.		**1117B.2.9 Text telephones.** **1117B.2.9.1 Where required.** **1.** If a total of four or more public pay telephones (including both interior and exterior phones) are provided at a site, and if at least one of the total is in an interior location, then at least one interior public text telephone shall be provided. **2.** If an interior public pay telephone is provided in a stadium or arena, in a convention center, in a hotel with a convention center or in a covered mall, at least one interior public text telephone shall be provided in the facility. **...** **4.** If alterations to existing buildings or facilities with less than four exterior or interior public pay telephones would increase the total number to four or more telephones with at least one in an interior location then a text telephone shall be provided. **5.** If alterations to one or more exterior or interior public pay telephones occur in an existing building or facility with four or more public telephones with at least one in an interior location then a text telephone shall be provided. **SECTION 1121B** **TRANSPORTATION FACILITIES** **1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **12. Text Telephones.** The following shall be provided in accordance with Sections 1117B.2.9.2 and 1117B.2.9.3: (a) If an interior public pay telephone is provided in a transit facility (as defined by the federal Department of Transportation) at least one interior public text telephone shall be provided in the station. (b) Where four or more public pay telephones serve a particular entrance to a rail station and at least one is in an interior location, at least one interior public text telephone complying with Sections 1117B.2.9.2 and 1117B.2.9.3 shall	Which Std.provides greater access **depends** on circumstances.	The pertinent issues are discussed on lines 472 and 473 below.	

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472	**217.4.3.1 Public Buildings.** Where at least one public pay telephone is provided in a *public building*, at least one public *TTY* shall be provided in the *building*. Where at least one public pay telephone is provided in a *public use* area of a *public building*, at least one public *TTY* shall be provided in the *public building* in a *public use* area.		**1117B.2.9 Text telephones.** **1117B.2.9.1 Where required.** **1.** If a total of four or more public pay telephones (including both interior and exterior phones) are provided at a site, and if at least one of the total is in an interior location, then at least one interior public text telephone shall be provided. **2.** If an interior public pay telephone is provided in a stadium or arena, in a convention center, in a hotel with a convention center or in a covered mall, at least one interior public text telephone shall be provided in the facility. **...** **4.** If alterations to existing buildings or facilities with less than four exterior or interior public pay telephones would increase the total number to four or more telephones with at least one in an interior location then a text telephone shall be provided. **5.** If alterations to one or more exterior or interior public pay telephones occur in an existing building or facility with four or more public telephones with at least one in an interior location then a text telephone shall be provided. **SECTION 1121B** **TRANSPORTATION FACILITIES** **1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **12. Text Telephones.** The following shall be provided in accordance with Sections 1117B.2.9.2 and 1117B.2.9.3: (a) If an interior public pay telephone is provided in a transit facility (as defined by the federal Department of Transportation) at least one interior public text telephone shall be provided in the station. (b) Where four or more public pay telephones serve a particular entrance to a rail station and at least one is in an interior location, at least one interior public text telephone complying with Sections 1117B.2.9.2 and 1117B.2.9.3 shall	Which Std.provides greater access **depends** on circumstances.	217.4.3.1 requires at least one TTY in a *public building* when one or more public pay phones are provided in a public use area of the building. The pertinent requirements of the CBC do not speak in terms of *public* or *private buildings*, but: 1) 1117B.2.9.1 requires at least one interior TTY when at least one public pay phone is provided in a stadium or arena, a convention center, a hotel with a convention center, or at a covered mall. 1121B.3.1, Item 12(a) extends the same requirement to transit facilities, and 1121B.4.1, Item 4 extends it to airports. Insofar as these are *public buildings*, the standards are equivalent. 2) In all other facilities* the CBC does not require a TTY at a facility, unless it provides 4 or more pay phones, total. Insofar as these are *public buildings*, the CBC provides less access. *Special requirements for hospitals and airports are discussed below on lines 476 and 478, respectively.	1) No action required. 2a) Incorporate the 217.4.3.1 requirement into 1117B.2.9.1. 2b) Create a note similar to the 217.4 Advisory, which states: "*In some instances one TTY can be used to satisfy more than one of these requirements. For example, a TTY required for a bank can satisfy the requirements for a building. However, the requirement for at least one TTY on an exterior site cannot be met by installing a TTY in a bank inside a building*."

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473	**217.4.3.2 Private Buildings.** Where four or more public pay telephones are provided in a *private building* , at least one public *TTY* shall be provided in the *building* .		**1117B.2.9 Text telephones.** **1117B.2.9.1 Where required.** **1.** If a total of four or more public pay telephones (including both interior and exterior phones) are provided at a site, and if at least one of the total is in an interior location, then at least one interior public text telephone shall be provided. **2.** If an interior public pay telephone is provided in a stadium or arena, in a convention center, in a hotel with a convention center or in a covered mall, at least one interior public text telephone shall be provided in the facility. **...** **4.** If alterations to existing buildings or facilities with less than four exterior or interior public pay telephones would increase the total number to four or more telephones with at least one in an interior location then a text telephone shall be provided. **5.** If alterations to one or more exterior or interior public pay telephones occur in an existing building or facility with four or more public telephones with at least one in an interior location then a text telephone shall be provided. **SECTION 1121B** **TRANSPORTATION FACILITIES** **1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **12. Text Telephones.** The following shall be provided in accordance with Sections 1117B.2.9.2 and 1117B.2.9.3: (a) If an interior public pay telephone is provided in a transit facility (as defined by the federal Department of Transportation) at least one interior public text telephone shall be provided in the station. (b) Where four or more public pay telephones serve a particular entrance to a rail station and at least one is in an interior location, at least one interior public text telephone complying with Sections 1117B.2.9.2 and 1117B.2.9.3 shall	2010 CBC provides **greater access** than 2010 ADA.	217.4.3.2 requires at least one TTY in a *private building* when four or more public pay phones are provided in the building. The pertinent requirements of the CBC do not speak in terms of *public* or *private buildings* , but: 1) 1117B.2.9.1 requires at least one interior TTY when at least one public pay phone is provided in a stadium or arena, a convention center, a hotel with a convention center, or at a covered mall. 1121B.3.1, Item 12(a) extends the same requirement to transit facilities, and 1121B.4.1, Item 4 extends it to airports. Insofar as these are *private buildings* , the CBC provides greater access. 2) In all other facilities* the CBC does not require a TTY at a facility, unless it provides 4 or more pay phones, total. Insofar as these are *private buildings* , the CBC provides greater access because it includes exterior public pay phones in the count to 4. *Special requirements for hospitals and airports are discussed below on lines 476 and 478, respectively.	

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474	**217.4.4 Exterior Site Requirement.** Where four or more public pay telephones are provided on an exterior *site* , at least one public *TTY* shall be provided on the *site* .		**1117B.2.9 Text telephones.** **1117B.2.9.1 Where required.** **1.** If a total of four or more public pay telephones (including both interior and exterior phones) are provided at a site, and if at least one of the total is in an interior location, then at least one interior public text telephone shall be provided. **2.** If an interior public pay telephone is provided in a stadium or arena, in a convention center, in a hotel with a convention center or in a covered mall, at least one interior public text telephone shall be provided in the facility. **...** **4.** If alterations to existing buildings or facilities with less than four exterior or interior public pay telephones would increase the total number to four or more telephones with at least one in an interior location then a text telephone shall be provided. **5.** If alterations to one or more exterior or interior public pay telephones occur in an existing building or facility with four or more public telephones with at least one in an interior location then a text telephone shall be provided. **SECTION 1121B** **TRANSPORTATION FACILITIES** **1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **...**	2010 CBC provides **less access** than 2010 ADA.	217.4.4 requires a TTY on the site when at least four exterior public pay phones are provided. All of the potentially applicable 1117B.2.9.1 requirements speak only of interior public pay phones, or, if they also speak of exterior public pay phones, they require an interior TTY.	1a) Incorporate the 217.4.4 requirement into 1117B.2.9.1. 1b) Create a note similar to the 217.4 Advisory, which states: "*In some instances one TTY can be used to satisfy more than one of these requirements. For example, a TTY required for a bank can satisfy the requirements for a building. However, the requirement for at least one TTY on an exterior site cannot be met by installing a TTY in a bank inside a building.* "

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475	**217.4.5 Rest Stops, Emergency Roadside Stops, and Service Plazas.** Where at least one public pay telephone is provided at a public rest stop, emergency roadside stop, or service plaza, at least one public *TTY* shall be provided.		**1117B.2.9 Text telephones.** **1117B.2.9.1 Where required.** **1.** If a total of four or more public pay telephones (including both interior and exterior phones) are provided at a site, and if at least one of the total is in an interior location, then at least one interior public text telephone shall be provided. **...** **4.** If alterations to existing buildings or facilities with less than four exterior or interior public pay telephones would increase the total number to four or more telephones with at least one in an interior location then a text telephone shall be provided. **5.** If alterations to one or more exterior or interior public pay telephones occur in an existing building or facility with four or more public telephones with at least one in an interior location then a text telephone shall be provided. **SECTION 1121B** **TRANSPORTATION FACILITIES** **1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **...**	2010 CBC provides **less access** than 2010 ADA.	217.4.5 requires a TTY at rest stops, emergency roadside stops, and service plazas when at least one public pay phone is provided. 1117B.2.9.1 does not speak specifically to these types of facilities. The only applicable CBC requirements require a TTY if 4 or more public pay phones are provided.	Incorporate the 217.4.5 requirement into 1117B.2.9.1.
476	**217.4.6 Hospitals.** Where at least one public pay telephone is provided serving a hospital emergency room, hospital recovery room, or hospital waiting room, at least one public *TTY* shall be provided at each location.		**1117B.2.9 Text telephones.** **1117B.2.9.1 Where required.** **...** **3.** If a public pay telephone is located in or adjacent to a hospital emergency room, hospital recovery room or hospital waiting room, one public text telephone shall be provided at each location. **...**	2010 CBC is **equivalent** to 2010 ADA.		
477	**217.4.7 Transportation Facilities.** In transportation *facilities*, in addition to the requirements of 217.4.1 through 217.4.4, where at least one public pay telephone serves a particular *entrance* to a bus or rail *facility*, at least one public *TTY* shall be provided to serve that *entrance*. ...		**1117B.2.9 Text telephones.** **1117B.2.9.1 Where required.** **...** **SECTION 1121B** **TRANSPORTATION FACILITIES** **1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **12. Text Telephones.** The following shall be provided in accordance with Sections 1117B.2.9.2 and 1117B.2.9.3: ... (b) Where four or more public pay telephones serve a particular entrance to a rail station and at least one is in an interior location, at least one interior public text telephone complying with Sections 1117B.2.9.2 and 1117B.2.9.3 shall be provided to serve that entrance. **...**	2010 CBC provides **less access** than 2010 ADA.	217.4.7 requires a TTY at an entrance to a bus or rail facility when at least one public pay phone is provided that serves that entrance. 1121B.3.1, Item 12(b) only applies to rail station entrances, and the requirement for a TTY at an entrance only kicks in when 4 or more public pay phones serve that entrance, and at least one is interior.	Modify 1121B.3.1, Item 12(b) to include the stricter 217.4.7 requirements.

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478	**217.4.7 Transportation Facilities.** ...In airports, in addition to the requirements of 217.4.1 through 217.4.4, where four or more public pay telephones are located in a terminal outside the security areas, a concourse within the security areas, or a baggage claim area in a terminal, at least one public *TTY* shall be provided in each location.		**1117B.2.9 Text telephones.** **1117B.2.9.1 Where required.** **...** **1121B.4 Airports.** **1121B.4.1 New construction.** **4.** ... if four or more public pay telephones are located in any of the following locations, at least one public text telephone shall also be provided in that location: (a) a main terminal outside the security areas; (b) a concourse within the security areas; or (c) a baggage claim area in a terminal.	2010 CBC is **equivalent** to 2010 ADA.		
479	**217.4.8 Detention and Correctional Facilities.** In detention and correctional *facilities* , where at least one pay telephone is provided in a secured area used only by detainees or inmates and security personnel, at least one *TTY* shall be provided in at least one secured area.		**1117B.2.9 Text telephones.** **1117B.2.9.1 Where required.** **1.** If a total of four or more public pay telephones (including both interior and exterior phones) are provided at a site, and if at least one of the total is in an interior location, then at least one interior public text telephone shall be provided. **...** **4.** If alterations to existing buildings or facilities with less than four exterior or interior public pay telephones would increase the total number to four or more telephones with at least one in an interior location then a text telephone shall be provided. **5.** If alterations to one or more exterior or interior public pay telephones occur in an existing building or facility with four or more public telephones with at least one in an interior location then a text telephone shall be provided.	2010 CBC provides **less access** than 2010 ADA.	217.4.8 requires a TTY at detention and correctional facilities when at least one public pay phone is provided in a secured area used only by detainees or inmates and security personnel. 1117B.2.9.1 does not speak specifically to these types of facilities. The only applicable CBC requirements require a TTY if 4 or more public pay phones are provided.	Incorporate the 217.4.8 requirement into 1117B.2.9.1.
480	**217.5 Shelves for Portable TTYs.** Where a bank of telephones in the interior of a *building* consists of three or more public pay telephones, at least one public pay telephone at the bank shall be provided with a shelf and an electrical outlet in accordance with 704.5.		**1117B.2.9 Text telephones.** **1117B.2.9.2 General.** Text telephones shall comply with the following requirements: **...** **2.** Where a bank of telephones in the interior of a building consists of three or more public pay telephones, at least one public pay telephone in each such bank shall be equipped with a shelf and an electrical outlet within or adjacent to the telephone enclosure. The telephone handset shall be capable of being placed flush on the surface of the shelf. The shelf shall be capable of accommodating a text telephone and shall have 6 inches (152 mm) minimum vertical clearance in the area where the text telephone is to be placed. **...**	2010 CBC is **equivalent** to 2010 ADA.		
481	**EXCEPTIONS: 1.** Secured areas of detention and correctional *facilities* where shelves and outlets are prohibited for purposes of security or safety shall not be required to comply with 217.5. **2.** The shelf and electrical outlet shall not be required at a bank of telephones with a *TTY* .			2010 CBC provides **greater access** than 2010 ADA.	Similar exceptions are not provided in the 2010 CBC.	Consider adding the exceptions to 1117B.2.9.2
482	**218 Transportation Facilities**		**SECTION 1121B** **TRANSPORTATION FACILITIES**	2010 CBC is **equivalent** to 2010 ADA.		

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483	**218.1 General.** Transportation *facilities* shall comply with 218.		**1121B.1 General.** Every station, bus stop, bus stop pad, terminal, building or other transportation facility shall incorporate the accessibility requirements of this code as modified by this chapter. The exceptions for elevators in Section 1103B do not apply to a terminal, depot or other station used for specified public transportation, or an airport passenger terminal, or facilities subject to Title II of the Americans with Disabilities Act. ...	2010 CBC is **equivalent** to 2010 ADA.	The issue here is that every transportation shall comply with the referenced technical requirements. Any differences in technical requirements are discussed therein.	
484	**218.2 New and Altered Fixed Guideway Stations.** New ... stations in rapid rail, light rail, commuter rail, intercity rail, high speed rail, and other fixed guideway systems shall comply with 810.5 through 810.10.		**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable:	2010 CBC is **equivalent** to 2010 ADA.	The issue here is that new (and altered) facilities and stations for fixed guideway systems shall comply with the referenced technical requirements. Any differences in technical requirements are discussed therein.	
485	**218.2 New and Altered Fixed Guideway Stations.** ... *altered* stations in rapid rail, light rail, commuter rail, intercity rail, high speed rail, and other fixed guideway systems shall comply with 810.5 through 810.10.		**SECTION 1121B** **TRANSPORTATION FACILITIES** **1121B.3.2 Existing facilities—alterations.** Alterations of transportation facilities shall comply with Section 1134B. **SECTION 1134B** **ACCESSIBILITY FOR EXISTING BUILDINGS** **1134B.1 Scope.** The provisions of this division apply to renovation, structural repair, alteration and additions to existing buildings, including those identified as historic buildings. ... **1134B.2 General.** When alterations, structural repairs or additions are made to existing buildings or facilities, they shall comply with all provisions of Division I – New Buildings, except as modified by this division. These requirements shall apply only to the area of specific alteration, structural repair or addition and shall include those areas listed below:	2010 CBC is **equivalent** to 2010 ADA.	The issue here is that new (and altered) facilities and stations for fixed guideway systems shall comply with the referenced technical requirements. Any differences in technical requirements are discussed therein.	

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486	**218.3 Key Stations and Existing Intercity Rail Stations.** *Key stations* and existing intercity rail stations shall comply with 810.5 through 810.10.		**SECTION 1121B** **TRANSPORTATION FACILITIES** **1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **1121B.3.2 Existing facilities—alterations.** Alterations of transportation facilities shall comply with Section 1134B. **SECTION 1134B** **ACCESSIBILITY FOR EXISTING BUILDINGS** **1134B.1 Scope.** The provisions of this division apply to renovation, structural repair, alteration and additions to existing buildings, including those identified as historic buildings. ... **1134B.2 General.** When alterations, structural repairs or additions are made to existing buildings or facilities, they shall comply with all provisions of Division I – New Buildings, except as modified by this division. These requirements shall apply only to the area of specific alteration, structural repair or addition and shall include those areas listed below:	2010 CBC is **equivalent** to 2010 ADA.	The 2010 ADA Stds. Define *Key Stations* as "Rapid and light rail stations, and commuter rail stations...". These are covered by 1121B.3.1 and 1134B by reference., The issue here is that new (and altered) facilities and stations for fixed guideway systems shall comply with the referenced technical requirements. Any differences in technical requirements are discussed therein.	
487	**218.3 Key Stations and Existing Intercity Rail Stations.** *Key stations* and existing intercity rail stations shall comply with 810.5 through 810.10.		**SECTION 1121B** **TRANSPORTATION FACILITIES** **1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **1121B.3.2 Existing facilities—alterations.** Alterations of transportation facilities shall comply with Section 1134B. **SECTION 1134B** **ACCESSIBILITY FOR EXISTING BUILDINGS** **1134B.1 Scope.** The provisions of this division apply to renovation, structural repair, alteration and additions to existing buildings, including those identified as historic buildings. ... **1134B.2 General.** When alterations, structural repairs or additions are made to existing buildings or facilities, they shall comply with all provisions of Division I – New Buildings, except as modified by this division. These requirements shall apply only to the area of specific alteration, structural repair or addition and shall include those areas listed below:	2010 CBC is **equivalent** to 2010 ADA.	The 2010 ADA Stds. Define *Key Stations* as "Rapid and light rail stations, and commuter rail stations...". These are covered by 1121B.3.1 and 1134B by reference., The issue here is that new (and altered) facilities and stations for fixed guideway systems shall comply with the referenced technical requirements. Any differences in technical requirements are discussed therein.	

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488	**218.3 Key Stations and Existing Intercity Rail Stations.** *Key stations* and existing intercity rail stations shall comply with 810.5 through 810.10.		**SECTION 1121B** **TRANSPORTATION FACILITIES** **1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **1121B.3.2 Existing facilities—alterations.** Alterations of transportation facilities shall comply with Section 1134B. **SECTION 1134B** **ACCESSIBILITY FOR EXISTING BUILDINGS** **1134B.1 Scope.** The provisions of this division apply to renovation, structural repair, alteration and additions to existing buildings, including those identified as historic buildings. ... **1134B.2 General.** When alterations, structural repairs or additions are made to existing buildings or facilities, they shall comply with all provisions of Division I – New Buildings, except as modified by this division. These requirements shall apply only to the area of specific alteration, structural repair or addition and shall include those areas listed below:	2010 CBC is **equivalent** to 2010 ADA.	The 2010 ADA Stds. Define *Key Stations* as "Rapid and light rail stations, and commuter rail stations...". These are covered by 1121B.3.1 and 1134B by reference., The issue here is that new (and altered) facilities and stations for fixed guideway systems shall comply with the referenced technical requirements. Any differences in technical requirements are discussed therein.	
489	**218.4 Bus Shelters.** Where provided, bus shelters shall comply with 810.3.		**1121B.2 Bus stops and terminals.** **1121B.2.1 New construction.** ... Where provided, bus stop shelters shall be installed so as to permit a wheelchair user to enter the shelter from the public way and access a clear floor area of 30 inches by 48 inches (762 mm by 1219 mm) complying with Section 1118B.4, completely within the shelter. Such shelters shall be connected by an accessible route to the boarding area. ...	2010 CBC is **equivalent** to 2010 ADA.	The issue here is that both standards agree that, where they are provided, bus shelters shall comply with the referenced technical requirements. Any differences in technical requirements are discussed therein.	
490	**218.4 Bus Shelters.** Where provided, bus shelters shall comply with 810.3. (See also 209.2.3.)		**1121B.2 Bus stops and terminals.** **1121B.2.1 New construction.** ... Where provided, bus stop shelters shall be installed so as to permit a wheelchair user to enter the shelter from the public way and access a clear floor area of 30 inches by 48 inches (762 mm by 1219 mm) complying with Section 1118B.4, completely within the shelter. Such shelters shall be connected by an accessible route to the boarding area. ... **1121B.2.2 Bus stop siting and alterations.** **1.** Bus stop sites shall be chosen such that the areas where lifts or ramps are to be deployed comply with Section 1121B.2.1.	2010 CBC is **equivalent** to 2010 ADA.	The issue here is that both standards agree that, where they are provided, bus shelters shall comply with the referenced technical requirements. Any differences in technical requirements are discussed therein.	

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491	**218.5 Other Transportation Facilities.** In other transportation facilities, public address systems shall comply with 810.7 …		**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **14.** Where public address systems are provided to convey information to the public in terminals, stations, or other fixed facilities, a means of conveying the same or equivalent information to persons with hearing loss or who are deaf shall be provided.	2010 CBC is **equivalent** to 2010 ADA.	218.5 refers to "other transportations facilities", which would appear to limit the scope of the requirement for public address systems. But the other other facilities (new and altered fixed guideway systems, and key stations and existing intercity rail stations) are required to also comply with 810.7 by reference in sections 218.2 and 218.3, respectively. As such, the 2010 ADA Stds. require public addres systems, where provided, to provide a means of conveying the same information to persons with hearing loss or who are deaf - as 1121B.3.1, Item 14 does.	
492	**218.5 Other Transportation Facilities.** In other transportation facilities, ... clocks shall comply with 810.8.		**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **15.** Where clocks are provided for use by the general public, the clock face shall be uncluttered so that its elements are clearly visible. Hands, numerals, and/or digits shall contrast with the background either light-on-dark or dark-on-light. Where clocks are mounted overhead, numerals and/or digits shall comply with Section 1117B.5.4. Clocks shall be placed in uniform locations throughout the facility and system.	2010 CBC provides **greater access** than 2010 ADA.	218.5 refers to "other transportations facilities", which would appear to limit the scope of the requirement for clocks. But the other other facilities (new and altered fixed guideway systems, and key stations and existing intercity rail stations) are required to also comply with 810.7 by reference in sections 218.2 and 218.3, respectively. As such, the 2010 ADA Stds. require clocks, where provided, to meet technical standards similar to those required by 1121B.3.1, Item 15. 1121B.3.1, Item 15, however, also requires that clocks shall be placed in uniform locations throughout the facility and system. There is no similar scoping requirement in 218.5 or 810.8. As such, the CBC provides greater access.	
493	**218.5 Other Transportation Facilities.** In other transportation *facilities* , public address systems shall comply with 810.7 and clocks shall comply with 810.8.		**1121B.4 Airports.** **1121B.4.1 New construction.** **6.** Terminal information systems which broadcast information to the general public through a public address system shall provide a means to provide the same or equivalent information to persons with a hearing loss or who are deaf. Such methods may include, but are not limited to, visual paging systems using video monitors and computer technology. For persons with certain types of hearing loss such methods may include, but are not limited to, an assistive listening system complying with Section 1104B.2.	2010 CBC is **equivalent** to 2010 ADA.	The issue here is public address systems in airports, which are covered by 218.5 and 1121B.4.1, Item 6. Both standards require public address systems in airports, where provided, to provide a means of conveying the same information to persons with hearing loss or who are deaf. 810.8 requires information be provided in a visula format, and 10.4.1(16) allows for other types of accommodations, but these are differences in technical, not scoping requirements.	
494	**218.5 Other Transportation Facilities.** In other transportation facilities, public address systems shall comply with 810.7 and clocks shall comply with 810.8.		**1121B.4 Airports.** **1121B.4.1 New construction.** **7.** Where clocks are provided for use by the general public the clock face shall be uncluttered so that its elements are clearly visible. Hands, numerals and/or digits shall contrast with their background either light-on-dark or dark-on-light. Where clocks are mounted overhead, numerals and/or digits shall comply with Section 1117B.5.4. Clocks shall be placed in uniform locations throughout the facility	Which Std.provides greater access **depends** on circumstances.	The issue here is clocks in airports, which are covered by 218.5 and 1121B.4.1, Item 7. Both standards require clocks in airports, where provided, to comply with similar technical standards. 1121B.4.1, Item 7, however, also requires that clocks shall be placed in uniform locations throughout the facility. There is no similar scoping requirement in 218.5 or 810.8. As such, the CBC provides greater access. However, the 2010 ADA Stds. requires the clock face to comply with all requirements for visual signs including finish and contrast, Style, And character proportions, not just character height reqs.	
495	**219 Assistive Listening Systems.**	N/A		NA	N/A	N/A
496	**219.1 General.** *Assistive listening systems* shall be provided in accordance with 219 and shall comply with 706.		**1104B.2** Assistive-listening systems in assembly areas. Assembly areas, conference and meeting rooms shall provide assistive-listening systems for persons with hearing impairments as provided in this section.	2010 CBC provides **greater access** than 2010 ADA.	See exception to 219.2 below.	N/A

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497	**219.2 Required Systems.** In each *assembly area* where audible communication is integral to the use of the space, an *assistive listening system* shall be provided.		**1104B.2** Assistive-listening systems in assembly areas. Assembly areas, conference and meeting rooms shall provide assistive-listening systems for persons with hearing impairments as provided in this section.	2010 CBC provides **greater access** than 2010 ADA.	CBC 1104B.2 does not provide the qualification "where audible communication is integral to the use of the space."	1. CBC should adopt ADA Stds. language in lieu of CBC. or 2. Retain 2010 CBC language since it requires ALS regardless of whether audible communication is integral to the use of the space.
498	**EXCEPTION:** Other than in courtrooms, *assistive listening systems* shall not be required where audio amplification is not provided.		**1104B.2, Exc.** This section does not apply to systems used exclusively for paging, or background music, or a combination of these two uses.	Which Std.provides greater access **depends** on circumstances.	The CBC exception excludes requiring ALS for paging and/or background music exclusively. ADA excludes requiring ALS if audio amplification is not otherwise provided except at courtrooms.	1. CBC should adopt ADA Stds. language in lieu of CBC, but retain 1104B.2, Exc. for additional clarity. or 2. Retain 2010 CBC language since it requires ALS regardless of whether there is audio amplification provided.
498.1			**1121B.4.1 #6** Terminal information systems which broadcast information to the general public through a public address system shall provide a means to provide the same or equivalent information to persons with a hearing loss or who are deaf. Such methods may include, but are not limited to, visual paging systems using video monitors and computer technology. For persons with certain types of hearing loss such methods may include, but are not limited to, an assistive listening system complying with Section 1104B.2.	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC mentions ALS as one possible method of providing broadcast airport terminal information to the deaf or hearing impaired. 2010 ADA Stds. do not specifcally address airport public address broadcasts.	2010 CBC does not need to be amended, since it provides greater access.
499	**219.3 Receivers.** Receivers complying with 706.2 shall be provided for *assistive listening systems* in each *assembly area* in accordance with Table 219.3. Twenty-five percent minimum of receivers provided, but no fewer than two, shall be hearing-aid compatible in accordance with 706.3.		**1104B.2 #1** **Number of personal receivers required.** The minimum number of receivers to be provided shall be equal to 4 percent of the total number of seats, but in no case less than two.	2010 CBC provides **greater access** than 2010 ADA.	CBC 1104B.2 #1 sets forth a flat 4% minimum number of receivers. ADA Table 219.3 is equavalent to the 4% minimum up to 500 seats, but has a sliding scale reducing the minimum percentage for larger assembly areas.	1. For sake of consistency with ADA Standards, 2010 CBC should adopt ADA Table 219.3. or 2. Retain CBC 4% without sliding scale reduction for larger assembly areas.
500	**219.3 Receivers.** Receivers complying with 706.2 shall be provided for *assistive listening systems* in each *assembly area* in accordance with Table 219.3. Twenty-five percent minimum of receivers provided, but no fewer than two, shall be hearing-aid compatible in accordance with 706.3.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not require hearing-aid compatable receivers.	2010 CBC should be amended to add ADA requirements for hearing-aid compatible receivers.
501	**EXCEPTIONS: 1.** Where a *building* contains more than one *assembly area* and the *assembly areas* required to provide *assistive listening systems* are under one management, the total number of required receivers shall be permitted to be calculated according to the total number of seats in the *assembly areas* in the *building* provided that all receivers are usable with all systems. **2.** Where all seats in an a*ssembly area* are served by an induction loop *assistive listening system,* the minimum number of receivers required by Table 219.3 to be hearing-aid compatible shall not be required to be provided.		N/A	2010 CBC **does not address** 2010 ADA req.	N/A	2010 CBC should be amended to add ADA Exception 1 if ADA Table 219.3 is adopted, and to add Exception 2 if ADA hearing-aid compatible receiver requirement is adopted.
502	**220 Automatic Teller Machines and Fare Machines**		**1117B.7 Automated teller machines and point of sale machines.**	2010 CBC provides **greater access** than 2010 ADA.	In addition to ATMs and fare vening machines, which are covered by 220, 1117B.7.1 also covers point-of-sale devices. As such, the CBC provides greater access.	

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503	**220.1 General.** Where automatic teller machines or self-service fare vending, collection, or adjustment machines are provided, at least one of each type provided at each location shall comply with 707. Where bins are provided for envelopes, waste paper, or other purposes, at least one of each type shall comply with 811.		**1117B.7.1 General.** Where ATMs, self-service fare vending, collection, or adjustment machines and point-of-sale devices are provided for the public they shall comply with Section 1117B.7. **1117B.7.1.1** Where ATMs or fare machines are provided, they shall be provided in accordance with Section 1117B.7.1.1 for each type provided. **1117B.7.1.1.1 One ATM.** Where one ATM or fare machine is provided at a location, it shall comply with Sections 1117B.7.2 through 1117B.7.8. **1117B.7.1.1.2 Two ATMs.** Where two ATMs or fare machines are provided at a location, one shall comply with Sections 1117B.7.2 through 1117B.7.8 and one shall comply with Sections 1117B.6 Items 2 and 4, 1117B.7.2, 1117B.7.4, 1117B.7.5, 1117B.7.6, 1117B.7.7.2 and 1117B.7.8. **1117B.7.1.1.3 Three or more ATMs.** Where three or more ATMs or fare machines are provided at a location, at least 50 percent shall comply with Sections 1117B.7.2 through 1117B.7.8 and the rest shall comply with Sections 1117B.6 Items 2 and 4, 1117B.7.2, 1117B.7.4, 1117B.7.5, 1117B.7.6, 1117B.7.7.2 and 1117B.7.8. **1117B.7.1.2** Where bins are provided for envelopes, waste paper, or other purposes, at least one of each type shall comply with Sections 1118B.4 and either 1118B.5 or 1118B.6. **SECTION 1121B** **TRANSPORTATION FACILITIES** **1121B.3 Fixed facilities and stations.** **...** If self-service fare collection devices are provided for the use of the general public, a minimum of 5 percent but not less than one accessible device for entering, and at least one for exiting, unless one device serves both functions, shall be provided at each location where such devices are provided.	2010 CBC provides **greater access** than 2010 ADA.	In addition to ATMs and fare vening machines, which are covered by 220, 1117B.7.1 also covers point-of-sale devices. 220.1 requires a minimum of 1 accessible ATM or self-service fare vending machine at each location. 1117B.7.1.1 requires multiple compliant ATMs when 3 or more are provided, and 1121B.3 requires 5% (but no fewer than 1) of all self-service fare vending machines to be accessible. As such, the CBC provides greater access.	

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504	**220.1 General.** Where automatic teller machines or self-service fare vending, collection, or adjustment machines are provided, at least one of each type provided at each location shall comply with 707. Where bins are provided for envelopes, waste paper, or other purposes, at least one of each type shall comply with 811.	**UNDER REVIEW** **ACC Note:** Regarding column N comment 2c): the issue here is scoping - when do the requirements apply, and to how many devices. Differences in the technical requirements should be compared in the section 707 analysis, not here.	**1117B.7.1 General.** Where ATMs, self-service fare vending, collection, or adjustment machines and point-of-sale devices are provided for the public they shall comply with Section 1117B.7. **1117B.7.1.1** Where ATMs or fare machines are provided, they shall be provided in accordance with Section 1117B.7.1.1 for each type provided. **1117B.7.1.1.1 One ATM.** Where one ATM or fare machine is provided at a location, it shall comply with Sections 1117B.7.2 through 1117B.7.8. **1117B.7.1.1.2 Two ATMs.** Where two ATMs or fare machines are provided at a location, one shall comply with Sections 1117B.7.2 through 1117B.7.8 and one shall comply with Sections 1117B.6 Items 2 and 4, 1117B.7.2, 1117B.7.4, 1117B.7.5, 1117B.7.6, 1117B.7.7.2 and 1117B.7.8. **1117B.7.1.1.3 Three or more ATMs.** Where three or more ATMs or fare machines are provided at a location, at least 50 percent shall comply with Sections 1117B.7.2 through 1117B.7.8 and the rest shall comply with Sections 1117B.6 Items 2 and 4, 1117B.7.2, 1117B.7.4, 1117B.7.5, 1117B.7.6, 1117B.7.7.2 and 1117B.7.8. **1117B.7.1.2** Where bins are provided for envelopes, waste paper, or other purposes, at least one of each type shall comply with Sections 1118B.4 and either 1118B.5 or 1118B.6. **SECTION 1121B** **TRANSPORTATION FACILITIES** **1121B.3 Fixed facilities and stations.** **...** If self-service fare collection devices are provided for the use of the general public, a minimum of 5 percent but not less than one accessible device for entering, and at least one for exiting, unless one device serves both functions, shall be provided at each location where such devices are provided.	2010 CBC provides **greater access** than 2010 ADA.	In addition to ATMs and fare vening machines, which are covered by 220, 1117B.7.1 also covers point-of-sale devices. 220.1 requires a minimum of 1 accessible ATM or self-service fare vending machine at each location. 1117B.7.1.1 requires multiple compliant ATMs when 3 or more are provided, and 1121B.3 requires 5% (but no fewer than 1) of all self-service fare vending machines to be accessible. As such, the CBC provides greater access.	
505	**220.1 General.** Where automatic teller machines or self-service fare vending, collection, or adjustment machines are provided, at least one of each type provided at each location shall comply with 707. Where bins are provided for envelopes, waste paper, or other purposes, at least one of each type shall comply with 811.	**UNDER REVIEW** **ACC Note:** Regarding column N comment 2b): the issue here is scoping - when do the requirements apply, and to how many devices. Differences in the technical requirements should be compared in the section 707 analysis, not here.	**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **7.** Automatic fare vending, collection and adjustment (for example, add-fare) systems shall comply with Section 1117B.7. ... Gates which must be pushed open by wheelchair or mobility aid users shall have a smooth continuous surface extending from 2 inches (51 mm) above the floor to 27 inches (686 mm) above the floor and shall comply with Sections 1133B.1 and 1133B.2.	2010 CBC provides **greater access** than 2010 ADA.	The issue here, per the comparison of the 1991 and 2010 ADA Stds. is the requirement of the former for smooth surfaces on gates at automatic fare vending, collection, and adjustment systems in transportation stations for fixed guideway systems. 1121B.3.1, Item 7 contains language similar to that found in the 1991 ADA Stds. for this technical requirement. The 2010 ADA Stds. does not provide a similar requirement.	
506	**Advisory 220.1 General.** If a bank provides both interior and exterior ATMs, each such installation is considered a separate location. Accessible ATMs, including those with speech and those that are within reach of people who use wheelchairs, must provide all the functions provided to customers at that location at all times. For example, it is unacceptable for the accessible ATM only to provide cash withdrawals while inaccessible ATMs also sell theater tickets.			**NA**	The advisory defines separate location(s) as it relates to the requirements for ATMs. It aslo clarifies that all ATM functions and services that are available at a location with multiple ATMs, must be provided at the accessible ATM(s). No similar definition or explaination is provided in the CBC. Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b)	
507	**221 Assembly Areas**		NA	NA	NA	NA

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
508	**221 Assembly Areas**		NA	NA	NA	NA
509	**§ 35.151 New construction and alterations.** (g) *Assembly areas.* ... ... (3) Wheelchair spaces and companion seats are not located on (or obstructed by) temporary platforms or other movable structures, except that when an entire seating section is placed on temporary platforms or other movable structures in an area where fixed seating is not provided, in order to increase seating for an event, wheelchair spaces and companion seats may be placed in that section. When wheelchair spaces and companion seats are not required to accommodate persons eligible for those spaces and seats, individual, removable seats may be placed in those spaces and seats; **§ 36.406 Standards for new construction and alterations.** (f) Assembly areas. ... ... (3) Wheelchair spaces and companion seats are not located on (or obstructed by) temporary platforms or other movable structures, except that when an entire seating section is placed on temporary platforms or other movable structures in an area where fixed seating is not provided, in order to increase seating for an event, wheelchair spaces and companion seats are not required to accommodate persons eligible for those spaces and seats, individual, removable seats may be placed in those spaces and seats;	**ETA Editor's Note at 221.1:** The Title III Regulations would also include the following requirement at 36.406(f) "Standards for new construction and alterations", on page 34557 and at 35.151(g)(2) on page 34507 in the Title II Regulations. **Assembly areas.** Assembly areas subject to the standards shall comply with the provisions applicable to assembly areas, including, but not limited to, sections 221 and 804. In addition, assembly areas shall ensure that: (2) Wheelchair and companion seating locations are not located on (or obstructed by) temporary platforms or other movable structures. When wheelchair seating locations are not required to accommodate people who use wheelchairs, individual, removable seats may be placed in those spaces;	**1104B.3.7 Removable seats.** Readily removable seats may be installed in these wheelchair spaces when such spaces are not required to accommodate wheelchair users.	2010 CBC **does not address** 2010 ADA req.	Although the CBC says that readily removable seats may be installed when wheelchair spaces are unsold, they do not limit the number of seats that can be installed to a 1:1 ratio. Neither do they restrict the use of temporary platforms or other movable structures.	Adopt these ADA requirements into the CBC.
510	**221.1 General.** *Assembly areas* shall provide *wheelchair spaces* , companion seats, and designated aisle seats complying with 221 and 802. …		**1104B.1 General.** All Group A occupancies shall be accessible as provided in this chapter. See also the general requirements in Section 1114B.1.1. **1105B.2 Group B occupancies**. Group B Occupancies used for assembly purposes shall conform to the requirements as specified in Section 1114B.1.1. For floors and levels in dining, banquet and bar facilities, see Section 1120B.	Which Std.provides greater access **depends** on circumstances.	The ADA Std defines and covers "Assemby Areas." CBC defines and covers "Assembly Occupancies" and "Occupancies used for assembly purposes."	This difference should be reviewed and addressed consistently or the differences flagged for users.
511	**221.1 General.** ... In addition, lawn seating shall comply with 221.5. [See additional requirements at 28 CFR 35.151(g), p. 12, and 28 CFR 36.406(f), p. 29.]	**UNDER REVIEW** 1991 Standards reference is scrambled on this row.	NA	2010 CBC **does not address** 2010 ADA req.	Lawn seating is not specifically mentioned in the CBC and none of the headings of the sections in 1104B are similar to earthen structures. (See also 221.5 below on row 544 below.)	Add language to the CBC to specifically cover lawn seating and outdoor ampitheaters constructed for assembly purposes.

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512	**221.1 General.** *Assembly areas* shall provide *wheelchair spaces*, companion seats, and designated aisle seats complying with 221 and 802. In addition, lawn seating shall comply with 221.5. [See additional requirements at 28 CFR 35.151(g), p. 12, and 28 CFR 36.406(f), p. 29.]		**1104B.3 Auditoriums, assembly halls, theaters and related facilities.** **1104B.3.1 Seating.** In all assembly places where seating is provided, there shall be spaces for persons using wheelchairs and semi-ambulant persons, as provided in this section. **1104B.4 Stadiums, grandstands, bleachers, athletic pavilions, gymnasiums and miscellaneous sport-related facilities.** **1104B.4.1 Spectator seating**. Spectator seating shall comply with Section 1104B.3. **1104B.5 Dining, banquet and bar facilities.** **1104B.5 #1. General.** Dining, banquet, and bar facilities shall be made accessible to persons with disabilities as provided in this section. All areas where each type of functional activity occurs shall be made accessible. **4. Seating.** Each dining, banquet and bar area shall have one wheelchair seating space for each 20 seats, with at least one minimum wheelchair seating space per functional area. Such seating shall be designed and arranged to permit use by wheelchair occupants, and shall comply with Section 1122B, Fixed or Built-in Seating, Tables, and Counters. Access to such seating spaces shall be provided with main aisles not less than 36 inches (914 mm) clear width. In establishments where separate areas are designated for smoking and non-smoking patrons, the required number of accessible fixed tables (or counters) shall be proportionally distributed between the smoking and non-smoking areas. Accessible seating spaces shall be integrated with general seating to allow a reasonable selection of seating area and to avoid having one area specifically highlighted as the area for persons with disabilities. The ratio of accessible seating is based on the total number of seats provided. Where food or drink is served at counters exceeding 34 inches (865 mm) in height for consumption by customers seated or standing at the	Which Std.provides greater access **depends** on circumstances.	CBC seating scoping varies by occupancy classification. It is not clear why Section 1104B.4.1 refers to 1104B.3 while the comparable language in 1104B.6.2.1 refers to 1104B.3.1.	Abandon the occupancy classification approach and adopt the ADA functional use approach to covering accessible seating requirements. That will simplify this section and make it easier to specify consistent requirements.
512.1	**221.1 General.** Assembly areas shall provide wheelchair spaces, companion seats, and designated aisle seats complying with 221 and 802. In addition, lawn seating shall comply with 221.5. _____ At least 5 percent of the total number of aisle seats provided shall comply with 802.4 and shall be the aisle seats located closest to accessible routes.		**1104B.3.4 Wheelchair spaces** . . . . In addition, 1 percent, but not less than one, of all fixed seats, shall be aisle seats with no armrests on the aisle side, or removable or folding armrests on the aisle side. Each such seat shall be identified by a sign or marker with the International Symbol of Accessibility (see Figure 11B.6). Signage notifying patrons of the availability of such seats shall be posted at the ticket office. Signs and markers shall comply with Section 1117B.5.1, Items 2 and 3, as applicable.		This is the only seating that requires marking with the ISA, because otherwise, it would not be identifable as accessible. However, specifiers and inspectors consistently ask for dozens, or even hundreds of ISA signs to identify every accessible feature, including spaces at tables with no seating, or spaces in bleachers and auditoriums with no seating.	There needs to be a very clear list within the scoping section listing which accessible elements require the ISA. Oversigning is a problem.
513	**221.2 Wheelchair Spaces.** *Wheelchair spaces* complying with 221.2 shall be provided in assembly areas with fixed seating.		(CBC Sections include the language covering this ADA section as shown in row 512 above.)	Which Std.provides greater access **depends** on circumstances.	(CBC Sections include the language covering this ADA section as shown in row 512 above.)	(CBC Sections include the language covering this ADA section as shown in row 512 above.)
514	**221.2.1 Number and Location.** *Wheelchair spaces* shall be provided complying with 221.2.1.		(CBC has no similar heading.)	NA	NA	NA

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515	**§ 36.308 Seating in assembly areas.** A public accommodation shall ensure that wheelchair spaces and companion seats are provided in each specialty seating area that provides spectators with distinct services or amenities that generally are not available to other spectators. If it is not readily achievable for a public accommodation to place wheelchair spaces and companion seats in each such specialty seating area, it shall provide those services or amenities to individuals with disabilities and their companions at other designated accessible locations at no additional cost. The number of wheelchair spaces and companion seats provided in specialty seating areas shall be included in, rather than in addition to, wheelchair space requirements set forth in table 221.2.1.1 in the 2010 Standards.	***ETA Editor's Note*** The Title III Regulations include the following requirement at 36.308, "Seating in assembly areas." Although not required under new construction standards, the regulations require that wheelchair users have access to specialty services and amenities available to other spectators. Designers should take this obligation into consideration when determining the location of wheelchair spaces.	**1104B.3 Auditoriums, assembly halls, theaters and related facilities.** **1104B.3.1 Seating.** In all assembly places where seating is provided, there shall be spaces for persons using wheelchairs and semi-ambulant persons, as provided in this section. **1104B.3.3 Variety of locations**. Accessible seating or accommodations in places of public amusement and resort, including theaters, concert halls and stadiums, shall be provided in a variety of locations so as to provide persons with disabilities a choice of admission prices otherwise available to members of the general public. **1104B.3.5 Placement of wheelchair locations.** Wheelchair areas shall be an integral part of any fixed seating plan, and shall be arranged so as to provide persons with disabilities a choice of admission prices and lines of sight comparable to those for members of the general public. Each wheelchair area shall adjoin an accessible route which shall also serve as a means of egress in case of emergency. At least one companion fixed seat shall be provided next to each wheelchair seating area. When the seating capacity exceeds 300, wheelchair spaces shall be provided in more than one location in addition to complying with Section 1104B.3.3. **Exceptions:** **1104B.3.5 Exc.1.** Accessible viewing positions where seating capacity is less than 300 may be clustered for bleachers, balconies and other areas having sight lines that require slopes of greater than one unit vertical in 20 units horizontal (5-percent slope). Equivalent accessible viewing positions may be located on levels having accessible egress. **1104B.3.5 Exc.2.** Where it is determined that dispersing accessible seating throughout an existing assembly area would create an unreasonable hardship, accessible seating areas may be clustered. Each accessible seating area shall have provisions for companion seating and shall be	2010 CBC provides **less access** than 2010 ADA.	The CBC uses performance language that does not assure compliance with this more specific ADA requirement.	Adopt these ADA requirements into the CBC.

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516	**221.2.1.1 General Seating.** *Wheelchair spaces* complying with 802.1 shall be provided in accordance with Table 221.2.1.1.		**1104B.3.4 Wheelchair spaces.** **1104B.3.4 #1.** The number of such spaces is as shown in Table 11B-1. **1104B.3.1 Seating...** **1104B.3.1 Exc.1.** In existing buildings and facilities when the enforcing agency determines that compliance with the seating requirements of this code would create an unreasonable hardship, such requirements shall not apply. When the unreasonable hardship finding is applied, at least 1 percent of the total seating provided shall be accessible to and usable by persons with disabilities who use wheelchairs, and such seating shall comply with the level requirements and the individual space requirements of this code. **1104B.5 Dining, banquet and bar facilities.** **1104B.5 #1. General.** ... 4. Seating. Each dining, banquet and bar area shall have one wheelchair seating space for each 20 seats, with at least one minimum wheelchair seating space per functional area.... The ratio of accessible seating is based on the total number of seats provided. Where food or drink is served at counters exceeding 34 inches (865 mm) in height for consumption by customers seated or standing at the counter, a portion of the main counter which is 60 inches (1525 mm) in length minimum shall be provided in compliance with Section 1122B.	2010 CBC provides **greater access** than 2010 ADA.	As modified by the Final Express Terms that go into effect 7/1/2012, the CBC still provides greater access than the ADA Standards in terms of wheelchair seating numbers for all sizes of facilities.	NA

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517	**221.2.1.2 Luxury Boxes, Club Boxes, and Suites in Arenas, Stadiums, and Grandstands.** In each luxury box, club box, and suite within arenas, stadiums, and grandstands, *wheelchair spaces* complying with 802.1 shall be provided in accordance with Table 221.2.1.1.		**1104B.3 Auditoriums, assembly halls, theaters and related facilities.** **1104B.3.1 Seating.** In all assembly places where seating is provided, there shall be spaces for persons using wheelchairs and semi-ambulant persons, as provided in this section. **1104B.3.3 Variety of locations**. Accessible seating or accommodations in places of public amusement and resort, including theaters, concert halls and stadiums, shall be provided in a variety of locations so as to provide persons with disabilities a choice of admission prices otherwise available to members of the general public. **1104B.3.5 Placement of wheelchair locations.** Wheelchair areas shall be an integral part of any fixed seating plan, and shall be arranged so as to provide persons with disabilities a choice of admission prices and lines of sight comparable to those for members of the general public. Each wheelchair area shall adjoin an accessible route which shall also serve as a means of egress in case of emergency. At least one companion fixed seat shall be provided next to each wheelchair seating area. When the seating capacity exceeds 300, wheelchair spaces shall be provided in more than one location in addition to complying with Section 1104B.3.3. **Exceptions:** **1104B.3.5 Exc.1.** Accessible viewing positions where seating capacity is less than 300 may be clustered for bleachers, balconies and other areas having sight lines that require slopes of greater than one unit vertical in 20 units horizontal (5-percent slope). Equivalent accessible viewing positions may be located on levels having accessible egress. **1104B.3.5 Exc.2.** Where it is determined that dispersing accessible seating throughout an existing assembly area would create an unreasonable hardship, accessible seating areas may be clustered. Each accessible seating area shall have provisions for companion seating and shall be	2010 CBC provides **less access** than 2010 ADA.	The CBC uses performance language that does not assure compliance with the more specific ADA requirements.	Adopt the ADA language and referenced sections.

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518	**Advisory 221.2.1.2 Luxury Boxes, Club Boxes, and Suites in Arenas, Stadiums, and Grandstands.** The number of wheelchair spaces required in luxury boxes, club boxes, and suites within an arena, stadium, or grandstand is to be calculated box by box and suite by suite.		**1104B.3 Auditoriums, assembly halls, theaters and related facilities.** **1104B.3.1 Seating.** In all assembly places where seating is provided, there shall be spaces for persons using wheelchairs and semi-ambulant persons, as provided in this section. **1104B.3.3 Variety of locations**. Accessible seating or accommodations in places of public amusement and resort, including theaters, concert halls and stadiums, shall be provided in a variety of locations so as to provide persons with disabilities a choice of admission prices otherwise available to members of the general public. **1104B.3.5 Placement of wheelchair locations.** Wheelchair areas shall be an integral part of any fixed seating plan, and shall be arranged so as to provide persons with disabilities a choice of admission prices and lines of sight comparable to those for members of the general public. Each wheelchair area shall adjoin an accessible route which shall also serve as a means of egress in case of emergency. At least one companion fixed seat shall be provided next to each wheelchair seating area. When the seating capacity exceeds 300, wheelchair spaces shall be provided in more than one location in addition to complying with Section 1104B.3.3. **Exceptions:** **1104B.3.5 Exc.1.** Accessible viewing positions where seating capacity is less than 300 may be clustered for bleachers, balconies and other areas having sight lines that require slopes of greater than one unit vertical in 20 units horizontal (5-percent slope). Equivalent accessible viewing positions may be located on levels having accessible egress. **1104B.3.5 Exc.2.** Where it is determined that dispersing accessible seating throughout an existing assembly area would create an unreasonable hardship, accessible seating areas may be clustered. Each accessible seating area shall have provisions for companion seating and shall be	2010 CBC provides **less access** than 2010 ADA.	The CBC uses performance language that does not assure compliance with the more specific ADA requirements.	Adopt the ADA language and referenced sections.

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519	**221.2.1.3 Other Boxes.** In boxes other than those required to comply with 221.2.1.2, the total number of *wheelchair spaces* required shall be determined in accordance with Table 221.2.1.1. *Wheelchair spaces* shall be located in not less than 20 percent of all boxes provided. *Wheelchair spaces* shall comply with 802.1.		**1104B.3 Auditoriums, assembly halls, theaters and related facilities.** **1104B.3.1 Seating.** In all assembly places where seating is provided, there shall be spaces for persons using wheelchairs and semi-ambulant persons, as provided in this section. **1104B.3.3 Variety of locations**. Accessible seating or accommodations in places of public amusement and resort, including theaters, concert halls and stadiums, shall be provided in a variety of locations so as to provide persons with disabilities a choice of admission prices otherwise available to members of the general public. **1104B.3.5 Placement of wheelchair locations.** Wheelchair areas shall be an integral part of any fixed seating plan, and shall be arranged so as to provide persons with disabilities a choice of admission prices and lines of sight comparable to those for members of the general public. Each wheelchair area shall adjoin an accessible route which shall also serve as a means of egress in case of emergency. At least one companion fixed seat shall be provided next to each wheelchair seating area. When the seating capacity exceeds 300, wheelchair spaces shall be provided in more than one location in addition to complying with Section 1104B.3.3. **Exceptions:** **1104B.3.5 Exc.1.** Accessible viewing positions where seating capacity is less than 300 may be clustered for bleachers, balconies and other areas having sight lines that require slopes of greater than one unit vertical in 20 units horizontal (5-percent slope). Equivalent accessible viewing positions may be located on levels having accessible egress. **1104B.3.5 Exc.2.** Where it is determined that dispersing accessible seating throughout an existing assembly area would create an unreasonable hardship, accessible seating areas may be clustered. Each accessible seating area shall have provisions for companion seating and shall be	2010 CBC provides **less access** than 2010 ADA.	The CBC uses performance language that does not assure compliance with the more specific ADA requirements.	Adopt the ADA language and referenced sections.
520	**Advisory 221.2.1.3 Other Boxes.** The provision for seating in “other boxes” includes box seating provided in facilities such as performing arts auditoria where tiered boxes are designed for spatial and acoustical purposes. The number of wheelchair spaces required in boxes covered by 221.2.1.3 is calculated based on the total number of seats provided in these other boxes. The resulting number of wheelchair spaces must be located in no fewer than 20% of the boxes covered by this section. For example, a concert hall has 20 boxes, each of which contains 10 seats, totaling 200 seats. In this example, 5 wheelchair spaces would be required, and they must be placed in at least 4 of the boxes. Additionally, because the wheelchair spaces must also meet the dispersion requirements of 221.2.3, the boxes containing these wheelchair spaces cannot all be located in one area unless an exception to the dispersion requirements applies.		NA	NA	NA	NA

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521	**221.2.1.4 Team or Player Seating.** At least one *wheelchair space* complying with 802.1 shall be provided in team or player seating areas serving *areas of sport activity* .		**1104B.3.11 Access to performing areas**. An accessible route shall connect wheelchair seating locations with performing areas, including stages, arena floors, dressing rooms, locker rooms and other spaces used by performers. **1104B.3.13 Miscellaneous areas.** Public toilets and other public areas shall be made accessible to persons with disabilities. **1104B.4.3 Participation areas.** Participation areas shall be accessible to persons with disabilities, including the following listed and similar activity areas: **1**. Tennis, racquetball and handball courts. **2.** Gymnasium floor areas and general exercise rooms. **3**. Basketball, volleyball and badminton courts, and bowling lanes. **4.** Swimming pool deck areas shall be accessible, ... **5.** Athletic team rooms and facilities, playing fields and running tracks.	Which Std.provides greater access **depends** on circumstances.	The requirement "*Participation areas shall be accessible to persons with disabilities* " provides insufficient guidance to design, construct, or operate for compliance. Details are needed to prevent wild interpretations, arguments, and lawsuits about what it means. Under one AHJ it might provide greater access. Under another, it might not provide any. In any case, it could not be certified as equivalent to the ADA Standards.	Adopt the ADA language and referenced sections.
522	**EXCEPTION:** *Wheelchair spaces* shall not be required in team or player seating areas serving bowling lanes not required to comply with 206.2.11.		NA	2010 CBC **does not address** 2010 ADA req.	This section simply exempts the bowling lanes that are not required to be on an accessible route from the wheelchair seating spaces requirement.	If the ADA language is adopted for this section, this should also be adopted.

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523	**221.2.2 Integration.** *Wheelchair spaces* shall be an integral part of the seating plan.		**1104B.3.5 Placement of wheelchair locations.** Wheelchair areas shall be an integral part of any fixed seating plan, ... **1104B.3.10 Life safety.** In determining the location of seating for persons with disabilities, life safety shall be considered, and all seating provided must comply with the fire and panic safety requirements of the State Fire Marshal. **1104B.5 Dining, banquet and bar facilities.** **4. Seating.** ... Accessible seating spaces shall be integrated with general seating to allow a reasonable selection of seating area and to avoid having one area specifically highlighted as the area for persons with disabilities. ... Where food or drink is served at counters exceeding 34 inches (865 mm) in height for consumption by customers seated or standing at the counter, a portion of the main counter which is 60 inches (1525 mm) in length minimum shall be provided in compliance with Section 1122B. **1104B.6 Religious facilities.** **1104B.6.1 General.** Religious facilities shall be made accessible to persons with disabilities as provided in this section. **1104B.6.1 Exc.** In existing buildings, when the enforcing agency determines that compliance with any regulation under this section would create an unreasonable hardship, an exception shall be granted when equivalent facilitation is provided. **1104B.6.2 Sanctuary.** Sanctuary areas shall be made accessible to persons with disabilities. **1104B.6.2.1** Wheelchair seating spaces in these areas shall conform to the requirements in Section 1104B.3.1. **1104B.6.2.2** Wheelchair access shall be provided to raised platforms, choir rooms, choir lofts, performing areas and other similar areas. **1104B.6.2.2 Exc.** In existing buildings, these regulations	Which Std.provides greater access **depends** on circumstances.	The ADA requirement is not limited to fixed seating plans. The Life safety "exception" that covers new construction as well as exisitng facilities gives designers and local officials an indeterminate opportunity to violate any number of other design requirements of these standards. The note in 1104B.5 #4 "*to avoid having one area specifically highlighted as the area for persons with disabilities" while helpful,* seems more advisory than prescriptive and actually might give the impression of watering down the integration and dispersal requirements in larger facilities. Accessible bar seating is now less restrictive under the ADA. (See ADA Section 226 on row 610 below.) Religious facilities are not covered by the ADA.	If ADA language and formatting is adopted, these differences will be resolved. Other sections listed in the CBC column are covered in other sections of the ADA except for religious facilities which would have to be added back if the ADA language is adopted.
524	**Advisory 221.2.2 Integration.** The requirement that wheelchair spaces be an “integral part of the seating plan” means that wheelchair spaces must be placed within the footprint of the seating area. Wheelchair spaces cannot be segregated from seating areas. For example, it would be unacceptable to place only the wheelchair spaces, or only the wheelchair spaces and their associated companion seats, outside the seating areas defined by risers in an assembly area.		NA	NA	NA	NA

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525	**221.2.3 Lines of Sight and Dispersion.** *Wheelchair spaces* shall provide lines of sight complying with 802.2 and shall comply with 221.2.3. In providing lines of sight, wheelchair spaces shall be dispersed. *Wheelchair spaces* shall provide spectators with choices of seating locations and viewing angles that are substantially equivalent to, or better than, the choices of seating locations and viewing angles available to all other spectators. When the number of *wheelchair spaces* required by 221.2.1 has been met, further dispersion shall not be required.		**1104B.3.5 Placement of wheelchair locations.** Wheelchair areas shall ... be arranged so as to provide persons with disabilities ... lines of sight comparable to those for members of the general public. ... When the seating capacity exceeds 300, wheelchair spaces shall be provided in more than one location in addition to complying with Section 1104B.3.3. **Exceptions:** **1104B.3.5 Exc.1.** Accessible viewing positions where seating capacity is less than 300 may be clustered for bleachers, balconies and other areas having sight lines that require slopes of greater than one unit vertical in 20 units horizontal (5-percent slope). ... **1104B.3.5 Exc.2.** Where it is determined that dispersing accessible seating throughout an existing assembly area would create an unreasonable hardship, accessible seating areas may be clustered. ...	2010 CBC provides **less access** than 2010 ADA.	The CBC uses performance language that does not assure compliance with the more specific ADA requirements. Comparable lines of sight in the ADA are compared to "all other spectators" not merely "members of the general public" per the CBC. Exc.1 which allows clustering in facilities with seating capacity < 300 when slopes exceed 1:20 seems redundant because the basic requirement doesn't require dispersal until the capacity exceeds 300. CBC Exc.2 for existing facilities does not rely on technical infeasibility but on cost, a less restrictive analysis than the ADA's. And, in this case, equivalent facilitation is not required if meeting the standard creates an unreasonable hardship.	Adopt the ADA language and referenced sections.
525.1	**221.2.3 Lines of Sight and Dispersion.** *Wheelchair spaces* shall provide lines of sight complying with 802.2 and shall comply with 221.2.3. In providing lines of sight, wheelchair spaces shall be dispersed. *Wheelchair spaces* shall provide spectators with choices of seating locations and viewing angles that are substantially equivalent to, or better than, the choices of seating locations and viewing angles available to all other spectators. When the number of *wheelchair spaces* required by 221.2.1 has been met, further dispersion shall not be required.		**1104B.3.3 Variety of locations**. Accessible seating or accommodations in places of public amusement and resort, including theaters, concert halls and stadiums, shall be provided in a variety of locations... **1104B.3.5 Placement of wheelchair locations**. Wheelchair areas ... shall be arranged so as to provide persons with disabilities a choice of admission prices and lines of sight comparable to those for members of the general public. ... When the seating capacity exceeds 300, wheelchair spaces shall be provided in more than one location in addition to complying with Section 1104B.3.3. **Exceptions:** **1104B.3.5 Exc.1.** Accessible viewing positions where seating capacity is less than 300 may be clustered for bleachers, balconies and other areas having sight lines that require slopes of greater than one unit vertical in 20 units horizontal (5-percent slope). Equivalent accessible viewing positions may be located on levels having accessible egress. **1104B.3.5 Exc.2.** Where it is determined that dispersing accessible seating throughout an existing assembly area would create an unreasonable hardship, accessible seating areas may be clustered. Each accessible seating area shall have provisions for companion seating and shall be located on an accessible route that also serves as a means of emergency egress. **1104B.3.10 Life safety.** In determining the location of seating for persons with disabilities, life safety shall be considered, and all seating provided must comply with the fire and panic safety requirements of the State Fire Marshal. **1104B.5 Dining, banquet and bar facilities.** **#1. General**. Dining, banquet, and bar facilities shall be made accessible to persons with disabilities as provided in this section. All areas where each type of functional activity	Which Std.provides greater access **depends** on circumstances.	The 2010 ADA Stds and regulations do not differentiate the dispersal requirements for all of the different types of assembly spaces as the 2010 CBC does. The 2010 CBC, like the 1991 ADA Std, is primarily a simple performance standard. The 2010 ADA Std. is far more prescriptive without giving up reliance on performance requirements as evidenced by the language in several of the Advisories. (Ex:Adv.221.2.3 "so that their experience is substantially equivalent to that of other members of the audience.") The 2010 ADA Stds. have added MANY new requirements not in the 2010 CBC. Life safety does not have it's own section in the 2010 ADA Stds as it does in the 2010 CBC where it might be interpreted to override other provisions of the requirements. Instead, it has been considered in developing the 2010 ADA Stds and it is assumed that it will be considered while meeting the other requirements. The 2010 ADA Stds do not cover religious facilities as 11104B.6 does.	1. Adopt the ADA approach to "assembly areas" (more like the "purposes" language sometimes used in the CBC), drop the confusions introduced by attempting to adopt accessibility requirements based on "occupancies" and carefully add back the requirements in assembly areas where the 2010 CBC is stricter. (See also row 510 above.)

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526	**221.2.3 Lines of Sight and Dispersion.** *Wheelchair spaces* shall provide lines of sight complying with 802.2 and shall comply with 221.2.3. In providing lines of sight, wheelchair spaces shall be dispersed. *Wheelchair spaces* shall provide spectators with choices of seating locations and viewing angles that are substantially equivalent to, or better than, the choices of seating locations and viewing angles available to all other spectators. When the number of *wheelchair spaces* required by 221.2.1 has been met, further dispersion shall not be required.		(See row 525 above.)	NA	(See row 525 above.)	(See row 525 above.)
527	**EXCEPTION:** *Wheelchair spaces* in team or player seating areas serving *areas of sport activity* shall not be required to comply with 221.2.3.		NA	2010 CBC **does not address** 2010 ADA req.	This section simply exempts (as necessary for many sports) player seating from the lines of sight and dispersion requirements.	If the ADA language is adopted for this section, this should also be adopted.
528	**Advisory 221.2.3 Lines of Sight and Dispersion.** Consistent with the overall intent of the ADA, individuals who use wheelchairs must be provided equal access so that their experience is substantially equivalent to that of other members of the audience. Thus, while individuals who use wheelchairs need not be provided with the best seats in the house, neither may they be relegated to the worst.		NA	NA	NA	NA
529	**221.2.3.1 Horizontal Dispersion.** *Wheelchair spaces* shall be dispersed horizontally.		**1104B.3.3 Variety of locations.** Accessible seating ... shall be provided in a variety of locations so as to provide persons with disabilities a choice of admission prices otherwise available to members of the general public. **1104B.3.5 Placement of wheelchair locations**. ... shall be arranged so as to provide persons with disabilities a choice of admission prices and lines of sight comparable to those for members of the general public. ... When the seating capacity exceeds 300, wheelchair spaces shall be provided in more than one location in addition to complying with Section 1104B.3.3. **...**	2010 CBC provides **less access** than 2010 ADA.	The CBC uses performance language that does not assure compliance with the more specific ADA requirements.	Adopt the ADA language and referenced sections.
530	**EXCEPTIONS: 1.** Horizontal dispersion shall not be required in *assembly areas* with 300 or fewer seats if the companion seats required by 221.3 and *wheelchair spaces* are located within the 2nd or 3rd quartile of the total row length. Intermediate aisles shall be included in determining the total row length. If the row length in the 2nd and 3rd quartile of a row is insufficient to accommodate the required number of companion seats and *wheelchair spaces*, the additional companion seats and wheelchair spaces shall be permitted to be located in the 1st and 4th quartile of the row. **2.** In row seating, two *wheelchair spaces* shall be permitted to be located side-by-side.		**1104B.3.5 Placement of wheelchair locations**. ... **Exceptions:** **1104B.3.5 Exc.1**. Accessible viewing positions where seating capacity is less than 300 may be clustered for bleachers, balconies and other areas having sight lines that require slopes of greater than one unit vertical in 20 units horizontal (5-percent slope). Equivalent accessible viewing positions may be located on levels having accessible egress. **1104B.3.5 Exc.2.** Where it is determined that dispersing accessible seating throughout an existing assembly area would create an unreasonable hardship, accessible seating areas may be clustered. Each accessible seating area shall have provisions for companion seating and shall be located on an accessible route that also serves as a means of emergency egress.	2010 CBC provides **less access** than 2010 ADA.	The CBC uses performance language that does not assure compliance with the more specific ADA requirements. Other provisions of this section of CBC are covered elsewhere in the 2010 ADA.	Adopt the ADA language and referenced sections.
531	**Advisory 221.2.3.1 Horizontal Dispersion.** Horizontal dispersion of wheelchair spaces is the placement of spaces in an assembly facility seating area from side-to-side or, in the case of an arena or stadium, around the field of play or performance area.		NA	NA	NA	NA

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531.1	**§ 35.151 New construction and alterations.** **(g) Assembly areas**. ... **(2)** Assembly areas that are required to horizontally disperse wheelchair spaces and companion seats by section 221.2.3.1 of the 2010 Standards and have seating encircling, in whole or in part, a field of play or performance area shall disperse wheelchair spaces and companion seats around that field of play or performance area;		NA	2010 CBC provides **less access** than 2010 ADA.	The CBC uses performance language that does not assure compliance with this more specific ADA requirement.	Adopt the ADA language and referenced sections.
532	**221.2.3.2 Vertical Dispersion.** *Wheelchair spaces* shall be dispersed vertically at varying distances from the screen, performance area, or playing field. In addition, *wheelchair spaces* shall be located in each balcony or *mezzanine* that is located on an *accessible* route.		**1104B.3.3 Variety of locations.** Accessible seating ... shall be provided in a variety of locations so as to provide persons with disabilities a choice of admission prices otherwise available to members of the general public. **1104B.3.5 Placement of wheelchair locations**. ... shall be arranged so as to provide persons with disabilities a choice of admission prices and lines of sight comparable to those for members of the general public. ... When the seating capacity exceeds 300, wheelchair spaces shall be provided in more than one location in addition to complying with Section 1104B.3.3. **...**	2010 CBC provides **less access** than 2010 ADA.	The CBC uses performance language that does not assure compliance with the more specific ADA requirements.	Adopt the ADA language and referenced sections.
533	**EXCEPTIONS: 1.** Vertical dispersion shall not be required in *assembly areas* with 300 or fewer seats if the *wheelchair spaces* provide viewing angles that are equivalent to, or better than, the average viewing angle provided in the *facility*. **2.** In bleachers, *wheelchair spaces* shall not be required to be provided in rows other than rows at points of entry to bleacher seating.		**1104B.3.5 Placement of wheelchair locations**. ... **Exceptions:** **1104B.3.5 Exc.1**. Accessible viewing positions where seating capacity is less than 300 may be clustered for bleachers, balconies and other areas having sight lines that require slopes of greater than one unit vertical in 20 units horizontal (5-percent slope). Equivalent accessible viewing positions may be located on levels having accessible egress. **1104B.3.5 Exc.2.** Where it is determined that dispersing accessible seating throughout an existing assembly area would create an unreasonable hardship, accessible seating areas may be clustered. Each accessible seating area shall have provisions for companion seating and shall be located on an accessible route that also serves as a means of emergency egress.	2010 CBC provides **less access** than 2010 ADA.	The CBC uses performance language that does not assure compliance with the more specific ADA requirements. Other provisions of this section of CBC are covered elsewhere in the 2010 ADA.	Adopt the ADA language and referenced sections.
534	**Advisory 221.2.3.2 Vertical Dispersion.** When wheelchair spaces are dispersed vertically in an assembly facility they are placed at different locations within the seating area from front-to-back so that the distance from the screen, stage, playing field, area of sports activity, or other focal point is varied among wheelchair spaces.		NA	NA	NA	NA

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535	**Advisory 221.2.3.2 Vertical Dispersion Exception 2.** Points of entry to bleacher seating may include, but are not limited to, cross aisles, concourses, vomitories, and entrance ramps and stairs. Vertical, center, or side aisles adjoining bleacher seating that are stepped or tiered are not considered entry points.	Note to Reader: The Department of Justice's revised ADA title II regulation (35.151(g)) and title III regulation (36.406(f)) require the following: Assembly areas. Assembly areas that are subject to this part [of the title III regulation or to this section of the title II regulation] shall comply with the provisions of the 2010 Standards applicable to assembly areas, including, but not limited to, sections 221 and 802. In addition, assembly areas shall ensure that -- (1) In stadiums, arenas, and grandstands, wheelchair spaces and companion seats are dispersed to all levels that include seating served by an accessible route; (2) Assembly areas that are required to horizontally disperse wheelchair spaces and companion seats by section 221.2.3.1 of the 2010 Standards and have seating encircling, in whole or in part, a field of play or performance area shall disperse wheelchair spaces and companion seats around that field of play or performance area; (3) Wheelchair spaces and companion seats are not	NA	NA	NA		NA

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535.1	**§ 35.151 New construction and alterations.** (g) Assembly areas. ... assembly areas shall ensure that— (1) In stadiums, arenas, and grandstands, wheelchair spaces and companion seats are dispersed to all levels that include seating served by an accessible route; **§ 36.406 Standards for new construction and alterations.** (f) Assembly areas.... assembly areas shall ensure that— (1) In stadiums, arenas, and grandstands, wheelchair spaces and companion seats are dispersed to all levels that include seating served by an accessible route;		**1104B.5 Dining, banquet and bar facilities.** **1. General.** Dining, banquet, and bar facilities shall be made accessible to persons with disabilities as provided in this section. All areas where each type of functional activity occurs shall be made accessible. **Exceptions:** **1104B.5 #1 Exc.1.** Existing buildings, when the enforcing agency determines that compliance with any regulation under this section would create an unreasonable hardship, an exception shall be granted when equivalent facilitation is provided. **1104B.5 #1 Exc.2**. Existing buildings, these regulations shall not apply when legal or physical constraints would not allow compliance with these regulations or equivalent facilitation without creating an unreasonable hardship. See Section 1.9.1.5. **2. Entrance.** Access to these facilities shall be provided at entrances and exits as required by Section 1133B.1.1. **3. Raised or sunken areas.** All raised or sunken areas, including dining areas, loggias and outdoor seating areas, shall be accessible. A raised platform where a head table or speaker's lectern is located shall be accessible. Open edges of raised or sunken areas shall be protected as required by Sections 1013 Guards, 1133B.8.1 Warning Curbs, or by other means as required by this code. For existing buildings, see Section 1120B, Floors and Levels. **4. Seating.** Each dining, banquet and bar area shall have one wheelchair seating space for each 20 seats, with at least one minimum wheelchair seating space per functional area. Such seating shall be designed and arranged to permit use by wheelchair occupants, and shall comply with Section 1122B, Fixed or Built-in Seating, Tables, and Counters. Access to such seating spaces shall be provided with main aisles not less than 36 inches (914 mm) clear width. In establishments where separate areas are designated for smoking and non-smoking patrons, the required number of accessible fixed tables (or counters) shall be proportionally distributed between the smoking and non-smoking areas. Accessible seating spaces shall be	Which Std.provides greater access **depends** on circumstances.	Although this language is written to require wheelchair spaces to be located on all levels served by an accesssible route, it also allows designs that have levels not served by an accessible route to have no wheelchair spaces as long as they and the closest wheelchair spaces meet the other requirements for ticket prices, lines of sight, amenities, speciality areas, etc. The places where the CBC provides less access than the ADA are: 1) where CBC covers Religious facilities, and 2) where specific exceptions in the ADA in Dining, Banquet, and Bar facilities are not allowed in CBC.	Adopt the ADA language and add back any specific language for religious facilities and any specific differences not covered by 206.2.5 for restaurants and cafeterias.
536	**§ 35.151 New construction and alterations.** (g) Assembly areas. ... assembly areas shall ensure that— ... (4) Stadium-style movie theaters shall locate wheelchair spaces and companion seats on a riser or cross-aisle in the stadium section that satisfies at least one of the following criteria— (i) It is located within the rear 60% of the seats provided in an auditorium; or (ii) It is located within the area of an auditorium in which the vertical viewing angles (as measured to the top of the screen) are from the 40th to the 100th percentile of vertical viewing angles for all seats as ranked from the seats in the first row (1st percentile) to seats in the back row (100th percentile). **§ 36.406 Standards for new construction and alterations.** (f) Assembly areas. ... assembly areas shall ensure that— ... (4) In stadium-style movie theaters, wheelchair spaces and companion seats are located on a riser or cross-aisle in the stadium section that satisfies at least one of the following criteria— (i) It is located within the rear 60% of the seats provided in an auditorium; or (ii) It is located within the area of an auditorium in which the vertical viewing angles (as measured to the top of the screen) are from the 40th to the 100th percentile of vertical viewing angles for all seats as ranked from the seats in the first row (1st percentile) to seats in the back row (100th percentile).	***ETA Editor's Note*** Note additional dispersion requirements in Title II Regulations at 35.151(g) and in Title III Regulations at 36.406(f) located at the beginning of this publication.	NA	2010 CBC provides **less access** than 2010 ADA.	The CBC uses general performance language that does not discuss this specific requirement.	Adopt these ADA requirements into the CBC.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
537	**221.3 Companion Seats.** At least one companion seat complying with 802.3 shall be provided for each *wheelchair space* required by 221.2.1.		**1104B.3.5 Placement of wheelchair locations.** ... At least one companion fixed seat shall be provided next to each wheelchair seating area. ... **Exceptions:** **...** **1104B.3.5 Exc.2.** ... Each accessible seating area shall have provisions for companion seating ...	2010 CBC is **equivalent** to 2010 ADA.	CBC uses multiple terms for ADA's "wheelchair space." CBC also refers to "companion fixed seat" in one place and "companion seating" (without reference to "fixed" in another).	Adopt ADA language for better consistency and to eliminate reference to fixed seating.
538	**§ 36.302 Modifications in policies, practices, or procedures.** **(f) Ticketing.** **(4) Purchasing multiple tickets.** **(i) General.** For each ticket for a wheelchair space purchased by an individual with a disability or a third-party purchasing such a ticket at his or her request, a public accommodation shall make available for purchase three additional tickets for seats in the same row that are contiguous with the wheelchair space, provided that at the time of purchase there are three such seats available. A public accommodation is not required to provide more than three contiguous seats for each wheelchair space. Such seats may include wheelchair spaces. **(ii) Insufficient additional contiguous seats available.** If patrons are allowed to purchase at least four tickets, and there are fewer than three such additional contiguous seat tickets available for purchase, a public accommodation shall offer the next highest number of such seat tickets available for purchase and shall make up the difference by offering tickets for sale for seats that are as close as possible to the accessible seats.	Although this requirement is included in the regulations under "Ticketing," facilities designed to easily accommodate it will be appreciated by those who have to handle ticket sales. In large facilities, good design will allow multiple group sizes including wheelchair and scooter users to be easily accommodated.	NA	2010 CBC **does not address** 2010 ADA req.	Although this requirement is included in the regulations under "Ticketing," facilities designed to easily accommodate it will be appreciated by those who have to handle ticket sales. In large facilities, good design will allow multiple group sizes including wheelchair and scooter users to be easily accommodated.	Consider adding language to the CBC to notify designers of this operational obligation.
539	**§ 36.302 Modifications in policies, practices, or procedures.** **(f) Ticketing.** **(4) Purchasing multiple tickets.** **...** **(v) Group sales.** If a group includes one or more individuals who need to use accessible seating because of a mobility disability or because their disability requires the use of the accessible features that are provided in accessible seating, the group shall be placed in a seating area with accessible seating so that, if possible, the group can sit together. If it is necessary to divide the group, it should be divided so that the individuals in the group who use wheelchairs are not isolated from their group. (Identical language for public entities is found in **§ 35.138 Ticketing / (d) Purchasing multiple tickets. / (5) Group sales.)**	Although this requirement is included in the regulations under "Ticketing," facilities designed to easily accommodate it will be appreciated by those who have to handle ticket sales. In large facilities, good design will allow multiple group sizes including wheelchair and scooter users to be easily accommodated.	NA	2010 CBC **does not address** 2010 ADA req.	Although this requirement is included in the regulations under "Ticketing," facilities designed to easily accommodate it will be appreciated by those who have to handle ticket sales. In large facilities, good design will allow multiple group sizes including wheelchair and scooter users to be easily accommodated.	Consider adding language to the CBC to notify designers of this operational obligation.
540	**221.4 Designated Aisle Seats.** At least 5 percent of the total number of aisle seats provided shall comply with 802.4 and shall be the aisle seats located closest to *accessible* routes.		**1104B.3.9 Designated aisle seats.** In addition to the wheelchair spaces required, 5 percent, but not less than one, of all fixed seats, shall be designated aisle seats with no armrests on the aisle side, or with removable or folding armrests on the aisle side. The designated aisle seats shall be those located closest to accessible routes. Each such seat shall be identified by a sign or marker with the International Symbol of Accessibility (see Figure 11B-6). Signage notifying patrons of the availability of such seats shall be posted at the ticket office. Signs and markers shall comply with Section 1117B.5.1 items 2 and 3, as applicable.	Which Std.provides greater access **depends** on circumstances.	2010 ADA does not limit the designated aisle seats to fixed seats. The 2010 ADA Standards do not allow removable armrests; they must be folding or retractable. Although the ADA does require a sign or marker on each designated aisle seat, it does not specifically require the ISA. Following the lack of a requirement for notifying patrons of the availability of wheelchair spaces, the ADA no longer requires signage at the ticket office notifying patrons of the availability of designated aisle seats.	Adopt the ADA language and, if needed, add back the requirements for an ISA at the seats and signage at the ticket office.
541	**221.4 Designated Aisle Seats.** At least 5 percent of the total number of aisle seats provided shall comply with 802.4 and shall be the aisle seats located closest to *accessible* routes.		(See row 540 above.)	NA	(See row 540 above.)	(See row 540 above.)
542	**EXCEPTION:** Team or player seating areas serving *areas of sport activity* shall not be required to comply with 221.4.		NA	2010 CBC **does not address** 2010 ADA req.	This section simply clarifies that the folding or retractable armrest requirements do not apply to team and player seating where other requirements might conflict with them.	If the ADA language is adopted for this section, this should also be adopted.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
543	**Advisory 221.4 Designated Aisle Seats.** When selecting which aisle seats will meet the requirements of 802.4, those aisle seats which are closest to, not necessarily on, accessible routes must be selected first. For example, an assembly area has two aisles (A and B) serving seating areas with an accessible route connecting to the top and bottom of Aisle A only. The aisle seats chosen to meet 802.4 must be those at the top and bottom of Aisle A, working toward the middle. Only when all seats on Aisle A would not meet the five percent minimum would seats on Aisle B be designated.		NA	NA	NA	NA
544	**221.5 Lawn Seating.** Lawn seating areas and exterior overflow seating areas, where fixed seats are not provided, shall connect to an *accessible* route.		NA	2010 CBC **does not address** 2010 ADA req.	"Lawn seating areas and exterior overflow seating areas, where fixed seats are not provided" are not specifically mentioned in the CBC and none of the headings of the sections in 1104B are similar.	Add language to the CBC to specifically cover "lawn seating areas and exterior overflow seating areas, where fixed seats are not provided."
546	**222 Dressing, Fitting, and Locker Rooms**		***1117B.8 Fitting and dressing rooms***. ... ***1104B.4 ... miscellaneous sport-related facilities.*** ***...*** ***1104B.4.5 Sanitary and locker facilities***. *Where spectator and/or participant sanitary and/or locker facilities are provided, they shall conform with the requirements in Section 1115B.* ***1104B.3.10 Access to performing areas.*** *An accessible route shall connect wheelchair seating locations with performing areas, including stages, arena floors, dressing rooms, locker rooms and other spaces used by performers.* ***1104B.4.4 Clubrooms.*** *Clubrooms shall be made accessible to persons with disabilities.* ***1104B.4.5 Sanitary and locker facilities***. *Where spectator and/or participant sanitary and/or locker facilities are provided, they shall conform with the requirements in Section 1115B.* *persons with disabilities.* ***1104B.4.5 Sanitary and locker facilities***. *Where spectator and/or participant sanitary and/or locker facilities are provided, they shall conform with the requirements in Section 1115B.* ***1115B.2 Bathing and shower facilities.*** *Where facilities for bathing are provided for the public, clients or employees, including showers or bathtubs, at least one shower or bathtub and support facilities such as lockers, and not less than 1 percent of all facilities, shall be accessible.*	2010 CBC provides **less access** than 2010 ADA.	CBC locker rooms are included in ~~a~~ separate sections - under Assembly, and Sanitary facilities. (See also 225 below.)	Relocate and add locker rooms.
547	**222.1 General.** Where dressing rooms, fitting rooms, or locker rooms are provided, at least 5 percent, but no fewer than one, of each type of use in each cluster provided shall comply with 803.		1117B.8 Fitting and dressing rooms. Where fitting or dressing rooms are provided ... 5 percent, but never less than one, of dressings rooms for each type of use in each cluster of dressing rooms shall be accessible ... 1104B.3.10 Access to performing areas. An accessible route shall connect wheelchair seating locations with performing areas, including stages, arena floors, dressing rooms, locker rooms and other spaces used by performers.	2010 CBC provides **less access** than 2010 ADA.	the word 'cluster' should be defined	Add locker rooms 2. A cluster is a group of rooms proximate to one another. Generally rooms in a cluster are within sight of or adjacent to one another

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548	**EXCEPTION:** In *alterations* , where it is *technically infeasible* to provide rooms in accordance with 222.1, one room for each sex on each level shall comply with 803. Where only unisex rooms are provided, unisex rooms shall be permitted.		NA	2010 CBC **does not address** 2010 ADA req.		1. Provide Excep as stated in ADA
549	**Advisory 222.1 General**. A “cluster” is a group of rooms proximate to one another. Generally, rooms in a cluster are within sight of, or adjacent to, one another. Different styles of design provide users varying levels of privacy and convenience. Some designs include private changing facilities that are close to core areas of the facility, while other designs use space more economically and provide only group dressing facilities. Regardless of the type of facility, dressing, fitting, and locker rooms should provide people with disabilities rooms that are equally private and convenient to those provided others. For example, in a physician’s office, if people without disabilities must traverse the full length of the office suite in clothing other than their street clothes, it is acceptable for people with disabilities to be asked to do the same.		NA	2010 CBC **does not address** 2010 ADA req.		1. Provide definition ofcluster
550	**222.2 ... Shelves.** Where ... shelves are provided in dressing, fitting or locker rooms without individual compartments, at least one of each type shall comply with 803.5. Where ... shelves are provided in individual compartments at least one of each type complying with 803.5 shall be provided in individual compartments in dressing, fitting, or locker rooms required to comply with 222.1.		1117B.8 Fitting and dressing rooms. ... ... Clothing hooks shall be located not greater than 48 inches (1219 mm) from the floor. …	Which Std.provides greater access **depends** on circumstances.	ADA requires a coat hook to be within reach range - if the coat hook is above the bench or another seat it can only be 46" max AFF since ADA stipulates within reach range CBC does not address shelf ht except in a medicine cabinet	Revise to ADA language Keep language of 48" max but also do not allow coat hooks to be above the bench or other seating inside the room 3. Create new section on shelving at 40" min to 48" max AFF
551	**222.2 Coat Hooks and Shelves.** Where coat hooks or shelves are provided in dressing, fitting or locker rooms without individual compartments, at least one of each type shall comply with 803.5. Where coat hooks or shelves are provided in individual compartments at least one of each type complying with 803.5 shall be provided in individual compartments in dressing, fitting, or locker rooms required to comply with 222.1.		1117B.8 Fitting and dressing rooms. ... ... Clothing hooks shall be located not greater than 48 inches (1219 mm) from the floor. …	Which Std.provides greater access **depends** on circumstances.	ADA requires a coat hook to be within reach range - if the coat hook is above the bench or another seat it can only be 46" max AFF since ADA stipulates within reach range CBC does not address shelf ht except in a medicine cabinet	Revise to ADA language Keep language of 48" max but also do not allow coat hooks to be above the bench or other seating inside the room 3. Create new section on shelving at 40" min to 48" max AFF
552	**222.2 Coat Hooks and Shelves.** Where coat hooks or shelves are provided in dressing, fitting or locker rooms without individual compartments, at least one of each type shall comply with 803.5. Where coat hooks or shelves are provided in individual compartments at least one of each type complying with 803.5 shall be provided in individual compartments in dressing, fitting, or locker rooms required to comply with 222.1.		1117B.8 Fitting and dressing rooms. ... ... Clothing hooks shall be located not greater than 48 inches (1219 mm) from the floor. …	Which Std.provides greater access **depends** on circumstances.	ADA requires a coat hook to be within reach range - if the coat hook is above the bench or another seat it can only be 46" max AFF since ADA stipulates within reach range CBC does not address shelf ht except in a medicine cabinet	Revise to ADA language Keep language of 48" max but also do not allow coat hooks to be above the bench or other seating inside the room 3. Create new section on shelving at 40" min to 48" max AFF
553	**223 Medical Care and Long-Term Care Facilities**		SECTION 1109B ACCESSIBILITY FOR GROUP I OCCUPANCIES	NA		
553.1			**1109B.2 Entrance.** At medical care facilities in which people receive physical or medical treatment or care and where persons may need assistance in responding to an emergency and where the period of stay may exceed twenty-four hours, at least one accessible entrance shall be protected from the weather by canopy or roof overhang. Such entrances shall incorporate a passenger loading zone complying with Section 11131B.2.	2010 CBC provides **greater access** than 2010 ADA.	2010 ADA Standards do not have an equivalent requirement regarding a protected accessible entrance with a canopy or roof overhang, where the 1991 ADA Standards did.	

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554	**223.1 General.** In licensed medical care *facilities* ... where the period of stay exceeds twenty-four hours, patient or resident sleeping rooms shall be provided in accordance with 223. [See additional requirements at 28 CFR 35.151(h), p. 13, and 28 CFR 36.406(g), p. 30.]		1109B.1 General. All Group I occupancies shall be accessible as provided in this chapter. See also the general requirements in Section 1114B.1.1. Exception: In existing buildings, when the enforcing agency determines that compliance with any regulation under this section would create an unreasonable hardship, an exception shall be granted when equivalent facilitation is provided. 1109B.3 Patient bedrooms and toilet rooms. Patient bedrooms and associated toilet facilities shall be made accessible as follows: ...	2010 CBC is **equivalent** to 2010 ADA.		
555	**223.1 General.** In licensed medical care *facilities* ... where the period of stay exceeds twenty-four hours, patient or resident sleeping rooms shall be provided in accordance with 223. [See additional requirements at 28 CFR 35.151(h), p. 13, and 28 CFR 36.406(g), p. 30.]		1109B.1 General. All Group I occupancies shall be accessible as provided in this chapter. See also the general requirements in Section 1114B.1.1. Exception: In existing buildings, when the enforcing agency determines that compliance with any regulation under this section would create an unreasonable hardship, an exception shall be granted when equivalent facilitation is provided. 1109B.3 Patient bedrooms and toilet rooms. Patient bedrooms and associated toilet facilities shall be made accessible as follows: ...	2010 CBC is **equivalent** to 2010 ADA.		
556	**EXCEPTION:** Toilet rooms that are part of critical or intensive care patient sleeping rooms shall not be required to comply with 603.			2010 CBC **does not address** 2010 ADA req.		Recommend using ADA language for this requirement.
557	**Advisory 223.1 General.** Because medical facilities frequently reconfigure spaces to reflect changes in medical specialties, Section 223.1 does not include a provision for dispersion of accessible patient or resident sleeping rooms. The lack of a design requirement does not mean that covered entities are not required to provide services to people with disabilities where accessible rooms are not dispersed in specialty areas. Locate accessible rooms near core areas that are less likely to change over time. While dispersion is not required, the flexibility it provides can be a critical factor in ensuring cost effective compliance with applicable civil rights laws, including titles II and III of the ADA and Section 504 of the Rehabilitation Act of 1973, as amended. Additionally, all types of features and amenities should be dispersed among accessible sleeping rooms to ensure equal access to and a variety of choices for all patients and residents.			2010 CBC **does not address** 2010 ADA req.		Recommend using ADA language for this requirement.

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558	**223.1.1 Alterations.** Where sleeping rooms are *altered* or added, the requirements of 223 shall apply only to the sleeping rooms being *altered* or *added* until the number of sleeping rooms complies with the minimum number required for new construction.		**1109B.3 Patient bedrooms and toilet rooms.** Patient bedrooms and associated toilet facilities shall be made accessible as follows: ... **Exceptions:** **1109B.3.1 Exc.1.** In existing buildings, when patient bedrooms are being added or altered as part of a planned renovation of an entire wing, a department, or other discrete area of an existing medical facility, the accessible rooms provided shall comply with Section 1109B.4 and shall be consistent with the percentage of rooms required to be accessible by 1109B.3, until the number of accessible patient bedrooms in the facility equals the overall number that would be required if the facility were newly constructed. (For example, if 20 patient bedrooms are being altered in the obstetrics department of a hospital, 2 of the altered rooms must be made accessible. If, within the same hospital, 20 patient bedrooms are being altered in a unit that specializes in treating mobility impairments, all of the altered rooms must be made accessible.) Where toilet/bathrooms are part of patient bedrooms which are added or altered and required to be accessible, each such patient toilet/bathroom shall comply with Section 1109B.5. **1109B.3.1 Exc.2**. In existing buildings, when patient bedrooms are being added or altered individually, and not as part of an alteration of the entire area, the altered patient bedrooms shall comply with Section 1109B.4, unless either: a) the number of accessible rooms provided in the department or area containing the altered patient bedroom equals the number of accessible patient bedrooms that would be required if the percentage requirements of Section 1109B.3 were applied to that department or area; or b) the number of accessible patient bedrooms in the facility equals the overall number that would be required if the facility were newly constructed. Where toilet/bathrooms are part of patient bedrooms which are added or altered and required to be accessible, each such toilet/bathroom shall comply with Section 1109B.5.	2010 CBC is **equivalent** to 2010 ADA.		
559	**Advisory 223.1.1 Alterations.** In alterations and additions, the minimum required number is based on the total number of sleeping rooms altered or added instead of on the total number of sleeping rooms provided in a facility. As a facility is altered over time, every effort should be made to disperse accessible sleeping rooms among patient care areas such as pediatrics, cardiac care, maternity, and other units. In this way, people with disabilities can have access to the full-range of services provided by a medical care facility.			2010 CBC **does not address** 2010 ADA req.		Recommend using ADA language for this requirement.
560	**§ 35.151 New construction and alterations.** (h) Medical care facilities. Medical care facilities that are subject to this section shall comply with the provisions of the 2010 Standards applicable to medical care facilities, including, but not limited to, sections 223 and 805. In addition, medical care facilities that do not specialize in the treatment of conditions that affect mobility shall disperse the accessible patient bedrooms required by section 223.2.1 of the 2010 Standards in a manner that is proportionate by type of medical specialty. **§ 36.406 Standards for new construction and alterations.** (g) Medical care facilities. Medical care facilities that are subject to this part shall comply with the provisions of the 2010 Standards applicable to medical care facilities, including, but not limited to, sections 223 and 805. In addition, medical care facilities that do not specialize in the treatment of conditions that affect mobility shall disperse the accessible patient bedrooms required by section 223.2.1 of the 2010 Standards in a manner that is proportionate by type of medical specialty.	***ETA Editor's Note*** See Title II Regulations at 35.151(h) and Title III Regulations at 36.406(g), "Medical care facilities," at the beginning of this publication for additional dispersion requirements. These requirements have often been ignored by design professionals.		2010 CBC **does not address** 2010 ADA req.		Recommend using ADA language for this requirement.

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561	**223.2 Hospitals, Rehabilitation Facilities, Psychiatric Facilities and Detoxification Facilities.** Hospitals, rehabilitation *facilities* , psychiatric *facilities* and detoxification *facilities* shall comply with 223.2.		**1109B.3 Patient bedrooms and toilet rooms.** Patient bedrooms and associated toilet facilities shall be made accessible as follows: **...** **1109B.3 #2**. General-purpose hospitals, psychiatric facilities and detoxification facilities shall have at least 10 percent of patient bedrooms and toilets, and all public use and common use areas, accessible. **1109B.3 #3.** Hospitals and rehabilitation facilities that specialize in treating conditions that affect mobility, or units within either that specialize in treating conditions that affect mobility, shall have all patient bedrooms and toilets and all public use and common use areas accessible. **Exceptions:** **...**	2010 CBC is **equivalent** to 2010 ADA.		
562	**223.2.1 Facilities Not Specializing in Treating Conditions That Affect Mobility.** In *facilities* not specializing in treating conditions that affect mobility, at least 10 percent, but no fewer than one, of the patient sleeping rooms shall provide mobility features complying with 805.	Note to Reader: The Department of Justice's revised ADA title II regulation (35.151(h)) and title III regulation (36.406(g)) require the following: Medical care facilities. Medical care facilities that are subject to this part [of the title III regulation or to this section of the title II regulation] shall comply with the provisions of the 2010 Standards applicable to medical care facilities, including, but not limited to, sections 223 and 805. In addition, medical care facilities that do not specialize in the treatment of conditions that affect mobility shall disperse the accessible patient bedrooms required by section 223.2.1 of the 2010 Standards in a manner that is proportionate by type of medical specialty.	**1109B.3 Patient bedrooms and toilet rooms.** Patient bedrooms and associated toilet facilities shall be made accessible as follows: **...** **1109B.3 #2**. General-purpose hospitals, psychiatric facilities and detoxification facilities shall have at least 10 percent of patient bedrooms and toilets, and all public use and common use areas, accessible. **...**	2010 CBC is **equivalent** to 2010 ADA.		
563	**223.2.2 Facilities Specializing in Treating Conditions That Affect Mobility.** In *facilities* specializing in treating conditions that affect mobility, 100 percent of the patient sleeping rooms shall provide mobility features complying with 805.		**1109B.3 Patient bedrooms and toilet rooms.** Patient bedrooms and associated toilet facilities shall be made accessible as follows: **...** **1109B.3 #3**. Hospitals and rehabilitation facilities that specialize in treating conditions that affect mobility, or units within either that specialize in treating conditions that affect mobility, shall have all patient bedrooms and toilets and all public use and common use areas accessible. **...**	2010 CBC is **equivalent** to 2010 ADA.		

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564	**Advisory 223.2.2 Facilities Specializing in Treating Conditions That Affect Mobility.** Conditions that affect mobility include conditions requiring the use or assistance of a brace, cane, crutch, prosthetic device, wheelchair, or powered mobility aid; arthritic, neurological, or orthopedic conditions that severely limit one's ability to walk; respiratory diseases and other conditions which may require the use of portable oxygen; and cardiac conditions that impose significant functional limitations. Facilities that may provide treatment for, but that do not specialize in treatment of such conditions, such as general rehabilitation hospitals, are not subject to this requirement but are subject to Section 223.2.1.			2010 CBC **does not address** 2010 ADA req.		Recommend using ADA language for this requirement.
565	**223.3 Long-Term Care Facilities.** In licensed long-term care *facilities* , at least 50 percent, but no fewer than one, of each type of resident sleeping room shall provide mobility features complying with 805.		**1109B.3 Patient bedrooms and toilet rooms.** Patient bedrooms and associated toilet facilities shall be made accessible as follows: **1109B.3 #1**. Long-term care facilities, including skilled nursing facilities, intermediate care facilities, bed and care and nursing homes shall have at least 50 percent of patient bedrooms and toilet rooms, and all public use and common use areas, accessible. **...**	2010 CBC is **equivalent** to 2010 ADA.		
566	**224 Transient Lodging Guest Rooms**		**1111B.4 Hotels, motels, inns, dormitories, resorts, ... and similar places of transient lodging.** ... **1111B.4.2 Guest rooms and suites.** …	2010 CBC **conflicts with** 2010 ADA.	The 2010 ADA classifies separately "places of lodging" *(transient lodging facilities)* , "social service center establishments" *(residential facilities with residential dwelling units).* The 2010 CBC does not classify these categories separately, and includes them all under the category of "transient lodging". It is advisable to define "transient lodging" and "residential dwelling unit" in Section 1102 of the 2010 CBC as they are defined by the 2010 ADA: *"Transient Lodging. A building or facility containing one or more guest room(s) for sleeping that provides accommodations that are primarily short-term in nature. Transient lodging does not include residential dwelling units intended to be used as a residence, inpatient medical care facilities, licensed long-term care facilities, detention or correctional facilities, or private buildings or facilities that contain not more than five rooms for rent or hire and that are actually occupied by the proprietor as the residence of such proprietor. "* and *"Residential Dwelling Unit. A unit intended to be used as a residence, that is primarily long-term in nature. Residential dwelling units do not include transient lodging, inpatient medical care, licensed long-term care, and detention or correctional facilities."* With regard to "dormitories", the 2010 ADA classifies undergraduate "housing at a place of education" as transient lodging and graduate and faculty "housing at a place of education" as residential dwelling units. The Section title "Accessiblity for Group R Occupancies" should remain. The 2010 CBC should address scope in Section 1111B ACCESSIBILITY FOR GROUP R OCCUPANCIES that residential facilities with residential dwelling units include social service center establishments such as group homes, halfway houses, etc. and transient lodging facilities include places of lodging such as hotels, motels, inns, resorts, dormitories for undergraduate housing, etc. similarly to the 2010 ADA.	1) Define "transient lodging" and "residential dwelling unit" in Section 1102 of the 2010 CBC as they are defined by the 2010 ADA. 2) Address scope in the 2010 CBC in SECTION 1111B ACCESSIBILITY FOR GROUP R OCCUPANCIES that a residential dwelling unit includes social service center establishments such as group homes, halfway houses, etc. and a transient lodging facilities include places of lodging such as hotels, motels, inns, resorts, dormitories for undergraduate housing, etc. similarly to the 2010 ADA.

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567	**§ 35.151 New construction and alterations.** (e) *Social service center establishments.* Group homes, halfway houses, shelters, or similar social service center establishments that provide either temporary sleeping accommodations or residential dwelling units that are subject to this section shall comply with the provisions of the 2010 Standards applicable to residential facilities, including, but not limited to, the provisions in sections 233 and 809. (1) In sleeping rooms with more than 25 beds covered by this section, a minimum of 5% of the beds shall have clear floor space complying with section 806.2.3 of the 2010 Standards. (2) Facilities with more than 50 beds covered by this section that provide common use bathing facilities shall provide at least one roll-in shower with a seat that complies with the relevant provisions of section 608 of the 2010 Standards. Transfer-type showers are not permitted in lieu of a roll-in shower with a seat, and the exceptions in sections 608.3 and 608.4 for residential dwelling units are not permitted. When separate shower facilities are provided for men and for women, at least one roll-in shower shall be provided for each group. **§ 36.406 Standards for new construction and alterations.** (d) *Social service center establishments* . Group homes, halfway houses, shelters, or similar social service center establishments that provide either temporary sleeping accommodations or residential dwelling units that are subject to this part shall comply with the provisions of the 2010 Standards applicable to residential facilities, including, but not limited to, the provisions in sections 233 and 809. (1) In sleeping rooms with more than 25 beds covered by this part, a minimum of 5% of the beds shall have clear floor space complying with section 806.2.3 of the 2010 Standards. (2) Facilities with more than 50 beds covered by this part that provide common use bathing facilities shall provide at least one roll-in shower with a seat that complies with the relevant provisions of section 608 of the 2010 Standards. Transfer-type showers are not permitted in lieu of a roll-in shower with a seat, and the exceptions in sections 608.3 and 608.4 for residential dwelling units are not permitted. When separate shower facilities are provided for men and for women, at least one roll-in shower shall be provided for each group.	**ETA Editor's Note** See Title III Regulations 36.406(c), "Places of lodging," at the beginning of this publication for additional requirements for transient lodging guest rooms. Also, at the beginning of this publication see the Title II Regulations at 35.151(e) and Title III Regulations at 36.406(d), "Social service center establishments" and Title II Regulations at 35.151(f) and Title III Regulations at 36.406(e) "Housing at a place of education."				
568	**224.1 General.** *Transient lodging facilities* shall provide guest rooms in accordance with 224. [See additional requirements for places of lodging at 28 CFR 36.406(c), p. 28, for housing at a place of education at 28 CFR 35.151(f), p. 11, and 28 CFR 36.406(E), p.29.]	***1111B.4 Hotels, motels, inns, dormitories, resorts, ... and similar places of transient lodging.*** *Hotels, motels, inns, dormitories, resorts, ... and similar places of transient lodging shall provide access for persons with disabilities in accordance with the provisions of the accessibility requirements of this California Building Code, except as herein provided.* *...* ***1111B.4.2 Guest rooms and suites.*** *Places of transient lodging shall incorporate the accessibility requirements of this code as modified by this chapter in at least one guest room or dormitory room together with their sanitary facilities as required in Table 11B-3. All accessible sleeping rooms or suites required by Table 11B-3 shall comply with the requirements of Section 1111B.4.5 for hearing impaired guests.*	2010 CBC is **equivalent** to 2010 ADA.	This analysis is based on the definition of transient lodging facility as defined by the 2010 ADA as "A building or facility containing one or more guest room(s) for sleeping that provides accommodations that are primarily short-term in nature. Transient lodging does not include residential dwelling units intended to be used as a residence, inpatient medical care facilities, licensed long-term care facilities, detention or correctional facilities, or private buildings or facilities that contain not more than five rooms for rent or hire and that are actually occupied by the proprietor as the residence of such proprietor."	1) Address separately provisions for both "transient lodging" and "residential dwelling unit" in SECTION 1111B ACCESSIBILITY FOR GROUP R OCCUPANCIES.
569	**224.1 General.** *Transient lodging facilities* shall provide guest rooms in accordance with 224. [See additional requirements for places of lodging at 28 CFR 36.406(c), p. 28, for housing at a place of education at 28 CFR 35.151(f), p. 11, and 28 CFR 36.406(E), p. 29.]					

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570	**§ 36.302 Modifications in policies, practices, or procedures.** (e)(1) Reservations made by places of lodging. A public accommodation that owns, leases (or leases to), or operates a place of lodging shall, with respect to reservations made by telephone, in person, or through a third party— (i) Modify its policies, practices, or procedures to ensure that individuals with disabilities can make reservations for accessible guest rooms during the same hours and in the same manner as individuals who do not need accessible rooms; (ii) Identify and describe accessible features in the hotels and guest rooms offered through its reservations service in enough detail to reasonably permit individuals with disabilities to assess independently whether a given hotel or guest room meets his or her accessibility needs; (iii) Ensure that accessible guest rooms are held for use by individuals with disabilities until all other guest rooms of that type have been rented and the accessible room requested is the only remaining room of that type; (iv) Reserve, upon request, accessible guest rooms or specific types of guest rooms and ensure that the guest rooms requested are blocked and removed from all reservations systems; and (v) Guarantee that the specific accessible guest room reserved through its reservations service is held for the reserving customer, regardless of whether a specific room is held in response to reservations made by others. (2) Exception. The requirements in paragraphs (iii), (iv), and (v) of this section do not apply to reservations for individual guest rooms or other units not owned or substantially controlled by the entity that owns, leases, or operates the overall facility. (3) Compliance date. The requirements in this section will apply to reservations made on or after March 15, 2012.					
571	**Advisory 224.1 General.** Certain facilities used for transient lodging, including time shares, dormitories, and town homes may be covered by both these requirements and the Fair Housing Amendments Act. The Fair Housing Amendments Act requires that certain residential structures having four or more multi-family dwelling units, regardless of whether they are privately owned or federally assisted, include certain features of accessible and adaptable design according to guidelines established by the U.S. Department of Housing and Urban Development (HUD). This law and the appropriate regulations should be consulted before proceeding with the design and construction of residential housing.					
572	**224.1.1 Alterations.** Where guest rooms are *altered* or *added*, the requirements of 224 shall apply only to the guest rooms being *altered* or *added* until the number of guest rooms complies with the minimum number required for new construction.		***1111B.4.2.4 Alterations in existing facilities.*** *When guest rooms are being altered in an existing facility, or portion thereof, subject to the requirements of this section, at least one guest room or suite that complies with the accessibility requirements of this code as modified by this chapter shall be provided for each 25 guest rooms, or fraction thereof, of rooms being altered until the number of such rooms provided equals the number required to be accessible in Table 11B-3. In addition, at least one guest room or suite that complies with the requirements of Section 1111B.4.5 shall be provided for each 25 guest rooms, or fraction thereof, of rooms being altered until the number of such rooms equals the number required to be accessible in Table 11B-4.*	2010 CBC provides **less access** than 2010 ADA.	In the 2010 ADA, this provision applies to guest rooms that are altered or added. The 2010 CBC refers only to rooms that are altered.	1) Recommend adding the terminology "altered or added" to the 2010 CBC.
573	**224.1.1 Alterations.** Where guest rooms are *altered* or *added*, the requirements of 224 shall apply only to the guest rooms being *altered* or *added* until the number of guest rooms complies with the minimum number required for new construction.					

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574	**224.1.1 Alterations.** Where guest rooms are *altered* or *added*, the requirements of 224 shall apply only to the guest rooms being *altered* or *added* until the number of guest rooms complies with the minimum number required for new construction.					
575	**224.1.1 Alterations.** Where guest rooms are *altered* or *added*, the requirements of 224 shall apply only to the guest rooms being *altered* or *added* until the number of guest rooms complies with the minimum number required for new construction.					
576	**224.1.1 Alterations.** Where guest rooms are *altered* or *added*, the requirements of 224 shall apply only to the guest rooms being *altered* or *added* until the number of guest rooms complies with the minimum number required for new construction.					
577	**Advisory 224.1.1 Alterations.** In alterations and additions, the minimum required number of accessible guest rooms is based on the total number of guest rooms altered or added instead of the total number of guest rooms provided in a facility. Typically, each alteration of a facility is limited to a particular portion of the facility. When accessible guest rooms are added as a result of subsequent alterations, compliance with 224.5 (Dispersion) is more likely to be achieved if all of the accessible guest rooms are not provided in the same area of the facility.					
578	**224.1.2 Guest Room Doors and Doorways.** *Entrances*, doors, and doorways providing user passage into and within guest rooms that are not required to provide mobility features complying with 806.2 shall comply with 404.2.3.		**1111B.4.2.3 Doors.** ... **1111B.4.2.3.2 Doors into and within all other rooms and suites.** Doors and doorways designed to allow passage into and within all other sleeping rooms and suites shall comply with Section 1133B.2.2.	2010 CBC is **equivalent** to 2010 ADA.	While there are requirements in the referenced sections vary somewhat, that these doors are required to have an accessible clear opening into and within guest rooms that are not required to provide mobility features is equivalent.	
579	**224.1.2 Guest Room Doors and Doorways.** *Entrances*, doors, and doorways providing user passage into and within guest rooms that are not required to provide mobility features complying with 806.2 shall comply with 404.2.3.					
580	**EXCEPTION:** Shower and sauna doors in guest rooms that are not required to provide mobility features complying with 806.2 shall not be required to comply with 404.2.3.			2010 CBC provides **less access** than 2010 ADA.	By reference to the 2010 CBC "*1133B.2.2 Exception: Doors not requiring full user passage, such as shallow closets, may have the clear opening reduced to 20 inches (510 mm) minimum",* the intent of this requirement is the same. Furthermore, technically the 2010 ADA is more stringent because the exceptions on the required width extend only to shower and sauna doors, and implies that other doors that do not require full user passage as having to comply with the accessible width requirement. The CBC requirement is actually more sensible while the 2010 ADA is more stringent, and the ADA Advisory actually clarifies this requirement similarly to the 2010 CBC. However, since advisories are not enforceable, then the requirement to limit the exception to the accessible width to only shower and sauna doors should be included in the 2010 CBC.	1) In order to meet the more stringent requirements of the 2010 ADA, recommend including this exception in the transient lodging section of the 2010 CBC.
581	**Advisory 224.1.2 Guest Room Doors and Doorways.** Because of the social interaction that often occurs in lodging facilities, an accessible clear opening width is required for doors and doorways to and within all guest rooms, including those not required to be accessible. This applies to all doors, including bathroom doors, that allow full user passage. Other requirements for doors and doorways in Section 404 do not apply to guest rooms not required to provide mobility features.					

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582	**224.2 Guest Rooms with Mobility Features.** In *transient lodging facilities* , guest rooms with mobility features complying with 806.2 shall be provided in accordance with Table 224.2. **§ 36.406 Standards for new construction and alterations.** (c) Places of lodging. Places of lodging subject to this part shall comply with the provisions of the 2010 Standards applicable to transient lodging, including, but not limited to, the requirements for transient lodging guest rooms in sections 224 and 806 of the 2010 Standards. (1) Guest rooms. Guest rooms with mobility features in places of lodging subject to the transient lodging requirements of 2010 Standards shall be provided as follows— (i) Facilities that are subject to the same permit application on a common site that each have 50 or fewer guest rooms may be combined for the purposes of determining the required number of accessible rooms and type of accessible bathing facility in accordance with table 224.2 to section 224.2 of the 2010 Standards. (ii) Facilities with more than 50 guest rooms shall be treated separately for the purposes of determining the required number of accessible rooms and type of accessible bathing facility in accordance with table 224.2 to section 224.2 of the 2010 Standards. (2) Exception. Alterations to guest rooms in places of lodging where the guest rooms are not owned or substantially controlled by the entity that owns, leases, or operates the overall facility and the physical features of the guest room interiors are controlled by their individual owners are not required to comply with § 36.402 or the alterations requirements in section 224.1.1 of the 2010 Standards. (3) Facilities with residential dwelling units and transient lodging units. Residential dwelling units that are designed and constructed for residential use exclusively are not subject to the transient lodging standards.		**1111B.4.2 Guest rooms and suites.** Places of transient lodging shall incorporate the accessibility requirements of this code as modified by this chapter in at least one guest room or dormitory room together with their sanitary facilities as required in Table 11B-3. ...	2010 CBC provides **greater access** than 2010 ADA.	The numbers differ from the 2010 ADA Table 224.2 and the 2010 CBC Table 11B-3 for certain quanties based on the total number of rooms. When 26-50 rooms are provided the 2010 ADA requires 2 fully accessible rooms with no roll-in showers and the 2010 CBC requires 2 fully accessible room with one of those rooms required to have a roll-in shower. So for this number of rooms the CBC is more stringent. However, the numbers differ again when the total number of guest rooms exceeds 500, because the ADA bases the minimum number per category on a percentage multiple of the total number of guest rooms provided which renders a fractional amount that must be rounded up, while the 2010 CBC does not.	1) Recommend retaining the 2010 CBC requirement that when 26-50 rooms are provided 2 fully accessible rooms are required with one of those rooms required to have a roll-in shower. 2) Recommend including the requirement that when over 500 rooms are provided, a percentage multiple of the total number of guest rooms provided is required for each specific category equivalent to the 2010 ADA.
582.1	**28 CFR 36.406(c)(1)(i)** ◦ *(1) Guest rooms* . Guest rooms with mobility features in places of lodging subject to the transient lodging requirements of 2010 Standards shall be provided as follows – ▪ (i) Facilities that are subject to the same permit application on a common site that each have 50 or fewer guest rooms may be combined for the purposes of determining the required number of accessible rooms and type of accessible bathing facility in accordance with table 224.2 to section 224.2 of the 2010 Standards.		NA	2010 CBC **does not address** 2010 ADA req.	CBC is silent about how to calculate the required number of accessible rooms when all rooms are spread over multiple buildings with more than 50 units in a building.	Clarify the intent
582.2	**28 CFR 36.406(c)(1)(ii)** ◦ *(1) Guest rooms* . Guest rooms with mobility features in places of lodging subject to the transient lodging requirements of 2010 Standards shall be provided as follows – ▪ (ii) Facilities with more than 50 guest rooms shall be treated separately for the purposes of determining the required number of accessible rooms and type of accessible bathing facility in accordance with table 224.2 to section 224.2 of the 2010 Standards.		NA	2010 CBC **does not address** 2010 ADA req.	CBC is silent about how to calculate the required number of accessible rooms when all rooms are spread over multiple buildings with more than 50 units in a building. Therefore,	Clarify the intent
582.3	**28 CFR 28 CFR 36.406(c)(2)** *(2) Exception.* Alterations to guest rooms in places of lodging where the guest rooms are not owned or substantially controlled by the entity that owns, leases, or operates the overall facility and the physical features of the guest room interiors are controlled by their individual owners are not required to comply with § 36.402 or the alterations requirements in section 224.1.1 of the 2010 Standards.		NA	2010 CBC **does not address** 2010 ADA req.	CBC is silent about owner-controlled units.	Clarify the intent

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583						
584	**224.3 Beds.** In guest rooms having more than 25 beds, 5 percent minimum of the beds shall have clear floor *space* complying with 806.2.3.		**1111B.4.3 Access to beds.** Accessible sleeping rooms shall have a 36-inch (914 mm) clear width maneuvering space located along both sides of a bed, except that where two beds are provided, this requirement can be met by providing a 36-inch-wide (914 mm) maneuvering space located between the beds. ...	2010 CBC provides **less access** than 2010 ADA.	By reference, 2010 ADA states in Section 806.2.3 "*Sleeping Areas. At least one sleeping area shall provide a clear floor space complying with 305 on both sides of a bed. The clear floor space shall be positioned for parallel approach to the side of the bed.EXCEPTION: Where a single clear floor space complying with 305 positioned for parallel approach is provided between two beds, a clear floor or ground space shall not be required on both sides of a bed."* This reference makes the clarification of the provision equivalent. However, 224.3 states, additionally, when a guest room has more than 25 beds, then 5% of the beds shall have clear floor space. The CBC has no such requirement.	1) Recommend including the requirement that when a guest room has more than 25 beds, then 5% of the beds shall have clear floor space.
585	**224.4 Guest Rooms with Communication Features.** In *transient lodging facilities* , guest rooms with communication features complying with 806.3 shall be provided in accordance with Table 224.4. **§ 36.406 Standards for new construction and alterations.** (c) Places of lodging. Places of lodging subject to this part shall comply with the provisions of the 2010 Standards applicable to transient lodging, including, but not limited to, the requirements for transient lodging guest rooms in sections 224 and 806 of the 2010 Standards. (1) Guest rooms. Guest rooms with mobility features in places of lodging subject to the transient lodging requirements of 2010 Standards shall be provided as follows— (i) Facilities that are subject to the same permit application on a common site that each have 50 or fewer guest rooms may be combined for the purposes of determining the required number of accessible rooms and type of accessible bathing facility in accordance with table 224.2 to section 224.2 of the 2010 Standards. (ii) Facilities with more than 50 guest rooms shall be treated separately for the purposes of determining the required number of accessible rooms and type of accessible bathing facility in accordance with table 224.2 to section 224.2 of the 2010 Standards. (2) Exception. Alterations to guest rooms in places of lodging where the guest rooms are not owned or substantially controlled by the entity that owns, leases, or operates the overall facility and the physical features of the guest room interiors are controlled by their individual owners are not required to comply with § 36.402 or the alterations requirements in section 224.1.1 of the 2010 Standards. (3) Facilities with residential dwelling units and transient lodging units. Residential dwelling units that are designed and constructed for residential use exclusively are not subject to the transient lodging standards.		**1111B.4.5 Visible alarms, notification devices and telephones for persons with hearing impairments.** In addition to those accessible sleeping rooms and suites required by Section 1111B.4.2, additional sleeping rooms and suites shall be provided with the following features as required by Table 11B-4 as follows: ...	2010 CBC provides **less access** than 2010 ADA.	The minimum number of required guest rooms with communication features in the 2010 ADA is greater than twice the amount required in the 2010 CBC.	1) Recommend revising 2010 CBC Table 11B-4 to reflect the more stringent amounts of minimum required guest rooms with communication features as shown in Table 224.4. of the 2010 ADA.
586						

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587	**224.4 Guest Rooms with Communication Features.** In *transient lodging facilities* , guest rooms with communication features complying with 806.3 shall be provided in accordance with Table 224.4. **§ 36.406 Standards for new construction and alterations.** (c) Places of lodging. Places of lodging subject to this part shall comply with the provisions of the 2010 Standards applicable to transient lodging, including, but not limited to, the requirements for transient lodging guest rooms in sections 224 and 806 of the 2010 Standards. (1) Guest rooms. Guest rooms with mobility features in places of lodging subject to the transient lodging requirements of 2010 Standards shall be provided as follows— (i) Facilities that are subject to the same permit application on a common site that each have 50 or fewer guest rooms may be combined for the purposes of determining the required number of accessible rooms and type of accessible bathing facility in accordance with table 224.2 to section 224.2 of the 2010 Standards. (ii) Facilities with more than 50 guest rooms shall be treated separately for the purposes of determining the required number of accessible rooms and type of accessible bathing facility in accordance with table 224.2 to section 224.2 of the 2010 Standards. (2) Exception. Alterations to guest rooms in places of lodging where the guest rooms are not owned or substantially controlled by the entity that owns, leases, or operates the overall facility and the physical features of the guest room interiors are controlled by their individual owners are not required to comply with § 36.402 or the alterations requirements in section 224.1.1 of the 2010 Standards. (3) Facilities with residential dwelling units and transient lodging units. Residential dwelling units that are designed and constructed for residential use exclusively are not subject to the transient lodging standards.					
588	**224.5 Dispersion.** Guest rooms required to provide mobility features complying with 806.2 and guest rooms required to provide communication features complying with 806.3 shall be dispersed among the various classes of guest rooms, and shall provide choices of types of guest rooms, number of beds, and other amenities comparable to the choices provided to other guests. Where the minimum number of guest rooms required to comply with 806 is not sufficient to allow for complete dispersion, guest rooms shall be dispersed in the following priority: guest room type, number of beds, and amenities. At least one guest room required to provide mobility features complying with 806.2 shall also provide communication features complying with 806.3. Not more than 10 percent of guest rooms required to provide mobility features complying with 806.2 shall be used to satisfy the minimum number of guest rooms required to provide communication features complying with 806.3.		**1111B.4.1 Available range of accommodations.** Accessible guest rooms or suites shall be dispersed among the various classes of sleeping accommodations to provide a range of options applicable to room sizes, costs, amenities provided and the number of beds provided.	2010 CBC provides **less access** than 2010 ADA.	The 2010 ADA is more stringent because when the minimum number of accessible guest rooms is not sufficient to allow for complete dispersion, it specifies a priority structure. The 2010 CBC makes no such provision. Furthermore, the 2010 ADA specifies that at least one guest room required to provide mobility features shall also provide communication features. The 2010 CBC makes no such provision. Additionally, the 2010 ADA also specifies that not more than 10 percent of guest rooms required to provide mobility features shall be used to satisfy the minimum number of guest rooms required to provide communication features. The 2010 CBC makes no such requirement.	1) Recommend adding the requirement to the 2010 CBC that states: "where the minimum number of guest rooms required to provide mobility and communication features is not sufficient to allow for complete dispersion, that guest rooms shall be dispersed in the following priority: guest room type, number of beds, and amenities." 2) Recommend adding the requirement to the 2010 CBC that states: "at least one guest room required to provide mobility features shall also provide communication features." 3) Recommend adding the requirement to the 2010 CBC that states: "not more than 10 percent of guest rooms required to provide mobility features shall be used to satisfy the minimum number of guest rooms required to provide communication features."
589	**224.5 Dispersion.** Guest rooms required to provide mobility features complying with 806.2 and guest rooms required to provide communication features complying with 806.3 shall be dispersed among the various classes of guest rooms, and shall provide choices of types of guest rooms, number of beds, and other amenities comparable to the choices provided to other guests. Where the minimum number of guest rooms required to comply with 806 is not sufficient to allow for complete dispersion, guest rooms shall be dispersed in the following priority: guest room type, number of beds, and amenities. At least one guest room required to provide mobility features complying with 806.2 shall also provide communication features complying with 806.3. Not more than 10 percent of guest rooms required to provide mobility features complying with 806.2 shall be used to satisfy the minimum number of guest rooms required to provide communication features complying with 806.3.					

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590	**224.5 Dispersion.** Guest rooms required to provide mobility features complying with 806.2 and guest rooms required to provide communication features complying with 806.3 shall be dispersed among the various classes of guest rooms, and shall provide choices of types of guest rooms, number of beds, and other amenities comparable to the choices provided to other guests. Where the minimum number of guest rooms required to comply with 806 is not sufficient to allow for complete dispersion, guest rooms shall be dispersed in the following priority: guest room type, number of beds, and amenities. ...					
591	**224.5 Dispersion.** Guest rooms required to provide mobility features complying with 806.2 and guest rooms required to provide communication features complying with 806.3 shall be dispersed among the various classes of guest rooms, and shall provide choices of types of guest rooms, number of beds, and other amenities comparable to the choices provided to other guests. Where the minimum number of guest rooms required to comply with 806 is not sufficient to allow for complete dispersion, guest rooms shall be dispersed in the following priority: guest room type, number of beds, and amenities. ...					
592	**224.5 Dispersion.** ... At least one guest room required to provide mobility features complying with 806.2 shall also provide communication features complying with 806.3. Not more than 10 percent of guest rooms required to provide mobility features complying with 806.2 shall be used to satisfy the minimum number of guest rooms required to provide communication features complying with 806.3.					
593	**224.5 Dispersion.** …					
594	**Advisory 224.5 Dispersion.** Factors to be considered in providing an equivalent range of options may include, but are not limited to, room size, bed size, cost, view, bathroom fixtures such as hot tubs and spas, smoking and nonsmoking, and the number of rooms provided.	Note to Reader: The Department of Justice's revised ADA title III regulation (36.406(c)) requires the following: Places of lodging. Places of lodging subject to this part [of the title III regulation] shall comply with the provisions of the 2010 Standards applicable to transient lodging, including, but not limited to, the requirements for transient lodging guest rooms in sections 224 and 806. (1) Guest rooms. Guest rooms with mobility features in places of lodging subject to the transient lodging requirements of 2010 Standards shall be provided as follows-- (i) Facilities that are subject to the same permit application on a common site that each have 50 or fewer guest rooms may be combined for the purposes of determining the required number of accessible rooms and type of accessible bathing facility in accordance with table 224.2 to section 224.2 of the 2010 Standards. (ii) Facilities with more than 50 guest rooms shall be treated separately for the purposes of determining the				

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595	**225 Storage**		**SECTION 1125B STORAGE**	2010 CBC is **equivalent** to 2010 ADA.		
596	**225.1 General.** Storage *facilities* shall comply with 225.		**1125B.1 General.** If fixed storage facilities such as cabinets, shelves, closets or drawers are provided where access is required by Section 1.9.1, at least one of each type shall comply with this section. Additional storage may be provided outside of the reach ranges shown in Figure 11B-5D.	2010 CBC is **equivalent** to 2010 ADA.		
597	**225.2 Storage.** Where storage is provided in accessible *spaces* , at least one of each type shall comply with 811.		1125B.1 General. If fixed storage facilities such as cabinets, shelves, closets or drawers are provided where access is required by Section 1.9.1, at least one of each type shall comply with this section. Additional storage may be provided outside of the reach ranges shown in Figure 11B-5D.	2010 CBC is **equivalent** to 2010 ADA.		
598	**225.2 Storage.** Where storage is provided in accessible *spaces* , at least one of each type shall comply with 811.		1125B.1 General. If fixed storage facilities such as cabinets, shelves, closets or drawers are provided where access is required by Section 1.9.1, at least one of each type shall comply with this section. Additional storage may be provided outside of the reach ranges shown in Figure 11B-5D.	2010 CBC is **equivalent** to 2010 ADA.		
599	**Advisory 225.2 Storage.** Types of storage include, but are not limited to, closets, cabinets, shelves, clothes rods, hooks, and drawers. Where provided, at least one of each type of storage must be within the reach ranges specified in 308; however, it is permissible to install additional storage outside the reach ranges.		1125B.1 General. If fixed storage facilities such as cabinets, shelves, closets or drawers are provided where access is required by Section 1.9.1, at least one of each type shall comply with this section. Additional storage may be provided outside of the reach ranges shown in Figure 11B-5D.	2010 CBC is **equivalent** to 2010 ADA.		
600	**225.2.1 Lockers.** Where lockers are provided, at least 5 percent, but no fewer than one of each type, shall comply with 811.		**1115B.2 Bathing and shower facilities**. Where facilities for bathing are provided for the public, clients or employees, including showers or bathtubs, at least one shower or bathtub and support facilities such as lockers, and not less than 1 percent of all facilities, shall be accessible. **1115B.8.5 Lockers.** Where lockers are provided for the public, clients, employees, members or participants, at least one locker and not less than 1 percent of all lockers shall be made accessible to persons with disabilities. A path of travel not less than 36 inches in clear width shall be provided to these lockers.	2010 CBC provides **less access** than 2010 ADA.	The CBC only requires 1% of lockers to be accessible	Increase the number of accessible lockers to 5%
600.1	**225.2.1 Lockers.** ... one of each type, …		**1115B.2 Bathing and shower facilities**. Where facilities for bathing are provided for the public, clients or employees, including showers or bathtubs, at least one shower or bathtub and support facilities such as lockers, and not less than 1 percent of all facilities, shall be accessible. **1115B.8.5 Lockers**. Where lockers are provided for the public, clients, employees, members or participants, at least one locker and not less than 1 percent of all lockers shall be made accessible to persons with disabilities. A path of travel not less than 36 inches in clear width shall be provided to these lockers.	2010 CBC provides **less access** than 2010 ADA.	The CBC does not require 1% of each type.	Add "of each type" to the section 1115B.2
601	**Advisory 225.2.1 Lockers.** Different types of lockers may include full-size and half-size lockers, as well as those specifically designed for storage of various sports equipment.					

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602	**225.2.2 Self-Service Shelving.** Self-service shelves shall be located on an *accessible* route complying with 402. Self-service shelving shall not be required to comply with 308.		**1104B.5 #5. Food service aisles.** Food service aisles shall be a minimum of 36 inches (914 mm) of clear width with a preferred width of 42 inches (1067 mm) where passage of stopped wheelchairs by pedestrians is desired. Tray slides shall be mounted no higher than 34 inches (864 mm) above the floor as shown in Figure 11B-16. If self-service shelves are provided, at least 50 percent of each type must be within the reach ranges in Sections 1118B.5 and 1118B.6. **1104B.5 #6. Tableware and condiment areas.** Self-service tableware, dishware, condiments, food and beverage display shelves and dispensing devices shall comply with Sections 1118B and 1122B.4. See Figure 11B-17. **106B.4 #2. Open book stacks.** Open book stacks (those available for customer use) shall be on an accessible route complying with Section 1114B.1.2, may be of normal height, and shall have main aisles no less than 44 inches (1118 mm) in clear width and side, range and end aisles no less than 36 inches (914 mm) in clear width. **1106B.4 #3. Height of book shelves.** Unless an attendant is available to assist persons with disabilities, all book shelving shall be located not more than 54 inches (1372 mm) above the floor. **1110B.2.1 Circulation.** Shelves or display units allowing self-service by customers in mercantile occupancies shall be located on an accessible route of travel complying with Section 1114B.1.2. **1125B.2 Clear floor space.** A clear floor space at least 30 inches by 48 inches (762 mm by 1219 mm) complying with Section 1118B.4 that allows either a forward or parallel approach by a person using a wheelchair shall be provided at accessible storage facilities.	Which Std.provides greater access **depends** on circumstances.	CBC language does not provide either the broad coverage or the broad exceptions that the 2010 ADA Stds. provide. For example, the 2010 ADA Stds. do not require self-service library shelving to be within reach ranges. Under certain circumstances, CBC does require self-service library shelves to be within 54" AFF. (Note that 50% of food service line self-service shelving is covered by the 2010 ADA Stds. at 227.4.) CBC Sections 1110B.2.1 and 1118B.4 require that some self-service shelving be located on an accessible route.	Adopt ADA langauage and add back the specifically stricter CBC sections.
602.1	**225.2.2 Self-Service Shelving.** ... Self-service shelving shall not be required to comply with 308.		See row above for analysis.	Which Std.provides greater access **depends** on circumstances.	See row above for analysis.	
603						
604	**Advisory 225.2.2 Self-Service Shelving.** Self-service shelves include, but are not limited to, library, store, or post office shelves.					
605	**225.3 Self-Service Storage Facilities.** *Self-service storage facilities* shall provide individual *self-service storage spaces* complying with these requirements in accordance with Table 225.3.		**1105B.3.6 Miscellaneous general standards**. 1. Circulation aisles and pedestrian ways shall be sized according to functional requirements and in no case shall be less than 36 inches in clear width. 2. Storage areas. The doorway providing access to all such areas shall not be less than 32 inches in clear width. Storage areas shall be made accessible in the number and dimensions provided in Section 1125B. **1125B.1 General**.... Section 1125B, at least one of each type shall comply with this section.... Figure 11B-5D.	2010 CBC provides **less access** than 2010 ADA.	The ADA has Table 225.3 which requires many more than 1	Include a section under 1125B that specifically address storage facilities.

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606	**Advisory 225.3 Self-Service Storage Facilities.** Although there are no technical requirements that are unique to self-service storage facilities, elements and spaces provided in facilities containing self-service storage spaces required to comply with these requirements must comply with this document where applicable. For example: the number of storage spaces required to comply with these requirements must provide Accessible Routes complying with Section 206; Accessible Means of Egress complying with Section 207; Parking Spaces complying with Section 208; and, where provided, other public use or common use elements and facilities such as toilet rooms, drinking fountains, and telephones must comply with the applicable requirements of this document.					
607	**225.3.1 Dispersion.** Individual *self-service storage spaces* shall be dispersed throughout the various classes of *spaces* provided. Where more classes of *spaces* are provided than the number required to be *accessible*, the number of *spaces* shall not be required to exceed that required by Table 225.3. *Self-service storage spaces* complying with Table 225.3 shall not be required to be dispersed among *buildings* in a multi-*building facility*.		The CBC does not have an equivelent section	2010 CBC provides **less access** than 2010 ADA.		Include a section under 1125B that specifically address storage facilities including the requirements found in 225.3.1 Dispersion.
608	**226 Dining Surfaces and Work Surfaces**		SECTION 1122B FIXED OR BUILT-IN SEATING, TABLES, AND COUNTERS SECTION 1104B ACCESSIBILITY FOR GROUP A OCCUPANCIES 1104B.5 Dining, banquet and bar facilities. SECTION 1110B ACCESSIBILITY FOR GROUP M OCCUPANCIES 1110B.1 Sales. SECTION 1106B ACCESSIBILITY FOR GROUP E OCCUPANCIES ***1106B.2 Laboratory rooms.*** ***106B.3 Teaching facility cubicles, study carrels, etc.*** 1106B.4 Library general use areas.	*NA*	CBC does not separate surfaces from seating and it is spread out in different areas	It would be better if there is one area for surfaces of all types and have it differentiated within that area.
608.1			SECTION 1104B ACCESSIBILITY FOR GROUP A OCCUPANCIES 1104B.5 Dining, banquet and bar facilities. ... Exceptions: .... The ratio of accessible seating is based on the total number of seats provided. …	2010 CBC **does not address** 2010 ADA req.	It is unclear whether the ratio of seating is calculated as a total for the whole facility or whether it is based on each room and area by seat type	Rather than stating that the ratio of accessible seating is based on the total, state the ratio of accessible seating is based upon the total of each distinct area Rather than stating that the ratio of accessible seating is based on the total, state the ratio of accessible seating is based upon the total of each distinct area and each seat type
608.2			SECTION 1104B ACCESSIBILITY FOR GROUP A OCCUPANCIES 1104B.5 Dining, banquet and bar facilities. ... Exceptions: ... Where food or drink is served at counters exceeding 34 inches (865 mm) in height for consumption by customers seated or standing at the counter, a portion of the main counter which is 60 inches (1525 mm) in length minimum shall be provided in compliance with Section 1122B. ... Food preparation areas. Access to food preparation areas shall comply with the provisions for entrance doors and doorways in Section 1008, and aisles in Sections 1017 and 1017.2.	2010 CBC provides **greater access** than 2010 ADA.	This is confusing for large counters	State that a 60" lowered portion of counter is provided for 5% of seating If bar has no seats or it varies, provide a 60" lower portion for every 50' linear feet or fraction with one minimum

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609	**226.1 General.** ... In addition, where work surfaces are provided for use by other than employees, at least 5 percent shall comply with 902.		SECTION 1110B ACCESSIBILITY FOR GROUP M OCCUPANCIES ... 1110B.1.2 Work areas. ... the customer side of sales or check-out stations shall be accessible. ... SECTION 1122B FIXED OR BUILT-IN SEATING, TABLES, AND COUNTERS 1122B.1 Minimum number. Where fixed or built-in ... counters are provided in accessible public use or common use areas, 5 percent, but never less than one, must be accessible as provided in this section. ... Exception: ... 1122B.4 Height of work surfaces. ... Where a single counter contains more than one transaction station, such as (but not limited to) a bank counter with multiple teller windows or a retail sales counter with multiple cash register stations, at least 5 percent, but never less than one, of each type of station shall be located at a section of counter that is at least 36 inches (914 mm) long and no more than 28 to 34 inches (711 to 864 mm) high. ...	2010 CBC **does not address** 2010 ADA req.	Under CBC1110B.1.2 Work Areas state that the customer side of sales or check-out stations shall be accessible but does not specify the percentage but 1122B states 5%	Clarify the percentage of being 5% or direct to a new portion of accessible counters and work surfaces

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610	**226.1 General.** Where dining surfaces are provided for the consumption of food or drink, at least 5 percent of the seating *spaces* and standing *spaces* at the dining surfaces shall comply with 902. …		***1104B.5 Dining, banquet and bar facilities.*** ***General***. *Dining, banquet, and bar facilities shall be made accessible to persons with disabilities as provided in this section. All areas where each type of functional activity occurs shall be made accessible.* ***...*** ***1104B.5 Dining, banquet and bar facilities.*** ***4. Seating.*** *Each dining, banquet and bar area shall have one wheelchair seating space for each 20 seats, with at least one minimum wheelchair seating space per functional area. ... Where food or drink is served at counters exceeding 34 inches (865 mm) in height for consumption by customers seated or standing at the counter, a portion of the main counter which is 60 inches (1525 mm) in length minimum shall be provided in compliance with Section 1122B.* *...* ***1122B.1 Minimum number.*** *Where fixed or built-in seating, tables or counters are provided in accessible public use or common use areas, 5 percent, but never less than one, must be accessible as provided in this section.* *...* *At ticketing counters, teller stations in a bank, registration counters in hotels and motels, box office ticket counters and other counters that may not have a cash register but at which goods or services are sold or distributed, a portion of the main counter which is a minimum of 36 inches (915 mm) in length shall be provided with a maximum height of 34 inches (864 mm).* ***Exception:*** *In existing buildings where it is determined that providing an accessible counter would create an unreasonable hardship, equivalent facilitation may consist of one of the following:* ***1.*** *An auxiliary counter, in close proximity to the main counter, meeting these requirements may be provided.* ***2.*** *Provision of a folding shelf attached to the main counter on which an individual with disabilities can write.*	Which Std.provides greater access **depends** on circumstances.	CBC does not include standing counters so is less restrictive than ADA - it would be helpful to stipulate how many linear inches equals one standing space (ie 24", 30", or 36") ADA and CBC are equivalent in terms of percentage of accessible Since the ADA now allows as little as 5% of bar positions to be accessible, for bars with less than 21 seating or standing positions, the current CBC requirement for a 60" wide accessible counter section is stricter than the 2010 ADA Stds. at small bars.	1. Add 5% of standing spaces to text 2. State that standing spaces are to be calculated as one space per every 30 linear inches 3. State that standing spaces are to be calculated as one space per every 36 linear inches 4. To allow wheelchair users and others who cannot use a high bar to have access with a companion at a small, consider keeping the 60" minimum width requirement in the current CBC or adding the requirement for an accessible table in the same area.
611	**226.1 General.** Where dining surfaces are provided for the consumption of food or drink, at least 5 percent of the seating spaces and standing spaces at the dining surfaces shall comply with 902. In addition, where work surfaces are provided for use by other than employees, at least 5 percent shall comply with 902.		1104B.5 Dining, banquet and bar facilities. General. Dining, banquet, and bar facilities shall be made accessible to persons with disabilities as provided in this section. All areas where each type of functional activity occurs shall be made accessible. ... 4. Seating. Each dining, banquet and bar area shall have one wheelchair seating space for each 20 seats, with at least one minimum wheelchair seating space per functional area. ... ***1122B.1 Minimum number.*** Where fixed or built-in seating, tables or counters are provided in accessible public use or common use areas, 5 percent, but never less than one, must be accessible as provided in this section. ... Where a single counter contains more than one transaction station, such as (but not limited to) a bank counter with multiple teller windows or a retail sales counter with multiple cash register stations, at least 5 percent, but never less than one, ...	Which Std.provides greater access **depends** on circumstances.	Work surfaces should be differentiated from sales/service counters consistantly	

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612	**226.1 General.** ... In addition, where work surfaces are provided for use by other than employees, at least 5 percent shall comply with 902.		SECTION 1110B ACCESSIBILITY FOR GROUP M OCCUPANCIES ... 1110B.1.2 Work areas. ... the customer side of sales or check-out stations shall be accessible. ... SECTION 1122B FIXED OR BUILT-IN SEATING, TABLES, AND COUNTERS 1122B.1 Minimum number. Where fixed or built-in seating, tables or counters are provided in accessible public use or common use areas, 5 percent, but never less than one, must be accessible as provided in this section. ... Exception:... 1122B.4 Height of work surfaces. ... Where a single counter contains more than one transaction station, such as (but not limited to) a bank counter with multiple teller windows or a retail sales counter with multiple cash register stations, at least 5 percent, but never less than one, of each type of station shall be located at a section of counter that is at least 36 inches (914 mm) long and no more than 28 to 34 inches (711 to 864 mm) high. ... At ticketing counters, teller stations in a bank, registration counters in hotels and motels, box office ticket counters and other counters that may not have a cash register but at which goods or services are sold or distributed, a portion of the main counter which is a minimum of 36 inches (915 mm) in length shall be provided with a maximum height of 34 inches (864 mm). ...	2010 CBC **does not address** 2010 ADA req.	Under CBC1110B.1.2 Work Areas state that the customer side of sales or check-out stations shall be accessible but does not specify the percentage but 1122B states 5% - ADA has an exception for sales and service counters not requiring the 5%	Clarify the percentage of being 5% or direct to a new portion of accessible counters and work surfaces
613	**EXCEPTIONS: 1.** Sales counters and service counters shall not be required to comply with 902. **2.** Check writing surfaces provided at check-out aisles not required to comply with 904.3 shall not be required to comply with 902.		NA	2010 CBC **does not address** 2010 ADA req.		Include the 2 excep from ADA into the CBC
614	**Advisory 226.1 General.** In facilities covered by the ADA, this requirement does not apply to work surfaces used only by employees. However, the ADA and, where applicable, Section 504 of the Rehabilitation Act of 1973, as amended, provide that employees are entitled to "reasonable accommodations." With respect to work surfaces, this means that employers may need to procure or adjust work stations such as desks, laboratory and work benches, fume hoods, reception counters, teller windows, study carrels, commercial kitchen counters, and conference tables to accommodate the individual needs of employees with disabilities on an "as needed" basis. Consider work surfaces that are flexible and permit installation at variable heights and clearances.		NA	2010 CBC **does not address** 2010 ADA req.		Include an exception for counters and writing surfaces used by solely employees

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615	**226.2 Dispersion.** Dining surfaces and work surfaces required to comply with 902 shall be dispersed throughout the *space* or *facility* containing dining surfaces and work surfaces.		1104B.5 Dining, banquet and bar facilities. ... 3. Raised or sunken areas. All raised or sunken areas, including dining areas, loggias and outdoor seating areas, shall be accessible. A raised platform where a head table or speaker's lectern is located shall be accessible. ... 4. Seating. Each dining, banquet and bar area shall have one wheelchair seating space for each 20 seats, with at least one minimum wheelchair seating space per functional area. .... In establishments where separate areas are designated for smoking and non-smoking patrons, the required number of accessible fixed tables (or counters) shall be proportionally distributed between the smoking and non-smoking areas. Accessible seating spaces shall be integrated with general seating to allow a reasonable selection of seating area and to avoid having one area specifically highlighted as the area for persons with disabilities. ... ***1122B.1 Minimum number.*** Where fixed or built-in seating, tables or counters are provided in accessible public use or common use areas, 5 percent, but never less than one, must be accessible as provided in this section. ... At ticketing counters, teller stations in a bank, registration counters in hotels and motels, box office ticket counters and other counters that may not have a cash register but at which goods or services are sold or distributed, a portion of the main counter which is a minimum of 36 inches (915 mm) in length shall be provided with a maximum height of 34 inches (864 mm). Exception: In existing buildings where it is determined that providing an accessible counter would create an unreasonable hardship, equivalent facilitation may consist of one of the following: ...	2010 CBC **does not address** 2010 ADA req.	Stating smoking areas specifically is somewhat out-dated since most of CA does not allow smoking in a food service facility	1. Add - Accessible dining and work surfaces are to be dispersed in all seating types and room types or areas (ie exterior & interior, bar and dining areas, tables and booths, and counters etc) high vs lower counter/table top areas, raised and sunken areas, and areas or rooms which have different amenities
616	**226.2 Dispersion.** Dining surfaces and work surfaces required to comply with 902 shall be dispersed throughout the *space* or *facility* containing dining surfaces and work surfaces.					
617	**227 Sales and Service**					
618	**227 Sales and Service**		1110B.1 Sales. ...			
619	**227.1 General.** Where provided, check-out aisles, sales counters, service counters, food service lines, queues, and waiting lines shall comply with 227 and 904.		1110B.1 Sales. ... the customer side of sales or check-out stations shall be accessible. 1122B.5 Sales and service counters, teller windows, and information counters. ...	2010 CBC provides **less access** than 2010 ADA.	CBC just states that sales & check-out stations should be made accessible - ADA states which items it needs to comply with CBC has a separate section for sales, service, & info counters which is not necessarily addressed in ADA	1. Adopt ADA language which includes the different types of counters and aisles

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619.1			SECTION 1122B FIXED OR BUILT-IN SEATING, TABLES, AND COUNTERS 1122B.1 Minimum number. Where fixed or built-in ... counters are provided in accessible public use or common use areas, 5 percent, but never less than one, must be accessible as provided in this section. An accessible route of travel complying with Section 1114B.1.2 shall lead to and through such fixed or built-in seating areas or tables. ... Exception: Knee clearance is not required at checkout counters or service counters. 1122B.4 Height of work surfaces. The tops of tables and counters shall be 28 inches to 34 inches (711 mm to 864 mm) from the floor or ground. Where a single counter contains more than one transaction station, such as (but not limited to) a bank counter with multiple teller windows or a retail sales counter with multiple cash register stations, at least 5 percent, but never less than one, of each type of station shall be located at a section of counter that is at least 36 inches (914 mm) long and no more than 28 to 34 inches (711 to 864 mm) high.		CBC has a separate section for built-in seating, tables, & counters which is a bit confusing since these counters overlap the other functional type counters per ADA	Remove counters from this section
620	**227.2 Check-Out Aisles.** Where check-out aisles are provided, check-out aisles complying with 904.3 shall be provided in accordance with Table 227.2. Where check-out aisles serve different functions, check-out aisles complying with 904.3 shall be provided in accordance with Table 227.2 for each function. Where check-out aisles are dispersed throughout the *building* or *facility* , check-out aisles complying with 904.3 shall be dispersed.		1110B.1 Sales. 1110B.1.1 General areas. ... ... 1110B.1.2 Work areas. ... the customer side of sales or check-out stations shall be accessible. ... 1110B.1.3 Check stands. Where check stands are provided, the minimum number of check stands that are accessible shall be as shown in Table 11B-2. ...	2010 CBC **does not address** 2010 ADA req.	ADA addresses different types of counters and aisles per use, each type with its own requirements CBC Table 11B-2 is equivalent to ADA Table 227.2	1. Create section specifically on check-out aisles separate from counters and adopt the ADA language and requirements
621	**EXCEPTION:** Where the selling space is under 5000 square feet (465 m2) no more than one check-out aisle complying with 904.3 shall be required.		1110B.1 Sales. ... In existing buildings, at least one checkout aisle shall be accessible in facilities with less than 5,000 square feet (465 m^2) of selling space. ...	2010 CBC provides **greater access** than 2010 ADA.	ADA provides for a min of 1 accessible check-out aisle for spaces under 5,000 SF - CBC only allows this for existing bldgs	Keep language as is Adopt language per the ADA
622	**227.2.1 Altered Check-Out Aisles.** Where check-out aisles are *altered* , at least one of each check-out aisle serving each function shall comply with 904.3 until the number of check-out aisles complies with 227.2.		1110B.1 Sales. ... In existing buildings, ... In facilities of 5,000 square feet (465 m^2) or more of selling space, at least one of each design of checkout aisle shall be made accessible when altered until the number of accessible checkout aisles of each design equals the number required in new construction. ...	2010 CBC is **equivalent** to 2010 ADA.		NA

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623	**227.3 Counters.** Where provided, at least one of each type of sales counter and service counter shall comply with 904.4. Where counters are dispersed throughout the *building* or *facility* , counters complying with 904.4 also shall be dispersed.		1110B.1 Sales. ... Accessible check stands shall provide ... a maximum adjoining counter height not exceeding 38 inches (965 mm) above the finish floor. The top of the counter lip shall not exceed 40 inches (1016 mm) above the finish floor. ... 1122B.4 Height of work surfaces. The tops of tables and counters shall be 28 inches to 34 inches (711 mm to 864 mm) from the floor or ground. Where a single counter contains more than one transaction station, such as (but not limited to) a bank counter with multiple teller windows or a retail sales counter with multiple cash register stations, at least 5 percent, but never less than one, of each type of station shall be located at a section of counter that is at least 36 inches (914 mm) long and no more than 28 to 34 inches (711 to 864 mm) high. 1122B.5 Sales and service counters, teller windows, and information counters. In department stores and miscellaneous retail stores where counters have cash registers and are provided for sales or distribution of goods or services to the public, at least one of each type ... At ticketing counters, teller stations in a bank, registration counters in hotels and motels, box office ticket counters and other counters that may not have a cash register but at which goods or services are sold or distributed, a portion of the main counter ...	2010 CBC provides **less access** than 2010 ADA.	CBC does not differentiate the different types of counters. A sales & service counter per ADA is is 36" max AFF & a check-out aisle counter per ADA is 38" max AFF with an additional 2" max lip CBC also requires 5% with 1 min accessible stations CBC also talks about different types of service counters in more detail	Adopt the ADA language and differentiate between the different counter types
623.1	**NA**		1104B.3.13 Ticket booths. Customer and employee sides of ticket booths and of concession and refreshment sales facilities shall be made accessible to persons with disabilities.	2010 CBC provides **greater access** than 2010 ADA.	ADA does not specifically address ticket booths although since the ADA and CBC both address the oublic side and now address employee areas this is no longer necessary	delete item
624	**Advisory 227.3 Counters.** Types of counters that provide different services in the same facility include, but are not limited to, order, pick-up, express, and returns. One continuous counter can be used to provide different types of service. For example, order and pick-up are different services. It would not be acceptable to provide access only to the part of the counter where orders are taken when orders are picked-up at a different location on the same counter. Both the order and pick-up section of the counter must be accessible.		1110B.1 Sales. ... Examples of checkout aisles of different design include those which are specifically designed to serve different functions. A different design includes, but is not limited to, the following features: length of belt or no belt, or permanent signage designating the aisle as an express lane.	2010 CBC is **equivalent** to 2010 ADA.		

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625	**227.4 Food Service Lines.** Food service lines shall comply with 904.5. Where self-service shelves are provided, at least 50 percent, but no fewer than one, of each type provided shall comply with 308.		1104B.5 Dining, banquet and bar facilities. ***Food service aisles.*** ... Tray slides shall be mounted no higher than 34 inches (864 mm) above the floor as shown in Figure 11B-16. If self-service shelves are provided, at least 50 percent of each type must be within the reach ranges in Sections 1118B.5 and 1118B.6. Tableware and condiment areas. Self-service tableware, dishware, condiments, food and beverage display shelves and dispensing devices shall comply with Sections 1118B and 1122B.4. See Figure 11B-17.	2010 CBC is **equivalent** to 2010 ADA.		
626	**227.5 Queues and Waiting Lines.** Queues and waiting lines servicing counters or check-out aisles required to comply with 904.3 or 904.4 shall comply with 403.		1133B.6 Aisles. 1133B.6.1 General. Every portion of every building in which are installed seats, tables, merchandise, equipment or similar materials shall be provided with aisles leading to an exit. 1133B.6.2 Width. Every aisle shall not be less than 36 inches (914 mm) wide if serving only one side, and not less than 44 inches (1118 mm) wide if serving both sides. In addition, aisles shall comply with Figure 11B-5E(a) and (b) for circulation around obstructions.	2010 CBC provides **less access** than 2010 ADA.	this CBC section does not refer to path of travel and level area requirements - only the width the CBC FIgure is missing one diagram that the ADA has - if the obstruction you are doing a 180 degree turn around is less than 48" and the aisles leading up to it are less than 42", then the end aisle is 60" wide	Adopt ADA language
627	**227.5 Queues and Waiting Lines.** Queues and waiting lines servicing counters or check-out aisles required to comply with 904.3 or 904.4 shall comply with 403.					
628	**228 Depositories, Vending Machines, Change Machines, Mail Boxes, and Fuel Dispensers**		**SECTION 1126B VENDING MACHINES AND OTHER EQUIPMENT** Spaces for vending machines and other equipment shall comply with Section 1118B (Space Allowance And Reach Range) and shall be located on an accessible route complying with Section 1114B.1.2. Controls for vending machines and other equipment shall comply with Section 1117B.6, (Controls and Operating Mechanisms). **SECTION 1101C** **CARD-READER DEVICES AT FUEL-DISPENSING EQUIPMENT**	NA		
629	**228.1 General.** Where provided, at least one of each type of depository, vending machine, change machine, and fuel dispenser shall comply with 309.		SECTION 1104C REQUIRED FEATURES Card-reading devices at motor vehicle fuel facilities shall be accessible by complying with only the following: 1. The highest operable part of each primary or alternate card reader shall be no more than 54 inches (1372 mm) measured from the base of the fuel dispenser. Where card readers are located on free-standing pedestals, the card-reading control function shall be no more than 54 inches (1372 mm) above an accessible level area which is served by an accessible route of travel.	2010 CBC provides **less access** than 2010 ADA.	Reach ranges in 1118B are proposed to be changed and will reflect the exact language of the ADA. Reach ranges for fuel dispensers has not be modified.	Modify rech ranges in Section 1104C to mimic the ADA
630	**228.1 General.** Where provided, at least one of each type of depository, vending machine, change machine, and fuel dispenser shall comply with 309.					

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631	**EXCEPTION:** Drive-up only depositories shall not be required to comply with 309.		There is no equivelent section in the CBC	NA		
632	**Advisory 228.1 General.** Depositories include, but are not limited to, night receptacles in banks, post offices, video stores, and libraries.					
633	**228.2 Mail Boxes.** Where *mail boxes* are provided in an interior location, at least 5 percent, but no fewer than one, of each type shall comply with 309. In residential *facilities*, where *mail boxes* are provided for each *residential dwelling unit*, *mail boxes* complying with 309 shall be provided for each *residential dwelling unit* required to provide mobility features complying with 809.2 through 809.4.		**SECTION 1126B VENDING MACHINES AND OTHER EQUIPMENT** Spaces for vending machines and other equipment shall comply with Section 1118B (Space Allowance And Reach Range) and shall be located on an accessible route complying with Section 1114B.1.2. Controls for vending machines and other equipment shall comply with Section 1117B.6, (Controls and Operating Mechanisms).	2010 CBC provides **less access** than 2010 ADA.	The CBC only vaguely incorporates the requirements for mail boxes as "other equipment". The CBC also does not discuss specific requirements for residential mailboxes "for each residential dwelling unit" and does not specify that 5% of mailboxes *not for dwellings*.	
634	**229 Windows**					
635	**229 Windows**			2010 CBC **does not address** 2010 ADA req.	The only section in the CBC that adresses operation of windows can be found in the 2010 California Historical Building Code: SECTION 8-503 ESCAPE OR RESCUE WINDOWS AND DOORS Basements in dwelling units and every sleeping room below the fourth floor shall have at least one openable window or door approved for emergency escape which shall open directly into a public street, public way, yard or exit court. Escape or rescue windows or doors shall have a minimum clear area of 3.3 square feet (0.31 m2) and a minimum width or height dimension of 18 inches (457 mm) and be operable from the inside to provide a full, clear opening without the use of special tools. Even with this section, the terminology of "special tools" is vague.	1. Recommend including the requirements of the 2010 ADA Section 229 Windows into the 2010 CBC. 2. Recommend elimination of the terminology "without the use of special tools" in Section 8-503 in the California Historical Building Code and replace with verbiage used in Section 309 Operable Parts as defined in the 2010 ADA.
636	**229.1 General.** Where glazed openings are provided in accessible rooms or spaces for operation by occupants, at least one opening shall comply with 309. …			2010 CBC **does not address** 2010 ADA req.	This required minimum addresses a the operation of a window for natural ventilation to be within required reach ranges, clear floor area, and operable parts as required by 2010 ADA Section 309.	1. Recommend including the requirements of the 2010 ADA Section 229 Windows into the 2010 CBC.
637	**229.1 General.** ... Each glazed opening required by an *administrative authority* to be operable shall comply with 309.			2010 CBC **does not address** 2010 ADA req.	This requirement addresses the operation of an emergency egress window to be within required reach ranges, clear floor area, and operable parts as required by 2010 ADA Section 309.	1. Recommend including the requirements of the 2010 ADA Section 229 Windows into the 2010 CBC.
638	**EXCEPTION: 1.** Glazed openings in *residential dwelling units* required to comply with 809 shall not be required to comply with 229. **2.** Glazed openings in guest rooms required to provide communication features and in guest rooms required to comply with 206.5.3 shall not be required to comply with 229.			2010 CBC **does not address** 2010 ADA req.	It is unclear why the requirements of ADA Section 229 do not extend to Residential Dwelling Units, but it is assumed not to be included because of the installation of required communication features.	1. Recommend including the requirements of the 2010 ADA Section 229 Windows into the 2010 CBC.
639	**230 Two-Way Communication Systems**		There is no equivelent section in the CBC	NA	Chapter 1007 has a section referencing two-way communication in relation ship to areas of refuge and at elevator lobies.	
640	**230.1 General.** Where a two-way communication system is provided to gain admittance to a *building* or *facility* or to restricted areas within a *building* or *facility*, the system shall comply with 708.		There is no equivelent section in the CBC	2010 CBC provides **less access** than 2010 ADA.		Include the requirements of ADA 230.1 into the CBC
641	**Advisory 230.1 General.** This requirement applies to facilities such as office buildings, courthouses, and other facilities where admittance to the building or restricted spaces is dependent on two-way communication systems.					
642	**231 Judicial Facilities**		There is no equivelent section in the CBC	NA		

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
643	**231.1 General.** Judicial *facilities* shall comply with 231.		There is no equivelent section in the CBC	NA		
644	**231.2 Courtrooms.** Each courtroom shall comply with 808.		There is no equivelent section in the CBC **1105B.3.5** ... courtrooms. Areas to be made accessible include the following: 1. Office areas, conference rooms, classrooms, dispatch rooms and similar areas, along with related sanitary facilities, shall be made accessible. 2. Detention area visitor rooms shall be made accessible. 3. At least one detention cell facility with supporting sanitary facilities shall be made accessible. 4. Courtroom areas, including the judge's chambers and bench, counsel tables, jury box, witness stand and public seating area shall be made accessible.	2010 CBC provides **less access** than 2010 ADA.	Section 808 of the ADA provides specific details on how to make these specific areas accessible. The CBC has only the general requirement of accessibility which requires one to search in several areas of the code to determine the level of accessibility.	
645	**231.3 Holding Cells.** Where provided, central holding cells and court-floor holding cells shall comply with 231.3.		There is no equivalent section in the CBC **1105B.3.5** ... 2. Detention area ... shall be made accessible. 3. At least one detention cell facility with supporting sanitary facilities shall be made accessible. …	2010 CBC provides **less access** than 2010 ADA.	Section 231.3 of the ADA provides specific details on how to make these specific areas accessible. The CBC has only the general requirement of accessibility which requires one to search in several areas of the code to determine the level of accessibility.	
646	**231.3.1 Central Holding Cells.** Where separate central holding cells are provided for adult male, juvenile male, adult female, or juvenile female, one of each type shall comply with 807.2. Where central holding cells are provided and are not separated by age or sex, at least one cell complying with 807.2 shall be provided.		There is no equivelent section in the CBC 1105B.3.5 ... courtrooms. Areas to be made accessible include the following: ... 2. Detention ... shall be made accessible. 3. At least one detention cell facility with supporting sanitary facilities shall be made accessible. ...	2010 CBC provides **less access** than 2010 ADA.	The CBC does not address holding cells for specific ages or genders.	
647	**231.3.2 Court-Floor Holding Cells.** Where separate court-floor holding cells are provided for adult male, juvenile male, adult female, or juvenile female, each courtroom shall be served by one cell of each type complying with 807.2. Where court-floor holding cells are provided and are not separated by age or sex, courtrooms shall be served by at least one cell complying with 807.2. Cells may serve more than one courtroom.		There is no equivalent section in the CBC **1105B.3.5** ... courtrooms. Areas to be made accessible include the following: ... 2. Detention ... shall be made accessible. 3. At least one detention cell facility with supporting sanitary facilities shall be made accessible. ...	2010 CBC provides **less access** than 2010 ADA.	The CBC does not address specific elements with a cell such as turning space, clear floor space at beds and benches.	
648	**231.4 Visiting Areas.** Visiting areas shall comply with 231.4.		There is no equivalent section in the CBC **1105B.3.5** ...courtrooms. Areas to be made accessible include the following: ... 2. ... visitor rooms shall be made accessible. ...	NA		
649	**231.4.1 Cubicles and Counters.** At least 5 percent, but no fewer than one, of cubicles shall comply with 902 on both the visitor and detainee sides. Where counters are provided, at least one shall comply with 904.4.2 on both the visitor and detainee sides.		There is no equivalent section in the CBC **1105B.3.5**... courtrooms. Areas to be made accessible include the following: ... and similar areas, ... shall be made accessible. ...	2010 CBC provides **less access** than 2010 ADA.	Section 231.4 of the ADA provides specific details on how to make these specific areas accessible. The CBC has only the general requirement of accessibility which requires one to search in several areas of the code to determine the level of accessibility.	
650	**EXCEPTION:** The detainee side of cubicles or counters at non-contact visiting areas not serving holding cells required to comply with 231 shall not be required to comply with 902 or 904.4.2.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		

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651	**231.4.2 Partitions.** Where solid partitions or security glazing separate visitors from detainees at least one of each type of cubicle or counter partition shall comply with 904.6.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.	Solid partitions are not addressed in the CBC	
652	**232 Detention Facilities and Correctional Facilities**		**1.1.1. Scope**. The provisions of this code shall apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal and demolition of every building or structure or any appurtenances connected or attached to such buildings or structures throughout the State of California. Note: See Preface to distinguish the model code provisions from the California provisions. 1. State-owned buildings, ... See Section 1.2 for additional scope provisions. 2. Local detention facilities regulated by the Corrections Standards Authority. See Section 1.3 for additional scope provisions. 13. General acute care hospitals, acute psychiatric hospitals, skilled nursing and/or intermediate care facilities, clinics licensed by the Department of Public Health and correctional treatment centers regulated by the Office of Statewide Health Planning and Development. See Section 1.10 for additional scope provisions.	2010 CBC **does not address** 2010 ADA req.	There is no separate CBC section for Detention Facilities and Correctional Facilities.	
653	**232.1 General.** *Buildings* , *facilities* , or portions thereof, in which people are detained for penal or correction purposes, or in which the liberty of the inmates is restricted for security reasons shall comply with 232. [See additional requirements at 28 CFR 35.151(k), p. 13.]		**1105B.3 Office buildings and personal and public service facilities.** Office buildings and personal and public service facilities shall conform to the provisions of this section. **1105B.3.1 Facilities covered.** Facilities covered in this section are those that are used by the public as customers, clients, visitors or which are potentially places of employment and shall include, but not be limited to, the following requirements: **1.** All personal and public service facilities, including ... police stations and detention facilities, ...		There is no separate CBC section for Detention Facilities and Correctional Facilities. CBC 1105B.3.1#3 requires that police stations and detention facilities are required to be accessible, but there are no specific requirements for these types of facilities. This section only applies to B Occupancies and State Prisons are typically I-3 Occupancies.	1. If the CBC version is adopted, include a separate section for Detention Facilities and Correctional Facilities and reference the specific requirements under both Section 1105B Accessibility for B Occupancies and Section 1109B Accessibility for I-3 Occupancies. 2. Adopt the 2010 ADA Stds. version verbatim.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC		Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
654	**Advisory 232.1 General.** Detention facilities include, but are not limited to, jails, detention centers, and holding cells in police stations. Correctional facilities include, but are not limited to, prisons, reformatories, and correctional centers.	Note to Reader: The Department of Justice's revised ADA title II regulation (35.151)(k)) requires the following: Detention and correctional facilities. (1) New construction of jails, prisons, and other detention and correctional facilities shall comply with the 2010 Standards except that public entities shall provide accessible mobility features complying with section 807.2 of the 2010 Standards for a minimum of 3%, but no fewer than one, of the total number of cells in a facility. Cells with mobility features shall be provided in each classification level. (2) Alterations to detention and correctional facilities. Alterations to jails, prisons, and other detention and correctional facilities shall comply with the 2010 Standards except that public entities shall provide accessible mobility features complying with section 807.2 of the 2010 Standards for a minimum of 3%, but no fewer than one, of the total number of cells being altered until at least 3%, but no fewer than one, of the total number of cells in a facility shall provide	NA	NA	NA		NA
655	**232.2 General Holding Cells and General Housing Cells** General holding cells and general housing cells shall be provided in accordance with 232.2.		**1105B.3.5 Police department, law enforcement, fire department facilities and courtrooms.** Areas to be made accessible include the following: ... 3. At least one detention cell facility ... shall be made accessible. …	2010 CBC **does not address** 2010 ADA req.		There is no separate CBC section for Detention Facilities and Correctional Facilities. CBC 1105B.3.1#3 requires that police stations and detention facilities are required to be accessible, but there are no specific requirements for these types of facilities. CBC 105B.3.5#3 requires at least one detention cell facility with supporting sanitary facilities shall be made accessible. These two sections only applies to B Occupancies and State Prisons are typically I-3 Occupancies. CBC also does not include a definition for General Holding Cells and General Housing Cells.	1. If the CBC version is adopted, include a separate section for Detention Facilities and Correctional Facilities and reference the specific requirements under both Section 1105B Accessibility for B Occupancies and Section 1109B Accessibility for I-3 Occupancies. 2. Adopt the 2010 ADA Stds. version verbatim, including definitions and exceptions.
656	**EXCEPTION:** *Alterations* to cells shall not be required to comply except to the extent determined by the Attorney General.		CBC does not have an equivalent exception.	2010 CBC **does not address** 2010 ADA req.		CBC does not have an equivalent exception.	1. If the CBC version is adopted, include a separate section for Detention Facilities and Correctional Facilities and reference the specific requirements under both Section 1105B Accessibility for B Occupancies and Section 1109B Accessibility for I-3 Occupancies. 2. Adopt the 2010 ADA Stds. version verbatim, including definitions and exceptions.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
657	**Advisory 232.2 General Holding Cells and General Housing Cells.** Accessible cells or rooms should be dispersed among different levels of security, housing categories, and holding classifications (e.g., male/female and adult/juvenile) to facilitate access. Many detention and correctional facilities are designed so that certain areas (e.g., "shift" areas) can be adapted to serve as different types of housing according to need. For example, a shift area serving as a medium-security housing unit might be redesignated for a period of time as a high-security housing unit to meet capacity needs. Placement of accessible cells or rooms in shift areas may allow additional flexibility in meeting requirements for dispersion of accessible cells or rooms.		NA	NA	NA	NA
658	**Advisory 232.2 General Holding Cells and General Housing Cells Exception.** Although these requirements do not specify that cells be accessible as a consequence of an alteration, title II of the ADA requires that each service, program, or activity conducted by a public entity, when viewed in its entirety, be readily accessible to and usable by individuals with disabilities. This requirement must be met unless doing so would fundamentally alter the nature of a service, program, or activity or would result in undue financial and administrative burdens.		NA	NA	NA	NA
659	**232.2.1 Cells with Mobility Features.** At least 2 percent, but no fewer than one, of the total number of cells in a *facility* shall provide mobility features complying with 807.2.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	The mobility features required by 2010 ADA Stds. Section 807.2 are included in other CBC sections: 1118B.3 (turning space); 1117B.8 (benches); 1111B.4.3 (beds). However, the requirement for benches is under the heading "Fitting and Dressing Rooms" and the requirement for beds only applies in R Occupancies. CBC does not address the 2 percent required percentage of cells with mobility features.	1. If the CBC version is adopted, include a separate section for Detention Facilities and Correctional Facilities and reference the specific requirements under both Section 1105B Accessibility for B Occupancies and Section 1109B Accessibility for I-3 Occupancies. 2. Adopt the 2010 ADA Stds. version verbatim, including definitions and exceptions.
660	**232.2.1.1 Beds.** In cells having more than 25 beds, at least 5 percent of the beds shall have clear floor space complying with 807.2.3.		**1111B.4.3 Access to beds**. Accessible sleeping rooms shall have a 36-inch (914 mm) clear width maneuvering space located along both sides of a bed, except that where two beds are provided, this requirement can be met by providing a 36-inch-wide (914 mm) maneuvering space located between the beds. ...	2010 CBC **does not address** 2010 ADA req.	This requirement for beds only applies in R Occupancies.	1. If the CBC version is adopted, include a separate section for Detention Facilities and Correctional Facilities and reference the specific requirements under both Section 1105B Accessibility for B Occupancies and Section 1109B Accessibility for I-3 Occupancies. 2. Adopt the 2010 ADA Stds. version verbatim, including definitions and exceptions.
661	**232.2.2 Cells with Communication Features.** At least 2 percent, but no fewer than one, of the total number of general holding cells and general housing cells equipped with audible emergency alarm systems and permanently installed telephones within the cell shall provide communication features complying with 807.3.		**1111B.4.5 Visible alarms, notification devices and telephones for persons with hearing impairments.** In addition to those accessible sleeping rooms and suites required by Section 1111B.4.2, additional sleeping rooms and suites shall be provided with the following features as required by Table 11B-4 as follows: 1111B.4.5.1 Visible alarms. Visible alarms shall be provided and shall comply with NFPA 72 and Chapter 9, Section 907.5.2.3.	2010 CBC **does not address** 2010 ADA req.	This requirement for beds only applies in R Occupancies.	1. If the CBC version is adopted, include a separate section for Detention Facilities and Correctional Facilities and reference the specific requirements under both Section 1105B Accessibility for B Occupancies and Section 1109B Accessibility for I-3 Occupancies. 2. Adopt the 2010 ADA Stds. version verbatim, including definitions and exceptions.
662	**232.3 Special Holding Cells and Special Housing Cells.** Where special holding cells or special housing cells are provided, at least one cell serving each purpose shall provide mobility features complying with 807.2. Cells subject to this requirement include, but are not limited to, those used for purposes of orientation, protective custody, administrative or disciplinary detention or segregation, detoxification, and medical isolation.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CBC does not have an equivalent section.	1. If the CBC version is adopted, include a separate section for Detention Facilities and Correctional Facilities and reference the specific requirements under both Section 1105B Accessibility for B Occupancies and Section 1109B Accessibility for I-3 Occupancies. 2. Adopt the 2010 ADA Stds. version verbatim, including definitions and exceptions.
663	**EXCEPTION:** *Alterations* to cells shall not be required to comply except to the extent determined by the Attorney General.		CBC does not have an equivalent exception.	2010 CBC **does not address** 2010 ADA req.	CBC does not have an equivalent exception.	1. If the CBC version is adopted, include a separate section for Detention Facilities and Correctional Facilities and reference the specific requirements under both Section 1105B Accessibility for B Occupancies and Section 1109B Accessibility for I-3 Occupancies. 2. Adopt the 2010 ADA Stds. and relevant sections of the reguilations. version verbatim, including definitions and exceptions.

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664	**§ 35.151 New construction and alterations.** *(2) Alterations to detention and correctional facilities.* Alterations to jails, prisons, and other detention and correctional facilities shall comply with the 2010 Standards except that public entities shall provide accessible mobility features complying with section 807.2 of the 2010 Standards for a minimum of 3%, but no fewer than one, of the total number of cells being altered until at least 3%, but no fewer than one, of the total number of cells in a facility shall provide mobility features complying with section 807.2. Altered cells with mobility features shall be provided in each classification level. However, when alterations are made to specific cells, detention and correctional facility operators may satisfy their obligation to provide the required number of cells with mobility features by providing the required mobility features in substitute cells (cells other than those where alterations are originally planned), provided that each substitute cell— (i) Is located within the same prison site; (ii) Is integrated with other cells to the maximum extent feasible; (iii) Has, at a minimum, equal physical access as the altered cells to areas used by inmates or detainees for visitation, dining, recreation, educational programs, medical services, work programs, religious services, and participation in other programs that the facility offers to inmates or detainees; and (iv) If it is technically infeasible to locate a substitute cell within the same prison site, a substitute cell must be provided at another prison site within the corrections system.		NA	NA	NA	NA
665	**232.4 Medical Care Facilities.** Patient bedrooms or cells required to comply with 223 shall be provided in addition to any medical isolation cells required to comply with 232.3.		**1109B.3 Patient bedrooms and toilet rooms**. Patient bedrooms and associated toilet facilities shall be made accessible as follows: 1. Long-term care facilities, including skilled nursing facilities, intermediate care facilities, bed and care and nursing homes shall have at least 50 percent of patient bedrooms and toilet rooms, ..., accessible. 2. General-purpose hospitals, psychiatric facilities and detoxification facilities shall have at least 10 percent of patient bedrooms and toilets, ... accessible. 3. Hospitals and rehabilitation facilities that specialize in treating conditions that affect mobility, or units within either that specialize in treating conditions that affect mobility, shall have all patient bedrooms and toilets ... accessible.	**does not address** 2010 ADA req.	This requirement for patient bedrooms and toilet rooms only applies in I Occupancies.	1. If the CBC version is adopted, include a separate section for Detention Facilities and Correctional Facilities and reference the specific requirements under both Section 1105B Accessibility for B Occupancies and Section 1109B Accessibility for I-3 Occupancies. 2. Adopt the 2010 ADA Stds. version verbatim, including definitions and exceptions.
666	**232.5 Visiting Areas.** Visiting areas shall comply with 232.5.		**1105B.3.5 Police department, law enforcement, fire department facilities and courtrooms.** Areas to be made accessible include the following: 1. ... 2. Detention area visitor rooms shall be made accessible. …	2010 CBC **conflicts with** 2010 ADA.	This requirement for visiting only applies in R Occupancies.	1. If the CBC version is adopted, include a separate section for Detention Facilities and Correctional Facilities and reference the specific requirements under both Section 1105B Accessibility for B Occupancies and Section 1109B Accessibility for I-3 Occupancies. 2. Adopt the 2010 ADA Stds. version verbatim, including definitions and exceptions.

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667	**232.5.1 Cubicles and Counters.** At least 5 percent, but no fewer than one, of cubicles shall comply with 902 on both the visitor and detainee sides. Where counters are provided, at least one shall comply with 904.4.2 on both the visitor and detainee or inmate sides.		**1122B.1 Minimum number.** Where fixed or built-in seating, tables or counters are provided in accessible public use or common use areas, 5 percent, but never less than one, must be accessible as provided in this section. ...**1122B.3 Knee clearance.** If seating for persons in wheelchairs is provided at fixed tables or counters, knee spaces at least 27 inches (686 mm) high, 30 inches (762 mm) wide and 19 inches (483 mm) deep shall be provided (see Figure 11B-13). **1122B.4 Height of work surfaces.** The tops of tables and counters shall be 28 inches to 34 inches (711 mm to 864 mm) from the floor or ground. **1122B.5 Sales and service counters, teller windows, and information counters.** In department stores and miscellaneous retail stores where counters have cash registers and are provided for sales or distribution of goods or services to the public, at least one of each type shall have a portion of the counter which is at least 36 inches (915 mm) in length with a maximum height of 34 inches (864 mm) above the finish floor and located on an accessible route complying with Section 1114B.1.2. At ticketing counters, teller stations in a bank, registration counters in hotels and motels, box office ticket counters and other counters that may not have a cash register but at which goods or services are sold or distributed, a portion of the main counter which is a minimum of 36 inches (915 mm) in length shall be provided with a maximum height of 34 inches (864 mm).	2010 CBC **does not address** 2010 ADA req.	CBC is not specific that the requirements of Section 1122B apply to the visitor and detainee or inmate sides of detention facilities and correctional facilities.	1. If the CBC version is adopted, include a separate section for Detention Facilities and Correctional Facilities and reference the specific requirements under both Section 1105B Accessibility for B Occupancies and Section 1109B Accessibility for I-3 Occupancies. 2. Adopt the 2010 ADA Stds. version verbatim, including definitions and exceptions.
668	**EXCEPTION:** The inmate or detainee side of cubicles or counters at non-contact visiting areas not serving holding cells or housing cells required to comply with 232 shall not be required to comply with 902 or 904.4.2.		**1122B.1 Minimum number.** Where fixed or built-in seating, tables or counters are provided in accessible public use or common use areas, 5 percent, but never less than one, must be accessible as provided in this section. ...**1122B.3 Knee clearance.** If seating for persons in wheelchairs is provided at fixed tables or counters, knee spaces at least 27 inches (686 mm) high, 30 inches (762 mm) wide and 19 inches (483 mm) deep shall be provided (see Figure 11B-13). **1122B.4 Height of work surfaces.** The tops of tables and counters shall be 28 inches to 34 inches (711 mm to 864 mm) from the floor or ground. **1122B.5 Sales and service counters, teller windows, and information counters.** In department stores and miscellaneous retail stores where counters have cash registers and are provided for sales or distribution of goods or services to the public, at least one of each type shall have a portion of the counter which is at least 36 inches (915 mm) in length with a maximum height of 34 inches (864 mm) above the finish floor and located on an accessible route complying with Section 1114B.1.2. At ticketing counters, teller stations in a bank, registration counters in hotels and motels, box office ticket counters and other counters that may not have a cash register but at which goods or services are sold or distributed, a portion of the main counter which is a minimum of 36 inches (915 mm) in length shall be provided with a maximum height of 34 inches (864 mm).	2010 CBC **conflicts with** 2010 ADA.	CBC does not provide an exception to the requirements of CBC 1122B at non-contact visiting areas not serving holding cells or housing cells.	1. If the CBC version is adopted, include a separate section for Detention Facilities and Correctional Facilities and reference the specific requirements under both Section 1105B Accessibility for B Occupancies and Section 1109B Accessibility for I-3 Occupancies. 2. Adopt the 2010 ADA Stds. version verbatim, including definitions and exceptions.

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669	**232.5.2 Partitions.** Where solid partitions or security glazing separate visitors from detainees or inmates at least one of each type of cubicle or counter partition shall comply with 904.6.		CBC does not have an equivalent exception.	2010 CBC **does not address** 2010 ADA req.	CBC does not provide an equivalent requirement to provide a method of voice communication at counters or windows where security glazing separates both sides of the counter or window.	1. If the CBC version is adopted, include a separate section for Detention Facilities and Correctional Facilities and reference the specific requirements under both Section 1105B Accessibility for B Occupancies and Section 1109B Accessibility for I-3 Occupancies. 2. Adopt the 2010 ADA Stds. version verbatim, including definitions and exceptions.
670	**233 Residential Facilities**		***SECTION 1111B ACCESSIBILITY FOR GROUP R OCCUPANCIES***	2010 CBC **conflicts with** 2010 ADA.	The 2010 ADA classifies separately "places of lodging" *(transient lodging facilities)* , "social service center establishments" *(residential facilities with residential dwelling units).* The 2010 CBC does not classify these categories separately, and includes them all under the category of "transient lodging". It is advisable to define "transient lodging" and "residential dwelling unit" in Section 1102 of the 2010 CBC as they are defined by the 2010 ADA: *"Transient Lodging. A building or facility containing one or more guest room(s) for sleeping that provides accommodations that are primarily short-term in nature. Transient lodging does not include residential dwelling units intended to be used as a residence, inpatient medical care facilities, licensed long-term care facilities, detention or correctional facilities, or private buildings or facilities that contain not more than five rooms for rent or hire and that are actually occupied by the proprietor as the residence of such proprietor. "* and *"Residential Dwelling Unit. A unit intended to be used as a residence, that is primarily long-term in nature. Residential dwelling units do not include transient lodging, inpatient medical care, licensed long-term care, and detention or correctional facilities."* With regard to "dormitories", the 2010 ADA classifies undergraduate "housing at a place of education" as transient lodging and graduate and faculty "housing at a place of educaiton" as residential dwelling units. The Section title "Accessiblity for Group R Occupancies" should remain. The 2010 CBC should address scope in Section 1111B ACCESSIBILITY FOR GROUP R OCCUPANCIES that r*esidential facilities with residential dwelling units* include social service center establishments such as group homes, halfway houses, etc. and *transient lodging facilities* include places of lodging such as hotels, motels, inns, resorts, dormitories for undergraduate housing, etc. similarly to the 2010 ADA. Section 1111B of the 2010 CBC also addresses residential facilities with publicly funded residential dwelling units, and refers	1) Define "transient lodging" and "residential dwelling unit" in Section 1102 of the 2010 CBC as they are defined by the 2010 ADA. 2) Address scope in the 2010 CBC in SECTION 1111B ACCESSIBILITY FOR GROUP R OCCUPANCIES that a residential facility with residential dwelling units includes social service center establishments such as group homes, halfway houses, etc. and a transient lodging facility includes places of lodging such as hotels, motels, inns, resorts, dormitories for undergraduate housing, etc. similarly to the 2010 ADA. 3) Create a section in Chapter 11B to specifically address residential facilities with publicly funded residential dwelling units.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
671	**§ 35.151 New construction and alterations.** (e) *Social service center establishments.* Group homes, halfway houses, shelters, or similar social service center establishments that provide either temporary sleeping accommodations or residential dwelling units that are subject to this section shall comply with the provisions of the 2010 Standards applicable to residential facilities, including, but not limited to, the provisions in sections 233 and 809. (1) In sleeping rooms with more than 25 beds covered by this section, a minimum of 5% of the beds shall have clear floor space complying with section 806.2.3 of the 2010 Standards. (2) Facilities with more than 50 beds covered by this section that provide common use bathing facilities shall provide at least one roll-in shower with a seat that complies with the relevant provisions of section 608 of the 2010 Standards. Transfer-type showers are not permitted in lieu of a roll-in shower with a seat, and the exceptions in sections 608.3 and 608.4 for residential dwelling units are not permitted. When separate shower facilities are provided for men and for women, at least one roll-in shower shall be provided for each group. **§ 36.406 Standards for new construction and alterations.** (d) Social service center establishments. Group homes, halfway houses, shelters, or similar social service center establishments that provide either temporary sleeping accommodations or residential dwelling units that are subject to this part shall comply with the provisions of the 2010 Standards applicable to residential facilities, including, but not limited to, the provisions in sections 233 and 809. (1) In sleeping rooms with more than 25 beds covered by this part, a minimum of 5% of the beds shall have clear floor space complying with section 806.2.3 of the 2010 Standards. (2) Facilities with more than 50 beds covered by this part that provide common use bathing facilities shall provide at least one roll-in shower with a seat that complies with the relevant provisions of section 608 of the 2010 Standards. Transfer-type showers are not permitted in lieu of a roll-in shower with a seat, and the exceptions in sections 608.3 and 608.4 for residential dwelling units are not permitted. When separate shower facilities are provided for men and for women, at least one roll-in shower shall be provided for each group.	**ETA Editor's Note** At the beginning of this publication see the additional requirements under Title II Regulations at 35.151(e) and Title III Regulations at 36.406(d), "Social service center establishments" and under Title II Regulations at 35.151(f) and Title III Regulations at 36.406(e) "Housing at a place of education".				
672	**233.1 General.** *Facilities* with *residential dwelling units* shall comply with 233. [See additional requirements at 28 CFR 35.151(e) and (f), p. 11, and 28 CFR 36.406(d) and (e), pp. 28 and 29.]		***SECTION 1111B ACCESSIBILITY FOR GROUP R OCCUPANCIES*** ***1111B.4 ... homeless shelters, halfway houses, ... group homes and ...*** *homeless shelters, halfway houses, ... group homes ... shall provide access for persons with disabilities in accordance with the provisions of the accessibility requirements of this California Building Code, except as herein provided.* ... ***1111B.5 Buildings and complexes containing publicly funded dwelling units.*** ***1111B.5.1 General.*** *Buildings and complexes containing publicly funded dwelling units shall be accessible as required by Chapter 11A, Housing Accessibility, except that scoping requirements for covered multifamily dwellings include one or more publicly funded dwelling units, ...*	2010 CBC **conflicts with** 2010 ADA.	This analysis is based on the definition of residential dwelling units as defined by the 2010 ADA as "A unit intended to be used as a residence, that is primarily long-term in nature. Residential dwelling units do not include transient lodging, inpatient medical care, licensed long-term care, and detention or correctional facilities."	1) Address separately provisions for "publicly funded residential dwelling units" in SECTION 1111B ACCESSIBILITY FOR GROUP R OCCUPANCIES.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
673	**§ 35.151 New construction and alterations.** (f) *Housing at a place of education* . Housing at a place of education that is subject to this section shall comply with the provisions of the 2010 Standards applicable to transient lodging, including, but not limited to, the requirements for transient lodging guest rooms in sections 224 and 806 subject to the following exceptions. For the purposes of the application of this section, the term ''sleeping room'' is intended to be used interchangeably with the term ''guest room'' as it is used in the transient lodging standards. (1) Kitchens within housing units containing accessible sleeping rooms with mobility features (including suites and clustered sleeping rooms) or on floors containing accessible sleeping rooms with mobility features shall provide turning spaces that comply with section 809.2.2 of the 2010 Standards and kitchen work surfaces that comply with section 804.3 of the 2010 Standards. (2) Multi-bedroom housing units containing accessible sleeping rooms with mobility features shall have an accessible route throughout the unit in accordance with section 809.2 of the 2010 Standards. (3) Apartments or townhouse facilities that are provided by or on behalf of a place of education, which are leased on a year-round basis exclusively to graduate students or faculty, and do not contain any public use or common use areas available for educational programming, are not subject to the transient lodging standards and shall comply with the requirements for residential facilities in sections 233 and 809 of the 2010 Standards. **§ 36.406 Standards for new construction and alterations.** *(e) Housing at a place of education* . Housing at a place of education that is subject to this part shall comply with the provisions of the 2010 Standards applicable to transient lodging, including, but not limited to, the requirements for transient lodging guest rooms in sections 224 and 806, subject to the following exceptions. For the purposes of the application of this section, the term ''sleeping room'' is intended to be used interchangeably with the term ''guest room'' as it is used in the transient lodging standards. (1) Kitchens within housing units containing accessible sleeping rooms with mobility features (including suites and clustered sleeping rooms) or on floors containing accessible sleeping rooms with mobility features shall provide turning spaces that comply with section 809.2.2 of the 2010 Standards and kitchen work surfaces that comply with section 804.3 of the 2010 Standards. (2) Multi-bedroom housing units containing accessible sleeping rooms with mobility features shall have an accessible route throughout the unit in accordance with section 809.2 of the 2010 Standards. (3) Apartments or townhouse facilities that are provided by or on behalf of a place of education, which are leased on a year-round basis exclusively to graduate students or faculty and do not contain any public use or common use areas available for educational					

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674	**Advisory 233.1 General.** Section 233 outlines the requirements for residential facilities subject to the Americans with Disabilities Act of 1990. The facilities covered by Section 233, as well as other facilities not covered by this section, may still be subject to other Federal laws such as the Fair Housing Act and Section 504 of the Rehabilitation Act of 1973, as amended. For example, the Fair Housing Act requires that certain residential structures having four or more multi-family dwelling units, regardless of whether they are privately owned or federally assisted, include certain features of accessible and adaptable design according to guidelines established by the U.S. Department of Housing and Urban Development (HUD). These laws and the appropriate regulations should be consulted before proceeding with the design and construction of residential facilities. Residential facilities containing residential dwelling units provided by entities subject to HUD's Section 504 regulations and residential dwelling units covered by Section 233.3 must comply with the technical and scoping requirements in Chapters 1 through 10 included this document. Section 233 is not a stand-alone section; this section only addresses the minimum number of residential dwelling units within a facility required to comply with Chapter 8. However, residential facilities must also comply with the requirements of this document. For example: Section 206.5.4 requires all doors and doorways providing user passage in residential dwelling units providing mobility features to comply with Section 404; Section 206.7.6 permits platform lifts to be used to connect levels within residential dwelling units providing mobility features; Section 208 provides general scoping for accessible parking and Section 208.2.3.1 specifies the required number of accessible parking spaces for each residential dwelling unit providing mobility features; Section 228.2 requires mail boxes to be within reach ranges when they serve residential dwelling units providing mobility features; play areas are addressed in Section 240; and swimming pools are addressed in Section 242. There are special provisions applicable to facilities containing residential dwelling units at: Exception 3 to 202.3; Exception to 202.4; 203.8; and Exception 4 to 206.2.3.					
675	**233.2 Residential Dwelling Units Provided by Entities Subject to HUD Section 504 Regulations.** Where *facilities* with *residential dwelling units* are provided by entities subject to regulations issued by the Department of Housing and Urban Development (HUD) under Section 504 of the Rehabilitation Act of 1973, as amended, such entities shall provide *residential dwelling units* with mobility features complying with 809.2 through 809.4 in a number required by the applicable HUD regulations. *Residential dwelling units* required to provide mobility features complying with 809.2 through 809.4 shall be on an accessible route as required by 206. In addition, such entities shall provide *residential dwelling units* with communication features complying with 809.5 in a number required by the applicable HUD regulations. Entities subject to 233.2 shall not be required to comply with 233.3.	There is no equivalent section in the CBC		2010 CBC **does not address** 2010 ADA req.	The 2010 CBC defines "publicly funded housing", as housing that involves state, county or municipal funds, or the funds of any political subdivision of the state. While it is stated in the CBC that DSA is committed to the incorporation of standards that are at least as restrictive as those required by the federal government for barrier-free design, the CBC is a state code, and therefore "publicly funded" in this case is defined adequately. If federal funds are used, then Section 504 requirements apply, and there are some requirements in Section 504 that are more stringent. A statement indicating that, for purposes of the code, the CBC does not define publicly funded as having the inclusion of federal funding, and that Section 504 regulations may have additional requirements for publicly funded housing receiving federal funds.	1) Retain CBC language for "publicly funded housing". 2) Recommend including language in the code indicating that, for purposes of the code, the CBC does not define publicly funded as having the inclusion of federal funding, and that Section 504 regulations may have additional requirements for publicly funded housing receiving federal funds.
676	**Advisory 233.2 Residential Dwelling Units Provided by Entities Subject to HUD Section 504 Regulations.** Section 233.2 requires that entities subject to HUD's regulations implementing Section 504 of the Rehabilitation Act of 1973, as amended, provide residential dwelling units containing mobility features and residential dwelling units containing communication features complying with these regulations in a number specified in HUD's Section 504 regulations. Further, the residential dwelling units provided must be dispersed according to HUD's Section 504 criteria. In addition, Section 233.2 defers to HUD the specification of criteria by which the technical requirements of this document will apply to alterations of existing facilities subject to HUD's Section 504 regulations.					

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677	**233.3 Residential Dwelling Units Provided by Entities Not Subject to HUD Section 504 Regulations.** *Facilities* with *residential dwelling units* provided by entities not subject to regulations issued by the Department of Housing and Urban Development (HUD) under Section 504 of the Rehabilitation Act of 1973, as amended, shall comply with 233.3.		***1111B.5 Buildings and complexes containing publicly funded dwelling units.*** ***1111B.5.1 General.*** *Buildings and complexes containing publicly funded dwelling units shall be accessible as required by Chapter 11A, Housing Accessibility, except that scoping requirements for covered multifamily dwellings include one or more publicly funded dwelling units, a...*	NA	Since federal funds are not considered when applying the definition of "publicly funded housing" in the CBC, it is assumed the CBC sets this requirement as the basis in the applicability of "publicly funded housing". No need to address.	
678	**§ 35.151 New construction and alterations.** (e) *Social service center establishments.* Group homes, halfway houses, shelters, or similar social service center establishments that provide either temporary sleeping accommodations or residential dwelling units that are subject to this section shall comply with the provisions of the 2010 Standards applicable to residential facilities, including, but not limited to, the provisions in sections 233 and 809. (1) In sleeping rooms with more than 25 beds covered by this section, a minimum of 5% of the beds shall have clear floor space complying with section 806.2.3 of the 2010 Standards. (2) Facilities with more than 50 beds covered by this section that provide common use bathing facilities shall provide at least one roll-in shower with a seat that complies with the relevant provisions of section 608 of the 2010 Standards. Transfer-type showers are not permitted in lieu of a roll-in shower with a seat, and the exceptions in sections 608.3 and 608.4 for residential dwelling units are not permitted. When separate shower facilities are provided for men and for women, at least one roll-in shower shall be provided for each group. **§ 36.406 Standards for new construction and alterations.** *(d) Social service center establishments.* Group homes, halfway houses, shelters, or similar social service center establishments that provide either temporary sleeping accommodations or residential dwelling units that are subject to this part shall comply with the provisions of the 2010 Standards applicable to residential facilities, including, but not limited to, the provisions in sections 233 and 809. (1) In sleeping rooms with more than 25 beds covered by this part, a minimum of 5% of the beds shall have clear floor space complying with section 806.2.3 of the 2010 Standards. (2) Facilities with more than 50 beds covered by this part that provide common use bathing facilities shall provide at least one roll-in shower with a seat that complies with the relevant provisions of section 608 of the 2010 Standards. Transfer-type showers are not permitted in lieu of a roll-in shower with a seat, and the exceptions in sections 608.3 and 608.4 for residential dwelling units are not permitted. When separate shower facilities are provided for men and for women, at least one roll-in shower shall be provided for each group.					

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679	**233.3.1 Minimum Number: New Construction.** Newly constructed *facilities* with *residential dwelling units* shall comply with 233.3.1.		***SECTION 1102A BUILDING ACCESSIBILITY 1102A.1 Where required.*** *Buildings or portions of buildings and facilities within the scope of this chapter shall be accessible to persons with disabilities. ... Dwelling units within a single structure separated by firewalls do not constitute separate buildings.* *Newly-constructed covered multifamily dwellings as defined in this chapter, include, but are not limited to, the following:* *1. Apartment buildings with 3 or more dwelling units including timeshare apartments not considered a place of public accommodation or transient lodging as defined in Health and Safety Code Section 19955 (a) and Chapter 2 of the California Building Code.* (Per 1111B.5 Apartment buildings with 1 or more dwelling units....) *2. Condominiums with 4 or more dwelling units including timeshare condominiums not considered a place of public accommodation or transient lodging as defined in Health and Safety Code Section 19955 (a) and Chapter 2 of the California Building Code.* (Per 1111B.5 Condominiums with 1 or more dwelling units....) *3. Lodging houses, as defined in Chapter 2 of the California Building Code, used as a residence with more than 3 but not more than 5 guest rooms.* (Per 1111B.5 Lodging houses with 1 or more guest rooms....) *4. Congregate residences, as defined in Chapter 2 of the California Building Code.* *5. Dwellings with 3 or more efficiency units, as defined in Chapter 2 of this code, or Section 17958.1 of the California Health and Safety Code.* (Per 1111B.5 Dwellings with 1 or more efficiency units....) *6. Shelters for homeless persons, not otherwise subject to the disabled access provisions of the Division of the State Architect–Access Compliance (DSA–AC).* *7. Dormitories, as defined in Chapter 2 of this code, with 3 or more guest rooms as defined in Chapter 2 of the California Building Code.* (Per 1111B.5 Dormitories with 1 or more guest rooms....., except , according to the 2010 ADA, housing at places of education where it is considered	2010 CBC is **equivalent** to 2010 ADA.	Per 1111B.5 publicly funded residential facilities are required to be accessible to persons with disabilities, so this requirement is equivalent. For clarity, Chapter 11B should not refer to Chapter 11A. Chapter 11B should classify which types of housing constitute "publicly funded residential facilities" and also state that such facilities are required to provide the specified mobility and communication features.	1) Chapter 11B should not refer to Chapter 11A. 2) Chapter 11B should define "publicly funded residential facilities" and also state that they are required to comply with the specified requirements for mobility and communication features.
680	**EXCEPTION:** Where *facilities* contain 15 or fewer *residential dwelling units*, the requirements of 233.3.1.1 and 233.3.1.2 shall apply to the total number of *residential dwelling units* that are constructed under a single contract, or are developed as a whole, whether or not located on a common *site*.		***SECTION 1102A BUILDING ACCESSIBILITY 1102A.1*** *... Each building on a building site shall be considered separately when determining the requirements contained in this chapter, except when calculating the number of units which must comply with Section 1102A.3.1. ...*	2010 CBC **does not address** 2010 ADA req.	Per 1111B.5, if a facility contains publicly funded dwelling units, then the scoping provisions apply to 1 or more units instead of the number specified in CBC 1102A.1. Chapter 11A addresses each building separately, but this assessment translates into all ground floor units being adaptable, and not accessible. ADA 233.1 requires 5% of the units to comply with mobility and communication features. This requirement is more stringent than the CBC. Even though this exception actually allows the construction of fewer accesible units when the whole is considered, it is still more stringent than the "adaptable" requirement of the CBC. This exception should be added to the 2010 CBC.	1) Include this exception in the 2010 CBC.

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681	**233.3.1.1 Residential Dwelling Units with Mobility Features.** In *facilities* with *residential dwelling units* , at least 5 percent, but no fewer than one unit, of the total number of *residential dwelling units* shall provide mobility features complying with 809.2 through 809.4 and shall be on an *accessible* route as required by 206.		***SECTION 1104A COVERED MULTIFAMILY DWELLINGS*** ***1104A.1 General.*** *All ground-floor dwelling units in nonelevator buildings shall be adaptable and on an accessible route, unless an accessible route is not required as determined by site impracticality provisions in Section 1150A. For buildings with elevators, see Section 1106A. Multistory dwelling units shall comply with Section 1102A.3.* ***1104A.2 Ground floors above grade.*** *Where the first floor containing dwelling units in a building is above grade, all units on that floor shall be served by an accessible route. This floor will be considered a ground floor and all dwelling units are considered covered multifamily dwelling units.* *...* *Multistory dwelling units shall comply with Section 1102A.3.* ***1102A.3 Multistory dwellings.*** ***1102A.3.1 Multistory apartment or condominium dwellings in buildings with no elevator.*** *This section shall apply to multistory dwelling units on the ground floor of buildings without elevators for which an application for a construction permit is submitted on or after July 1, 2005.* *...* *At least 10 percent but not less than one of the multistory dwellings in apartment buildings with 3 or more dwelling units and/or condominiums with 4 or more dwelling units shall comply with the following: (Per CBC 1111B.5, at least 10 percent but not less than one of the multistory dwellings in apartment buildings with 1 or more dwelling units and/or condominiums with 1 or more dwelling units.....)* *...* *The minimum number of multifamily dwelling units which must comply with this section shall be calculated using the total number of all multistory dwelling units in buildings on a site which are subject to this section. Any fraction thereof*	2010 CBC provides **less access** than 2010 ADA.	2010 CBC Chapter 11A requires all ground floor units to be adaptable and on an accessible route, a requirement that is more stringent than the 2010 ADA. However, depending on how many units are provided in a facility the number of ground floor units may be less than the 5% of total units of the building, and so in this regard the 2010 CBC is less restrictive than the 2010 ADA. Additionally, with regard to specific accessible requirements inside the units, the 2010 ADA is more restrictive for the required 5% (see respective sections on kitchens, bathing faciilties, and accessible routes.) For multistory dwellings, 10% of all multistory units must be adaptable on the ground floor, but the ground floor of these units are not required to provide a sleeping area or a full bathroom, so they are not providing the mobility features as specified in the 2010 ADA . Furthermore, "carriage units" are not considered "covered multifamily dwellings". The 2010 ADA requires 5% of total units to meet the mobility standards. In certain instances, if the facility has few ground floor units, numerous "carriage units" and multistory units, then the minimum number of units providing full mobiliity features can fall below 5%.	1) Specify the requirement in Chapter 11B Publicly Funded Residential Facilities, that all ground floor units shall be adaptable and on an accessible route, and 10% of ground floor units of multistory dwellings shall be adaptable and on an accessible route (as per Chapter 11A). 2) In Chapter 11B, add the provision that a minimum of 5%, or at least one unit, of the total publicly funded residential dwelling units must provide mobility features as specified in the 2010 ADA.

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682	**233.3.1.2 Residential Dwelling Units with Communication Features.** In *facilities* with *residential dwelling units* , at least 2 percent, but no fewer than one unit, of the total number of *residential dwelling units* shall provide communication features complying with 809.5.		**907.5.2.3.3 Groups R-1 and R-2.1.** Group R-1 and R-2.1 dwelling units or sleeping units in accordance with Table 907.5.2.3.3 shall be provided with a visible alarm notification appliance, activated by both the in-room smoke alarm and the building fire alarm system. **907.5.2.3.4 Group R-2.** In Group R-2 occupancies required by Section 907 to have a fire alarm system, all dwelling units and sleeping units shall be provided with the capability to support visible alarm notification appliances in accordance with NFPA 72. **907.5.2.3.5 Groups R-2.1, R-3.1 and R-4.** Protective social care facilities which house persons who are hearing impaired, shall be provided with notification appliances for the hearing impaired installed in accordance with NFPA 72 and which shall activate upon initiation of the fire alarm system or the smoke alarms. **420.4.4 Visible alarms.** In buildings meeting the definition of "COVERED MULTIFAMILY DWELLINGS" in accordance with Chapter 11A and with fuel-burning appliances and/or attached garages as described in Section 420.4.1, all required carbon monoxide alarms shall be provided with the capability to support visible alarm notification appliances in accordance with NFPA 720 and Chapter 11B.	Which Std.provides greater access **depends** on circumstances.	For Group R-1 occupancies (congregate residences with 17 or more occupants), certain R-2.1 occupancies (group homes, halfway houses) that will change from "transient lodging facilities" to "residential dwelling units" the 2010 CBC Table 907.5.2.3.3 is more stringent at greater than 2% units requiring visible alarms to be installed. For Group R-2 occupancies the 2010 CBC requires visible alarm notification appliances to be supported but not installed, therefore 2010 ADA is more stringent. For certain Group R-2.1 Occupancies, R-3.1 Occupancies, and R-4 Occupancies, the 2010 CBC is more stringent because visible alarms are required. With regard to carbon monoxide alarms, the the 2010 CBC requires visible alarm notification appliances to be supported but not installed, therefore 2010 ADA is more stringent.	1) In Chapter 11B, Where the 2010 CBC is less stringent, require that a minimum of 2% of the units, but at least one, in publicly funded residential facilities provide communication features.
683	**233.3.2 Residential Dwelling Units for Sale.** *Residential dwelling units* offered for sale shall provide *accessible* features to the extent required by regulations issued by Federal agencies under the Americans with Disabilities Act or Section 504 of the Rehabilitation Act of 1973, as amended. [See additional requirements at 28 CFR 35.151(k), p. 13.]		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.	This analysis aims to achieve the endeavor of the incorporation of standards that are at least as restrictive as those required by the federal government for barrier-free design in the ADA. Since the applicable requirements of the CBC apply to all newly-constructed or altered publicly funded housing, there is no need to make a distinction of whether or not such units are for sale. However, if including the statement achieves clarity, then it should be included.	1) Recommend including the statement that publicly-funded residential dwelling units offered for sale shall provide accessible features according to the provisions of Chapter 11B Publicly Funded Residential Facilities (revised as recommended through this analysis).

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684	**Advisory 233.3.2 Residential Dwelling Units for Sale.** A public entity that conducts a program to build housing for purchase by individual home buyers must provide access according to the requirements of the ADA regulations and a program receiving Federal financial assistance must comply with the applicable Section 504 regulation.	Note to Reader: The Department of Justice's revised ADA title II regulation (35.151)(j)) requires the following: Facilities with residential dwelling units for sale to individual owners. (1) Residential dwelling units designed and constructed or altered by public entities that will be offered for sale to individuals shall comply with the requirements for residential facilities in the 2010 Standards including sections 233 and 809. (2) The requirements of paragraph (1) also apply to housing programs that are operated by public entities where design and construction of particular residential dwelling units takes place only after a specific buyer has been identified. In such programs, the covered entity must provide the units that comply with the requirements for accessible features to those pre-identified buyers with disabilities who have requested such a unit.				
685	**233.3.3 Additions.** Where an *addition* to an existing *building* results in an increase in the number of *residential dwelling units*, the requirements of 233.3.1 shall apply only to the *residential dwelling units* that are added until the total number of *residential dwelling units* complies with the minimum number required by 233.3.1. *Residential dwelling units* required to comply with 233.3.1.1 shall be on an *accessible* route as required by 206.		**1101A.1 Scope.** **1101A.1.3.** Additions to existing buildings, where the addition alone meets the definition of a covered multifamily dwelling. **1102A.2 Existing buildings.** ... Additions shall be subject to the requirements of this chapter, provided the addition, when considered alone, meets the definition of a covered multifamily dwelling, as defined in this chapter. New common use spaces serving existing covered multifamily dwellings shall be subject to the requirements of this chapter.	2010 CBC provides **less access** than 2010 ADA.	Because the CBC is less restrictive than the ADA in regard to the amount of units required to provide mobility and communication features, it would translate that this provision when applied to additions would translate likewise. Retain this requirement.	1) Specify the requirement in Chapter 11B Publicly Funded Residential Facilities, that all ground floor units that are added shall be adaptable and on an accessible route, and 10% of ground floor units of multistory dwellings that are added shall be adaptable and on an accessible route (as per Chapter 11A). 2) In Chapter 11B, add the provision that a minimum of 5%, or at least one unit, of the total publicly funded residential dwelling units that are added must provide mobility features as specified in the 2010 ADA. 2) Where the 2010 CBC is less stringent, require that a minimum of 2% of the units that are added to publicly funded residential facilities contain communication features.

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686	**233.3.4 Alterations.** *Alterations* shall comply with 233.3.4.		**1102A.2 Existing buildings.** ... Housing which is publicly funded as defined in Chapter 2 of this code is subject to provisions of the Division of the State Architect (DSA–AC). See Section 1111B.5. Note: For all existing public use areas, public accommodations, and housing which is publicly funded, see Chapter 11B, Division IV, Section 1134B, for provisions of the Division of the State Architect – Access Compliance (DSA–AC). **1134B.2 General.** When alterations, structural repairs or additions are made to existing buildings or facilities, they shall comply with all provisions of Division I – New Buildings, except as modified by this division. These requirements shall apply only to the area of specific alteration, structural repair or addition and shall include those areas listed below: **1134B.2.1** A primary entrance to the building or facility and the primary path of travel to the specific area of alteration, structural repair or addition, and sanitary facilities, drinking fountains, signs and public telephones serving the area.	2010 CBC is **equivalent** to 2010 ADA.	While CBC Chapter 1134B does not sufficiently address how residential dwelling units within publicly funded residential facilities should be altered, the requirement that an alteration needs to comply with accessibility requirements exists. Recommend addressing in Chapter 11B Publicly Funded Residential Facilities the requirements for alterations that apply specifically to housing.	1) Recommend addressing in Chapter 11B Publicly Funded Residential Facilities the requirements for alterations that apply specifically to housing.
687	**EXCEPTION:** Where compliance with 809.2, 809.3, or 809.4 is *technically infeasible* , or where it is *technically infeasible* to provide an accessible route to a *residential dwelling unit* , the entity shall be permitted to *alter* or construct a *comparable residential dwelling unit* to comply with 809.2 through 809.4 provided that the minimum number of *residential dwelling units* required by 233.3.1.1 and 233.3.1.2, as applicable, is satisfied.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.	Since this requirement is not addressed in the 2010 CBC, this provision should be included in order for the 2010 CBC to meet the minimum accessibility requirements of the 2010 ADA.	1) Add this requirement to the 2010 CBC for publicly funded residential facilities.
688	**Advisory 233.3.4 Alterations Exception.** A substituted dwelling unit must be comparable to the dwelling unit that is not made accessible. Factors to be considered in comparing one dwelling unit to another should include the number of bedrooms; amenities provided within the dwelling unit; types of common spaces provided within the facility; and location with respect to community resources and services, such as public transportation and civic, recreational, and mercantile facilities.					
689	**233.3.4.1 Alterations to Vacated Buildings.** Where a *building* is vacated for the purposes of *alteration* , and the *altered building* contains more than 15 *residential dwelling units* , at least 5 percent of the *residential dwelling units* shall comply with 809.2 through 809.4 and shall be on an *accessible* route as required by 206. In addition, at least 2 percent of the *residential dwelling units* shall comply with 809.5.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.	The 2010 CBC does not differentiate whether or not a publicly funded alteration occurs to vacated bulidings. Since this requirement is more stringent it should be included in the 2010 CBC.	1) In Chapter 11B, add the provision that a minimum of 5%, or at least one unit, of the total publicly funded residential dwelling units must provide mobility features as specified in the 2010 ADA. 2) Where the 2010 CBC is less stringent, require that a minimum of 2% of the units that are publicly funded residential dwelling units must contain communication features. 3) Require that the units that have mobility and communication features are on an accessible route.
690	**Advisory 233.3.4.1 Alterations to Vacated Buildings.** This provision is intended to apply where a building is vacated with the intent to alter the building. Buildings that are vacated solely for pest control or asbestos removal are not subject to the requirements to provide residential dwelling units with mobility features or communication features.					

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691	**233.3.4.2 Alterations to Individual Residential Dwelling Units.** In individual *residential dwelling units*, where a bathroom or a kitchen is substantially *altered*, and at least one other room is *altered*, the requirements of 233.3.1 shall apply to the *altered residential dwelling units* until the total number of *residential dwelling units* complies with the minimum number required by 233.3.1.1 and 233.3.1.2. *Residential dwelling units* required to comply with 233.3.1.1 shall be on an *accessible* route as required by 206.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.	The 2010 CBC does not address alterations to individual dwelling units in publicly funded residential facilities, but to buildings or complexes as a whole. Since this requirement is more stringent it should be included in the 2010 CBC.	1) In publicly funded residential facilities, add the provision that in individual residential dwelling units, where a bathroom or a kitchen is substantially altered, and at least one other room is altered, mobility features shall apply to the altered residential dwelling units until the total number of residential dwelling units reaches 5%. 2) In publicly funded housing where the 2010 CBC is less stringent, add the provision that in individual residential dwelling units, where a bathroom or a kitchen is substantially altered, and at least one other room is altered, communication features shall apply to the altered residential dwelling units until the total number of residential dwelling units reaches 2%. 3) Require that the units that have mobility and communication features are on an accessible route.
692	**EXCEPTION:** Where facilities contain 15 or fewer *residential dwelling units*, the requirements of 233.3.1.1 and 233.3.1.2 shall apply to the total number of *residential dwelling units* that are *altered* under a single contract, or are developed as a whole, whether or not located on a common *site*.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.	Per 1111B.5, if a facility contains publicly funded dwelling units, then the scoping provisions apply to 1 or more units instead of the number specified in CBC 1102A.1. Chapter 11A addresses each building separately, but this assessment translates into all ground floor units being adaptable, and not accessible. ADA 233.1 requires 5% of the units to comply with mobility and communication features. This requirement is more stringent than the CBC. Even though this exception actually allows the construction of fewer accesible units when the whole is considered, it is still more stringent than the "adaptable" requirement of the CBC. This exception should be added to the 2010 CBC.	1) Include this exception in the 2010 CBC.
693	**Advisory 233.3.4.2 Alterations to Individual Residential Dwelling Units.** Section 233.3.4.2 uses the terms “substantially altered” and “altered.” A substantial alteration to a kitchen or bathroom includes, but is not limited to, alterations that are changes to or rearrangements in the plan configuration, or replacement of cabinetry. Substantial alterations do not include normal maintenance or appliance and fixture replacement, unless such maintenance or replacement requires changes to or rearrangements in the plan configuration, or replacement of cabinetry. The term “alteration” is defined both in Section 106 of these requirements and in the Department of Justice ADA regulations.					
694	**233.3.5 Dispersion.** *Residential dwelling units* required to provide mobility features complying with 809.2 through 809.4 and *residential dwelling units* required to provide communication features complying with 809.5 shall be dispersed among the various types of *residential dwelling units* in the *facility* and shall provide choices of *residential dwelling units* comparable to, and integrated with, those available to other residents.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.	The CBC does not address dispersion in publicly funded housing. Since this requirement is more stringent it should be included in the 2010 CBC.	1) Require that publicly funded residential dwelling units required to provide mobility features and communication features shall be dispersed among the various types of residential dwelling units in the facility and shall provide choices of residential dwelling units comparable to, and integrated with, those available to other residents.

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695	**EXCEPTION:** Where multi-story *residential dwelling units* are one of the types of *residential dwelling units* provided, one-story *residential dwelling units* shall be permitted as a substitute for multi-story *residential dwelling units* where equivalent *spaces* and amenities are provided in the one-story *residential dwelling unit*.	Note to Reader: The Department of Justice's revised ADA title II regulation (35.151(e)) and title III regulation (36.406(d)) require the following: Social service center establishments. Group homes, halfway houses, shelters, or similar social service center establishments that provide either temporary sleeping accommodations or residential dwelling units that are subject to this part [of the title III regulation or to this section of the title II regulation] shall comply with the provisions of the 2010 Standards applicable to residential facilities, including, but not limited to, the provisions in sections 233 and 809. (1) In sleeping rooms with more than 25 beds covered by this part [of the title III regulation or to this section of the title II regulation], a minimum of 5% of the beds shall have clear floor space complying with section 806.2.3 of the 2010 Standards. (2) Facilities with more than 50 beds covered by this part [of the title III regulation or to this section of the title II	There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.	According to this analysis, a multistory unit with adaptable requirements on the ground floor are not as accessible as a unit that provides the required mobility and communication features required by the ADA. This requirement allows a one-story accessible unit to substitute, and should be included in the 2010 CBC.	1) Include this requirement in the 2010 CBC.
696	**234 Amusement Rides**		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
697	**234.1 General.** *Amusement rides* shall comply with 234.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
698	**EXCEPTION:** Mobile or portable *amusement rides* shall not be required to comply with 234.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		

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699	**Advisory 234.1 General.** These requirements apply generally to newly designed and constructed amusement rides and attractions. A custom designed and constructed ride is new upon its first use, which is the first time amusement park patrons take the ride. With respect to amusement rides purchased from other entities, new refers to the first permanent installation of the ride, whether it is used off the shelf or modified before it is installed. Where amusement rides are moved after several seasons to another area of the park or to another park, the ride would not be considered newly designed or newly constructed. Some amusement rides and attractions that have unique designs and features are not addressed by these requirements. In those situations, these requirements are to be applied to the extent possible. An example of an amusement ride not specifically addressed by these requirements includes “virtual reality” rides where the device does not move through a fixed course within a defined area. An accessible route must be provided to these rides. Where an attraction or ride has unique features for which there are no applicable scoping provisions, then a reasonable number, but at least one, of the features must be located on an accessible route. Where there are appropriate technical provisions, they must be applied to the elements that are covered by the scoping provisions.					
700	**Advisory 234.1 General Exception.** Mobile or temporary rides are those set up for short periods of time such as traveling carnivals, State and county fairs, and festivals. The amusement rides that are covered by 234.1 are ones that are not regularly assembled and disassembled.					
701	**234.2 Load and Unload Areas.** Load and unload areas serving *amusement rides* shall comply with 1002.3.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
702	**234.3 Minimum Number.** *Amusement rides* shall provide at least one *wheelchair space* complying with 1002.4, or at least one *amusement ride* seat designed for transfer complying with 1002.5, or at least one *transfer device* complying with 1002.6.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
703	**EXCEPTIONS: 1.** *Amusement rides* that are controlled or operated by the rider shall not be required to comply with 234.3. **2.** *Amusement rides* designed primarily for children, where children are assisted on and off the ride by an adult, shall not be required to comply with 234.3. **3.** *Amusement rides* that do not provide *amusement ride seats* shall not be required to comply with 234.3.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
704	**Advisory 234.3 Minimum Number. Exceptions 1 through 3.** Amusement rides controlled or operated by the rider, designed for children, or rides without ride seats are not required to comply with 234.3. These rides are not exempt from the other provisions in 234 requiring an accessible route to the load and unload areas and to the ride. The exception does not apply to those rides where patrons may cause the ride to make incidental movements, but where the patron otherwise has no control over the ride.					
705	**Advisory 234.3 Minimum Number. Exception 2.** The exception is limited to those rides designed “primarily” for children, where children are assisted on and off the ride by an adult. This exception is limited to those rides designed for children and not for the occasional adult user. An accessible route to and turning space in the load and unload area will provide access for adults and family members assisting children on and off these rides.					
706	**234.4 Existing Amusement Rides.** Where existing *amusement rides* are *altered*, the *alteration* shall comply with 234.4.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
707	**Advisory 234.4 Existing Amusement Rides.** Routine maintenance, painting, and changing of theme boards are examples of activities that do not constitute an alteration subject to this section.					

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
708	**234.4.1 Load and Unload Areas.** Where load and unload areas serving existing *amusement rides* are newly designed and constructed, the load and unload areas shall comply with 1002.3.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
709	**234.4.2 Minimum Number.** Where the structural or operational characteristics of an *amusement ride* are *altered* to the extent that the *amusement ride's* performance differs from that specified by the manufacturer or the original design, the *amusement ride* shall comply with 234.3.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
710	**235 Recreational Boating Facilities**		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
711	**235.1 General.** Recreational boating *facilities* shall comply with 235.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
712	**235.2 Boat Slips.** *Boat slips* complying with 1003.3.1 shall be provided in accordance with Table 235.2. Where the number of *boat slips* is not identified, each 40 feet (12 m) of *boat slip* edge provided along the perimeter of the pier shall be counted as one *boat slip* for the purpose of this section.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
713	**Advisory 235.2 Boat Slips.** The requirement for boat slips also applies to piers where boat slips are not demarcated. For example, a single pier 25 feet (7620 mm) long and 5 feet (1525 mm) wide (the minimum width specified by Section 1003.3) allows boats to moor on three sides. Because the number of boat slips is not demarcated, the total length of boat slip edge (55 feet, 17 m) must be used to determine the number of boat slips provided (two). This number is based on the specification in Section 235.2 that each 40 feet (12 m) of boat slip edge, or fraction thereof, counts as one boat slip. In this example, Table 235.2 would require one boat slip to be accessible.					
714	**235.2.1 Dispersion.** *Boat slips* complying with 1003.3.1 shall be dispersed throughout the various types of *boat slips* provided. Where the minimum number of *boat slips* required to comply with 1003.3.1 has been met, no further dispersion shall be required.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
715	**Advisory 235.2.1 Dispersion.** Types of boat slips are based on the size of the boat slips; whether single berths or double berths, shallow water or deep water, transient or longer-term lease, covered or uncovered; and whether slips are equipped with features such as telephone, water, electricity or cable connections. The term "boat slip" is intended to cover any pier area other than launch ramp boarding piers where recreational boats are moored for purposes of berthing, embarking, or disembarking. For example, a fuel pier may contain boat slips, and this type of short term slip would be included in determining compliance with 235.2.					
716	**235.3 Boarding Piers at Boat Launch Ramps.** Where *boarding piers* are provided at *boat launch ramps*, at least 5 percent, but no fewer than one, of the *boarding piers* shall comply with 1003.3.2.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
717	**236 Exercise Machines and Equipment**		There is no equivalent section in the CBC	2009 CBC **does not address** 2010 ADA req.		

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718	**236.1 General.** At least one of each type of exercise machine and equipment shall comply with 1004.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
719	**Advisory 236.1 General.** Most strength training equipment and machines are considered different types. Where operators provide a biceps curl machine and cable-cross-over machine, both machines are required to meet the provisions in this section, even though an individual may be able to work on their biceps through both types of equipment. Similarly, there are many types of cardiovascular exercise machines, such as stationary bicycles, rowing machines, stair climbers, and treadmills. Each machine provides a cardiovascular exercise and is considered a different type for purposes of these requirements.					
720	**237 Fishing Piers and Platforms**		**1132B.2 Parks and recreational areas**. The following parks and recreational areas shall comply with these regulations. **... 4. Boat docks.** ... fishing piers, ..., shall be accessible.	2010 CBC is **equivalent** to 2010 ADA.	CBC 1132B.2#4 requires fishing piers to be accessible and is under the Section 1132B.2 heading "parks and recreational areas" CBC requires boat docks to be accessible but does not provide additional or different requirements than those found elsewhere so it is assumed that the other requirements of Chapter 11B apply to boat docks.	The CA State Parks Accessibility Guidelines 2009 Edition is the most comparable document to the 2010 ADA Stds. requirements for recreational boating facilities. These guidelines are not enforceable as law. Section 6 is titled "Boating" and 6.I.B requires fishing piers to be accessible and is the most comparable section to 2010 ADA Stds. Section 1005.
721	**237.1 General.** Fishing piers and platforms shall comply with 1005.		**1132B.2 Parks and recreational areas**. The following parks and recreational areas shall comply with these regulations. **... 4. Boat docks.** Boat docks, fishing piers, etc., shall be accessible.		CBC 1132B.2#4 requires fishing piers to be accessible and is under the Section 1132B.2 heading "parks and recreational areas" CBC requires boat docks to be accessible but does not provide additional or different requirements than those found elsewhere so it is assumed that the other requirements of Chapter 11B apply to boat docks.	The CA State Parks Accessibility Guidelines 2009 Edition is the most comparable document to the 2010 ADA Stds. requirements for recreational boating facilities. These guidelines are not enforceable as law. Section 6 is titled "Boating" and 6.I.B requires fishing piers to be accessible and is the most comparable section to 2010 ADA Stds. Section 1005.
722	**238 Golf Facilities**		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
723	**238.1 General.** Golf *facilities* shall comply with 238.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
724	**238.2 Golf Courses.** Golf courses shall comply with 238.2.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
725	**238.2.1 Teeing Grounds.** Where one *teeing ground* is provided for a hole, the *teeing ground* shall be designed and constructed so that a golf car can enter and exit the *teeing ground*. Where two *teeing grounds* are provided for a hole, the forward *teeing ground* shall be designed and constructed so that a golf car can enter and exit the *teeing ground*. Where three or more *teeing grounds* are provided for a hole, at least two *teeing grounds*, including the forward *teeing ground*, shall be designed and constructed so that a golf car can enter and exit each *teeing ground*.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
726	**EXCEPTION:** In existing golf courses, the forward *teeing ground* shall not be required to be one of the *teeing grounds* on a hole designed and constructed so that a golf car can enter and exit the *teeing ground* where compliance is not feasible due to terrain.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
727	**238.2.2 Putting Greens.** Putting greens shall be designed and constructed so that a golf car can enter and exit the putting green.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
728	**238.2.3 Weather Shelters.** Where provided, weather shelters shall be designed and constructed so that a golf car can enter and exit the weather shelter and shall comply with 1006.4.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
729	**238.3 Practice Putting Greens, Practice Teeing Grounds, and Teeing Stations at Driving Ranges.** At least 5 percent, but no fewer than one, of practice putting greens, practice *teeing grounds* , and teeing stations at driving ranges shall be designed and constructed so that a golf car can enter and exit the practice putting greens, practice *teeing grounds* , and teeing stations at driving ranges.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
730	**239 Miniature Golf Facilities**		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CBC 1132B Outdoor Occupancies is the most comparable section to 2010 ADA Stds. 1007 but makes no mention of miniature golf courses.	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
731	**239.1 General.** Miniature golf *facilities* shall comply with 239.		NA	NA	NA	NA
732	**239.2 Minimum Number.** At least 50 percent of holes on miniatures golf courses shall comply with 1007.3.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	The CA State Parks Accessibility Guidelines 2009 Edition is the most comparable document to the 2010 ADA Stds. requirements for recreational boating facilities. These guidelines are not enforceable as law. Section 6 is titled "Boating" and is the most comparable section to 2010 ADA Stds. Section 240.	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
733	**Advisory 239.2 Minimum Number.** Where possible, providing access to all holes on a miniature golf course is recommended. If a course is designed with the minimum 50 percent accessible holes, designers or operators are encouraged to select holes which provide for an equivalent experience to the maximum extent possible.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.II.A requires all newly constructed play areas designed for children ages 2 and over or altered portions of existing play areas to be accessible. There is no requirement that where separate play areas are provided within a site for specific age groups that each play area shall comply.	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
734	**239.3 Miniature Golf Course Configuration.** Miniature golf courses shall be configured so that the holes complying with 1007.3 are consecutive. Miniature golf courses shall provide an *accessible* route from the last hole complying with 1007.3 to the course *entrance* or exit without requiring travel through any other holes on the course.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	1. CA State Parks Accessibility Guidelines Section 27.II.A.1 requires that "where play components are relocated in existing play areas for the purpose of creating safe use zones or where play components are altered and the ground surface is not altered, the ground surface inside the play area shall not be required to be modified for accessibility", similar to 2010 ADA Stds. 240.1 Exceptions 2 & 4. 2010 ADA Stds. 240.1 Exception 1 also adds "or extended for more than one use zone" to Exception 2. 2. There is no exception similar to 2010 ADA Stds. 240.1 Exceptions 1 or 3.	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
735	**EXCEPTION:** One break in the sequence of consecutive holes shall be permitted provided that the last hole on the miniature golf course is the last hole in the sequence.		NA	NA	NA	NA
736	**Advisory 239.3 Miniature Golf Course Configuration.** Where only the minimum 50 percent of the holes are accessible, an accessible route from the last accessible hole to the course exit or entrance must not require travel back through other holes. In some cases, this may require an additional accessible route. Other options include increasing the number of accessible holes in a way that limits the distance needed to connect the last accessible hole with the course exit or entrance.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines do not include any requirements for additions to play areas.	Incorporate the 2010 ADA Standards definitions, requirements and exceptions.
737	**240 Play Areas**		NA	NA	NA	NA
738	**240.1 General.** *Play areas* for children ages 2 and over shall comply with 240. Where separate *play areas* are provided within a *site* for specific age groups, each *play area* shall comply with 240.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	1. CA State Parks Accessibility Guidelines Section 27.VIII.A requires that "where ground level play components are provided, at least one of each type provided shall be located on an accessible route." Section 27.VIII.B additionally requires that "where elevated play components are provided, ground level play components shall be provided in accordance with the chart on the following page", which is identical to 2010 ADA Standards Table 240.2.1.2.	Incorporate the 2010 ADA Standards definitions, requirements and exceptions.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
739	**EXCEPTIONS: 1.** *Play areas* located in family child care *facilities* where the proprietor actually resides shall not be required to comply with 240. **2.** In existing *play areas,* where *play components* are relocated for the purposes of creating safe *use zones* and the ground surface is not *altered* or extended for more than one *use zone* , the *play area* shall not be required to comply with 240. **3.** *Amusement attractions* shall not be required to comply with 240. **4.** Where *play components* are *altered* and the ground surface is not *altered* , the ground surface shall not be required to comply with 1008.2.6 unless required by 202.4.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	1. CA State Parks Accessibility Guidelines Section 27.VIII.A requires that "where ground level play components are provided, at least one of each type provided shall be located on an accessible route." 2. Section 27.VIII.B additionally requires that "where elevated play components are provided, ground level play components shall be provided in accordance with the chart on the following page", which is identical to 2010 ADA Standards Table 240.2.1.2. 3. Section 27.VIII.C additionally requires "when more than one ground level play component is required on an accessible route, they shall be integrated in the play area. Grouping all accessible ground level components in one location does not constitute integration."	Incorporate the 2010 ADA Standards definitions, requirements and exceptions.
740	**Advisory 240.1 General.** Play areas may be located on exterior sites or within a building. Where separate play areas are provided within a site for children in specified age groups (e.g., preschool (ages 2 to 5) and school age (ages 5 to 12)), each play area must comply with this section. Where play areas are provided for the same age group on a site but are geographically separated (e.g., one is located next to a picnic area and another is located next to a softball field), they are considered separate play areas and each play area must comply with this section.		NA	NA	NA	NA
741	**240.1.1 Additions.** Where *play areas* are designed and constructed in phases, the requirements of 240 shall apply to each successive *addition* so that when the *addition* is completed, the entire *play area* complies with all the applicable requirements of 240.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.VIII.A requires that "where ground level play components are provided, at least one of each type provided shall be located on an accessible route."	Incorporate the 2010 ADA Standards definitions, requirements and exceptions.
742	**Advisory 240.1.1 Additions.** These requirements are to be applied so that when each successive addition is completed, the entire play area complies with all applicable provisions. For example, a play area is built in two phases. In the first phase, there are 10 elevated play components and 10 elevated play components are added in the second phase for a total of 20 elevated play components in the play area. When the first phase was completed, at least 5 elevated play components, including at least 3 different types, were to be provided on an accessible route. When the second phase is completed, at least 10 elevated play components must be located on an accessible route, and at least 7 ground level play components, including 4 different types, must be provided on an accessible route. At the time the second phase is complete, ramps must be used to connect at least 5 of the elevated play components and transfer systems are permitted to be used to connect the rest of the elevated play components required to be located on an accessible route.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.VIII.B requires that "where elevated play components are provided, ground level play components shall be provided in accordance with the chart on the following page", which is identical to 2010 ADA Standards Table 240.2.1.2.	Incorporate the 2010 ADA Standards definitions, requirements and exceptions.
743	**240.2 Play Components.** Where provided, *play components* shall comply with 240.2.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines does not include a similar exception.	Incorporate the 2010 ADA Standards definitions, requirements and exceptions.
744	**240.2.1 Ground Level Play Components.** *Ground level play components* shall be provided in the number and types required by 240.2.1. *Ground level play components* that are provided to comply with 240.2.1.1 shall be permitted to satisfy the additional number required by 240.2.1.2 if the minimum required types of *play components* are satisfied. Where two or more required *ground level play components* are provided, they shall be dispersed throughout the *play area* and integrated with other *play components* .		NA	NA	NA	NA

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745	**Advisory 240.2.1 Ground Level Play Components.** Examples of ground level play components may include spring rockers, swings, diggers, and stand-alone slides. When distinguishing between the different types of ground level play components, consider the general experience provided by the play component. Examples of different types of experiences include, but are not limited to, rocking, swinging, climbing, spinning, and sliding. A spiral slide may provide a slightly different experience from a straight slide, but sliding is the general experience and therefore a spiral slide is not considered a different type of play component from a straight slide. Ground level play components accessed by children with disabilities must be integrated into the play area. Designers should consider the optimal layout of ground level play components accessed by children with disabilities to foster interaction and socialization among all children. Grouping all ground level play components accessed by children with disabilities in one location is not considered integrated. Where a stand-alone slide is provided, an accessible route must connect the base of the stairs at the entry point to the exit point of the slide. A ramp or transfer system to the top of the slide is not required. Where a sand box is provided, an accessible route must connect to the border of the sand box. Accessibility to the sand box would be enhanced by providing a transfer system into the sand or by providing a raised sand table with knee clearance complying with 1008.4.3. Ramps are preferred over transfer systems since not all children who use wheelchairs or other mobility devices may be able to use, or may choose not to use, transfer systems. Where ramps connect elevated play components, the maximum rise of any ramp run is limited to 12 inches (305 mm). Where possible, designers and operators are encouraged to provide ramps with a slope less than the 1:12 maximum. Berms or sculpted dirt may be used to provide elevation and may be part of an accessible route to composite play structures. Platform lifts are permitted as a part of an accessible route. Because lifts must be independently operable, operators should carefully consider the appropriateness of their use in unsupervised settings.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.VIII.C requires "when more than one ground level play component is required on an accessible route, they shall be integrated in the play area. Grouping all accessible ground level components in one location does not constitute integration."	Incorporate the 2010 ADA Standards definitions, requirements and exceptions.
746	**240.2.1.1 Minimum Number and Types.** Where *ground level play components* are provided, at least one of each type shall be on an *accessible* route and shall comply with 1008.4.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.VIII.A requires that "where ground level play components are provided, at least one of each type provided shall be located on an accessible route."	Incorporate the 2010 ADA Standards definitions, requirements and exceptions.
747	**240.2.1.2 Additional Number and Types.** Where *elevated play components* are provided, *ground level play components* shall be provided in accordance with Table 240.2.1.2 and shall comply with 1008.4.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.VIII.B requires that "where elevated play components are provided, ground level play components shall be provided in accordance with the chart on the following page", which is identical to 2010 ADA Standards Table 240.2.1.2.	Incorporate the 2010 ADA Standards definitions, requirements and exceptions.
748	**EXCEPTION:** If at least 50 percent of the *elevated play components* are connected by a *ramp* and at least 3 of the *elevated play components* connected by the *ramp* are different types of *play components* , the *play area* shall not be required to comply with 240.2.1.2.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines does not include a similar exception.	Incorporate the 2010 ADA Standards definitions, requirements and exceptions.
749	**Advisory 240.2.1.2 Additional Number and Types.** Where a large play area includes two or more composite play structures designed for the same age group, the total number of elevated play components on all the composite play structures must be added to determine the additional number and types of ground level play components that must be provided on an accessible route.		NA	NA	NA	NA
750	**240.2.2 Elevated Play Components.** Where *elevated play components* are provided, at least 50 percent shall be on an *accessible* route and shall comply with 1008.4.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.VIII.C requires "when more than one ground level play component is required on an accessible route, they shall be integrated in the play area. Grouping all accessible ground level components in one location does not constitute integration."	Incorporate the 2010 ADA Standards definitions, requirements and exceptions.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
751	**Advisory 240.2.2 Elevated Play Components.** A double or triple slide that is part of a composite play structure is one elevated play component. For purposes of this section, ramps, transfer systems, steps, decks, and roofs are not considered elevated play components. Although socialization and pretend play can occur on these elements, they are not primarily intended for play. Some play components that are attached to a composite play structure can be approached or exited at the ground level or above grade from a platform or deck. For example, a climber attached to a composite play structure can be approached or exited at the ground level or above grade from a platform or deck on a composite play structure. Play components that are attached to a composite play structure and can be approached from a platform or deck (e.g., climbers and overhead play components) are considered elevated play components. These play components are not considered ground level play components and do not count toward the requirements in 240.2.1.2 regarding the number of ground level play components that must be located on an accessible route.		NA	NA NA		NA
752	**241 Saunas and Steam Rooms**		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
753	**241 General.** Where provided, saunas and steam rooms shall comply with 612.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
754	**EXCEPTION:** Where saunas or steam rooms are clustered at a single location, no more than 5 percent of the saunas and steam rooms, but no fewer than one, of each type in each cluster shall be required to comply with 612.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
755	**242 Swimming Pools, Wading Pools, and Spas**		... 4. Swimming pool ... …	2010 CBC **does not address** 2010 ADA req.	CBC addresses pools only as a misc category under sports	Provide a new section addressing swimming pools, wading pools, and spas
756	**242.1 General.** Swimming pools, wading pools, and spas shall comply with 242.		... 4. Swimming pool	2010 CBC **does not address** 2010 ADA req.	CBC does not address wading pools or spas	
757	**242.2 Swimming Pools.** At least two *accessible* means of entry shall be provided for swimming pools. *Accessible* means of entry shall be swimming pool lifts complying with 1009.2; sloped entries complying with 1009.3; transfer walls complying with 1009.4; transfer systems complying with 1009.5; and pool stairs complying with 1009.6. At least one *accessible* means of entry provided shall comply with 1009.2 or 1009.3.		... 4. Swimming pool ..., and a mechanism to assist persons with disabilities in gaining entry into the pool and in exiting from the pool shall be provided. Such a mechanism may consist of a swimming pool lift device that meets all of the following criteria: ...	2010 CBC provides **less access** than 2010 ADA.	CBC only provides for one means of entry CBC only addresses lift mechanisms for pool entry	Adopt ADA language for swimming pool access
758	**EXCEPTIONS: 1.** Where a swimming pool has less than 300 linear feet (91 m) of swimming pool wall, no more than one *accessible* means of entry shall be required provided that the *accessible* means of entry is a swimming pool lift complying with 1009.2 or sloped entry complying with 1009.3. **2.** Wave action pools, leisure rivers, sand bottom pools, and other pools where user access is limited to one area shall not be required to provide more than one *accessible* means of entry provided that the *accessible* means of entry is a swimming pool lift complying with 1009.2, a sloped entry complying with 1009.3, or a transfer system complying with 1009.5. **3.** *Catch pools* shall not be required to provide an *accessible* means of entry provided that the catch *pool edge* is on an *accessible* route.		... 4. Swimming pool ..., and a mechanism to assist persons with disabilities in gaining entry into the pool and in exiting from the pool shall be provided. Such a mechanism may consist of a swimming pool lift device that meets all of the following criteria: ...	2010 CBC **does not address** 2010 ADA req.	CBC does not address smaller swimming pools CBC does not address wave action pools, leisure rivers, sand bottom pools, or where access is limited to one area CBC does not address catch pools although CBC does address that the deck areas in general should be accessible	Adopt ADA language for the various types of pool exceptions shown in the ADA

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
759	**Advisory 242.2 Swimming Pools.** Where more than one means of access is provided into the water, it is recommended that the means be different. Providing different means of access will better serve the varying needs of people with disabilities in getting into and out of a swimming pool. It is also recommended that where two or more means of access are provided, they not be provided in the same location in the pool. Different locations will provide increased options for entry and exit, especially in larger pools.		NA			
760	**Advisory 242.2 Swimming Pools. Exception 1.** Pool walls at diving areas and areas along pool walls where there is no pool entry because of landscaping or adjacent structures are to be counted when determining the number of accessible means of entry required.		NA		the ADA provides a clarification for calculating small vs large pools which should also be adopted	
761	**242.3 Wading Pools.** At least one *accessible* means of entry shall be provided for wading pools. *Accessible* means of entry shall comply with sloped entries complying with 1009.3.		**...** 4. Swimming pool ...: …	2010 CBC **does not address** 2010 ADA req.	CBC does not address wading pools	Adopt the language for wading pools from ADA
762	**242.4 Spas.** At least one *accessible* means of entry shall be provided for spas. *Accessible* means of entry shall comply with swimming pool lifts complying with 1009.2; transfer walls complying with 1009.4; or transfer systems complying with 1009.5.		... 4. Swimming pool …	2010 CBC **does not address** 2010 ADA req.	CBC does not address spas	Adopt the language for spas from ADA
763	**EXCEPTION:** Where spas are provided in a cluster, no more than 5 percent, but no fewer than one, spa in each cluster shall be required to comply with 242.4.		NA	2010 CBC **does not address** 2010 ADA req.	CBC does not address spas	Adopt the exception for clustered spas from ADA
764	**243 Shooting Facilities with Firing Positions**		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
765	**243.1 General.** Where shooting *facilities* with firing positions are designed and constructed at a site, at least 5 percent, but no fewer than one, of each type of firing position shall comply with 1010.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		
766	**CHAPTER 3: BUILDING BLOCKS**		NA	NA	NA	NA
767	**301 General**		**1101B.1 General.** **...**	2010 CBC is **equivalent** to 2010 ADA.	In 2010 CBC, requirements for building blocks ae located in different sections of Chapter 11B rather than being grouped into one section.	
768	**301.1 Scope.** The provisions of Chapter 3 shall apply where required by Chapter 2 or where referenced by a requirement in this document.		**1101B.1 General.** **1. Buildings or facilities or portions of buildings shall be accessible to persons with disabilities as required by this chapter.** **...**	2010 CBC is **equivalent** to 2010 ADA.	Corresponding CBC requirements are found in 1103B.1(Building Accessibility-Scope), 1118B(Space Allowance and Reach Ranges), 1114B.1.2Accessible route of travel), 1133B.8.6(Protruding objects), 1120B.2(Floor surface)and 1124B(Ground and Floor Surfaces), and 1117B.6(Controls and operating mechanisms). Any differences in scoping and specific technical requirements are discussed on other lines herein. Both standards state that the technical standards shall apply per the provided scoping language.	
769	**302 Floor or Ground Surfaces**		**SECTION 1124B** **GROUND AND FLOOR SURFACES**	2010 CBC is **equivalent** to 2010 ADA.		
770	**302.1 General.** Floor and ground surfaces shall be stable, firm, and slip resistant and shall comply with 302.		**1124B.1 General.** Ground and floor surfaces along accessible routes and in accessible rooms and spaces, including floors, walks, ramps, stairs and curb ramps, shall be stable, firm, slip resistant and shall comply with this section. **...**	2010 CBC is **equivalent** to 2010 ADA.		

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771	**302.1 EXCEPTIONS: 1.** Within animal containment areas, floor and ground surfaces shall not be required to be stable, firm, and slip resistant. **2.** *Areas of sport activity* shall not be required to comply with 302.			Which Std.provides greater access **depends** on circumstances.	The 2010 ADA Stds. Do not define "animal containment areas", so it is difficult to say if one standard provides greater access than the other. An animal containment area could be anything from a kennel to a corral to a zoo habitat. While the 2010 ADA Stds. clearly do not required these areas to comply with 302, it may be that there are facilities that qualify as animal containment areas that are also not covered by Chapter 11B of the CBC, simply because of their nature. It seems implausible that the CBC intends for all kennels, corrals, and zoo habitats to be paved, but the absense of any language speaking to the matter makes the issue a difficult one to argue.	1) Adopt the 2010 ADA Stds. language. 2) Maintain silence on the matter. 3) Fashion new language for the CBC that addresses the matter.
771.1	**302.1 EXCEPTIONS: ...** **2.** *Areas of sport activity* shall not be required to comply with 302.		**1104B.1 General.** All Group A occupancies shall be accessible as provided in this chapter. See also the general requirements in Section 1114B.1.1. **1104B.4 Stadiums, grandstands, bleachers, athletic pavilions, gymnasiums and miscellaneous sport-related facilities.** **1104B.4.3 Participation areas.** Participation areas shall be accessible to persons with disabilities, including the following listed and similar activity areas: **1.** Tennis, racquetball and handball courts. **2.** Gymnasium floor areas and general exercise rooms. **3.** Basketball, volleyball and badminton courts, and bowling lanes. **4.** Swimming pool deck areas shall be accessible, and a mechanism to assist persons with disabilities in gaining entry into the pool and in exiting from the pool shall be provided. ... **5.** Athletic team rooms and facilities, playing fields and running tracks. **...**	Which Std.provides greater access **depends** on circumstances.	*Area of sport activity* is defined in the 2010 ADA Stds.; the 2010 CBC does not define "participation areas". As such, it is difficult to say whether or not the two are speaking to the same subject. Clearly many of the activiy areas listed under 1104B.4.3 as being required to be accessible qualify as *areas of sport activity* . In requiring them to be accessible, 1104B.4.3 appears to require them to comply with the ground and floor surface requirements of 1124B. It is not clear, however, whether or not unlisted or dissimilar participation areas such as raised boxing or wrestling rings, or raised diving boards and diving platforms, which are specifically exempted from being on an accessible route in 203 of the ADA Stds. are required be accessible per 1104B.4.3, and therefore required to comply with 1124B. 1104B.4.3 mentions volleyball and badminton courts. Are beach vollleyball and grass badminton courts required to comply? By their nature, beach volleyball courts are unfirm and unstable, and grass is generally considerd to not comply with 1124B.1. It appears as though the CBC provides greater access because it specifically requires the listed and similar activity areas to be accessible. But in doing so, it may result in the prohibition of some sports due to the inability to make their surfaces accessible. 302.1(2) specifically excludes areas of sport activity from complying with ground and floor surface requirements, and therefore, might seem to offer a lesser degree of access. But most of the 1104B.4.3 activity areas will, by their nature, meet those requirements. 302.1(2), while perhaps providing less accessibility, acknowledges that many sport activities occur on surfaces that cannot comply with 302, and in doing so, does not create requirements that could result in the prohibition of those activities.	1) Adopt the 2010 ADA Stds. language. 2) Maintain the current CBC language. 3) Maintain the current CBC language, but define key terms, and/or offer exceptions.
772	**Advisory 302.1 General.** A stable surface is one that remains unchanged by contaminants or applied force, so that when the contaminant or force is removed, the surface returns to its original condition. A firm surface resists deformation by either indentations or particles moving on its surface. A slip-resistant surface provides sufficient frictional counterforce to the forces exerted in walking to permit safe ambulation.			NA	The terms stable, firm, and slip-resistant are not defined in the CBC. Advisory notes, unless specifically stated otherwise, explain or illustrate the rule, they do not establish enforceable requirements. See 35.151 (d) & 36.406 (b).	

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773	**302.2 Carpet.** Carpet or carpet tile shall be securely attached and shall have a firm cushion, pad, or backing or no cushion or pad. Carpet or carpet tile shall have a level loop, textured loop, level cut pile, or level cut/uncut pile texture. Pile height shall be ½ inch (13 mm) maximum. Exposed edges of carpet shall be fastened to floor surfaces and shall have trim on the entire length of the exposed edge. Carpet edge trim shall comply with 303.		**SECTION 1124B** **GROUND AND FLOOR SURFACES** **...** **1124B.3 Carpet.** If carpet or carpet tile is used on a ground or floor surface, then it shall be securely attached; have a firm cushion, pad or backing or no cushion or pad; and have a level loop, textured loop, level-cut pile or level-cut/uncut pile texture. The maximum pile height shall be ½ inch (12.7 mm). See Figure 11B-7E(b). Exposed edges of carpet shall be fastened to floor surfaces and have trim along the entire length of the exposed edge. Carpet edge trim shall comply with Section 1124B.2. **...**	2010 CBC is **equivalent** to 2010 ADA.	Both the 2010 ADA Stds and the CBC specify a maximum carpet pile height of 1/2"; however, the CBC uses the more precise measurement 12.7 mm, whereas the ADA Stds round the metric measurement up to 13 mm. This measurements are essentially equivalent.	
774	**Advisory 302.2 Carpet.** Carpets and permanently affixed mats can significantly increase the amount of force (roll resistance) needed to propel a wheelchair over a surface. The firmer the carpeting and backing, the lower the roll resistance. A pile thickness up to ½ inch (13 mm) (measured to the backing, cushion, or pad) is allowed, although a lower pile provides easier wheelchair maneuvering. If a backing, cushion or pad is used, it must be firm. Preferably, carpet pad should not be used because the soft padding increases roll resistance.			NA	There is no equivalent language in the CBC. Advisory notes, unless specifically stated otherwise, explain or illustrate the rule, they do not establish enforceable requirements. See 35.151 (d) & 36.406 (b).	
775	**302.3 Openings.** Openings in floor or ground surfaces shall not allow passage of a sphere more than ½ inch (13 mm) diameter except as allowed in 407.4.3, 409.4.3, 410.4, 810.5.3 and 810.10. …		**SECTION 1124B** **GROUND AND FLOOR SURFACES** **...** **1124B.4 Gratings.** If gratings are located in walking surfaces, then they shall have spaces no greater than ½ inch (12.7 mm) wide in one direction (see Figure 11B-7E). …	2010 CBC provides **less access** than 2010 ADA.	The 1124B.4 term "gratings" limits application of the 1/2" maximum space (as might be found at a joint between sections of sidewalk, or at separations along an accessible route where dissimilar materials meet), whereas "openings" per 302.3 does not. The CBC offers similar exceptions for elevator hoistways (1116B.1.2), platform lift sills , rail station platforms (1121B.3.1 #9), and track crossings (1121B.3.1 #13).	1) Adopt the 2010 ADA language. 2) Modify the CBC language so that it applies to openings other than those found in gratings.
776	**302.3 Openings.** ... Elongated openings shall be placed so that the long dimension is perpendicular to the dominant direction of travel.		**SECTION 1124B** **GROUND AND FLOOR SURFACES** **...** If gratings have elongated openings, then they shall be placed so that the long dimension is perpendicular to the dominant direction of travel (see Figure 11B-7E).	2010 CBC provides **less access** than 2010 ADA.	1124B.4 limits the application of the standard to "gratings"; 302.3 does not.	1.) Adopt the 2010 ADA language. 2.) Modify the CBC language so that it applies to openings other than those found in gratings.
777	**303 Changes in Level**		**SECTION 1124B** **GROUND AND FLOOR SURFACES** **...**	2010 CBC is **equivalent** to 2010 ADA.		
778	**303.1 General.** Where changes in level are permitted in floor or ground surfaces, they shall comply with 303.		**SECTION 1124B** **GROUND AND FLOOR SURFACES** **1124B.1 General.** Ground and floor surfaces along accessible routes and in accessible rooms and spaces, including floors, walks, ramps, stairs and curb ramps, shall be stable, firm, slip resistant and shall comply with this section. **1124B.2 Changes in level.** ...	2010 CBC provides **less access** than 2010 ADA.	303 applies only where changes in level are permitted. They are not permitted, for instance, in required turning spaces (304.2) or in clear floor or ground spaces (305.2). The 2010 CBC includes no similar restrictions.	1) Add language to 1118B.4 and 1118B.3 that prohibits changes in level from occurring within the required clear floor or ground spaces and turning spaces, respectively. 2) Add language to 1124B that prohibits changes in level from occurring within the required clear floor or ground spaces and turning spaces. 3) Do not modify the CBC to prohibit changes in level from occurring within required clear floor or ground space and turning spaces. Such language could have significant consequences: for instance, an otherwise compliant carpet transition strip would create a noncompliant condition if located within the required clear floor space of an element.

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779	**303.1 General.** Where changes in level are permitted in floor or ground surfaces, they shall comply with 303.		**SECTION 1124B** **GROUND AND FLOOR SURFACES** **1124B.1 General.** Ground and floor surfaces along accessible routes and in accessible rooms and spaces, including floors, walks, ramps, stairs and curb ramps, shall be stable, firm, slip resistant and shall comply with this section. **1124B.2 Changes in level.** ...	2010 CBC provides **less access** than 2010 ADA.	303 applies only where changes in level are permitted. They are not permitted, for instance, in required turning spaces (304.2) or in clear floor or ground spaces (305.2). The 2010 CBC includes no similar restrictions.	1) Add language to 1118B.4 and 1118B.3 that prohibits changes in level from occurring within the required clear floor or ground spaces and turning spaces, respectively. 2) Add language to 1124B that prohibits changes in level from occurring within the required clear floor or ground spaces and turning spaces. 3) Do not modify the CBC to prohibit changes in level from occurring within required clear floor or ground space and turning spaces. Such language could have significant consequences: for instance, an otherwise compliant carpet transition strip would create a noncompliant condition if located within the required clear floor space of an element.
780	**303.1 EXCEPTIONS: 1.** Animal containment areas shall not be required to comply with 303. **2.** *Areas of sport activity* shall not be required to comply with 303.			Which Std.provides greater access **depends** on circumstances.	The 2010 ADA Stds. Do not define "animal containment areas", so it is difficult to say if one standard provides greater access than the other. An animal containment area could be anything from a kennel to a corral to a zoo habitat. While the 2010 ADA Stds. clearly do not required these areas to comply with 302, it may be that there are facilities that qualify as animal containment areas that are also not covered by Chapter 11B of the CBC, simply because of their nature.	1) Adopt the 2010 ADA Stds. language. 2) Maintain silence on the matter. 3) Fashion new language for the CBC that addresses the matter.
780.1	**303.1 EXCEPTIONS: ...** **2.** *Areas of sport activity* shall not be required to comply with 303.		**1104B.1 General.** All Group A occupancies shall be accessible as provided in this chapter. See also the general requirements in Section 1114B.1.1. **1104B.4 Stadiums, grandstands, bleachers, athletic pavilions, gymnasiums and miscellaneous sport-related facilities.** **1104B.4.3 Participation areas.** Participation areas shall be accessible to persons with disabilities, including the following listed and similar activity areas: **1.** Tennis, racquetball and handball courts. **2.** Gymnasium floor areas and general exercise rooms. **3.** Basketball, volleyball and badminton courts, and bowling lanes. **4.** Swimming pool deck areas shall be accessible, and a mechanism to assist persons with disabilities in gaining entry into the pool and in exiting from the pool shall be provided. ... **5.** Athletic team rooms and facilities, playing fields and running tracks. **...**	Which Std.provides greater access **depends** on circumstances.	*Area of sport activity* is defined in the 2010 ADA Stds.; the 2010 CBC does not define "participation areas". As such, it is difficult to say whether or not the two are speaking to the same subject. Clearly many of the activiy areas listed under 1104B.4.3 as being required to be accessible qualify as *areas of sport activity* . In requiring them to be accessible, 1104B.4.3 appears to require them to comply with the ground and floor surface requirements of 1124B. It is not clear, however, whether or not unlisted or dissimilar participation areas such as raised boxing or wrestling rings, or raised diving boards and diving platforms, which are specifically exempted from being on an accessible route in 203 of the ADA Stds. are required be accessible per 1104B.4.3, and therefore required to comply with 1124B. It appears as though the CBC provides greater access because it specifically requires the listed and similar activity areas to be accessible. But in doing so, it may result in the prohibition of some sports due to the inability to make their surfaces accessible. 302.1(2) specifically excludes areas of sport activity from complying with ground and floor surface requirements, and therefore, might seem to offer a lesser degree of access. But most of the 1104B.4.3 activity areas will, by their nature, meet those requirements. 302.1(2), while perhaps providing less accessibility, acknowledges that many sport activities occur on surfaces that cannot comply with 302, and in doing so, does not create requirements that could result in the prohibition of those activities.	1) Adopt the 2010 ADA Stds. language. 2) Maintain the current CBC language. 3) Maintain the current CBC language, but define key terms, and/or offer exceptions.

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781	**303.2 Vertical.** Changes in level of ¼ inch (6.4 mm) high maximum shall be permitted to be vertical.		**SECTION 1124B** **GROUND AND FLOOR SURFACES** **...** **1124B.2 Changes in level.** Changes in level up to ¼ inch (6.4 mm) may be vertical and without edge treatment [see Figure 11B-5E(c)]. ... **1133B.2.4.1 Thresholds.** The floor or landing shall not be more than ½ inch (12.7 mm) lower than the threshold of the doorway. Change in level between ¼ inch (6 mm) and ½ inch (12.7 mm) shall be beveled with a slope no greater than one unit vertical in 2 units horizontal (50-percent slope). Change in level greater than ½ inch (12.7 mm) shall be accomplished by means of a ramp. See Section 1133B.5.1. **SECTION 1133B** **GENERAL ACCESSIBILITY FOR ENTRANCES, EXITS AND PATHS OF TRAVEL** **1133B.7 Walks and Sidewalks.** **1133B.7.1 Continuous surface.** Walks and sidewalks subject to these regulations shall have a continuous common surface, not interrupted by steps or by abrupt changes in level exceeding ½ inch (12.7 mm) (see Section 1133B.7.4), ... **1133B.7.4 Changes in level.** Changes in level shall comply with Section 1124B.2.	2010 CBC is **equivalent** to 2010 ADA.		
782	**303.3 Beveled.** Changes in level between ¼ inch (6.4 mm) high minimum and ½ inch (13 mm) high maximum shall be beveled with a slope not steeper than 1:2.		**SECTION 1124B** **GROUND AND FLOOR SURFACES** ... **1124B.2 Changes in level.** ... Changes in level between ¼ inch (6.4 mm) and ½ inch (12.7 mm) shall be beveled with a slope no greater than one unit vertical in 2 units horizontal (50-percent slope) [see Figure 11B-5E(d)]. ... **1133B.2.4.1 Thresholds.** The floor or landing shall not be more than ½ inch (12.7 mm) lower than the threshold of the doorway. Change in level between ¼ inch (6 mm) and ½ inch (12.7 mm) shall be beveled with a slope no greater than one unit vertical in 2 units horizontal (50-percent slope). Change in level greater than ½ inch (12.7 mm) shall be accomplished by means of a ramp. See Section 1133B.5.1. **SECTION 1133B** **GENERAL ACCESSIBILITY FOR ENTRANCES, EXITS AND PATHS OF TRAVEL** **1133B.7 Walks and Sidewalks.** **1133B.7.1 Continuous surface.** Walks and sidewalks subject to these regulations shall have a continuous common surface, not interrupted by steps or by abrupt changes in level exceeding ½ inch (12.7 mm) (see Section 1133B.7.4), ... **1133B.7.4 Changes in level.** Changes in level shall comply with Section 1124B.2.	Which Std.provides greater access **depends** on circumstances.	The language of the two standards is essentially the same, however the referenced figures are different. Figure 303.3 illustrates a 1/4" maximum high beveled section on top of a 1/4" high vertical rise. Figure 11B-5E (d) shows that when the rise is > 1/4", the entire change in level must be beveled at a slope no greater than 1:2. Figure 11B-5E(d) is stricter than 303.3, but, as stated on the CBC figures "THESE DIAGRAMS ILLUSTRATE THE SPECIFIC REQUIREMENTS OF THESE REGULATIONS AND ARE INTENDED ONLY AS AN AID FOR BUILDING DESIGN AND CONSTRUCTION". This is generally taken to mean that the figures are illustrative but not enforcable (by themselves). As such, whether 11B-5E(d) or 303.3 is correct is left up to each building official to decide.	1) Adopt 2010 ADA Stds. Figure 303.3. 2) Keep CBC Figure 11B-5E(d) as-is. Add language to the standard that clarifies that if the change in level is > 1/4" in height, the entire rise must be sloped no greater than 1:2.

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783	**Advisory 303.3 Beveled.** A change in level of ½ inch (13 mm) is permitted to be ¼ inch (6.4 mm) vertical plus ¼ inch (6.4 mm) beveled. However, in no case may the combined change in level exceed ½ inch (13 mm). …		**SECTION 1124B** **GROUND AND FLOOR SURFACES** ... **1124B.2 Changes in level.** ... Changes in level between ¼ inch (6.4 mm) and ½ inch (12.7 mm) shall be beveled with a slope no greater than one unit vertical in 2 units horizontal (50-percent slope) [see Figure 11B-5E(d)]. ... **1133B.2.4.1 Thresholds.** The floor or landing shall not be more than ½ inch (12.7 mm) lower than the threshold of the doorway. Change in level between ¼ inch (6 mm) and ½ inch (12.7 mm) shall be beveled with a slope no greater than one unit vertical in 2 units horizontal (50-percent slope). Change in level greater than ½ inch (12.7 mm) shall be accomplished by means of a ramp. See Section 1133B.5.1. **SECTION 1133B** **GENERAL ACCESSIBILITY FOR ENTRANCES, EXITS AND PATHS OF TRAVEL** **1133B.7 Walks and Sidewalks.** **1133B.7.1 Continuous surface.** Walks and sidewalks subject to these regulations shall have a continuous common surface, not interrupted by steps or by abrupt changes in level exceeding ½ inch (12.7 mm) (see Section 1133B.7.4), ... **1133B.7.4 Changes in level.** Changes in level shall comply with Section 1124B.2.	Which Std.provides greater access **depends** on circumstances.	The advisory states what is illustrated in Figure 303.3. Figure 303.3 illustrates a 1/4" maximum high beveled section on top of a 1/4" high vertical rise. Figure 11B-5E (d) shows that when the rise is > 1/4", the entire change in level must be beveled at a slope no greater than 1:2. Figure 11B-5E(d) is stricter than 303.3, but, as stated on the CBC figures "THESE DIAGRAMS ILLUSTRATE THE SPECIFIC REQUIREMENTS OF THESE REGULATIONS AND ARE INTENDED ONLY AS AN AID FOR BUILDING DESIGN AND CONSTRUCTION". This is generally taken to mean that the figures are illustrative but not enforcable (by themselves). The text of the two standards are essentially the same. As such, whether 11B-5E(d) or 303.3 is correct is left up to each building official to decide.	1) Adopt 2010 ADA Stds. Figure 303.3. 2) Keep CBC Figure 11B-5E(d) as-is. Add language to the standard that clarifies that if the change in level is > 1/4" in height, the entire rise must be sloped no greater than 1:2.
784	**Advisory 303.3 Beveled.** ... Changes in level exceeding ½ inch (13 mm) must comply with 405 (Ramps) or 406 (Curb Ramps).		**SECTION 1124B** **GROUND AND FLOOR SURFACES** ... **1124B.2 Changes in level....** Changes in level greater than ½ inch (12.7 mm) shall be accomplished by means of a curb ramp, ramp, elevator or platform lift that complies with Sections 1127B.5, 1133B.5, 1116B.1 or 1116B.2, respectively. **...** **1133B.2.4.1 Thresholds.** The floor or landing shall not be more than ½ inch (12.7 mm) lower than the threshold of the doorway. Change in level between ¼ inch (6 mm) and ½ inch (12.7 mm) shall be beveled with a slope no greater than one unit vertical in 2 units horizontal (50-percent slope). Change in level greater than ½ inch (12.7 mm) shall be accomplished by means of a ramp. See Section 1133B.5.1. **SECTION 1133B** **GENERAL ACCESSIBILITY FOR ENTRANCES, EXITS AND PATHS OF TRAVEL** **1133B.7 Walks and Sidewalks.** **1133B.7.1 Continuous surface.** Walks and sidewalks subject to these regulations shall have a continuous common surface, not interrupted by steps or by abrupt changes in level exceeding ½ inch (12.7 mm) (see Section 1133B.7.4),... **1133B.7.4 Changes in level.** Changes in level shall comply with Section 1124B.2.	2010 CBC is **equivalent** to 2010 ADA.	The Advisory 303.3 language is essentially the same as that found in 1124B.2; the difference is the advisory is not enforcable, and 1124B.2 is. This would mean that the CBC is stricter, except that the same language is also included in 303.4, which is enforcable.	

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785	**303.4 Ramps.** Changes in level greater than ½ inch (13 mm) high shall be *ramped* , and shall comply with 405 or 406.		**SECTION 1124B** **GROUND AND FLOOR SURFACES** ... **1124B.2 Changes in level.** ... Changes in level greater than ½ inch (12.7 mm) shall be accomplished by means of a curb ramp, ramp, elevator or platform lift that complies with Sections 1127B.5, 1133B.5, 1116B.1 or 1116B.2, respectively. **...** **1133B.2.4.1 Thresholds.** The floor or landing shall not be more than ½ inch (12.7 mm) lower than the threshold of the doorway. Change in level between ¼ inch (6 mm) and ½ inch (12.7 mm) shall be beveled with a slope no greater than one unit vertical in 2 units horizontal (50-percent slope). Change in level greater than ½ inch (12.7 mm) shall be accomplished by means of a ramp. See Section 1133B.5.1. **SECTION 1133B** **GENERAL ACCESSIBILITY FOR ENTRANCES, EXITS AND PATHS OF TRAVEL** **1133B.7 Walks and Sidewalks.** **1133B.7.1 Continuous surface.** Walks and sidewalks subject to these regulations shall have a continuous common surface, not interrupted by steps or by abrupt changes in level exceeding ½ inch (12.7 mm) (see Section 1133B.7.4), ... **1133B.7.4 Changes in level.** Changes in level shall comply with Section 1124B.2.	2010 CBC is **equivalent** to 2010 ADA.	There are differences in the referenced sections of each o fthese standards, but the bottom line for each is the same: rises > 1/2" in height must meet the requirements for ramps (or be accomplished via a lift of some sort).	
786	**304 Turning Space**		**1118B.3 Wheelchair turning space.** …	2010 CBC is **equivalent** to 2010 ADA.		

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787	**304.1 General.** Turning *space* shall comply with 304.		**1118B.3 Wheelchair turning space.** The space required for a wheelchair to make a 180-degree turn is a clear space of 60 inches (1524 mm) diameter [see Figure 11B-12(a)] or a T-shaped space. See Figure 11B-12(b). **1109B.4 Patient bedroom areas.** Accessible patient bedrooms shall comply with the following requirements: **1.** Each bedroom shall have a turning space measuring 60 inches (1524 mm) clear in diameter, or that is a T-shaped space complying with Figure 11B-12. ... **1115B.1 General.** Bathing and toilet facilities that serve buildings, facilities or portions of buildings or facilities that are required by these standards to be accessible to persons with disabilities, shall be on an accessible route and shall conform to the following requirements. ... An unobstructed turning space complying with Section 1115B.3.1, Item 1, or 1115B.3.2, Item 1, as applicable, shall be provided within an accessible toilet facility. ... **1115B.3 Toilet facilities.** **1115B.3.1 Multiple-accommodation toilet facilities.** Multiple-accommodation toilet facilities shall have the following: **1. Wheelchair clearance.** A clear space measured from the floor to a height of 27 inches (686 mm) above the floor, within the sanitary facility room, of sufficient size to inscribe a circle with a diameter not less than 60 inches (1524 mm) in size. ... **1115B.3.2 Single-accommodation toilet facilities.** Single-accommodation toilet facilities shall have the following: **1. Wheelchair clearance.** ... There shall be in the room a clear floor space of at least 60 inches (1524 mm) in diameter, or a T-shaped space complying with Figure 11B-12 (a) and (b). ...	Which Std.provides greater access **depends** on circumstances.	The sizes and configurations of the circular and T-shaped turning spaces are the same in each of the standards, but there are other aspects that are different. 1) 304.2 does not permit changes in level to occur within the turning space; no similar prohibition exists within any of the relevant CBC sections. 2) 304.2 Exception does not permit slopes steeper than 1:48 within the turning space. The CBC does not state this explicitly, but because the turning space is part of a required accessible route, it must meet cross slope requirements (1133B.7.1.3 via 1114B.1.2). Since one travels in multiple directions within a turning space, the maximum allowed cross slope requirement of 1:50 applies across the entirety of the sapce. One could argue that the CBC 1:50 is more restrictive than the ADA 1:48, and therefore provides greater access, but the difference in the two standards is quite minor. The ADA requirement recognizes that elements are commonly constructed in terms of inches, not percentages, and it allows for cross slopes of up to 1/4" per foot. While it is perhaps less restrictive, 1:48 recognizes and allows for common construction industry practice without significantly impacting accessibility. 3) 1118B.3 does not contain language describing the required or allowed height of the turning space. One must therefore conclude that the turning space is not allowed to be reduced in height (below 80" AFF per 1133B.8.6.2). 4) 1109B.4 does not contain language describing the required or allowed height of the turning space. One must therefore conclude that the turning space is not allowed to be reduced in height (below 80" AFF per 1133B.8.6.2). 5) 1115B.3.1 #1 allows the turning space to be reduced to a height of 27" in multiple-accommodation toilet rooms. 1115B.3.1 #1 does not specify whether or not the turning space may be 27" high over its entire surface (which seems impractical), or if there are limitations on this reduced-height space. 304.3.1 permits the space to include knee and toe clearance complying with 306, which essentially means that it may be reduced to as low as 9" in height for a depth of 6", and 27" for an additional depth of 19" (25" overall). 6) 1115B.3.2 #1 does not contain language describing the	1) This issue is discussed on line 788 below. 2) This issue is discussed on line 789 below. 3) This issue is discussed on lines 792 and 793 below. 4) This issue is discussed on lines 792 and 793 below. 5) This issue is discussed on lines 792 and 793 below. 6) This issue is discussed on lines 792 and 793 below.

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788	**304.2 Floor or Ground Surfaces.** Floor or ground surfaces of a turning *space* shall comply with 302. Changes in level are not permitted.		**1118B.3 Wheelchair turning space.** The space required for a wheelchair to make a 180-degree turn is a clear space of 60 inches (1524 mm) diameter [see Figure 11B-12(a)] or a T-shaped space. See Figure 11B-12(b). **1109B.4 Patient bedroom areas.** Accessible patient bedrooms shall comply with the following requirements: **1.** Each bedroom shall have a turning space measuring 60 inches (1524 mm) clear in diameter, or that is a T-shaped space complying with Figure 11B-12. ... **1115B.1 General.** Bathing and toilet facilities that serve buildings, facilities or portions of buildings or facilities that are required by these standards to be accessible to persons with disabilities, shall be on an accessible route and shall conform to the following requirements. ... An unobstructed turning space complying with Section 1115B.3.1, Item 1, or 1115B.3.2, Item 1, as applicable, shall be provided within an accessible toilet facility. ... **1115B.3 Toilet facilities.** **1115B.3.1 Multiple-accommodation toilet facilities.** Multiple-accommodation toilet facilities shall have the following: **1. Wheelchair clearance.** A clear space measured from the floor to a height of 27 inches (686 mm) above the floor, within the sanitary facility room, of sufficient size to inscribe a circle with a diameter not less than 60 inches (1524 mm) in size. ... **1115B.3.2 Single-accommodation toilet facilities.** Single-accommodation toilet facilities shall have the following: **1. Wheelchair clearance.** ... There shall be in the room a clear floor space of at least 60 inches (1524 mm) in diameter, or a T-shaped space complying with Figure 11B-12 (a) and (b). ... **1124B.1 General.** Ground and floor surfaces along accessible routes and in accessible rooms and spaces	2010 CBC provides **less access** than 2010 ADA.	304.2 does not permit changes in level to occur within the turning space*; no similar prohibition exists within any of the relevant CBC sections. *Advisory 304.2 appears to say that changes in level are permitted as long as they comply with 303, but, by its nature, an advisory is not enforceable. It seems wholly unnecessary to say on the one hand that changes in level are not permitted, and then on the other to say that they actually are - that 304.2 intended to say that noncompliant changes in level are not permitted. It certainly is confusing - especially given that an advisory is not enforceable. Regardless of what the advisory says, one must hold that 304.2 prohibits changes in level of any kind from occurring within required turning spaces.	1) Add language to the relevant CBC sections that prohibits changes in level from occurring within required turning spaces. 2) Do not prohibit changes in level from occurring within turning spaces.

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789	**EXCEPTION:** Slopes not steeper than 1:48 shall be permitted.		**1118B.3 Wheelchair turning space.** The space required for a wheelchair to make a 180-degree turn is a clear space of 60 inches (1524 mm) diameter [see Figure 11B-12(a)] or a T-shaped space. See Figure 11B-12(b). **1109B.4 Patient bedroom areas.** Accessible patient bedrooms shall comply with the following requirements: **1.** Each bedroom shall have a turning space measuring 60 inches (1524 mm) clear in diameter, or that is a T-shaped space complying with Figure 11B-12. ... **1115B.1 General.** Bathing and toilet facilities that serve buildings, facilities or portions of buildings or facilities that are required by these standards to be accessible to persons with disabilities, shall be on an accessible route and shall conform to the following requirements. ... An unobstructed turning space complying with Section 1115B.3.1, Item 1, or 1115B.3.2, Item 1, as applicable, shall be provided within an accessible toilet facility. ... **1115B.3 Toilet facilities.** **1115B.3.1 Multiple-accommodation toilet facilities.** Multiple-accommodation toilet facilities shall have the following: **1. Wheelchair clearance.** A clear space measured from the floor to a height of 27 inches (686 mm) above the floor, within the sanitary facility room, of sufficient size to inscribe a circle with a diameter not less than 60 inches (1524 mm) in size. .... **1115B.3.2 Single-accommodation toilet facilities.** Single-accommodation toilet facilities shall have the following: **1. Wheelchair clearance.** ... There shall be in the room a clear floor space of at least 60 inches (1524 mm) in diameter, or a T-shaped space complying with Figure 11B-12 (a) and (b). .... **1133B.7 Walks and Sidewalks.** ...	2010 CBC provides **less access** than 2010 ADA.	304.2 Exception does not permit slopes steeper than 1:48 within the turning space. The CBC does not state this explicitly, but because the turning space is part of a required accessible route, it must meet cross slope requirements (1133B.7.1.3 via 1114B.1.2). Since one travels in multiple directions within a turning space, the maximum allowed cross slope requirement of 1:50 applies across the entirety of the sapce. 1) Having to utilize 1133B.7, which is titled Walks and Sidewalks, and is only reachable for this purpose through 1114B.1.2, is extremely cumbersome. It would be much better if this viatlly important requirement was clearly stated in a more direct fashion. 2) One could argue that the CBC 1:50 is more restrictive than the ADA 1:48, and therefore provides greater access, but the difference in the two standards is quite minor. The ADA requirement recognizes that elements are commonly constructed in terms of inches, not percentages, and it allows for cross slopes of up to 1/4" per foot. While it is perhaps less restrictive, 1:48 recognizes and allows for common construction industry practice without significantly impacting accessibility.	1a) Add language to 1118B.3 that clarifies that required turning spaces may slope no greater than 2% (= 1:50) or 2.08% (= 1:48 = 1/4"/ft). 1b) Maintain the current circuitous route. 2a) Maintain the current language of 1133B.7.1.3, which calls for maximum cross slopes of 1:50. 2b) Modify 1133B.7.1.3 to agree with 403.3 by calling for maximum cross slopes of 1:48.
790	**Advisory 304.2 Floor or Ground Surface Exception.** As used in this section, the phrase “changes in level” refers to surfaces with slopes and to surfaces with abrupt rise exceeding that permitted in Section 303.3. Such changes in level are prohibited in required clear floor and ground spaces, turning spaces, and in similar spaces where people using wheelchairs and other mobility devices must park their mobility aids such as in wheelchair spaces, or maneuver to use elements such as at doors, fixtures, and telephones. The exception permits slopes not steeper than 1:48.			NA	There is no similar language in the CBC. Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b) Advisory 304.2 appears to say that changes in level are permitted as long as they comply with 303, but, by its nature, an advisory is not enforceable. It seems wholly unnecessary to say on the one hand that changes in level are not permitted, and then on the other to say that they actually are - that 304.2 intended to say that noncompliant changes in level are not permitted. It certainly is confusing - especially given that an advisory is not enforceable. Regardless of what the advisory says, one must hold that 304.2 prohibits changes in level of any kind from occurring within required turning spaces.	

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791	**304.3 Size.** Turning *space* shall comply with 304.3.1 or 304.3.2.		**1118B.3 Wheelchair turning space.** The space required for a wheelchair to make a 180-degree turn is a clear space of 60 inches (1524 mm) diameter [see Figure 11B-12(a)] or a T-shaped space. See Figure 11B-12(b). **1109B.4 Patient bedroom areas.** Accessible patient bedrooms shall comply with the following requirements: **1.** Each bedroom shall have a turning space measuring 60 inches (1524 mm) clear in diameter, or that is a T-shaped space complying with Figure 11B-12. ... **1115B.1 General.** Bathing and toilet facilities that serve buildings, facilities or portions of buildings or facilities that are required by these standards to be accessible to persons with disabilities, shall be on an accessible route and shall conform to the following requirements. ... An unobstructed turning space complying with Section 1115B.3.1, Item 1, or 1115B.3.2, Item 1, as applicable, shall be provided within an accessible toilet facility. ... **1115B.3 Toilet facilities.** **1115B.3.1 Multiple-accommodation toilet facilities.** Multiple-accommodation toilet facilities shall have the following: **1. Wheelchair clearance.** A clear space measured from the floor to a height of 27 inches (686 mm) above the floor, within the sanitary facility room, of sufficient size to inscribe a circle with a diameter not less than 60 inches (1524 mm) in size. ... **1115B.3.2 Single-accommodation toilet facilities.** Single-accommodation toilet facilities shall have the following: **1. Wheelchair clearance.** ... There shall be in the room a clear floor space of at least 60 inches (1524 mm) in diameter, or a T-shaped space complying with Figure 11B-12 (a) and (b). ...	Which Std.provides greater access **depends** on circumstances.	The sizes and configurations of the circular and T-shaped turning spaces are the same in each of the standards, but the prescribed minimum heights are different. 1) 1118B.3 does not contain language describing the required or allowed height of the turning space. One must therefore conclude that the turning space is not allowed to be reduced in height (below 80" AFF per 1133B.8.6.2). 2) 1109B.4 does not contain language describing the required or allowed height of the turning space. One must therefore conclude that the turning space is not allowed to be reduced in height (below 80" AFF per 1133B.8.6.2). 3) 1115B.3.1 #1 allows the turning space to be reduced to a height of 27" in multiple-accommodation toilet rooms. 1115B.3.1 #1 does not specify whether or not the turning space may be 27" high over its entire surface (which seems impractical), or if there are limitations on this reduced-height space. 304.3.1 permits the space to include knee and toe clearance complying with 306, which essentially means that it may be reduced to as low as 9" in height for a depth of 6", and 27" for an additional depth of 19" (25" overall). 4) 1115B.3.2 #1 does not contain language describing the required or allowed height of the turning space. It isn't clear wheter or not this is intentional or an oversight. The lack of language similar to that in 1115B.3.1 #1, however, requires one to conclude that the turning space is not allowed to be reduced similarly in height (below 80" AFF per 1133B.8.6.2).	These issues are discussed on lines 792 and 793 below.

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792	**304.3.1 Circular Space.** The turning space shall be a *space* of 60 inches (1525 mm) diameter minimum. The *space* shall be permitted to include knee and toe clearance complying with 306.		**1118B.3 Wheelchair turning space.** The space required for a wheelchair to make a 180-degree turn is a clear space of 60 inches (1524 mm) diameter [see Figure 11B-12(a)] ... **1109B.4 Patient bedroom areas.** Accessible patient bedrooms shall comply with the following requirements: **1.** Each bedroom shall have a turning space measuring 60 inches (1524 mm) clear in diameter, ... **1115B.1 General.** Bathing and toilet facilities that serve buildings, facilities or portions of buildings or facilities that are required by these standards to be accessible to persons with disabilities, shall be on an accessible route and shall conform to the following requirements. ... An unobstructed turning space complying with Section 1115B.3.1, Item 1, ..., as applicable, shall be provided within an accessible toilet facility. ... **1115B.3 Toilet facilities.** **1115B.3.1 Multiple-accommodation toilet facilities.** Multiple-accommodation toilet facilities shall have the following: **1. Wheelchair clearance.** A clear space measured from the floor to a height of 27 inches (686 mm) above the floor, within the sanitary facility room, of sufficient size to inscribe a circle with a diameter not less than 60 inches (1524 mm) in size. ... **1115B.3.2 Single-accommodation toilet facilities.** Single-accommodation toilet facilities shall have the following: **1. Wheelchair clearance.** ... There shall be in the room a clear floor space of at least 60 inches (1524 mm) in diameter, or a T-shaped space complying with Figure 11B-12 (a) and (b). ...	2010 CBC provides **greater access** than 2010 ADA.	The sizes and configurations of the circular and T-shaped turning spaces are the same in each of the standards, but the prescribed minimum heights are different. 1) 1118B.3 does not contain language describing the required or allowed height of the turning space. One must therefore conclude that the turning space is not allowed to be reduced in height (below 80" AFF per 1133B.8.6.2). The CBC provides greater access. 2) 1109B.4 does not contain language describing the required or allowed height of the turning space. One must therefore conclude that the turning space is not allowed to be reduced in height (below 80" AFF per 1133B.8.6.2). The CBC provides greater access. 3) 1115B.3.1 #1 allows the turning space to be reduced to a height of 27" in multiple-accommodation toilet rooms. 1115B.3.1 #1 does not specify whether or not the turning space may be 27" high over its entire surface (which seems impractical), or if there are limitations on this reduced-height space. 304.3.1 permits the space to include knee and toe clearance complying with 306, which essentially means that it may be reduced to as low as 9" in height for a depth of 6", and 27" for an additional depth of 19" (25" overall). Since 1115B.3.1 #1 does not prescribe a maximum depth for the height reduction, the CBC provides lesser access. 4) 1115B.3.2 #1 does not contain language describing the required or allowed height of the turning space. It isn't clear wheter or not this is intentional or an oversight. The lack of language similar to that in 1115B.3.1 #1, however, requires one to conclude that the turning space is not allowed to be reduced similarly in height (below 80" AFF per 1133B.8.6.2). The CBC provides greater access.	1a) Adopt the ADA language for knee/toe space as it pertains to the extension of the turning space under objects. 1b) Do not permit turning spaces to be reduced in height in general. Leave the CBC language as it is. 2a) Adopt the ADA language for knee/toe space as it pertains to the extension of the turning space under objects. 2b) Do not permit turning spaces to be reduced in height in this specific case. Leave the CBC language as it is. 3a) Adopt the ADA language for knee/toe space as it pertains to the extension of the turning space under objects. 3b) Leave the CBC language as it is. 3c) Modify the CBC language so that it expresses the maximum depth to which the circle may be reduced to a height of 27". 4a) Adopt the ADA language for knee/toe space as it pertains to the extension of the turning space under objects. 4b) Do not permit turning spaces to be reduced in height in this specific case. Leave the CBC language as it is. 4c) Clarify that turning spaces in single-accommodation toilet facilities may be reduced in height, and express the constraints of the reduction.

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793	**304.3.2 T-Shaped Space.** The turning *space* shall be a T-shaped *space* within a 60 inch (1525 mm) square minimum with arms and base 36 inches (915 mm) wide minimum. Each arm of the T shall be clear of obstructions 12 inches (305 mm) minimum in each direction and the base shall be clear of obstructions 24 inches (610 mm) minimum. The *space* shall be permitted to include knee and toe clearance complying with 306 only at the end of either the base or one arm.		**1118B.3 Wheelchair turning space.** The space required for a wheelchair to make a 180-degree turn is ...] or a T-shaped space. See Figure 11B-12(b). **1109B.4 Patient bedroom areas.** Accessible patient bedrooms shall comply with the following requirements: **1.** Each bedroom shall have a turning space ... that is a T-shaped space complying with Figure 11B-12. ... **1115B.1 General.** Bathing and toilet facilities that serve buildings, facilities or portions of buildings or facilities that are required by these standards to be accessible to persons with disabilities, shall be on an accessible route and shall conform to the following requirements. ... An unobstructed turning space complying with Section 1115B.3.1, Item 1, or 1115B.3.2, Item 1, as applicable, shall be provided within an accessible toilet facility. ... **1115B.3 Toilet facilities.** **1115B.3.1 Multiple-accommodation toilet facilities.** Multiple-accommodation toilet facilities shall have the following: **1. Wheelchair clearance.** A clear space measured from the floor to a height of 27 inches (686 mm) above the floor, within the sanitary facility room, of sufficient size to inscribe a circle with a diameter not less than 60 inches (1524 mm) in size. ... **1115B.3.2 Single-accommodation toilet facilities.** Single-accommodation toilet facilities shall have the following: **1. Wheelchair clearance.** ... There shall be in the room ... a T-shaped space complying with Figure 11B-12 (a) and (b). ...	2010 CBC provides **greater access** than 2010 ADA.	The sizes and configurations of the circular and T-shaped turning spaces are the same in each of the standards, but the prescribed minimum heights are different. 1) 1118B.3 does not contain language describing the required or allowed height of the turning space. One must therefore conclude that the turning space is not allowed to be reduced in height (below 80" AFF per 1133B.8.6.2). The CBC provides greater access. 2) 1109B.4 does not contain language describing the required or allowed height of the turning space. One must therefore conclude that the turning space is not allowed to be reduced in height (below 80" AFF per 1133B.8.6.2). The CBC provides greater access. 3) 1115B.3.1 #1 does not mention a T-shaped turning space, which must mean that only a turning circle will suffice in multi-accommodation toilet rooms. 4) 1115B.3.2 #1 does not contain language describing the required or allowed height of the turning space. It isn't clear wheter or not this is intentional or an oversight. The lack of language similar to that in 1115B.3.1 #1, however, requires one to conclude that the turning space is not allowed to be reduced similarly in height (below 80" AFF per 1133B.8.6.2). The CBC provides greater access.	1a) Adopt the ADA language for knee/toe space as it pertains to the extension of the clear floor space under objects. 1b) Do not permit turning spaces to be reduced in height in general. Leave the CBC language as it is. 2a) Adopt the ADA language for knee/toe space as it pertains to the extension of the clear floor space under objects. 2b) Do not permit turning spaces to be reduced in height in this specific case. Leave the CBC language as it is. 3) No action required. 4a) Adopt the ADA language for knee/toe space as it pertains to the extension of the clear floor space under objects. 4b) Do not permit turning spaces to be reduced in height in this specific case. Leave the CBC language as it is. 4c) Clarify that turning spaces in single-accommodation toilet facilities may be reduced in height, and express the constraints of the reduction.

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794	**304.4 Door Swing.** Doors shall be permitted to swing into turning *spaces* .		**1118B.3 Wheelchair turning space.** The space required for a wheelchair to make a 180-degree turn is a clear space of 60 inches (1524 mm) diameter [see Figure 11B-12(a)] or a T-shaped space. See Figure 11B-12(b). **1109B.4 Patient bedroom areas.** Accessible patient bedrooms shall comply with the following requirements: **1.** Each bedroom shall have a turning space measuring 60 inches (1524 mm) clear in diameter, or that is a T-shaped space complying with Figure 11B-12. ... **1115B.1 General.** Bathing and toilet facilities that serve buildings, facilities or portions of buildings or facilities that are required by these standards to be accessible to persons with disabilities, shall be on an accessible route and shall conform to the following requirements. ... An unobstructed turning space complying with Section 1115B.3.1, Item 1, or 1115B.3.2, Item 1, as applicable, shall be provided within an accessible toilet facility. ... **1115B.3 Toilet facilities.** **1115B.3.1 Multiple-accommodation toilet facilities.** Multiple-accommodation toilet facilities shall have the following: **1. Wheelchair clearance.** ... Other than the door to the accessible water closet compartment, a door, in any position, may encroach into this space by not more than 12 inches (305 mm). **1115B.3.2 Single-accommodation toilet facilities.** Single-accommodation toilet facilities shall have the following: **1. Wheelchair clearance.** ... No door shall encroach into this space for more than 12 inches (305 mm). See Figure 11B-1A.		304.4 allows door to swing into turning spaces. 1) 1118B.3 does not contain language regarding door swings over turning spaces. It is not clear, therefore, whether or not doors are allowed to swing into turning spaces in general. 2) 1109B.4 does not contain language regarding door swings over turning spaces. It is not clear, therefore, whether or not doors are allowed to swing into turning spaces in patient bedroom areas. 3) 1115B.3.1 #1 does not permit any door other than the accessible stall door to swing more than 12" into the turning space. The CBC provides greatr access. 4) 1115B.3.2 #1 does not permit any door to swing more than 12" into the turning space. The CBC provides greater access.	1a) Modify 1118B.3 to include the ADA language allowing for doors to swing across turning spaces. 1b) Modify 1118B.3 to clarify whether or not doors may swing across turning spaces in general. 1c) Leave 1118B.3 as-is. 2a) Modify 1109B.4 to include the ADA language allowing for doors to swing across turning spaces. 2b) Modify 1109B.4 to clarify whether or not doors may swing across turning spaces in patient bedrooms. 2c) Leave 1109B.4 as-is. 3a) Modify 1115B.3.1 #1 to include the ADA language allowing for doors to swing across turning spaces without limitation. 3b) Leave 1115B.3.1 #1 as-is. 4a) Modify 1115B.3.2 #1 to include the ADA language allowing for doors to swing across turning spaces without limitation. 4b) Leave 1115B.3.2 #1 as-is.
795	**305 Clear Floor or Ground Space**		**1118B.4 Clear floor or ground space for wheelchairs.** …	2010 CBC is **equivalent** to 2010 ADA.		

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
796	**305.1 General.** Clear floor or ground *space* shall comply with 305.		**1118B.4 Clear floor or ground space for wheelchairs.** ... **1115B.4.2 Accessible urinals.** Urinals required to be accessible shall comply with this subsection. **....** This clear space shall comply with Section 1118B.4. **1115B.4.3 Accessible lavatories.** Lavatories required to be accessible shall comply with this subsection. The requirements of this subsection shall apply to lavatory fixtures, vanities and built-in lavatories. **3.** A clear floor space ... complying with Section 1118B.4 shall be provided ... **1115B.8 Accessories.** **1115B.8.2 Medicine cabinets.** ... A clear floor space ... complying with Section 1118B.4 shall be provided ... **1117B.1 Accessible drinking fountains.** Where drinking fountains are provided, they shall comply with this section: **2. Clearances.** ... A clear floor space ... complying with Section 1118B.4 shall be provided ... **1117B.2 Telephones.** **1117B.2.1 General.** If public pay telephones, public closed-circuit telephones or other public telephones are provided, they shall comply with this section... **1117B.2.2 Clear floor or ground space.** A clear floor or ground space ... that allows either a forward or parallel approach by a person using a wheelchair shall be provided at telephones. **...** **1117B.6 Controls and operating mechanisms.** **2. Clear floor space.** Clear floor space complying with Section 1118B.4 ... shall be provided at controls, dispensers, receptacles and other operable equipment. **1117B.7 Automated teller machines and point of sale**	Which Std.provides greater access **depends** on circumstances.	The sizes and configurations of the wheelchair clear floor spaces are the same in each of the standards, but they differ in other aspects. 1) 305.2 does not permit changes in level to occur within the turning space; no similar prohibition exists within any of the relevant CBC sections. The CBC provides less access than the ADA Stds. 2) 305.2 Exception does not permit slopes steeper than 1:48 within the turning space. The CBC does not state slope requirements explicitly, but because clear floor spaces are part of a required accessible route, they must meet cross slope and slope requirements (1133B.7.1.3 and 1133B.5 via 1114B.1.2 and). This means cross slopes up to 2% (1:50), and slopes up to 5% (8.33% if ramp requirements are met) are allowed within required clear floor spaces. The CBC provides less access than the ADA Stds. 3) With respect to cross slope, one could argue that the CBC 1:50 is more restrictive than the ADA 1:48, and therefore provides greater access, but the difference in the two standards is quite minor. The ADA requirement recognizes that elements are commonly constructed in terms of inches, not percentages, and it allows for cross slopes of up to 1/4" per foot. While it is perhaps less restrictive, 1:48 recognizes and allows for common construction industry practice without significantly impacting accessibility. 4) 305.4 allows, unless noted otherwise, the specified clear floor or ground space to include knee and toe clearance complying with 306. 1118B.4 states that clear or ground spaces may be part of the knee space required under some objects. No otherwise elements were found in the ADA Stds., and the CBC does not provide a list of the "some". 5) The minimum knee space configuration noted in 1118B.4 is relative; it is dependent on the knee space requirements of specific elements, whereas 305 defines it clearly, and applies it ubiquitously. Under tables, for instance, the CBC would allow the clear floor space (considered to extend under the table) to be reduced to no less than 27" high, but under lavatories, it could be reduced to as little as 9" high for a maximum depth of 6" (for toe space). The ADA allows the clear floor space height to be	1) This issue is discussed on line 797 below. 2) This issue is discussed on line 798 below. 3) This issue is discussed on line 798 below. 4) This issue is discussed on line 800 below. 5) This issue is discussed on line 800 below.
797	**305.2 Floor or Ground Surfaces.** Floor or ground surfaces of a clear floor or ground *space* shall comply with 302. Changes in level are not permitted.		**1118B.4 Clear floor or ground space for wheelchairs.** ... **3. Surfaces for wheelchair spaces.** Clear floor or ground spaces for wheelchairs shall comply with Section 1124B Ground and Floor Surfaces. **SECTION 1124B** **GROUND AND FLOOR SURFACES** ... **1124B.2 Changes in level.** Changes in level up to ¼ inch (6.4 mm) may be vertical and without edge treatment [see Figure 11B-5E(c)]. Changes in level between ¼ inch (6.4 mm) and ½ inch (12.7 mm) shall be beveled with a slope no greater than one unit vertical in 2 units horizontal (50-percent slope) [see Figure 11B-5E(d)]. ... 1127B.5, 1133B.5, 1116B.1 or 1116B.2,...	2010 CBC provides **less access** than 2010 ADA.	See comments above (lines 769-776) regarding the differences between 302 and 1124B. One significant difference: 305.2 does not permit changes in level to occur within the clear floor or graound space*; no similar prohibition exists within any of the relevant CBC sections. * See the comments on lines 788 and 190 regarding Advisory 304.2. No similar advisory is provided at 305.2, although 304.2 does mention clear floor and ground spaces.	1) Add language to the relevant CBC sections that prohibits changes in level from occurring within required clear floor or ground spaces. 2) Do not prohibit changes in level from occurring within required clear floor or ground spaces.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
798	**EXCEPTION:** Slopes not steeper than 1:48 shall be permitted.		**1118B.4 Clear floor or ground space for wheelchairs.** **...** **1133B.7 Walks and Sidewalks.** **...** **1133B.7.1.3 Surface cross slopes.** Surface cross slopes shall not exceed one unit vertical in 50 units horizontal (2-percent slope). **1117B.2 Telephones.** **1117B.2.1 General.** If public pay telephones, public closed-circuit telephones or other public telephones are provided, they shall comply with this section ... **1117B.2.2 Clear floor or ground space.** A clear floor or ground space at least 30 inches by 48 inches (762 mm by 1219 mm) that allows either a forward or parallel approach by a person using a wheelchair shall be provided at telephones. **...**	2010 CBC provides **less access** than 2010 ADA.	1) 305.2 Exception does not permit slopes steeper than 1:48 within the turning space. The CBC does not state slope requirements explicitly, but because clear floor spaces are part of a required accessible route, they must meet cross slope and slope requirements (1133B.7.1.3 and 1133B.5 via 1114B.1.2 and). This means cross slopes up to 2% (1:50), and slopes up to 5% (8.33% if ramp requirements are met) are allowed within required clear floor spaces. The CBC provides less access than the ADA Stds. 2) With respect to cross slope, one could argue that the CBC 1:50 is more restrictive than the ADA 1:48, and therefore provides greater access, but the difference in the two standards is quite minor. The ADA requirement recognizes that elements are commonly constructed in terms of inches, not percentages, and it allows for cross slopes of up to 1/4" per foot. While it is perhaps less restrictive, 1:48 recognizes and allows for common construction industry practice without significantly impacting accessibility.	1a) Add language to 1118B.4 that clarifies that the required clear floor or ground space may slope no greater than 2% (= 1:50) or 2.08% (= 1:48 = 1/4"/ft). 1b) Reference 1118B.4 in 1117B.2.2, or add language to 1117B.2.2 that clarifies that the required clear floor or ground space may slope no greater than 2% (= 1:50) or 2.08% (= 1:48 = 1/4"/ft). 2a) Maintain the current language of 1133B.7.1.3, which calls for maximum cross slopes of 1:50. 2b) Modify 1133B.7.1.3 to agree with 403.7 by calling for maximum cross slopes of 1:48.
799	**305.3 Size.** The clear floor or ground *space* shall be 30 inches (760 mm) minimum by 48 inches (1220 mm) minimum.		**1118B.4 Clear floor or ground space for wheelchairs.** **1. Size and approach.** The minimum clear floor or ground space required to accommodate a single, stationary wheelchair and occupant is 30 inches by 48 inches (762 mm by 1219 mm). ... **1115B.4.2 Accessible urinals.** Urinals required to be accessible shall comply with this subsection. **3.** Where urinals are provided, at least one shall have a clear floor space 30 inches by 48 inches (762 mm by 1219 mm) ... This clear space shall comply with Section 1118B.4. **1115B.4.3 Accessible lavatories.** Lavatories required to be accessible shall comply with this subsection. The requirements of this subsection shall apply to lavatory fixtures, vanities and built-in lavatories. **3.** A clear floor space 30 inches by 48 inches (762 mm by 1219 mm) complying with Section 1118B.4 shall be provided... **1115B.8 Accessories.** **1115B.8.2 Medicine cabinets.** ... A clear floor space 30 inches by 48 inches (762 mm by 1219 mm) complying with Section 1118B.4 shall be provided ... **1117B.1 Accessible drinking fountains.** Where drinking fountains are provided, they shall comply with this section: **2. Clearances.** ... A clear floor space at least 30 inches (762 mm) by 48 inches (1219 mm) complying with Section 1118B.4 shall be provided... **1117B.2 Telephones.** **1117B.2.1 General.** If public pay telephones, public closed-circuit telephones or other public telephones are provided, they shall comply with this section... **1117B.2.2 Clear floor or ground space.** A clear floor or ground space at least 30 inches by 48 inches (762 mm by	2010 CBC is **equivalent** to 2010 ADA.		

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800	**305.4 Knee and Toe Clearance.** Unless otherwise specified, clear floor or ground *space* shall be permitted to include knee and toe clearance complying with 306.		**1118B.4 Clear floor or ground space for wheelchairs.** **1. Size and approach.** ... Clear floor or ground space for wheelchairs may be part of the knee space required under some objects. ... **1115B.4.3 Accessible lavatories.** Lavatories required to be accessible shall comply with this subsection. The requirements of this subsection shall apply to lavatory fixtures, vanities and built-in lavatories. **3.** .... Such clear floor space shall ... extend a maximum of 19 inches (483 mm) into knee and toe space underneath the lavatory. See Figure 11B-1D, Knee Clearance. **...** **1117B.1 Accessible drinking fountains.** Where drinking fountains are provided, they shall comply with this section: **2. Clearances.** Wall- and post-mounted cantilevered drinking fountains ... shall have a clear knee space between the bottom of the apron and the floor or ground not less than 27 inches (686 mm) in height, 30 inches (762 mm) in width, and 8 inches (203 mm) in depth, the depth measurements being taken from the front edge of the fountain back toward the wall or mounting post. The knee clearance space must be free of equipment or obstructions. Additionally, there shall be toe clearance of 9 inches (229 mm) in height above the floor and 17 inches (432 mm) in depth from the front edge of the fountain. The toe clearance space must be free of equipment or obstructions. A clear floor space at least 30 inches (762 mm) by 48 inches (1219 mm) complying with Section 1118B.4 shall be provided in front of the drinking fountain to allow forward approach. ... **1117B.2 Telephones.** **1117B.2.1 General.** If public pay telephones, public closed-circuit telephones or other public telephones are provided, they shall comply with this section... **1117B.2.2 Clear floor or ground space**	Which Std.provides greater access **depends** on circumstances.	1) 305.4 allows, unless noted otherwise, the specified clear floor or ground space to include knee and toe clearance complying with 306. 1118B.4 states that clear or ground spaces may be part of the knee space required under some objects. Which standard provides greater access depends on the object. 2) The minimum knee space configuration noted in 1118B.4 is relative; it is dependent on the knee space requirements of specific elements, whereas 305 defines it clearly, and applies it ubiquitously. Under tables, for instance, the CBC would allow the clear floor space (considered to extend under the table) to be reduced to no less than 27" high, but under lavatories, it could be reduced to as little as 9" high for a maximum depth of 6" (for toe space). The ADA allows the clear floor space height to be reduced per the toe space requirements under all elements. The CBC provides greater access than the ADA Stds. Knee clear area always includes a toe clear area, for the simple fact that one's toes precede one's knees under an element. The stipulation of toe space requirements should not be viewed as an increase in the standards for clear space under an element, but a lessening. For instance, the CBC requires a minimum 30" wide x 19" deep x 27" high clear floor space under dining tables. That 19" deep space includes space for one's toes; nevertheless, it still must be at least 27" high. The 2010 ADA Stds. also requires a minimum 30" wide x 19" deep space under a dining table, but it allows the leading 6" of that clear space to be reduced in height to 9". The allowed height reduction for toes results in a lessening of the standard. As such, the CBC standard is stricter.	1a) "Some" of 1118B.4 is not helpful; it lacks definitive description and direction. Consider using language similar to that of 305.4 - "... may be part of the knee space required under objects unless noted otherwise". 1b) "Some" of 1118B.4 is not helpful; it lacks definitive description and direction. Consider using language similar to "... may be part of the knee space required under objects where noted (elsewhere)". 2a) Adopt the ADA language for knee/toe space as it pertains to the extension of the clear fllor or ground space under objects, or 2b) Leave the CBC language as it is.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
801	**305.5 Position.** Unless otherwise specified, clear floor or ground *space* shall be positioned for either forward or parallel approach to an *element* .		**1118B.4 Clear floor or ground space for wheelchairs.** **1. Size and approach.** ... The minimum clear floor or ground space for wheelchairs may be positioned for forward or parallel approach to an object. ... **1115B.4.2 Accessible urinals.** Urinals required to be accessible shall comply with this subsection. **...** in front of the urinal to allow forward approach. ... **1115B.4.3 Accessible lavatories.** Lavatories required to be accessible shall comply with this subsection. The requirements of this subsection shall apply to lavatory fixtures, vanities and built-in lavatories. **3.** A clear floor space ... shall be provided in front of a lavatory to allow forward approach. ... **....** A clear floor space ... shall be provided in front of a medicine cabinet to allow a forward or parallel approach. **1117B.1 Accessible drinking fountains.** Where drinking fountains are provided, they shall comply with this section: **2. Clearances.** ... A side approach drinking fountain is not acceptable. **1117B.2 Telephones.** **1117B.2.1 General.** If public pay telephones, public closed-circuit telephones or other public telephones are provided, they shall comply with this section ... **1117B.2.2 Clear floor or ground space.** A clear floor or ground space ... that allows either a forward or parallel approach by a person using a wheelchair shall be provided at telephones. **1117B.2.3 Size and approach.** ... The minimum clear floor or ground space for wheelchairs may be positioned for forward or parallel approach to an object. ... **1117B.6 Controls and operating mechanisms.** **2. Clear floor space.** Clear floor space ... that allows a	2010 CBC provides **greater access** than 2010 ADA.	1) 1115B.4.2 requires a forward approach to accessible urinals; 605.3 does as well. 2) 1115B.4.3 requires a forward approach to accessible lavatories. 606.2 does as well, but there are a number of exceptions. 3) 1117B.1 #2 requires a forward approach to accessible drinking fountains. 602.2 does as well, except in a narrowly defined case regarding units for children's use. 4) 1117B.9 #1 requires a forward approach to accessible sinks. 606.2 does as well, but there are a number of exceptions.	1) No action required. 2a) Adopt the ADA Stds. Exceptions. 2b) Maintain the CBC text as-is. 3a) Adopt the ADA Stds. Exceptions. 3b) Maintain the CBC text as-is. 4a) Adopt the ADA Stds. Exceptions. 4b) Maintain the CBC text as-is.

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802	**305.6 Approach.** One full unobstructed side of the clear floor or ground *space* shall adjoin an *accessible* route or adjoin another clear floor or ground *space*.		**1118B.4 Clear floor or ground space for wheelchairs.** **...** **#2. Relationship of maneuvering clearances to wheelchair spaces.** One full unobstructed side of the clear floor or ground space for a wheelchair shall adjoin or overlap an accessible route or adjoin another wheelchair clear floor space. .... **1115B.4.3 Accessible lavatories.** Lavatories required to be accessible shall comply with this subsection. The requirements of this subsection shall apply to lavatory fixtures, vanities and built-in lavatories. **3.** A clear floor space ... complying with Section 1118B.4 shall be provided in front of a lavatory .... Such clear floor space shall adjoin or overlap an accessible route ... **1117B.2 Telephones.** **1117B.2.1 General.** If public pay telephones, public closed-circuit telephones or other public telephones are provided, they shall comply with this section... **1117B.2.4 Relationship of maneuvering clearances to wheelchair spaces.** One full unobstructed side of the clear floor or ground space for a wheelchair shall adjoin another wheelchair clear floor space. ...	2010 CBC is **equivalent** to 2010 ADA.		
803	**305.7 Maneuvering Clearance.** Where a clear floor or ground *space* is located in an alcove or otherwise confined on all or part of three sides, additional maneuvering clearance shall be provided in accordance with 305.7.1 and 305.7.2.		**1118B.4 Clear floor or ground space for wheelchairs.** **....** If a clear floor space is located in an alcove or otherwise confined on all or a part of three sides, additional maneuvering clearances shall be provided as shown in Figure 11B-5A(b). **...** **1117B.2 Telephones.** **1117B.2.1 General.** If public pay telephones, public closed-circuit telephones or other public telephones are provided, they shall comply with this section ... **1117B.2.4 Relationship of maneuvering clearances to wheelchair spaces.** ... If a clear floor space is located in an alcove or otherwise confined on all or part of three sides, additional maneuvering clearances shall be provided. See Figure 11B-5A.	2010 CBC is **equivalent** to 2010 ADA.		

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804	**305.7.1 Forward Approach.** Alcoves shall be 36 inches (915 mm) wide minimum where the depth exceeds 24 inches (610 mm).		**1118B.4 Clear floor or ground space for wheelchairs.** **...** If a clear floor space is located in an alcove or otherwise confined on all or a part of three sides, additional maneuvering clearances shall be provided as shown in Figure 11B-5A(b). **....** **1117B.2 Telephones.** **1117B.2.1 General.** If public pay telephones, public closed-circuit telephones or other public telephones are provided, they shall comply with this section ... **1117B.2.4 Relationship of maneuvering clearances to wheelchair spaces.** ... If a clear floor space is located in an alcove or otherwise confined on all or part of three sides, additional maneuvering clearances shall be provided. See Figure 11B-5A.	2010 CBC is **equivalent** to 2010 ADA.		
805	**305.7.2 Parallel Approach.** Alcoves shall be 60 inches (1525 mm) wide minimum where the depth exceeds 15 inches (380 mm).		**1118B.4 Clear floor or ground space for wheelchairs.** **...** If a clear floor space is located in an alcove or otherwise confined on all or a part of three sides, additional maneuvering clearances shall be provided as shown in Figure 11B-5A(b). **....** **1117B.2 Telephones.** **1117B.2.1 General.** If public pay telephones, public closed-circuit telephones or other public telephones are provided, they shall comply with this section ... **1117B.2.4 Relationship of maneuvering clearances to wheelchair spaces.** ... If a clear floor space is located in an alcove or otherwise confined on all or part of three sides, additional maneuvering clearances shall be provided. See Figure 11B-5A.	2010 CBC is **equivalent** to 2010 ADA.		
806	**306 Knee and Toe Clearance**			Which Std.provides greater access **depends** on circumstances.	The 2010 CBC does not have a section specifically dedicated to knee and toe clearances. The requirements for knee and toe clearances are presented at individual elements as applicable. The 2010 ADA Stds approach allows for the knee and toe clearance allowances and/or requirements to be applied to elements that may not be considered in the 2010 CBC. While this ubiquitous application of a standard may result in less stringent requirements for some elements (i.e., lavatories, sinks, and dining tables), it does provide greater freedom of use and a more consistent model to follow.	1) Adopt a separate section devoted to knee and toe clearance, and apply it universally. 2) maintain the current CBC dispersed format for this issue.

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807	**306.1 General.** Where *space* beneath an *element* is included as part of clear floor or ground *space* or turning *space* , the *space* shall comply with 306. …		**1115B.4.3 Accessible lavatories.** Lavatories required to be accessible shall comply with this subsection. The requirements of this subsection shall apply to lavatory fixtures, vanities and built-in lavatories. **...** All lavatories that are designated to be accessible shall be ... mounted ... with vertical clearance measured from the bottom of the apron or the outside bottom edge of the lavatory of 29 inches (737 mm) reducing to 27 inches (686 mm) at a point located 8 inches (203 mm) back from the front edge. In addition, a minimum 9-inch-high (230 mm) toe clearance must be provided extending back toward the wall to a distance no more than 6 inches (150 mm) from the back wall. The toe clearance space must be free of equipment or obstructions. **...** Such clear floor space shall adjoin or overlap an accessible route and shall extend a maximum of 19 inches (483 mm) into knee and toe space underneath the lavatory. See Figure 11B-1D, Knee Clearance. **...** **1117B.1 Accessible drinking fountains.** Where drinking fountains are provided, they shall comply with this section: **...** **2. Clearances.** Wall- and post-mounted cantilevered drinking fountains ... shall have a clear knee space between the bottom of the apron and the floor or ground not less than 27 inches (686 mm) in height, 30 inches (762 mm) in width, and 8 inches (203 mm) in depth, the depth measurements being taken from the front edge of the fountain back toward the wall or mounting post. The knee clearance space must be free of equipment or obstructions. Additionally, there shall be toe clearance of 9 inches (229 mm) in height above the floor and 17 inches (432 mm) in depth from the front edge of the fountain. The toe clearance space must be free of equipment or obstructions. ... **1117B.2 Telephones.** **1117B.2.1 General.** If public pay telephones, public closed		The 2010 CBC does not have a section specifically dedicated to knee and toe clearances. The requirements for knee and toe clearances are presented at individual elements as applicable. The 2010 ADA Stds approach allows for the knee and toe clearance allowances and/or requirements to be applied to elements that may not be considered in the 2010 CBC. While this ubiquitous application of a standard may result in less stringent requirements for some elements (i.e., lavatories, sinks, and dining tables), it does provide greater freedom of use and a more consistent model to follow.	1) Adopt a separate section devoted to knee and toe clearance, and apply it universally. 2) maintain the current CBC dispersed format for this issue.
808	**306.1 General.** ... Aditional *space* shall not be prohibited beneath an *element* but shall not be considered as part of the clear floor or ground *space* or turning *space* .			2010 CBC is **equivalent** to 2010 ADA.	Language similar to the 306.1 clarification is not provided in the CBC, but there also is nothing therein that prohibits additional space beneath elements. Several CBC figures illustrate space beneath fixtures that is beyond the boundaries of the required clear floor spaces. While perhaps not necessary, the 306.1 statement is helpful, and could eliminate the possibility of a misinterpretation of the standards.	1) Considering adding the statement in question to the CBC. 1118B.4 #1 is likely the best location.
809	**Advisory 306.1 General.** Clearances are measured in relation to the usable clear floor space, not necessarily to the vertical support for an element. When determining clearance under an object for required turning or maneuvering space, care should be taken to ensure the space is clear of any obstructions.			NA	There is no comparable language in the CBC regarding this advisory. Advisory notes are not used in the CBC. Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b)	

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810	**306.2 Toe Clearance.**			Which Std.provides greater access **depends** on circumstances.	The 2010 CBC does not have a section specifically dedicated to knee and toe clearances. The requirements for knee and toe clearances are presented at individual elements as applicable. The 2010 ADA Stds approach allows for the knee and toe clearance allowances and/or requirements to be applied to elements that may not be considered in the 2010 CBC. While this ubiquitous application of a standard may result in less stringent requirements for some elements (i.e., lavatories, sinks, and dining tables), it does provide greater freedom of use and a more consistent model to follow.	1) Adopt a separate section devoted to knee and toe clearance, and apply it universally. 2) maintain the current CBC dispersed format for this issue.
811	**306.2.1 General.** *Space* under an *element* between the finish floor or ground and 9 inches (230 mm) above the finish floor or ground shall be considered toe clearance and shall comply with 306.2.		**1115B.4.3 Accessible lavatories.** Lavatories required to be accessible shall comply with this subsection. The requirements of this subsection shall apply to lavatory fixtures, vanities and built-in lavatories. **...** All lavatories that are designated to be accessible shall be a... mounted ... with vertical clearance measured from the bottom of the apron or the outside bottom edge of the lavatory of 29 inches (737 mm) reducing to 27 inches (686 mm) at a point located 8 inches (203 mm) back from the front edge. In addition, a minimum 9-inch-high (230 mm) toe clearance must be provided extending back toward the wall to a distance no more than 6 inches (150 mm) from the back wall. The toe clearance space must be free of equipment or obstructions. **...** Such clear floor space shall adjoin or overlap an accessible route and shall extend a maximum of 19 inches (483 mm) into knee and toe space underneath the lavatory. See Figure 11B-1D, Knee Clearance. **...** **1117B.1 Accessible drinking fountains.** Where drinking fountains are provided, they shall comply with this section: **...** **2. Clearances.** Wall- and post-mounted cantilevered drinking fountains ... shall have a clear knee space between the bottom of the apron and the floor or ground not less than 27 inches (686 mm) in height, 30 inches (762 mm) in width, and 8 inches (203 mm) in depth, the depth measurements being taken from the front edge of the fountain back toward the wall or mounting post. The knee clearance space must be free of equipment or obstructions. Additionally, there shall be toe clearance of 9 inches (229 mm) in height above the floor and 17 inches (432 mm) in depth from the front edge of the fountain. The toe clearance space must be free of equipment or obstructions. ... **1117B.2 Telephones.** **1117B.2.1 General.** If public pay telephones, public closed-circuit telephones or other public telephones are provided	2010 CBC provides **greater access** than 2010 ADA.	Knee clear area always includes a toe clear area, for the simple fact that one's toes precede one's knees under an element. The stipulation of toe space requirements should not be viewed as an increase in the standards for clear space under an element, but a lessening. For instance, the CBC requires a minimum 30" wide x 19" deep x 27" high clear floor space under dining tables. That 19" deep space includes space for one's toes; nevertheless, it still must be at least 27" high. The 2010 ADA Stds. also requires a minimum 30" wide x 19" deep space under a dining table, but it allows the leading 6" of that clear space to be reduced in height to 9". The allowed height reduction for toes results in a lessening of the standard. As such, the CBC standard is stricter. The standards describe toe clearance in different ways, and each is a bit confusing. This is a case where the figures do a much better job of illustrating the requirements than the text does. The bottom line, however, is that the prescribed spaces for toes are of the same dimension in each standard: 9" minimum high x 6" maximum deep. This space is measured from the leading edge of the knee space. The difference between the standards with respect to toe space lies in the depth to which this space may extend under elements. The 2010 ADA Stds. allow it to be considered to extend 25" maximum under all elements. The 2010 CBC allows it to be considered to extend 25" maximum under most elements, but reduces that allowed extension to 19" maximum under lavatories, sinks, and drinking fountains. By not allowing the clear floor space to be considered to extend further under these elements, the CBC is actually stricter, and it provides greater access. For example, for forward reach access over an obstruction (Figure 11B-5C (b)) the maximum allowed reach depth must not exceed the depth of the clear floor space under the obstruction. By limiting the depth of the clear floor space under lavatories to 19", the standards also limit the distance controls may be located beyond the front edge of the lavatory. Soap and paper towel dispensers, as well as faucet controls must be located	

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812	**306.2.1 General.** *Space* under an *element* between the finish floor or ground and 9 inches (230 mm) above the finish floor or ground shall be considered toe clearance and shall comply with 306.2.		**1115B.4.3 Accessible lavatories.** Lavatories required to be accessible shall comply with this subsection. The requirements of this subsection shall apply to lavatory fixtures, vanities and built-in lavatories. **...** a minimum 9-inch-high (230 mm) toe clearance must be provided extending back toward the wall to a distance no more than 6 inches (150 mm) from the back wall. The toe clearance space must be free of equipment or obstructions. **...** **1117B.1 Accessible drinking fountains.** Where drinking fountains are provided, they shall comply with this section: **...** **2. Clearances.** ... there shall be toe clearance of 9 inches (229 mm) in height above the floor and 17 inches (432 mm) in depth from the front edge of the fountain. The toe clearance space must be free of equipment or obstructions. ...	2010 CBC is **equivalent** to 2010 ADA.	The standards describe toe clearance in different ways, and each is a bit confusing. This is a case where the figures do a much better job of illustrating the requirements than the text does. The bottom line, however, is that the prescribed spaces for toes are of the same dimension in each standard: 9" minimum high x 6" maximum deep. This space is measured from the leading edge of the knee space.	
813	**306.2.2 Maximum Depth.** Toe clearance shall extend 25 inches (635 mm) maximum under an *element* .		**1115B.4.3 Accessible lavatories.** Lavatories required to be accessible shall comply with this subsection. The requirements of this subsection shall apply to lavatory fixtures, vanities and built-in lavatories. **...** Such clear floor space shall adjoin or overlap an accessible route and shall extend a maximum of 19 inches (483 mm) into knee and toe space underneath the lavatory. See Figure 11B-1D, Knee Clearance. **...** **1117B.1 Accessible drinking fountains.** Where drinking fountains are provided, they shall comply with this section: **...** **2. Clearances.** Wall- and post-mounted cantilevered drinking fountains shall be a minimum of 18 inches (457 mm) and a maximum of 19 inches (483 mm) in depth ... **1117B.2 Telephones.** **1117B.2.1 General.** If public pay telephones, public closed-circuit telephones or other public telephones are provided, they shall comply with this section to ... Clear floor or ground space for wheelchairs may be part of the knee space required under some objects. ... **...** **1117B.9 Accessible sinks.** Sinks required to be accessible shall comply with this subsection. **...** The clear floor space shall ... extend a maximum of 19 inches (485 mm) underneath the sink (see Figure 11B-1D). **...** Knee clearance that is at least 27 inches (685 mm) high, 30 inches (762 mm) wide and 19 inches (485 mm) deep shall be provided underneath sinks. ... **1118B.4 Clear floor or ground space for wheelchairs.** **...** Clear floor or ground space for wheelchairs may be part of the knee space required under some objects. ... **...**. **1122B.2 Seating.** ... Such clear floor space shall not overlap knee space by more than 19 inches (483 mm) (see ...). **1122B.3 Knee clearance.** If seating for persons in	2010 CBC provides **greater access** than 2010 ADA.	The difference between the standards with respect to toe space lies in the depth to which this space may extend under elements. The 2010 ADA Stds. allow it to be considered to extend 25" maximum under all elements. The 2010 CBC allows it to be considered to extend 25" maximum under most elements, but reduces that allowed extension to 19" maximum under lavatories, sinks, and drinking fountains, and 20" maximum under obstructions at telephones. By not allowing the clear floor space to be considered to extend further under these elements, the CBC is actually stricter, and it provides greater access. For example, for forward reach access over an obstruction (Figure 11B-5C (b)) the maximum allowed reach depth must not exceed the depth of the clear floor space under the obstruction. By limiting the depth of the clear floor space under lavatories to 19", the standards also limit the distance controls may be located beyond the front edge of the lavatory. Soap and paper towel dispensers, as well as faucet controls must be located within 19" of the front of the fixture or its counter. The 2010 ADA Stds. allows those elements to be located as far back as 25" from the front of the fixture or its counter. By requiring the controls to be closer, the CBC provides greater access.	

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814	**306.2.2 Maximum Depth.** Toe clearance shall extend 25 inches (635 mm) maximum under an *element* .		**1115B.4.3 Accessible lavatories.** Lavatories required to be accessible shall comply with this subsection. The requirements of this subsection shall apply to lavatory fixtures, vanities and built-in lavatories. **...** Such clear floor space shall adjoin or overlap an accessible route and shall extend a maximum of 19 inches (483 mm) into knee and toe space underneath the lavatory. See Figure 11B-1D, Knee Clearance. **...** **1117B.1 Accessible drinking fountains.** Where drinking fountains are provided, they shall comply with this section: **...** **2. Clearances.** Wall- and post-mounted cantilevered drinking fountains shall be a minimum of 18 inches (457 mm) and a maximum of 19 inches (483 mm) in depth ... **1117B.2 Telephones.** **1117B.2.1 General.** If public pay telephones, public closed-circuit telephones or other public telephones are provided, they shall comply with this section ... Clear floor or ground space for wheelchairs may be part of the knee space required under some objects. ... **1117B.9 Accessible sinks.** Sinks required to be accessible shall comply with this subsection. **...** The clear floor space shall ... extend a maximum of 19 inches (485 mm) underneath the sink (see Figure 11B-1D). **...** Knee clearance that is at least 27 inches (685 mm) high, 30 inches (762 mm) wide and 19 inches (485 mm) deep shall be provided underneath sinks. ... **1118B.4 Clear floor or ground space for wheelchairs.** **...** Clear floor or ground space for wheelchairs may be part of the knee space required under some objects. ... **1122B.2 Seating.** ... Such clear floor space shall not overlap knee space by more than 19 inches (483 mm) (see...).	2010 CBC provides **greater access** than 2010 ADA.	The difference between the standards with respect to toe space lies in the depth to which this space may extend under elements. The 2010 ADA Stds. allow it to be considered to extend 25" maximum under all elements. The 2010 CBC allows it to be considered to extend 25" maximum under most elements, but reduces that allowed extension to 19" maximum under lavatories, sinks, and drinking fountains, and 20" maximum under obstructions at telephones. By not allowing the clear floor space to be considered to extend further under these elements, the CBC is actually stricter, and it provides greater access. For example, for forward reach access over an obstruction (Figure 11B-5C (b)) the maximum allowed reach depth must not exceed the depth of the clear floor space under the obstruction. By limiting the depth of the clear floor space under lavatories to 19", the standards also limit the distance controls may be located beyond the front edge of the lavatory. Soap and paper towel dispensers, as well as faucet controls must be located within 19" of the front of the fixture or its counter. The 2010 ADA Stds. allows those elements to be located as far back as 25" from the front of the fixture or its counter. By requiring the controls to be closer, the CBC provides greater access.	

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815	**306.2.3 Minimum Required Depth.** Where toe clearance is required at an *element* as part of a clear floor *space*, the toe clearance shall extend 17 inches (430 mm) minimum under the *element*.		**1115B.4.3 Accessible lavatories.** Lavatories required to be accessible shall comply with this subsection. The requirements of this subsection shall apply to lavatory fixtures, vanities and built-in lavatories. **...** All lavatories that are designated to be accessible shall be a minimum 17 inches (432 mm) in horizontal depth ... **1117B.1 Accessible drinking fountains.** Where drinking fountains are provided, they shall comply with this section: **...** **2. Clearances.** Wall- and post-mounted cantilevered drinking fountains shall ... shall have a clear knee space ... not less than ... 8 inches (203 mm) in depth, ... Additionally, there shall be toe clearance of 9 inches (229 mm) in height above the floor and 17 inches (432 mm) in depth from the front edge of the fountain. ... under some objects. ... **1117B.9 Accessible sinks.** Sinks required to be accessible shall comply with this subsection. **...** Knee clearance that is at least 27 inches (685 mm) high, 30 inches (762 mm) wide and 19 inches (485 mm) deep shall be provided underneath sinks. ... **1122B.2 Seating.** ... **1122B.3 Knee clearance.** If seating for persons in wheelchairs is provided at fixed tables or counters, knee spaces at least 27 inches (686 mm) high, 30 inches (762 mm) wide and 19 inches (483 mm) deep shall be provided (see Figure 11B-13).	2010 CBC provides **greater access** than 2010 ADA.	306.2.3 prescribes a minimum horizontal depth of 17" when clear floor space is required under an element. 1) 1115B.4.3 #2 requires the same for lavatories. CBC equivalent. 2) 1117B.1 #2 requires the same for drinking fountains. CBC Equivalent. 3) 1117B.9 requires a minimum horizontal depth of 19" at accessible sinks. 606.2 confirms that the knee and toe space prescribed at 306 is required at accessible sinks. CBC provides greater access. 4) 1122B.3 requires a minimum horizontal depth of 19" at accessible seating. 902.2 confirms that the knee and toe space prescribed at 306 is required at accessible dining surfaces. CBC provides greater access.	
816	**306.2.3 Minimum Required Depth.** Where toe clearance is required at an *element* as part of a clear floor *space*, the toe clearance shall extend 17 inches (430 mm) minimum under the *element*.		**1115B.4.3 Accessible lavatories.** Lavatories required to be accessible shall comply with this subsection. The requirements of this subsection shall apply to lavatory fixtures, vanities and built-in lavatories. **...** All lavatories that are designated to be accessible shall be a minimum 17 inches (432 mm) in horizontal depth ... **1117B.1 Accessible drinking fountains.** Where drinking fountains are provided, they shall comply with this section: **...** **2. Clearances.** Wall- and post-mounted cantilevered drinking fountains shall ... shall have a clear knee space... not less than ... 8 inches (203 mm) in depth,... Additionally, there shall be toe clearance of 9 inches (229 mm) in height above the floor and 17 inches (432 mm) in depth from the front edge of the fountain. ... **1122B.2 Seating.** ... **1122B.3 Knee clearance.** If seating for persons in wheelchairs is provided at fixed tables or counters, knee spaces at least 27 inches (686 mm) high, 30 inches (762 mm) wide and 19 inches (483 mm) deep shall be provided (see Figure 11B-13).	2010 CBC provides **greater access** than 2010 ADA.	306.2.3 prescribes a minimum horizontal depth of 17" when clear floor space is required under an element. 1) 1115B.4.3 #2 requires the same for lavatories. CBC equivalent. 2) 1117B.1 #2 requires the same for drinking fountains. CBC Equivalent. 3) 1117B.9 requires a minimum horizontal depth of 19" at accessible sinks. 606.2 confirms that the knee and toe space prescribed at 306 is required at accessible sinks. CBC provides greater access. 4) 1122B.3 requires a minimum horizontal depth of 19" at accessible seating. 902.2 confirms that the knee and toe space prescribed at 306 is required at accessible dining surfaces. CBC provides greater access.	

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
817	**306.2.4 Additional Clearance.** *Space* extending greater than 6 inches (150 mm) beyond the available knee clearance at 9 inches (230 mm) above the finish floor or ground shall not be considered toe clearance.			2010 CBC is **equivalent** to 2010 ADA.	Language similar to the 306.2.4 clarification is not provided in the CBC, but there also is nothing therein that prohibits additional space beneath elements. Several CBC figures illustrate space beneath fixtures that is beyond the boundaries of the required clear floor spaces. While perhaps not necessary, the 306.2.4 statement is helpful, and could eliminate the possibility of a misinterpretation of the standards.	1) Considering adding the statement in question to the CBC. 1118B.4 #1 is likely the best location.
818	**306.2.5 Width.** Toe clearance shall be 30 inches (760 mm) wide minimum.		**1115B.4.3 Accessible lavatories.** Lavatories required to be accessible shall comply with this subsection. The requirements of this subsection shall apply to lavatory fixtures, vanities and built-in lavatories. **...** **3.** A clear floor space 30 inches by 48 inches (762 mm by 1219 mm) complying with Section 1118B.4 shall be provided... Such clear floor space shall... extend a maximum of 19 inches (483 mm) into knee and toe space underneath the lavatory. ... **1117B.1 Accessible drinking fountains.** Where drinking fountains are provided, they shall comply with this section: **...** **2. Clearances.** Wall- and post-mounted cantilevered drinking fountains ... shall have a clear knee space... not less than ... 30 inches (762 mm) in width, ... **1117B.2 Telephones.** **1117B.2.1 General.** If public pay telephones, public closed-circuit telephones or other public telephones are provided, they shall comply with this section ... **1117B.2.3 Size and approach.** The minimum clear floor or ground space required to accommodate a single, stationary wheelchair and occupant is 30 inches by 48 inches (762 mm by 1219 mm). The minimum clear floor or ground space for wheelchairs may be positioned for forward or parallel approach to an object. Clear floor or ground space for wheelchairs may be part of the knee space required under some objects. ... **1117B.9 Accessible sinks.** Sinks required to be accessible shall comply with this subsection. **...** Knee clearance that is at least 27 inches (685 mm) high, 30 inches (762 mm) wide and 19 inches (485 mm) deep shall be provided underneath sinks. ... **1118B.4 Clear floor or ground space for wheelchairs.**	2010 CBC is **equivalent** to 2010 ADA.		
819	**306.3 Knee Clearance.**			Which Std.provides greater access **depends** on circumstances.	The 2010 CBC does not have a section specifically dedicated to knee and toe clearances. The requirements for knee and toe clearances are presented at individual elements as applicable. The 2010 ADA Stds approach allows for the knee and toe clearance allowances and/or requirements to be applied to elements that may not be considered in the 2010 CBC. While this ubiquitous application of a standard may result in less stringent requirements for some elements (i.e., lavatories, sinks, and dining tables), it does provide greater freedom of use and a more consistent model to follow.	1) Adopt a separate section devoted to knee and toe clearance, and apply it universally. 2) maintain the current CBC dispersed format for this issue.

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820	**306.3.1 General.** *Space* under an *element* between 9 inches (230 mm) and 27 inches (685 mm) above the finish floor or ground shall be considered knee clearance and shall comply with 306.3.		**1115B.4.3 Accessible lavatories.** Lavatories required to be accessible shall comply with this subsection. The requirements of this subsection shall apply to lavatory fixtures, vanities and built-in lavatories. **...** All lavatories that are designated to be accessible shall be... with vertical clearance measured from the bottom of the apron or the outside bottom edge of the lavatory of 29 inches (737 mm) reducing to 27 inches (686 mm) at a point located 8 inches (203 mm) back from the front edge. In addition, a minimum 9-inch-high (230 mm) toe clearance must be provided extending back toward the wall to a distance no more than 6 inches (150 mm) from the back wall. The toe clearance space must be free of equipment or obstructions. **...** Such clear floor space shall adjoin or overlap an accessible route and shall extend a maximum of 19 inches (483 mm) into knee and toe space underneath the lavatory. See Figure 11B-1D, Knee Clearance. **...** **1117B.1 Accessible drinking fountains.** Where drinking fountains are provided, they shall comply with this section: **...** **2. Clearances.** Wall- and post-mounted cantilevered drinking fountains ... shall have a clear knee space between the bottom of the apron and the floor or ground not less than 27 inches (686 mm) in height, 30 inches (762 mm) in width, and 8 inches (203 mm) in depth, the depth measurements being taken from the front edge of the fountain back toward the wall or mounting post. The knee clearance space must be free of equipment or obstructions. Additionally, there shall be toe clearance of 9 inches (229 mm) in height above the floor and 17 inches (432 mm) in depth from the front edge of the fountain. The toe clearance space must be free of equipment or obstructions. ... **1117B.2 Telephones.** **1117B.2.1 General.** If public pay telephones, public closed	2010 CBC provides **greater access** than 2010 ADA.	The standards describe knee clearance in different ways, and each is a bit confusing. This is a case where the figures do a much better job of illustrating the requirements than the text does. The bottom line, however, is that the prescribed height and width for knees are of the same dimension in each standard: 27" minimum high x 30" maximum wide. There are two differences between the standards with respect to knee space: 1) The 2010 ADA Stds. allow it to be considered to extend 25" maximum under all elements. The 2010 CBC allows it to be considered to extend 25" maximum under most elements, but reduces that allowed extension to 19" maximum under lavatories, sinks, and drinking fountains. By not allowing the clear floor space to be considered to extend further under these elements, the CBC is actually stricter, and it provides greater access. For example, for forward reach access over an obstruction (Figure 11B-5C (b)) the maximum allowed reach depth must not exceed the depth of the clear floor space under the obstruction. By limiting the depth of the clear floor space under lavatories to 19", the standards also limit the distance controls may be located beyond the front edge of the lavatory. Soap and paper towel dispensers, as well as faucet controls must be located within 19" of the front of the fixture or its counter. The 2010 ADA Stds. allows those elements to be located as far back as 25" from the front of the fixture or its counter. By requiring the controls to be closer, the CBC provides greater access. 2) 306 allows the required clearance under all elements to be reduced per the 306.2 toe space requirements. The CBC applies a similar standard to lavatories and drinking foruntains, but not to sinks and accessible seating. Regarding the latter, the CBC requires a minimum clear height of 27" for the full depth of the required clear floor space. As such, the CBC provides greater access.	

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821	**306.3.2 Maximum Depth.** Knee clearance shall extend 25 inches (635 mm) maximum under an *element* at 9 inches (230 mm) above the finish floor or ground.		**1115B.4.3 Accessible lavatories.** Lavatories required to be accessible shall comply with this subsection. The requirements of this subsection shall apply to lavatory fixtures, vanities and built-in lavatories. **...** All lavatories that are designated to be accessible shall be ... mounted ... with vertical clearance measured from the bottom of the apron or the outside bottom edge of the lavatory of 29 inches (737 mm) reducing to 27 inches (686 mm) at a point located 8 inches (203 mm) back from the front edge. In addition, a minimum 9-inch-high (230 mm) toe clearance must be provided extending back toward the wall to a distance no more than 6 inches (150 mm) from the back wall. The toe clearance space must be free of equipment or obstructions. **...** Such clear floor space shall adjoin or overlap an accessible route and shall extend a maximum of 19 inches (483 mm) into knee and toe space underneath the lavatory. See Figure 11B-1D, Knee Clearance. **...** **1117B.1 Accessible drinking fountains.** Where drinking fountains are provided, they shall comply with this section: **...** **2. Clearances.** Wall- and post-mounted cantilevered drinking fountains ... shall have a clear knee space between the bottom of the apron and the floor or ground not less than 27 inches (686 mm) in height, 30 inches (762 mm) in width, and 8 inches (203 mm) in depth, the depth measurements being taken from the front edge of the fountain back toward the wall or mounting post. The knee clearance space must be free of equipment or obstructions. Additionally, there shall be toe clearance of 9 inches (229 mm) in height above the floor and 17 inches (432 mm) in depth from the front edge of the fountain. The toe clearance space must be free of equipment or obstructions. ... **1117B.2 Telephones.** **1117B.2.1 General.** If public pay telephones, public closed	2010 CBC provides **greater access** than 2010 ADA.	The standards describe knee clearance in different ways, and each is a bit confusing. 306.3.1 defines knee space as the area under an element between 9" - 27" AFF, then 306.3.2 says that knee clearance shall extend at a particular depth at 9" AFF. This is a case where the figures do a much better job of illustrating the requirements than the text does. The bottom line, however, is that the prescribed height and width for knees are of the same dimension in each standard: 27" minimum high x 30" maximum wide. There are two differences between the standards with respect to knee space: 1) The 2010 ADA Stds. allow it to be considered to extend 25" maximum under all elements. The 2010 CBC allows it to be considered to extend 25" maximum under most elements, but reduces that allowed extension to 19" maximum under lavatories, sinks, and drinking fountains. By not allowing the clear floor space to be considered to extend further under these elements, the CBC is actually stricter, and it provides greater access. For example, for forward reach access over an obstruction (Figure 11B-5C (b)) the maximum allowed reach depth must not exceed the depth of the clear floor space under the obstruction. By limiting the depth of the clear floor space under lavatories to 19", the standards also limit the distance controls may be located beyond the front edge of the lavatory. Soap and paper towel dispensers, as well as faucet controls must be located within 19" of the front of the fixture or its counter. The 2010 ADA Stds. allows those elements to be located as far back as 25" from the front of the fixture or its counter. By requiring the controls to be closer, the CBC provides greater access. 2) 306 allows the required clearance under all elements to be reduced per the 306.2 toe space requirements. The CBC applies a similar standard to lavatories and drinking foruntains, but not to sinks and accessible seating. Regarding the latter, the CBC requires a minimum clear height of 27" for the full depth of the required clear floor space. As such, the CBC provides greater access.	

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822	**306.3.3 Minimum Required Depth.** Where knee clearance is required under an *element* as part of a clear floor space, the knee clearance shall be 11 inches (280 mm) deep minimum at 9 inches (230 mm) above the finish floor or ground, and 8 inches (205 mm) deep minimum at 27 inches (685 mm) above the finish floor or ground.		**1115B.4.3 Accessible lavatories.** Lavatories required to be accessible shall comply with this subsection. The requirements of this subsection shall apply to lavatory fixtures, vanities and built-in lavatories. **...** All lavatories that are designated to be accessible shall be a minimum 17 inches (432 mm) in horizontal depth and mounted ... with vertical clearance measured from the bottom of the apron or the outside bottom edge of the lavatory of 29 inches (737 mm) reducing to 27 inches (686 mm) at a point located 8 inches (203 mm) back from the front edge. In addition, a minimum 9-inch-high (230 mm) toe clearance must be provided extending back toward the wall to a distance no more than 6 inches (150 mm) from the back wall. ... **1117B.1 Accessible drinking fountains.** Where drinking fountains are provided, they shall comply with this section: **...** **2. Clearances.** Wall- and post-mounted cantilevered drinking fountains shall ... shall have a clear knee space ... not less than ... 8 inches (203 mm) in depth,... Additionally, there shall be toe clearance of 9 inches (229 mm) in height above the floor and 17 inches (432 mm) in depth from the front edge of the fountain. ... **1117B.2 Telephones.** **...** under some objects. ... **1117B.9 Accessible sinks.** Sinks required to be accessible shall comply with this subsection. **...** Knee clearance that is at least 27 inches (685 mm) high, 30 inches (762 mm) wide and 19 inches (485 mm) deep shall be provided underneath sinks. ... **1122B.2 Seating.** ... **1122B.3 Knee clearance.** If seating for persons in wheelchairs is provided at fixed tables or counters, knee spaces at least 27 inches (686 mm) high, 30 inches (762 mm) wide and 19 inches (483 mm) deep shall be provided (see Figure 11B-13).	2010 CBC provides **greater access** than 2010 ADA.	306.2.3 prescribes a total minimum horizontal depth of 17" when clear floor space is required under an element. This space is permitted to be reduced to 9" in height at a distance of 11" from the closest edge of the space. 1) 1115B.4.3 #2 requires the same for lavatories. CBC equivalent. 2) 1117B.1 #2 requires the same for drinking fountains. CBC Equivalent. 3) 1117B.9 requires a minimum horizontal depth of 19" at accessible sinks. It does not permit this space to be reduced in height for toe clearance. 606.2 confirms that the knee and toe space prescribed at 306 is required at accessible sinks. CBC provides greater access. 4) 1122B.3 requires a minimum horizontal depth of 19" at accessible seating. It does not permit this space to be reduced in height for toe clearance. 902.2 confirms that the knee and toe space prescribed at 306 is required at accessible dining surfaces. CBC provides greater access.	

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823	**306.3.4 Clearance Reduction.** Between 9 inches (230 mm) and 27 inches (685 mm) above the finish floor or ground, the knee clearance shall be permitted to reduce at a rate of 1 inch (25 mm) in depth for each 6 inches (150 mm) in height.		**1115B.4.3 Accessible lavatories.** Lavatories required to be accessible shall comply with this subsection. The requirements of this subsection shall apply to lavatory fixtures, vanities and built-in lavatories. **...** All lavatories that are designated to be accessible shall be a minimum 17 inches (432 mm) in horizontal depth and mounted ... with vertical clearance measured from the bottom of the apron or the outside bottom edge of the lavatory of 29 inches (737 mm) reducing to 27 inches (686 mm) at a point located 8 inches (203 mm) back from the front edge. In addition, a minimum 9-inch-high (230 mm) toe clearance must be provided extending back toward the wall to a distance no more than 6 inches (150 mm) from the back wall. ... **1117B.1 Accessible drinking fountains.** Where drinking fountains are provided, they shall comply with this section: **...** **2. Clearances.** Wall- and post-mounted cantilevered drinking fountains shall ... shall have a clear knee space... not less than ... 8 inches (203 mm) in depth,... Additionally, there shall be toe clearance of 9 inches (229 mm) in height above the floor and 17 inches (432 mm) in depth from the front edge of the fountain. ... **1117B.2 Telephones.** **...** under some objects. ... **1117B.9 Accessible sinks.** Sinks required to be accessible shall comply with this subsection. **...** Knee clearance that is at least 27 inches (685 mm) high, 30 inches (762 mm) wide and 19 inches (485 mm) deep shall be provided underneath sinks. ... **1122B.2 Seating.** ... **1122B.3 Knee clearance.** If seating for persons in wheelchairs is provided at fixed tables or counters, knee spaces at least 27 inches (686 mm) high, 30 inches (762 mm) wide and 19 inches (483 mm) deep shall be provided	2010 CBC provides **greater access** than 2010 ADA.	Knee clear area always includes a toe clear area, for the simple fact that one's toes precede one's knees under an element. The stipulation of toe space requirements should not be viewed as an increase in the standards for clear space under an element, but a lessening. For instance, the CBC requires a minimum 30" wide x 19" deep x 27" high clear floor space under dining tables. That 19" deep space includes space for one's toes; nevertheless, it still must be at least 27" high. The 2010 ADA Stds. also requires a minimum 30" wide x 19" deep space under a dining table, but it allows the leading 6" of that clear space to be reduced in height to 9". The allowed height reduction for toes results in a lessening of the standard. As such, the CBC standard is stricter.	

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824	**306.3.5 Width.** Knee clearance shall be 30 inches (760 mm) wide minimum.		**1115B.4.3 Accessible lavatories.** Lavatories required to be accessible shall comply with this subsection. The requirements of this subsection shall apply to lavatory fixtures, vanities and built-in lavatories. **...** **3.** A clear floor space 30 inches by 48 inches (762 mm by 1219 mm) complying with Section 1118B.4 shall be provided ...Such clear floor space shall ... extend a maximum of 19 inches (483 mm) into knee and toe space underneath the lavatory. ... **1117B.1 Accessible drinking fountains.** Where drinking fountains are provided, they shall comply with this section: **...** **2. Clearances.** Wall- and post-mounted cantilevered drinking fountains ... shall have a clear knee space ... not less than... 30 inches (762 mm) in width,... **1117B.2 Telephones.** **1117B.2.1 General.** If public pay telephones, public closed-circuit telephones or other public telephones are provided, they shall comply with this section ... **1117B.2.3 Size and approach.** The minimum clear floor or ground space required to accommodate a single, stationary wheelchair and occupant is 30 inches by 48 inches (762 mm by 1219 mm). The minimum clear floor or ground space for wheelchairs may be positioned for forward or parallel approach to an object. Clear floor or ground space for wheelchairs may be part of the knee space required under some objects. ... **1117B.9 Accessible sinks.** Sinks required to be accessible shall comply with this subsection. **...** Knee clearance that is at least 27 inches (685 mm) high, 30 inches (762 mm) wide and 19 inches (485 mm) deep shall be provided underneath sinks. ... **1118B.4 Clear floor or ground space for wheelchairs.** **1. Size and approach.** The minimum clear floor or ground	2010 CBC is **equivalent** to 2010 ADA.		
825	**307 Protruding Objects**		**1133B.8.6 Protruding objects.**	2010 CBC is **equivalent** to 2010 ADA.	NA	NA
826	**307.1 General.** Protruding objects shall comply with 307.		CBC does not have an equivalent section subheading.	2010 CBC **does not address** 2010 ADA req.		1. If the CBC version is adopted, add a section subheading which reads "Protruding objects shall comply with 1133B.8.6" 2. Adopt 2010 ADA Standards version verbatim.
827	**307.2 Protrusion Limits.** Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the *circulation path* .		**1133B.8.6.1 General.** Objects projecting from walls (for example, telephones) with their leading edges between 27 inches (686 mm) and 80 inches (2032 mm) above the finished floor shall protrude no more than 4 inches (102 mm) into walks, halls, corridors, passageways or aisles. Objects mounted with their leading edges at or below 27 inches (686 mm) above the finished floor may protrude any amount. ...	2010 CBC is **equivalent** to 2010 ADA.	1. CBC and 2010 ADA Standards metric conversions differ slightly. 2. 2010 ADA Standards uses "circulation path" while CBC uses " walks, halls, corridors, passageways or aisles." 3. CBC has additional language indicating that objects with their leading edge at or below 27 inches AFF may protrude any amount. 4. CBC has additional language indicating that protruding objects shall not reduce the clear width or an accessible route or maneuvering space.	1. If the CBC version is adopted, revise "walks, etc." to "circulation path." 2. Adopt 2010 ADA Standards language verbatim. 3. Regardless of version adopted, include CBC requirement that protruding objects shall not reduce the clear width of an accessible route or maneuvering space. 4. Although the CBC specifically allows objects with their leading edge at or below 27" AFF to protrude any amount and 2010 ADA Standards does not, 2010 ADA Standards does imply this.
828	**307.2 EXCEPTION:** Handrails shall be permitted to protrude 4½ inches (115 mm) maximum.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CBC Section 1133B.5.5.1 allows handrails at ramps to project into the required clear width a distance of 3-1/2 inches maximum from each side at the handrail height but this is not equivalent to the requirements for protruding objects.	1. Adopt the 2010 ADA Standards exception. 2. Do not adopt the exception.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
829	**Advisory 307.2 Protrusion Limits.** When a cane is used and the element is in the detectable range, it gives a person sufficient time to detect the element with the cane before there is body contact. Elements located on circulation paths, including operable elements, must comply with requirements for protruding objects. For example, awnings and their supporting structures cannot reduce the minimum required vertical clearance. Similarly, casement windows, when open, cannot encroach more than 4 inches (100 mm) into circulation paths above 27 inches (685 mm).		N/A	2010 CBC **does not address** 2010 ADA req.		
830	**307.3 Post-Mounted Objects.** Free-standing objects mounted on posts or pylons shall overhang *circulation paths* 12 inches (305 mm) maximum when located 27 inches (685 mm) minimum and 80 inches (2030 mm) maximum above the finish floor or ground. Where a sign or other obstruction is mounted between posts or pylons and the clear distance between the posts or pylons is greater than 12 inches (305 mm), the lowest edge of such sign or obstruction shall be 27 inches (685 mm) maximum or 80 inches (2030 mm) minimum above the finish floor or ground.		**1133B.8.6.1 General.** ... Free-standing objects mounted on posts or pylons may overhang 12 inches (305 mm) maximum from 27 inches (686 mm) to 80 inches (2032 mm) above the ground or finished floor. Protruding objects shall not reduce the clear width of an accessible route or maneuvering space. See Figure 11B-7A. **1133B.8.6.3 Free-standing signs.** Wherever signs mounted on posts or pylons protrude from the posts or pylons and the bottom edge of the sign is at less than 80 inches (2032 mm) above the finished floor or ground level, the edges of such signs shall be rounded or eased and the corners shall have a minimum radius of 0.125 inches (3.2 mm).	2010 CBC **does not address** 2010 ADA req.	1. CBC indicates free-standing objects mounted on posts "may" overhang 12" maximum while 2010 ADA Standards uses "shall". 2. While CBC Fig. 11B-7C illustrates the CBC requirement that free-standing overhanging objects mounted between posts more than 12" apart shall be mounted 27" maximum AFF, the requirement is not included in the text of the CBC. 3. 2010 ADA Standards does not include a requirement that the edges of signs les than 80" AFF be rounded or eased.	1. If the CBC version is adopted, include the 2010 ADA Standards text requiring the 27" minimum height for free-standing objects mounted between posts more than 12" apart. 2. If the 2010 ADA Standards version is adopted, maintain the requirement for the edges of signs less than 80" AFF to be rounded or eased.
831	**307.3 EXCEPTION:** The sloping portions of handrails serving stairs and *ramps* shall not be required to comply with 307.3.		CBC does not have an equivalent exception.	2010 CBC **does not address** 2010 ADA req.	CBC Section 1133B.5.5.1 allows handrails at ramps to project into the required clear width a distance of 3-1/2 inches maximum from each side at the handrail height but this is not equivalent to the requirements for protruding objects.	1. If the CBC version is adopted, include the 2010 ADA Standards exception for handrails. 2. Adopt the 2010 ADA Standards version.
832	**307.4 Vertical Clearance.** Vertical clearance shall be 80 inches (2030 mm) high minimum. Guardrails or other barriers shall be provided where the vertical clearance is less than 80 inches (2030 mm) high. The leading edge of such guardrail or barrier shall be located 27 inches (685 mm) maximum above the finish floor or ground.		**1133B.8.6.2 Head room.** Walks, halls, corridors, passageways, aisles or other circulation spaces shall have 80 inches (2032 mm) minimum clear head room. If vertical clearance of an area adjoining an accessible route is reduced to less than 80 inches (nominal dimension), a barrier to warn blind or visually-impaired persons shall be provided. See Figures 11B-7A and 11B-7C.	2010 CBC **does not address** 2010 ADA req.	1. While CBC Fig. 11B-7C illustrates the CBC requirement that a cane-detectable barrier is required 27" maximum AFF where head room is reduced to less than 80" AFF, the requirement is not included in the text of the CBC. 2. CBC uses " barrier to warn blind or visually impaired persons" while 2010 ADA Standards uses "guardrails or other barriers". 3. CBC uses "walks, corridors, etc." while does not specifically mention that this requirement applies to accessible routes. 4. The 27" height is to the top of the barrier in the CBC figure and the bottom of the barrier in the 2010 ADA Standards figure.	1. If the CBC version is adopted, include the 2010 ADA Standards text requiring the 27" maximum height for barriers where vertical clearance is reudced to less than 80" AFF in the test of the CBC. 2. Revise CBC Fig. 11B-7C to indicate the 27" maximum height to the bottom of the barrier. 3. Adopt the 2010 ADA Standards version.
833	**307.4 EXCEPTION:** Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the finish floor or ground.		**1133B.2.2 Width and height.** Every required exit doorway shall be of a size as to permit the installation of a door not less than 3 feet (914 mm) in width and not less than 6 feet 8 inches (2032 mm) in height.	2010 CBC **does not address** 2010 ADA req.	CBC does not include a similar exception.	1. Adopt CBC without 2010 ADA Standards exception. 2. Adopt CBC with 2010 ADA Standards exception.
834	**307.5 Required Clear Width.** Protruding objects shall not reduce the clear width required for accessible routes.		**1133B.8.6.1 General.** ... Protruding objects shall not reduce the clear width of an accessible route or maneuvering space. See Figure 11B-7A.	2010 CBC is **equivalent** to 2010 ADA.	CBC also requires that protruding objects may not reduce the width of a meneuvering space, which 2010 ADA Standards does not.	Since maneuvering spaces can also include 60" diameter spaces, recommend revising the wording to *"shall not reduce the clear widfth of an accessible route or encroach into a required maneuvering space."*
835	**308 Reach Ranges**		SECTION 1118B – SPACE ALLOWANCE AND REACH RANGES			
835.1			1104B.5 Dining, banquet and bar facilities. ... Food service aisles. ... reach ranges in Sections 1118B.5 and 1118B.6.			
835.2			1106B.2 Laboratory rooms. ... accessible to and usable by persons with disabilities in compliance with Section 1118B, Space Allowance and Reach Ranges, …			

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
835.3			1106B.3 Teaching facility cubicles, study carrels, etc. ... in each group (language, dental, audiovisual, typing, drafting, darkrooms, etc.) made accessible to and usable by persons with disabilities in compliance with Section 1118B, Space Allowance and Reach Ranges, ...			
835.4			1106B.4 Library general use areas. ... 4. Card catalogs and magazine displays. ... reach heights ...Sections 1118B.5 ... …			
835.5			1106B.4 Library general use areas. ... 5. Reading and study areas. ... shall comply with Section 1118B, “Space Allowance and Reach Ranges”,…			
835.6			1115B.4.4.9 Soap dish. ... and within reach limits from the seat.			
835.7			116B.1.8 Car inside. ...located within one of the reach ranges specified in Sections 1118B.5 and 1118B.6. …			
835.8			1117B.2 Telephones. ... 2 or more banks ... At least 1 telephone per floor shall meet the requirements for a forward reach telephone.			
835.9			117B.2.6 Mounting height. ...shall be within the reach ranges specified in Sections 1118B.5 and 1118B.6. ... to reach diagonally shall have the highest operable part no higher than 54 inches …			
835.10			1117B.2.7 Enclosures. ... 1. Side reach possible. Where a parallel approach is provided at a telephone within an enclosure, the enclosure and counter may extend beyond the face of the telephone a maximum of 10 inches (254 mm). The enclosure and counter may not overlap the required clear floor or ground space. See Figure 11B-4.			
835.11			1117B.2.7 Enclosures. ... 3. Forward reach required. …			
835.12			1117B.2.12 Telephone books. ... complies with the reach ranges in Sections 1118B.5 and 1118B.6.			
835.13			1117B.6 Controls and operating mechanisms. ... 3. Height. ... placed within at least one of the reach ranges specified in Sections 1118B.5 and 1118B.6.			

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835.14			SECTION 1118B SPACE ALLOWANCE AND REACH RANGES 1118B.5 Forward reach. ... 1118B.5.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1219 mm) maximum and the low forward reach shall be 15 inches (381 mm) minimum above the finish floor or ground. See Figure 11B-5C (a). 1118B.5.2 Obstructed high reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1219 mm) maximum where the reach depth is 20 inches (508 mm) maximum. Where the reach depth exceeds 20 inches (508 mm), the high forward reach shall be 44 inches (1118 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. See Figure 11B-5C (b) and (c).		
835.15			1118B.6 Side reach. ... 1118B.6.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1219 mm) maximum and the low side reach shall be 15 inches (381 mm) minimum above the finish floor or ground. See Figure 11B-5D (a). Exception: An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (254 mm) maximum. 1118B.6.2 Obstructed high reach. Where a clear floor or ground space allows a parallel approach to an element and the high side reach is over an obstruction, the height of the obstruction shall be 34 inches (864 mm) maximum and the depth of the obstruction shall be 24 inches (610 mm) maximum. The high side reach shall be 48 inches (1219 mm) maximum for a reach depth of 10 inches (254 mm) maximum. Where the reach depth exceeds 10 inches (254 mm), the high side reach shall be 46 inches (1168 mm) maximum for a reach depth of 24 inches (610 mm) maximum. See Figure 11B-5D (b) and (c). Exception: The top of washing machines and clothes dryers shall be permitted to be 36 inches (914 mm) maximum above the finish floor.		
835.16			SECTION 1125B STORAGE 1125B.1 General. ... Additional storage may be provided outside of the reach ranges shown in Figure 11B-5D.			

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835.17			SECTION 1125B STORAGE 1125B.3 Height. ... shall be within at least one of the reach ranges specified in Sections 1118B.5 and 1118B.6. …			
836	**308.1 General.** Reach ranges shall comply with 308.		NA			
837	**Advisory 308.1 General.** The following table provides guidance on reach ranges for children according to age where building elements such as coat hooks, lockers, or operable parts are designed for use primarily by children. These dimensions apply to either forward or side reaches. Accessible elements and operable parts designed for adult use or children over age 12 can be located outside these ranges but must be within the adult reach ranges required by 308.		NA	2010 CBC **does not address** 2010 ADA req.	Might be helpful to include advisory	
838	**308.2 Forward Reach.**		SECTION 1118B – SPACE ALLOWANCE AND REACH RANGES 1118B.5 Forward reach		per 7/1 supplement	
839	**308.2.1 Unobstructed.** Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground.		1118B.5 Forward reach.... 1118B.5.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1219 mm) maximum and the low forward reach shall be 15 inches (381 mm) minimum above the finish floor or ground. See Figure 11B-5C (a).	2010 CBC is **equivalent** to 2010 ADA.	the metric system dimensions are not the same in CBC as ADA - CBC is more restrivitve	As a rule, it might be better and less confusing to use the ADA metric dimensions, typ
840	**308.2.2 Obstructed High Reach.** Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the *element* for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum.		1118B.5 Forward reach ... 1118B.5.2 Obstructed high reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1219 mm) maximum where the reach depth is 20 inches (508 mm) maximum. Where the reach depth exceeds 20 inches (508 mm), the high forward reach shall be 44 inches (1118 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. See Figure 11B-5C (b) and (c).	2010 CBC is **equivalent** to 2010 ADA.	the metric system dimensions are not the same in CBC as ADA - CBC is more restrivitve	As a rule, it might be better and less confusing to use the ADA metric dimensions, typ
841	**308.3 Side Reach.**		SECTION 1118B – SPACE ALLOWANCE AND REACH RANGES 1118B.6 Side reach....			
842	**308.3.1 Unobstructed.** Where a clear floor or ground space allows a parallel approach to an *element* and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground.		1118B.6.1 Unobstructed. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1219 mm) maximum and the low side reach shall be 15 inches (381 mm) minimum above the finish floor or ground. See Figure 11B-5D (a). ...	2010 CBC is **equivalent** to 2010 ADA.		
843	**308.3.1 EXCEPTIONS: 1.** An obstruction shall be permitted between the clear floor or ground space and the *element* where the depth of the obstruction is 10 inches (255 mm) maximum. **...**		1118B.6.1 Unobstructed. .... Exception: An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (254 mm) maximum. ...	2010 CBC is **equivalent** to 2010 ADA.		

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844	**308.3.1 EXCEPTIONS: ...** **2.** *Operable parts* of fuel dispensers shall be permitted to be 54 inches (1370 mm) maximum measured from the surface of the *vehicular way* where fuel dispensers are installed on existing curbs.		SECTION 1104C REQUIRED FEATURES Card-reading devices at motor vehicle fuel facilities shall be accessible by complying with only the following: The highest operable part of each primary or alternate card reader shall be no more than 54 inches (1372 mm) measured from the base of the fuel dispenser. Where card readers are located on free-standing pedestals, the card-reading control function shall be no more than 54 inches (1372 mm) above an accessible level area which is served by an accessible route of travel. ...	2010 CBC provides **less access** than 2010 ADA.	Exception 2 is missing and is located in CBC 11C - 1104C.1 CBC states 54" max above an accessible level as opposed to ADA stating 54" max above the vehicular way	1. It should say from the surface of the vehicular way where installed on existing curbs
845	**308.3.2 Obstructed High Reach.** Where a clear floor or ground *space* allows a parallel approach to an *element* and the high side reach is over an obstruction, the height of the obstruction shall be 34 inches (865 mm) maximum and the depth of the obstruction shall be 24 inches (610 mm) maximum. The high side reach shall be 48 inches (1220 mm) maximum for a reach depth of 10 inches (255 mm) maximum. Where the reach depth exceeds 10 inches (255 mm), the high side reach shall be 46 inches (1170 mm) maximum for a reach depth of 24 inches (610 mm) maximum.		1118B.6.2 Obstructed high reach. Where a clear floor or ground space allows a parallel approach to an element and the high side reach is over an obstruction, the height of the obstruction shall be 34 inches (864 mm) maximum and the depth of the obstruction shall be 24 inches (610 mm) maximum. The high side reach shall be 48 inches (1219 mm) maximum for a reach depth of 10 inches (254 mm) maximum. Where the reach depth exceeds 10 inches (254 mm), the high side reach shall be 46 inches (1168 mm) maximum for a reach depth of 24 inches (610 mm) maximum. See Figure 11B-5D (b) and (c). ...	2010 CBC is **equivalent** to 2010 ADA.		
846	**308.3.2 EXCEPTIONS: 1.** The top of washing machines and clothes dryers shall be permitted to be 36 inches (915 mm) maximum above the finish floor. **...**		... Exception: The top of washing machines and clothes dryers shall be permitted to be 36 inches (914 mm) maximum above the finish floor.	2010 CBC is **equivalent** to 2010 ADA.		
846.1	**308.3.2 EXCEPTIONS: ...** **2.** *Operable parts* of fuel dispensers shall be permitted to be 54 inches (1370 mm) maximum measured from the surface of the *vehicular way* where fuel dispensers are installed on existing curbs.		***SECTION 1104C*** ***REQUIRED FEATURES*** Card-reading devices at motor vehicle fuel facilities shall be accessible by complying with only the following: The highest operable part of each primary or alternate card reader shall be no more than 54 inches (1372 mm) measured from the base of the fuel dispenser. Where card readers are located on free-standing pedestals, the card-reading control function shall be no more than 54 inches (1372 mm) above an accessible level area which is served by an accessible route of travel. ...	2010 CBC provides **less access** than 2010 ADA.	Exception 2 is missing and is located in CBC 11C - 1104C.1 CBC states 54" max above an accessible level as opposed to ADA stating 54" max above the vehicular way CBC allows for an exception not in the ADA	1. It should say from the surface of the vehicular way where installed on existing curbs
847	**309 Operable Parts**		**1117B.6 Controls and operating mechanisms.**	2010 CBC is **equivalent** to 2010 ADA.		
848	**309.1 General.** *Operable parts* shall comply with 309.		**1117B.6 Controls and operating mechanisms.** **1. General.** Controls and operating mechanisms in accessible spaces, along accessible routes or as parts of accessible elements (for example, light switches and dispenser controls) and those required to be accessible by Section 1.9.1 shall comply with the requirements of this section.	2010 CBC is **equivalent** to 2010 ADA.		

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849	**309.2 Clear Floor Space.** A clear floor or ground space complying with 305 shall be provided.		**1117B.6 Controls and operating mechanisms.** **1. General.** Controls and operating mechanisms in accessible spaces, along accessible routes or as parts of accessible elements (for example, light switches and dispenser controls) and those required to be accessible by Section 1.9.1 shall comply with the requirements of this section. **2. Clear floor space**. Clear floor space complying with Section 1118B.4 that allows a forward or parallel approach by a person using a wheelchair shall be provided at controls, dispensers, receptacles and other operable equipment.	2010 CBC is **equivalent** to 2010 ADA.	Differences in the requirements of referenced sections 305 and 1118B.4 are documented in detail elsewhere in this document. The point of this line is that both the ADA Stds. And the CBC require compliant clear floor spaces at accessible elements.	
850	**309.3 Height.** *Operable parts* shall be placed within one or more of the reach ranges specified in 308.		**1117B.6 Controls and operating mechanisms.** **1. General.** Controls and operating mechanisms in accessible spaces, along accessible routes or as parts of accessible elements (for example, light switches and dispenser controls) and those required to be accessible by Section 1.9.1 shall comply with the requirements of this section. **3. Height.** The highest operable part of all controls, dispensers, receptacles and other operable equipment shall be placed within at least one of the reach ranges specified in Sections 1118B.5 and 1118B.6. **...** **5. Installation heights of electrical switches and receptacle outlets.** **5.1 Electrical switches.** Controls and switches intended to be used by the occupant of the room or area to control lighting and receptacle outlets, appliances or cooling, heating and ventilating equipment, shall be located no more than 48 inches (1219 mm) measured from the top of the outlet box nor less than 15 inches (381 mm) measured from the bottom of the outlet box to the level of the finish floor or working platform. **5.2 Electrical receptacle outlets.** Electrical receptacle outlets on branch circuits of 30 amperes or less and communication system receptacles shall be located no more than 48 inches (1219 mm) measured from the top of the receptacle outlet box or receptacle housing nor less than 15 inches (381 mm) measured from the bottom of the receptacle outlet box or receptacle housing to the level of the finish floor or working platform. **Exceptions:** **1.** Receptacle outlets installed as part of permanently installed baseboard heaters are exempt. **2.** Required receptacle outlets shall be permitted in floors when adjacent to sliding panels or walls. **3.** Baseboard electrical outlets used in relocatable partitions, window walls or other electrical convenience floor outlets are not subject to the minimum height requirements. **4.** This section shall not apply to existing buildings when the	Which Std.provides greater access **depends** on circumstances.	1118B.5 and 1118B.6 were recently modified to be in agreement with the 2010 ADA Stds., so the two standards are equivalent with respect to basic and general height requirements. There are differences, however in the height requirements in specific instances: 1) 1117B.6 #5 calls for electrical swithches and outlets to be located within the standard reach ranges, but they require that these measurements be taken to the top of the outlet box for the high measurement, and the bottom of the outlet box for the low. There is no similar requirement in 308 or 309. The CBC is stricter, and thus provides greater access. 2) A number of exceptions are provided in 1117B.6 #5 that are not included in 308 or 309. Scoping section 205.1 provides a similar, but different list of exceptions. Which standard provides greater access depends on the circumstances. 3) 106B.4 #3 requires book shelves to be no higher than 54" AFF unless an attendant is available to assist. 54" is beyond the new reach range heights, but 225.2.2 excludes shelves of this type from having to comply with reach range requirements. The CBC is stricter, and thus provides greater access. 4) 1115B.4.4 requires water controls in accessible showers to be located 39" - 41" AFF measured to the centerline of the controls. This is lower than the 2010 ADA Stds. maximum allowed height of 48" AFF. The CBC is stricter, and thus provides greater access. 5) 1115B.4.4.9 requires soap dishes in showers to be mounted at 40" AFF. This is lower than the 2010 ADA Stds. maximum allowed height of 48" AFF. The CBC is stricter, and thus provides greater access. 6) 1115B.8.2 requires medicine cabinets in toilet rooms to be mounted such that at least one shelf is no higher than 44" AFF. This is lower than the 2010 ADA Stds. maximum allowed height of 48" AFF. The CBC is stricter, and thus provides greater access. 7) 1115B.8.3 requires at least one towel, sanitary napkin, waste receptacles, dispensers, and controls in toilet rooms to be mounted no higher than 40" AFF to the highest operable. This is lower than the 2010 ADA Stds. maximum allowed height of 48" AFF. The CBC is stricter, and thus provides greater access.	2) Coordinate the 1117B.6 #5 exceptions for electrical switches and receptacle outlets with those found in 205.1. 7) Since sinks (not just lavatories located in toilet rooms) are now covered by the 2010 ADA Stds., determine if the accessory maximum height requirement should be applied to sinks not located in sanitary facilities. 8) Since it is conceivable that one could space up-down elevator call buttons more than 12" apart, consider including a stipulation in 1116B.1.10 that limits the height of the top button to 48" AFF.
851	**309.4 Operation.** *Operable parts* shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate *operable parts* shall be 5 pounds (22.2 N) maximum.		**1117B.6 Controls and operating mechanisms.** **...** **4. Operation.** Controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 pounds (22.2 N) of force.	2010 CBC is **equivalent** to 2010 ADA.		

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852	**309.4 EXCEPTION:** Gas pump nozzles shall not be required to provide *operable parts* that have an activating force of 5 pounds (22.2 N) maximum.		**1117B.6 Controls and operating mechanisms.** **1. General.** Controls and operating mechanisms in accessible spaces, along accessible routes or as parts of accessible elements (for example, light switches and dispenser controls) and those required to be accessible by Section 1.9.1 shall comply with the requirements of this section. **...** **4. Operation.** Controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 pounds (22.2 N) of force. **...**	2010 CBC provides **greater access** than 2010 ADA.	The CBC contains no exception for gas pump nozzle activation force. The 2010 ADA Stds exception seems reasonable given the nature of these devices. In fact II have never seen a gas pump nozzle that didn't require tight grasping to operate. That doesn't mean they don't exist, or that they can't be created, but it seems wrong that standards should establish criteria that can not be met (with current technology).	Consider adopting the 2010 ADA Stds. Exception for gas pump nozzle activation force.
853	**CHAPTER 4: ACCESSIBLE ROUTES**		N/A	NA	This is just the section heading	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
854	**401 General**		N/A	NA	This is just the section heading	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
855	**401.1 Scope.** The provisions of Chapter 4 shall apply where required by Chapter 2 or where referenced by a requirement in this document.		N/A	NA	2010 CBC scoping of accessible routes is addressed in other sections of the code rather than in a single single section.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
856	**402 Accessible Routes**		N/A	NA	This is just the section heading	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
857	**402.1 General.** *Accessible* routes shall comply with 402.		N/A	NA	This is just a referencing statement in the ADA Stds. 2010 CBC does not similarly reference accessible route requirements.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
858	**402.2 Components.** *Accessible* routes shall consist of one or more of the following components: walking surfaces with a *running slope* not steeper than 1:20, doorways, *ramps, curb ramps* excluding the flared sides, elevators, and platform lifts. All components of an accessible route shall comply with the applicable requirements of Chapter 4.		**1102B** **DEFINITIONS** **ACCESSIBLE ROUTE OF TRAVEL** is a continuous unobstructed path connecting all accessible elements and spaces in an accessible building or facility that can be negotiated by a person with a disability using a wheelchair and that is also safe for and usable by persons with other disabilities, and that is consistent with the definition of “Path of travel” in this section. Interior accessible routes may include corridors, floors, ramps, elevators, lifts and clear floor space at fixtures. Exterior accessible routes may include parking access aisles, curb ramps, crosswalks at vehicular ways, walks, sidewalks, ramps, and lifts. An accessible route does not include stairs, steps, or escalators.	Which Std.provides greater access **depends** on circumstances.	2010 ADA Stds. provides a briefer and somewhat more general definition of accessible route compnents than 2010 CBC. 2010 CBC's definition of accessible route of travel includes scoping language that is addressed in ADA Stds. Chapter 2.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
859	**Advisory 402.2 Components.** Walking surfaces must have running slopes not steeper than 1:20, see 403.3. Other components of accessible routes, such as ramps (405) and curb ramps (406), are permitted to be more steeply sloped.		N/A	NA	This is just an advisory. The technical requirements are addressed in other sections of the CBC.	2010 CBC need not be amended.

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860	**403 Walking Surfaces**	**UNDER REVIEW** **ACC Note:** *Walking Surfaces* is a misleading title, and 4.5 is not equivalent to 403. Walking surfaces, as defined in 402.2 are a component of an accessible route. They are walkways that slope no more than 5%. Ground and floor surfaces (4.5) are a part of that accessible route component, just as they are a part of curb ramps and ramps.	**1114B.1.2 Accessible route of travel.**	2010 CBC is **equivalent** to 2010 ADA.		
861	**403.1 General.** Walking surfaces that are a part of an *accessible* route shall comply with 403.	**UNDER REVIEW** **ACC Note:** *Walking Surfaces* is a misleading title, and 4.5.1 is not equivalent to 403.1. Walking surfaces, as defined in 402.2 are a component of an accessible route. They are walkways that slope no more than 5%. Ground and floor surfaces (4.5) are a part these walkways, just as they are a part of curb ramps and ramps. 4.1.3(3) (see line 863) would be a more comparable 1991 cite.	**SECTION 1103B** **BUILDING ACCESSIBILITY** **1103B.1 Scope.** Accessibility to buildings or portions of buildings shall be provided for all occupancy classifications except as modified or enhanced by this chapter. Occupancy requirements in this chapter may modify general requirements, but never to the exclusion of them. When a building or facility contains more than one use, the occupancy specific accessibility provisions for each portion of the building or facility shall apply. An accessible route of travel complying with Section 1114B.1.2 shall connect all elements and spaces within a building or facility... **SECTION 1104B** **ACCESSIBILITY FOR GROUP A OCCUPANCIES** **1104B.5 Dining, banquet and bar facilities.** **4. Seating.** ... Access to such seating spaces shall be provided with main aisles not less than 36 inches (914 mm) clear width. ... **5. Food service aisles.** Food service aisles shall be a minimum of 36 inches (914 mm) of clear width with a preferred width of 42 inches (1067 mm) where passage of stopped wheelchairs by pedestrians is desired. ... **SECTION 1105B** **ACCESSIBILITY FOR GROUP B OCCUPANCIES** **1105B.3.2 Business and professional offices.** Areas to be made accessible include the following: **3.** Employee work areas shall have a minimum of 36 inches (914 mm) clear width access, except as modified in other portions of these regulations. See Sections 1133B.6.1 and 1133B.6.2. **1105B.3.3 Personal and public service facilities.** Areas to be made accessible include the following: **2.** Employee work areas shall have a minimum of 36 inches (914 mm) clear width access, except as modified in other	Which Std.provides greater access **depends** on circumstances.	The issue under consideration here is basic 2010 ADA Stds. requirement that walking surfaces shall comply with the clear width requirements stated in 403.5. Both standards require walkways to be a minimum of 36" with similar exceptions except as follows: 1) 403.5.Exception allows circulation paths in employee work areas to be reduced by work area equipment in certain conditions. It isn't clear which standard offers greater access. 2) 403.5.1 Exception allows the clear width to be reduced to as little as 32" for a maximum length of 24" provided that the reduced width segments are separated by 36" minimumum wide segments that are at least 48" long. 1114B.1.2 (Figure 11B-10) allows clear widths to be reduced in a similar fashion, but it does not specify a minimum spacing between segments of reduced width. The 2010 ADA Stds. is more explicit. As such, it provides greater access. 3) 403.5.2 Exception allows a 36" minimum wide route at turns that are < 48" wide if the turning area is at least 60" deep. The CBC does not offer a similar exception. It is not clear which standard offers greater access. 4) 403.6 requires handrails, when provided, to comply with 505 even though handrails are not required on walkways that slope < 5%. The CBC does not speak to handrails that are provided, but not required. The 2010 ADA Stds. provides greater access. 5) 1106B.4 #2 requires main aisles in open book stacks of library general use areas to be at least 44" wide. The CBC provides greater access. 6) 1115B.3.1 #4.5 requires an unobstructed access of not less than 44" through multiple-accommodation toilet rooms to the accessible water closet compartment. The CBC provides greater access. 7) 1121B.3.1 #7 requires accessible fare collection devices in new transportation stations for fixed guideway systems to have a minimum clear opening width of 32". Because the 2010 Stds. does not speak to this specific issue, and its general provisions are stricter, the 2010 ADA Stds. provides greater access. 8) 1121B.3.1 #16 requires escalators in below grade transportation stations for fixed fare quideway systems to be at	1) This issue is discussed on line 868. 2) This issue is discussed on lines 870, 872, & 873. 3) This issue is discussed on lines 874 & 875. 4) This issue is discussed on line 878. 5) No action required. 6) No action required. 7)2) This issue is discussed on lines 870, 872, & 873. 8) No action required. 9) No action required. 10) No action required. 11) No action required. 12) 2) This issue is discussed on lines 870, 872, & 873.

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862	**403.2 Floor or Ground Surface.** Floor or ground surfaces shall comply with 302.		**SECTION 1124B** **GROUND AND FLOOR SURFACES** **1124B.1 General.** Ground and floor surfaces along accessible routes and in accessible rooms and spaces, including floors, walks,..., comply with this section.	2010 CBC is **equivalent** to 2010 ADA.	403.2 references 302, which differs in a couple of ways from 1124B. 1) 302 does not include *Changes in Level* (1124b.2), which are prohibited by the 2010 ADA Stds. in required clear floor and ground spaces (305) and turning spaces (304). But, 403.4 permits changes in level within walkways such as the ones in question here, so there is no effective difference or conflict here. 2) Animal containment areas and areas of sport activity are not required to comply with 302. The CBC does not provide similar exceptions. But again, the issue here is walkways, so the exceptions to 302 are not pertinent. There is no effective difference or conflict here.	
863	**403.2 Floor or Ground Surface.** Floor or ground surfaces shall comply with 302.		**SECTION 1124B** **GROUND AND FLOOR SURFACES** **1124B.1 General.** Ground and floor surfaces along accessible routes and in accessible rooms and spaces, including floors, walks, ..., comply with this section.	2010 CBC is **equivalent** to 2010 ADA.	403.2 references 302, which differs in a couple of ways from 1124B. 1) 302 does not include *Changes in Level* (1124b.2), which are prohibited by the 2010 ADA Stds. in required clear floor and ground spaces (305) and turning spaces (304). But, 403.4 permits changes in level within walkways such as the ones in question here, so there is no effective difference or conflict here. 2) Animal containment areas and areas of sport activity are not required to comply with 302. The CBC does not provide similar exceptions. But again, the issue here is walkways, so the exceptions to 302 are not pertinent. There is no effective difference or conflict here.	
864	**403.2 Floor or Ground Surface.** Floor or ground surfaces shall comply with 302.		**SECTION 1124B** **GROUND AND FLOOR SURFACES** **1124B.1 General.** Ground and floor surfaces along accessible routes and in accessible rooms and spaces, including floors, walks, ... comply with this section.	2010 CBC is **equivalent** to 2010 ADA.	403.2 references 302, which differs in a couple of ways from 1124B. 1) 302 does not include *Changes in Level* (1124b.2), which are prohibited by the 2010 ADA Stds. in required clear floor and ground spaces (305) and turning spaces (304). But, 403.4 permits changes in level within walkways such as the ones in question here, so there is no effective difference or conflict here. 2) Animal containment areas and areas of sport activity are not required to comply with 302. The CBC does not provide similar exceptions. But again, the issue here is walkways, so the exceptions to 302 are not pertinent. There is no effective difference or conflict here.	

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865	**403.3 Slope.** The *running slope* of walking surfaces shall not be steeper than 1:20. The *cross slope* of walking surfaces shall not be steeper than 1:48.		**1114B.1.2 Accessible route of travel.** When a building, or portion of a building, is required to be accessible or adaptable, an accessible route of travel complying with Sections 1102B, 1114B, 1124B, 1133B.3, 1133B.5, 1133B.7 and 1133B.8.6 shall be provided to all portions of the building, to accessible building entrances and between the building and the public way. All walks, halls, corridors, aisles, skywalks, tunnels, and other spaces that are part of an accessible route shall comply with the applicable provisions of this code. ... At least one accessible route shall connect accessible building or facility entrances with all accessible spaces ... **1133B.5.1 General.** Ramps shall conform to the provisions of this section. Any accessible route of travel shall be considered a ramp if its slope is greater than one unit vertical in 20 units horizontal (5-percent slope). **1133B.7.3 Five percent gradient.** When the slope in the direction of travel of any walk exceeds 1 unit vertical in 20 units horizontal (5-percent slope), it shall comply with the provisions of Section 1133B.5. **1133B.7.1.3 Surface cross slopes.** Surface cross slopes shall not exceed one unit vertical in 50 units horizontal (2-percent slope).	2010 CBC provides **greater access** than 2010 ADA.	403.3 clearly and concisely states the requirements for slope and cross slope of walking surfaces. To arrive at the same information in the CBC, one must begin with 1114B and 1114B.1.2, which references and applies 1133B.5 (ramps) and 1133B.7 (walks and sidewalks). 1) The path one must take in the CBC to determine the maximum allowed slopes and cross slopes of walking surfaces is more difficult than it needs to be. It would be much better if this **vitally** important information was clearly stated in a more direct fashion. 2) Regarding cross slope, one could argue that the CBC 1:50 is more restrictive than the ADA 1:48, and therefore provides greater access, but the difference in the two standards is quite minor. The ADA requirement recognizes that elements are commonly constructed in terms of inches, not percentages, and it allows for cross slopes of up to 1/4" per foot. While it is perhaps less restrictive, 1:48 recognizes and allows for common construction industry practice without significantly impacting accessibility.	1a) Add language to 11124B that clarifies that walkways along accessible routes may slope no greater than 5% and have cross slopes no greater than 2% (= 1:50) or 2.08% (= 1:48 = 1/4"/ft). 1b) Maintain the current language and path to the information. 2a) Maintain the current language of 1133B.7.1.3, which calls for maximum cross slopes of 1:50. 2b) Modify 1133B.7.1.3 to agree with 403.3 by calling for maximum cross slopes of 1:48.
866	**403.4 Changes in Level.** Changes in level shall comply with 303.		**1124B.2 Changes in level.** Changes in level up to ¼ inch (6.4 mm) may be vertical and without edge treatment [see Figure 11B-5E(c)]. Changes in level between ¼ inch (6.4 mm) and ½ inch (12.7 mm) shall be beveled with a slope no greater than one unit vertical in 2 units horizontal (50-percent slope) [see Figure 11B-5E(d)]. Changes in level greater than ½ inch (12.7 mm) shall be accomplished by means of a curb ramp, ramp, elevator or platform lift that complies with Sections 1127B.5, 1133B.5, 1116B.1 or 1116B.2, respectively.	Which Std.provides greater access **depends** on circumstances.	Figure 303.3 illustrates a 1/4" maximum high beveled section on top of a 1/4" high vertical rise. Figure 11B-5E (d) shows that when the rise is > 1/4", the entire change in level must be beveled at a slope no greater than 1:2. Figure 11B-5E(d) is stricter than 303.3, but, as stated on the CBC figures "THESE DIAGRAMS ILLUSTRATE THE SPECIFIC REQUIREMENTS OF THESE REGULATIONS AND ARE INTENDED ONLY AS AN AID FOR BUILDING DESIGN AND CONSTRUCTION". This is generally taken to mean that the figures are illustrative but not enforcable (by themselves). The text of the two standards are essentially the same. As such, whether 11B-5E(d) or 303.3 is correct is left up to each building official to decide.	1) Adopt 2010 ADA Stds. Figure 303.3. 2) Keep CBC Figure 11B-5E(d) as-is. Add language to the standard that clarifies that if the change in level is > 1/4" in height, the entire rise must be sloped no greater than 1:2.

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867	**403.5 Clearances.** Walking surfaces shall provide clearances complying with 403.5.		**SECTION 1103B** **BUILDING ACCESSIBILITY** **1103B.1 Scope.** Accessibility to buildings or portions of buildings shall be provided for all occupancy classifications except as modified or enhanced by this chapter. Occupancy requirements in this chapter may modify general requirements, but never to the exclusion of them. When a building or facility contains more than one use, the occupancy specific accessibility provisions for each portion of the building or facility shall apply. An accessible route of travel complying with Section 1114B.1.2 shall connect all elements and spaces within a building or facility. ... **SECTION 1104B** **ACCESSIBILITY FOR GROUP A OCCUPANCIES** **1104B.5 Dining, banquet and bar facilities.** **4. Seating.** .... Access to such seating spaces shall be provided with main aisles not less than 36 inches (914 mm) clear width. ... **5. Food service aisles.** Food service aisles shall be a minimum of 36 inches (914 mm) of clear width with a preferred width of 42 inches (1067 mm) where passage of stopped wheelchairs by pedestrians is desired. ... **SECTION 1105B** **ACCESSIBILITY FOR GROUP B OCCUPANCIES** **1105B.3.2 Business and professional offices.** Areas to be made accessible include the following: **3.** Employee work areas shall have a minimum of 36 inches (914 mm) clear width access, except as modified in other portions of these regulations. See Sections 1133B.6.1 and 1133B.6.2. **1105B.3.3 Personal and public service facilities.** Areas to be made accessible include the following: **2.** Employee work areas shall have a minimum of 36 inches (914 mm) clear width access, except as modified in other	Which Std.provides greater access **depends** on circumstances.	The issue under consideration here is basic 2010 ADA Stds. requirement that walking surfaces shall comply with the clear width requirements stated in 403.5. Both standards require walkways to be a minimum of 36" with similar exceptions except as follows: 1) 403.5.Exception allows circulation paths in employee work areas to be reduced by work area equipment in certain conditions. It isn't clear which standard offers greater access. 2) 403.5.1 Exception allows the clear width to be reduced to as little as 32" for a maximum length of 24" provided that the reduced width segments are separated by 36" minimumum wide segments that are at least 48" long. 1114B.1.2 (Figure 11B-10) allows clear widths to be reduced in a similar fashion, but it does not specify a minimum spacing between segments of reduced width. The 2010 ADA Stds. is more explicit. As such, it provides greater access. 3) 403.5.2 Exception allows a 36" minimum wide route at turns that are < 48" wide if the turning area is at least 60" deep. The CBC does not offer a similar exception. It is not clear which standard offers greater access. 4) 403.6 requires handrails, when provided, to comply with 505 even though handrails are not required on walkways that slope < 5%. The CBC does not speak to handrails that are provided, but not required. The 2010 ADA Stds. provides greater access. 5) 1106B.4 #2 requires main aisles in open book stacks of library general use areas to be at least 44" wide. The CBC provides greater access. 6) 1115B.3.1 #4.5 requires an unobstructed access of not less than 44" through multiple-accommodation toilet rooms to the accessible water closet compartment. The CBC provides greater access. 7) 1121B.3.1 #7 requires accessible fare collection devices in new transportation stations for fixed guideway systems to have a minimum clear opening width of 32". Because the 2010 Stds. does not speak to this specific issue, and its general provisions are stricter, the 2010 ADA Stds. provides greater access. 8) 1121B.3.1 #16 requires escalators in below grade transportation stations for fixed fare guideway systems to be at	1) This issue is discussed on line 868. 2) This issue is discussed on lines 870, 872, & 873. 3) This issue is discussed on lines 874 & 875. 4) This issue is discussed on line 878. 5) No action required. 6) No action required. 7)2) This issue is discussed on lines 870, 872, & 873. 8) No action required. 9) No action required. 10) No action required. 11) No action required. 12) 2) This issue is discussed on lines 870, 872, & 873.

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868	**403.5 EXCEPTION:** Within *employee work areas* , clearances on *common use circulation paths* shall be permitted to be decreased by *work area equipment* provided that the decrease is essential to the function of the work being performed.		**1114B.1.2 Accessible route of travel.** When a building, or portion of a building, is required to be accessible or adaptable, an accessible route of travel complying with Sections ..., 1114B, ...1133B.7 and 1133B.8.6 shall be provided to all portions of the building, to accessible building entrances and between the building and the public way. All walks, halls, corridors, aisles, skywalks, tunnels, and other spaces that are part of an accessible route shall comply with the applicable provisions of this code. ... At least one accessible route shall connect accessible building or facility entrances with all accessible spaces ... . Unless otherwise indicated, the minimum clear width of an accessible route shall not be less than 36 inches (914 mm) except at doors complying with Section 1133B.2 or obstructions complying with Figure 11B-10... **SECTION 1123B** **ACCESS TO EMPLOYEE AREAS** **1123B.1 General.** Employee areas shall comply with the accessibility requirements of this chapter. 1123B.2 Work stations. Specific work stations need only comply with aisle width (Sections 1133B.6.1 and 1133B.6.2) and floors and levels (Section 1120B), and entryways shall be 32 inches (813 mm) in clear width. Exception: Accessibility is not required to (1) observation galleries used primarily for security purposes; or (2) in nonoccupiable spaces accessed only by ladders, catwalks, crawl spaces, very narrow passageways or freight (nonpassenger) elevators, and frequented only by service personnel for repair purposes; such spaces include, but are not limited to, elevator pits, elevator penthouses, mechanical rooms, piping or equipment catwalks. 1133B.6 Aisles. **1133B.6.1 General.** Every portion of every building in which are installed seats, tables, merchandise, equipment or similar materials shall be provided with aisles leading to an exit	Which Std.provides greater access **depends** on circumstances.	403.5 provides a clear exception to clear width requirements in employee work areas that meet a specific requirement. It isn't clear whether or not the CBC requires circulation paths in employee work areas to meet clear width requirements. In the 2007 CBC Section 1123B contained the following statement: "*Employee areas shall conform to all requirements of the Division of the State Architect - Access Compliance in the California Building Code...*". That statement has been removed from the 2010 CBC. 1133B.6 requires "*Every portion of every building ... shal be provided with aisles leading to an exit.*", and 1133B.6.2 requires every aisle to be at least 36" wide; 44" wide if serving both sides. But 1114B.1.2, which innumerates the requirements for accessible routes, which must be "*provided to all portions of buildings*", does not include 1133B.6 in the list of sections that must be complied with. 1123B.1, which applies to all employee areas, mentions 1133B.6, but only with respect to "s*pecific work stations".* 1105B and 1108B call for aisles in employee work areas to comply with 1133B.6, but they only apply to Group B and Group H occupancies, respectively. Employee work areas obviously exist in facilities with different occupancy classifications. 1106B.2 allows aisles in laboratorys under condition of unreasonable hardship and specific use to be reduced to as little as 32". A reference to 1133B.6 in 1114B.1.2, and/or a statement or two regarding clear widths added to 1123B would go a long way toward cleaning this up.	1) Add a reference to 1133B.6 in 1114B.1.2. 2) Add a statement to 1123B regarding minimum clear widths of aisles. 2) Add an exception (somewhere - most likely in 1123B) that expresses the 403.5 exception. 3) Do not add an exception that expresses the 403.5 exception.

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869	**403.5.1 Clear Width.** Except as provided in 403.5.2 and 403.5.3, the clear width of walking surfaces shall be 36 inches (915 mm) minimum.		**SECTION 1103B** **BUILDING ACCESSIBILITY** **1103B.1 Scope.** Accessibility to buildings or portions of buildings shall be provided for all occupancy classifications except as modified or enhanced by this chapter. Occupancy requirements in this chapter may modify general requirements, but never to the exclusion of them. When a building or facility contains more than one use, the occupancy specific accessibility provisions for each portion of the building or facility shall apply. An accessible route of travel complying with Section 1114B.1.2 shall connect all elements and spaces within a building or facility. ... **SECTION 1104B** **ACCESSIBILITY FOR GROUP A OCCUPANCIES** **1104B.5 Dining, banquet and bar facilities.** **4. Seating.** ... Access to such seating spaces shall be provided with main aisles not less than 36 inches (914 mm) clear width. ... **5. Food service aisles.** Food service aisles shall be a minimum of 36 inches (914 mm) of clear width with a preferred width of 42 inches (1067 mm) where passage of stopped wheelchairs by pedestrians is desired. ... **SECTION 1105B** **ACCESSIBILITY FOR GROUP B OCCUPANCIES** **1105B.3.2 Business and professional offices.** Areas to be made accessible include the following: **3.** Employee work areas shall have a minimum of 36 inches (914 mm) clear width access, except as modified in other portions of these regulations. See Sections 1133B.6.1 and 1133B.6.2. **1105B.3.3 Personal and public service facilities.** Areas to be made accessible include the following: **2.** Employee work areas shall have a minimum of 36 inches (914 mm) clear width access, except as modified in other	Which Std.provides greater access **depends** on circumstances.	The issue under consideration here is basic 2010 ADA Stds. requirement that walking surfaces shall comply with the clear width requirements stated in 403.5. There are numerous other aisle width requirements in CBC Chapter 10 such as 1005, 1007.3, 1008.1, 1010.5.1, 1018.2, 1023.2, 1027.5.1, 1028.6, 1028.9, and 1028.10. Both standards require walkways to be a minimum of 36" with similar exceptions except as follows: 1) 403.5.Exception allows circulation paths in employee work areas to be reduced by work area equipment in certain conditions. It isn't clear which standard offers greater access because neither standard assures access to all aisles from accessible entrances to the space. 2) 403.5.1 Exception allows the clear width to be reduced to as little as 32" for a maximum length of 24" provided that the reduced width segments are separated by 36" minimumum wide segments that are at least 48" long. 1114B.1.2 (Figure 11B-10) allows clear widths to be reduced in a similar fashion, but it does not specify a minimum spacing between segments of reduced width. The 2010 ADA Stds. is more explicit. As such, it provides greater access. 3) 403.5.2 Exception allows a 36" minimum wide route at turns that are < 48" wide if the turning area is at least 60" deep. The CBC does not offer a similar exception. It is not clear which standard offers greater access. 4) 403.6 requires handrails, when provided, to comply with 505 even though handrails are not required on walkways that slope < 5%. The CBC does not speak to handrails that are provided, but not required. The 2010 ADA Stds. provides greater access. 5) 1106B.4 #2 requires main aisles in open book stacks of library general use areas to be at least 44" wide. The CBC provides greater access because it provides two 22" wide units of exit width which allows people to flow two abreast (one stream of people from each side aisle) at exit speeds. 6) 1115B.3.1 #4.5 requires an unobstructed access of not less than 44" through multiple-accommodation toilet rooms to the accessible water closet compartment. The CBC provides greater access because it allows easy passing.	1) This issue is discussed on line 868. 2) This issue is discussed on lines 870, 872, & 873. 3) This issue is discussed on lines 874 & 875. 4) This issue is discussed on line 878. 5) No action required. 6) No action required. 7) This issue is discussed on lines 870, 872, & 873. 8) No action required. 9) No action required. 10) No action required. 11) Clarify whether the aisles that must be "not less than 44 inches wide if serving both sides" means a) "serving merchandise display shelves on both sides", b) "serving merchandise storage or display shelves on both sides", and/or c) "serving aisles entering from both sides" like main aisles in libraries. 12) This issue is discussed on lines 870, 872, & 873.

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870	**403.5.1 Clear Width.** Except as provided in 403.5.2 and 403.5.3, the clear width of walking surfaces shall be 36 inches (915 mm) minimum.		**SECTION 1103B** **BUILDING ACCESSIBILITY** **1103B.1 Scope.** Accessibility to buildings or portions of buildings shall be provided for all occupancy classifications except as modified or enhanced by this chapter. Occupancy requirements in this chapter may modify general requirements, but never to the exclusion of them. When a building or facility contains more than one use, the occupancy specific accessibility provisions for each portion of the building or facility shall apply. An accessible route of travel complying with Section 1114B.1.2 shall connect all elements and spaces within a building or facility. ... **SECTION 1114B** **FACILITY ACCESSIBILITY** **1114B.1.2 Accessible route of travel.** When a building, or portion of a building, is required to be accessible or adaptable, an accessible route of travel complying with Sections ..., 1114B, ..., 1133B.3, 1133B.5, 1133B.7 ... shall be provided to all portions of the building, to accessible building entrances and between the building and the public way. All walks, halls, corridors, aisles, skywalks, tunnels, and other spaces that are part of an accessible route shall comply with the applicable provisions of this code. ... At least one accessible route within the boundary of the site shall be provided from public transportation stops, accessible parking and accessible passenger loading zones and public streets or sidewalks to the accessible building entrance they serve. The accessible route shall, to the maximum extent feasible, coincide with the route for the general public. At least one accessible route shall connect accessible buildings, facilities, elements and spaces that are on the same site. ... ... Unless otherwise indicated, the minimum clear width of an accessible route shall not be less than 36 inches (914 mm) except at doors complying with Section 1133B.2 or obstructions complying with Figure 11B-10. ... **SECTION 1118B**	Which Std.provides greater access **depends** on circumstances.	The issue under consideration here is notion that the general requirement of 36" minimum holds throughout, except for limited distances where it may be reduced to as little as 32" clear. 1) 403.5.1 Exception allows the clear width to be reduced to as little as 32" for a maximum length of 24" provided that the reduced width segmants are separated by 36" minimumum wide segments that are at least 48" long. 1114B.1.2 (Figure 11B-10) allows clear widths to be reduced in a similar fashion, but it does not specify a minimum spacing between segments of reduced width. The 2010 ADA Stds. is more explicit. As such, it provides greater access. 2) 1121B.3.1 #7 requires accessible fare collection devices in new transportation stations for fixed guideway systems to have a minimum clear opening width of 32". Because the 2010 Stds. does not speak to this specific issue, and its general provisions are stricter, the 2010 ADA Stds. provides greater access. 3) 1133B.7.1 requires exterior walkways to be at least 48" wide, with an exception for unreasonable hardship. In such cases exterior walkways may be reduced to as little as 36" in clear width. The CBC provides greater access.	1) Modify 1114B.1.2 and/or Figure 11B-10 to specify that when multiple segments of reduced width exist, they must be separated by at least 48". 2) Modify 1121B.3.1 #7 to indicate that when fare collection devices are > 24" in depth, the minimum clear width is 36" per Figure 11B-10. 3) No action required.

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871	**403.5.1 Clear Width.** Except as provided in 403.5.2 and 403.5.3, the clear width of walking surfaces shall be 36 inches (915 mm) minimum.		**SECTION 1103B** **BUILDING ACCESSIBILITY** **1103B.1 Scope.** Accessibility to buildings or portions of buildings shall be provided for all occupancy classifications except as modified or enhanced by this chapter. Occupancy requirements in this chapter may modify general requirements, but never to the exclusion of them. When a building or facility contains more than one use, the occupancy specific accessibility provisions for each portion of the building or facility shall apply. An accessible route of travel complying with Section 1114B.1.2 shall connect all elements and spaces within a building or facility. ... **SECTION 1104B** **ACCESSIBILITY FOR GROUP A OCCUPANCIES** **1104B.5 Dining, banquet and bar facilities.** **4. Seating.** ... Access to such seating spaces shall be provided with main aisles not less than 36 inches (914 mm) clear width. ... **5. Food service aisles.** Food service aisles shall be a minimum of 36 inches (914 mm) of clear width with a preferred width of 42 inches (1067 mm) where passage of stopped wheelchairs by pedestrians is desired. ... **SECTION 1105B** **ACCESSIBILITY FOR GROUP B OCCUPANCIES** **1105B.3.2 Business and professional offices.** Areas to be made accessible include the following: **3.** Employee work areas shall have a minimum of 36 inches (914 mm) clear width access, except as modified in other portions of these regulations. See Sections 1133B.6.1 and 1133B.6.2. **1105B.3.3 Personal and public service facilities.** Areas to be made accessible include the following: **2.** Employee work areas shall have a minimum of 36 inches (914 mm) clear width access, except as modified in other portions of these regulations. See Sections 1133B.6.1 and	Which Std.provides greater access **depends** on circumstances.	The issue under consideration here is basic 2010 ADA Stds. requirement that walking surfaces shall comply with the clear width requirements stated in 403.5. Both standards require walkways to be a minimum of 36" with similar exceptions except as follows: 1) 403.5.Exception allows circulation paths in employee work areas to be reduced by work area equipment in certain conditions. It isn't clear which standard offers greater access. 2) 403.5.1 Exception allows the clear width to be reduced to as little as 32" for a maximum length of 24" provided that the reduced width segments are separated by 36" minimumum wide segments that are at least 48" long. 1114B.1.2 (Figure 11B-10) allows clear widths to be reduced in a similar fashion, but it does not specify a minimum spacing between segments of reduced width. The 2010 ADA Stds. is more explicit. As such, it provides greater access. 3) 403.5.2 Exception allows a 36" minimum wide route at turns that are < 48" wide if the turning area is at least 60" deep. The CBC does not offer a similar exception. It is not clear which standard offers greater access. 4) 403.6 requires handrails, when provided, to comply with 505 even though handrails are not required on walkways that slope < 5%. The CBC does not speak to handrails that are provided, but not required. The 2010 ADA Stds. provides greater access. 5) 1106B.4 #2 requires main aisles in open book stacks of library general use areas to be at least 44" wide. The CBC provides greater access. 6) 1115B.3.1 #4.5 requires an unobstructed access of not less than 44" through multiple-accommodation toilet rooms to the accessible water closet compartment. The CBC provides greater access. 7) 1121B.3.1 #7 requires accessible fare collection devices in new transportation stations for fixed guideway systems to have a minimum clear opening width of 32". Because the 2010 Stds. does not speak to this specific issue, and its general provisions are stricter, the 2010 ADA Stds. provides greater access. 8) 1121B.3.1 #16 requires escalators in below grade transportation stations for fixed fare guideway systems to be at	1) This issue is discussed on line 868. 2) This issue is discussed on lines 870, 872, & 873. 3) This issue is discussed on lines 874 & 875. 4) This issue is discussed on line 878. 5) No action required. 6) No action required. 7)2) This issue is discussed on lines 870, 872, & 873. 8) No action required. 9) No action required. 10) No action required. 11) No action required. 12) 2) This issue is discussed on lines 870, 872, & 873.

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872	**403.5.1 EXCEPTION:** The clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided that reduced width segments are separated by segments that are 48 inches (1220 mm) long minimum and 36 inches (915 mm) wide minimum.		**SECTION 1103B** **BUILDING ACCESSIBILITY** **1103B.1 Scope.** Accessibility to buildings or portions of buildings shall be provided for all occupancy classifications except as modified or enhanced by this chapter. Occupancy requirements in this chapter may modify general requirements, but never to the exclusion of them. When a building or facility contains more than one use, the occupancy specific accessibility provisions for each portion of the building or facility shall apply. An accessible route of travel complying with Section 1114B.1.2 shall connect all elements and spaces within a building or facility. ... **SECTION 1114B** **FACILITY ACCESSIBILITY** **1114B.1.2 Accessible route of travel.** When a building, or portion of a building, is required to be accessible or adaptable, an accessible route of travel complying with Sections ..., 1114B, ..., 1133B.3, 1133B.5, 1133B.7 ... shall be provided to all portions of the building, to accessible building entrances and between the building and the public way. All walks, halls, corridors, aisles, skywalks, tunnels, and other spaces that are part of an accessible route shall comply with the applicable provisions of this code. ... At least one accessible route within the boundary of the site shall be provided from public transportation stops, accessible parking and accessible passenger loading zones and public streets or sidewalks to the accessible building entrance they serve. The accessible route shall, to the maximum extent feasible, coincide with the route for the general public. At least one accessible route shall connect accessible buildings, facilities, elements and spaces that are on the same site. ... ... Unless otherwise indicated, the minimum clear width of an accessible route shall not be less than 36 inches (914 mm) except at doors complying with Section 1133B.2 or obstructions complying with Figure 11B-10. ... **SECTION 1118B**	Which Std.provides greater access **depends** on circumstances.	The issue under consideration here is notion that the general requirement of 36" minimum holds throughout, except for limited distances where it may be reduced to as little as 32" clear. 1) 403.5.1 Exception allows the clear width to be reduced to as little as 32" for a maximum length of 24" provided that the reduced width segmants are separated by 36" minimumum wide segments that are at least 48" long. 1114B.1.2 (Figure 11B-10) allows clear widths to be reduced in a similar fashion, but it does not specify a minimum spacing between segments of reduced width. The 2010 ADA Stds. is more explicit. As such, it provides greater access. 2) 1121B.3.1 #7 requires accessible fare collection devices in new transportation stations for fixed guideway systems to have a minimum clear opening width of 32". Because the 2010 Stds. does not speak to this specific issue, and its general provisions are stricter, the 2010 ADA Stds. provides greater access. 3) 1133B.7.1 requires exterior walkways to be at least 48" wide, with an exception for unreasonable hardship. In such cases exterior walkways may be reduced to as little as 36" in clear width. The CBC provides greater access.	1) Modify 1114B.1.2 and/or Figure 11B-10 to specify that when multiple segments of reduced width exist, they must be separated by at least 48". 2) Modify 1121B.3.1 #7 to indicate that when fare collection devices are > 24" in depth, the minimum clear width is 36" per Figure 11B-10. 3) No action required.

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873	**403.5.1 EXCEPTION:** The clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided that reduced width segments are separated by segments that are 48 inches (1220 mm) long minimum and 36 inches (915 mm) wide minimum.		**SECTION 1103B** **BUILDING ACCESSIBILITY** **1103B.1 Scope.** Accessibility to buildings or portions of buildings shall be provided for all occupancy classifications except as modified or enhanced by this chapter. Occupancy requirements in this chapter may modify general requirements, but never to the exclusion of them. When a building or facility contains more than one use, the occupancy specific accessibility provisions for each portion of the building or facility shall apply. An accessible route of travel complying with Section 1114B.1.2 shall connect all elements and spaces within a building or facility. ... **SECTION 1114B** **FACILITY ACCESSIBILITY** **1114B.1.2 Accessible route of travel.** When a building, or portion of a building, is required to be accessible or adaptable, an accessible route of travel complying with Sections ..., 1114B, ..., 1133B.3, 1133B.5, 1133B.7 ... shall be provided to all portions of the building, to accessible building entrances and between the building and the public way. All walks, halls, corridors, aisles, skywalks, tunnels, and other spaces that are part of an accessible route shall comply with the applicable provisions of this code. ... At least one accessible route within the boundary of the site shall be provided from public transportation stops, accessible parking and accessible passenger loading zones and public streets or sidewalks to the accessible building entrance they serve. The accessible route shall, to the maximum extent feasible, coincide with the route for the general public. At least one accessible route shall connect accessible buildings, facilities, elements and spaces that are on the same site. ... ... Unless otherwise indicated, the minimum clear width of an accessible route shall not be less than 36 inches (914 mm) except at doors complying with Section 1133B.2 or obstructions complying with Figure 11B-10. ... **SECTION 1118B**	Which Std.provides greater access **depends** on circumstances.	The issue under consideration here is notion that the general requirement of 36" minimum holds throughout, except for limited distances where it may be reduced to as little as 32" clear. 1) 403.5.1 Exception allows the clear width to be reduced to as little as 32" for a maximum length of 24" provided that the reduced width segmants are separated by 36" minimumum wide segments that are at least 48" long. 1114B.1.2 (Figure 11B-10) allows clear widths to be reduced in a similar fashion, but it does not specify a minimum spacing between segments of reduced width. The 2010 ADA Stds. is more explicit. As such, it provides greater access. 2) 1121B.3.1 #7 requires accessible fare collection devices in new transportation stations for fixed guideway systems to have a minimum clear opening width of 32". Because the 2010 Stds. does not speak to this specific issue, and its general provisions are stricter, the 2010 ADA Stds. provides greater access. 3) 1133B.7.1 requires exterior walkways to be at least 48" wide, with an exception for unreasonable hardship. In such cases exterior walkways may be reduced to as little as 36" in clear width. The CBC provides greater access.	1) Modify 1114B.1.2 and/or Figure 11B-10 to specify that when multiple segments of reduced width exist, they must be separated by at least 48". 2) Modify 1121B.3.1 #7 to indicate that when fare collection devices are > 24" in depth, the minimum clear width is 36" per Figure 11B-10. 3) No action required.

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874	**403.5.2 Clear Width at Turn.** Where the *accessible* route makes a 180 degree turn around an *element* which is less than 48 inches (1220 mm) wide, clear width shall be 42 inches (1065 mm) minimum approaching the turn, 48 inches (1220 mm) minimum at the turn and 42 inches (1065 mm) minimum leaving the turn.		**SECTION 1103B** **BUILDING ACCESSIBILITY** **1103B.1 Scope.** Accessibility to buildings or portions of buildings shall be provided for all occupancy classifications except as modified or enhanced by this chapter. Occupancy requirements in this chapter may modify general requirements, but never to the exclusion of them. When a building or facility contains more than one use, the occupancy specific accessibility provisions for each portion of the building or facility shall apply. An accessible route of travel complying with Section 1114B.1.2 shall connect all elements and spaces within a building or facility. ... **SECTION 1114B** **FACILITY ACCESSIBILITY** **1114B.1.2 Accessible route of travel.** When a building, or portion of a building, is required to be accessible or adaptable, an accessible route of travel complying with Sections ..., 1114B, ..., 1133B.3, 1133B.5, 1133B.7 ... shall be provided to all portions of the building, to accessible building entrances and between the building and the public way. All walks, halls, corridors, aisles, skywalks, tunnels, and other spaces that are part of an accessible route shall comply with the applicable provisions of this code. ... At least one accessible route within the boundary of the site shall be provided from public transportation stops, accessible parking and accessible passenger loading zones and public streets or sidewalks to the accessible building entrance they serve. The accessible route shall, to the maximum extent feasible, coincide with the route for the general public. At least one accessible route shall connect accessible buildings, facilities, elements and spaces that are on the same site. .... If a person in a wheelchair must make a turn around an obstruction the minimum clear width of the accessible route shall be as shown in Figure 11B-5E(a) and (b). **SECTION 1118B**	Which Std.provides greater access **depends** on circumstances.	The issue under consideration here is notion that the general requirement of 36" minimum holds throughout, except at 180° turns, where the minimum width may need to increase, depending on the length of the turning area. 403.5.2 Exception allows a 36" minimum wide route at turns that are < 48" wide if the turning area is at least 60" deep. The CBC does not offer a similar exception. It is not clear which standard offers greater access.	1) Modify Figure 11B-5E to agree with Figure 403.5.2 (b). 2) Leave 11B-1E as it is.

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875	**403.5.2 EXCEPTION:** Where the clear width at the turn is 60 inches (1525 mm) minimum compliance with 403.5.2 shall not be required.		**SECTION 1103B** **BUILDING ACCESSIBILITY** **1103B.1 Scope.** Accessibility to buildings or portions of buildings shall be provided for all occupancy classifications except as modified or enhanced by this chapter. Occupancy requirements in this chapter may modify general requirements, but never to the exclusion of them. When a building or facility contains more than one use, the occupancy specific accessibility provisions for each portion of the building or facility shall apply. An accessible route of travel complying with Section 1114B.1.2 shall connect all elements and spaces within a building or facility. ... **SECTION 1114B** **FACILITY ACCESSIBILITY** **1114B.1.2 Accessible route of travel.** When a building, or portion of a building, is required to be accessible or adaptable, an accessible route of travel complying with Sections ..., 1114B, ..., 1133B.3, 1133B.5, 1133B.7 ... shall be provided to all portions of the building, to accessible building entrances and between the building and the public way. All walks, halls, corridors, aisles, skywalks, tunnels, and other spaces that are part of an accessible route shall comply with the applicable provisions of this code. ... At least one accessible route within the boundary of the site shall be provided from public transportation stops, accessible parking and accessible passenger loading zones and public streets or sidewalks to the accessible building entrance they serve. The accessible route shall, to the maximum extent feasible, coincide with the route for the general public. At least one accessible route shall connect accessible buildings, facilities, elements and spaces that are on the same site. ... If a person in a wheelchair must make a turn around an obstruction the minimum clear width of the accessible route shall be as shown in Figure 11B-5E(a) and (b).	Which Std.provides greater access **depends** on circumstances.	The issue under consideration here is notion that the general requirement of 36" minimum holds throughout, except at 180° turns, where the minimum width may need to increase, depending on the length of the turning area. 403.5.2 Exception allows a 36" minimum wide route at turns that are < 48" wide if the turning area is at least 60" deep. The CBC does not offer a similar exception. It is not clear which standard offers greater access.	1) Modify Figure 11B-5E to agree with Figure 403.5.2 (b). 2) Leave 11B-1E as it is.
876	**403.5.3 Passing Spaces.** An accessible route with a clear width less than 60 inches (1525 mm) shall provide passing spaces at intervals of 200 feet (61 m) maximum. …		**SECTION 1118B** **SPACE ALLOWANCE AND REACH RANGES** **...** **1118B.2 Width for wheelchair passing.** The minimum width for two wheelchairs to pass is 60 inches (1524 mm). See Figure 11B-11. **SECTION 1133B** **GENERAL ACCESSIBILITY FOR ENTRANCES, EXITS AND PATHS OF TRAVEL** **1133B.3 Corridors, hallways and exterior exit balconies.** **...** **1133B.3.2 Corridors and hallways over 200 feet (60 960 mm).** Corridors and hallways that are located on an accessible route and exceed 200 feet (60 960 mm) in length shall have a minimum clear width of 60 inches (1524 mm). ...	2010 CBC is **equivalent** to 2010 ADA.		

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877	**403.5.3 Passing Spaces.** An *accessible* route with a clear width less than 60 inches (1525 mm) shall provide passing *spaces* at intervals of 200 feet (61 m) maximum. Passing *spaces* shall be either: a space 60 inches (1525 mm) minimum by 60 inches (1525 mm) minimum; or, an intersection of two walking surfaces providing a T-shaped *space* complying with 304.3.2 where the base and arms of the T-shaped space extend 48 inches (1220 mm) minimum beyond the intersection.		**SECTION 1133B** **GENERAL ACCESSIBILITY FOR ENTRANCES, EXITS AND PATHS OF TRAVEL** **1133B.3 Corridors, hallways and exterior exit balconies.** ... **1133B.3.2 Corridors and hallways over 200 feet (60 960 mm).** Corridors and hallways that are located on an accessible route and exceed 200 feet (60 960 mm) in length shall have a minimum clear width of 60 inches (1524 mm). If an accessible route has less than 60 inches (1524 mm) clear width, then passing spaces at least 60 inches by 60 inches (1524 mm by 1524 mm) shall be located at intervals of 200 feet (60 960 mm) maximum. A "T" intersection of two corridors or walks is an acceptable passing place. See Figure 11B-34.	2010 CBC provides **greater access** than 2010 ADA.	403.5.3 specifies that the T-shaped intersection of corridors, when utilized to meet the requirement for passing spaces, must comply with the standard T-shaped turning space as illustrated in 304.3.2. 1133B.3.2 refers to Figure 11B-34, which illustrates a "T" intersection of corridors 44" wide - probably because the occupant load of a facility with a corridor that is > 200' long would cretainly have an occupant load > 10. The CBC 44" wide corridors provide greater access than the ADA 36" wide corridors. 11B-34 does not illustrate a minimum length for the Ts, but given that the intersecting corridor is 44" wide, the "T" sections would only need to be 4" long in order to accommodate the standard T-turn.	
878	**403.6 Handrails.** Where handrails are provided along walking surfaces with *running slopes* not steeper than 1:20 they shall comply with 505.		**1133B.5 Ramps.** **1133B.5.1 General.** Ramps shall conform to the provisions of this section. Any accessible route of travel shall be considered a ramp if its slope is greater than one unit vertical in 20 units horizontal (5-percent slope). **1133B.5.5 Handrails for ramps.** **1133B.5.5.1** Handrails are required on ramps that provide access if slope exceeds one unit vertical in 20 units horizontal (5-percent slope), except that at exterior door landings, handrails are not required on ramps less than 6 inches (152 mm) rise or 72 inches (1829 mm) in length. ...	2010 CBC **does not address** 2010 ADA req.	403.6, which speaks to walkways that slope no greater than 5%, requires handrails, when provided, to comply with 505. The 2010 ADA Stds. does not require handrails on walkways that slope < 5%. 1133B.5.5.1 requires handrails on ramps, which by definition, slope > 5%. The CBC does not require handrails on walkways that slope ≤ 5%. The CBC does not speak to handrails that are provided where they are not required.	1) Add language to the CBC, possibly within 1114B, that states **that** when handrails are provided along walkways, regardless of whether or not they are required, they shall comply with applicable portions of 1133B.5.5.
879	**Advisory 403.6 Handrails.** Handrails provided in elevator cabs and platform lifts are not required to comply with the requirements for handrails on walking surfaces.		**SECTION 1116B** **ELEVATORS AND PLATFORM (WHEELCHAIR) LIFTS** ... **1116B.1.11 Handrails.** A handrail shall be provided on one wall of the car, preferably the rear. The rails shall be smooth, and the inside surface at least 1½ inches (38 mm) clear of the walls at a nominal height of 32 inches (813 mm) from the floor. Nominal equals ± 1 inch (25 mm). Thirty-two inches (813 mm) is required to reduce interference with car controls where the lowest button is centered at 35 inches (889 mm) above floor.	2010 CBC provides **greater access** than 2010 ADA.	The 2010 ADA Stds. Speaks of handrails in elevator cars and platform lifts in an advisory, and says that they are not required to comply with the requirements for handrails on walking surfaces. Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b) 1116B.1.11 provides enforcable requirements for handrails in elevators and platform lifts.	
879.1			***SECTION 1104C*** ***REQUIRED FEATURES*** Card-reading devices at motor vehicle fuel facilities shall be accessible by complying with only the following: The highest operable part of each primary or alternate card reader shall be no more than 54 inches (1372 mm) measured from the base of the fuel dispenser. Where card readers are located on free-standing pedestals, the card-reading control function shall be no more than 54 inches (1372 mm) above an accessible level area which is served by an accessible route of travel...	2010 CBC provides **less access** than 2010 ADA.	Exception 2 is missing and is located in CBC 11C - 1104C.1 CBC states 54" max above an accessible level as opposed to ADA stating 54" max above the vehicular way CBC allows for an exception not in the ADA	1. It should say from the surface of the vehicular way where installed on existing curbs

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880	**404 Doors, Doorways, and Gates**		Division III – ACCESSIBILITY FOR ENTRANCES, EXITS AND PATHS OF TRAVEL This division includes additional requirements which supersede less restrictive requirements in Chapter 10 where access is required. SECTION 1133B GENERAL ACCESSIBILITY FOR ENTRANCES, EXITS AND PATHS OF TRAVEL 1133B.1 Building accessibility. See this chapter.	2010 CBC **does not address** 2010 ADA req.	CBC does not specifically address Doors, Doorways, & Gates - it is embedded in a section on accessible entrances, exits & POT	1. Create new section similar to ADA
881	**404.1 General.** Doors, doorways, and gates that are part of an *accessible* route shall comply with 404.		SECTION 1133B GENERAL ACCESSIBILITY FOR ENTRANCES, EXITS AND PATHS OF TRAVEL 1133B.1 Building accessibility. See this chapter. 1133B.1.1 Entrances. 1133B.1.1.1 Entrances and exterior ground floor exit doors. 1133B.1.1.1.1 All entrances and exterior ground-floor exit doors to buildings and facilities shall be made accessible to persons with disabilities. ...	2010 CBC **does not address** 2010 ADA req.		1. Create new section similar to ADA
882	**404.1 General.** ... gates that are part of an accessible route shall comply with 404.		1133B.1.1.1.4 Gates. All gates, including ticket gates, shall meet all applicable specifications for doors.	2010 CBC is **equivalent** to 2010 ADA.	Might want to add to a newly created Doors & Gates section	

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883	**404.1 General.** Doors, doorways, and gates that are part of an *accessible* route shall comply with 404.		SECTION 1133B GENERAL ACCESSIBILITY FOR ENTRANCES, EXITS AND PATHS OF TRAVEL 1133B.1 Building accessibility. See this chapter. 1133B.1.1 Entrances. 1133B.1.1.1 Entrances and exterior ground floor exit doors. 1133B.1.1.1.1 All entrances and exterior ground-floor exit doors to buildings and facilities shall be made accessible to persons with disabilities. Such entrances shall be connected by an accessible route ... Exceptions: 1. Exterior ground-floor exits serving smoke-proof enclosures, stairwells and exit doors servicing stairs only need not be made accessible. 2. Exits in excess of those required by Chapter 10, and which are more than 24 inches (610 mm) above grade are not required to be accessible. Such doors shall have signs warning that they are not accessible. Warning signs shall comply with Section 1117B.5.1 Item 2. 3. In existing buildings where the enforcing agency determines that compliance with the building standards of this section would create an unreasonable hardship, an exception shall be granted when equivalent facilitation is provided. Equivalent facilitation would require at least one entrance to be accessible to and usable by persons with disabilities. 4. These building standards shall not apply to existing buildings when legal or physical constraints will not allow compliance with these building standards or equivalent facilitation without creating an unreasonable hardship. See Section 1.9.1.5, Special Conditions for Persons with Disabilities Requiring Appeals Action Ratification.	2010 CBC **does not address** 2010 ADA req.		1. Create new section similar to ADA
884	**404.1 General.** Doors, doorways, and gates that are part of an *accessible* route shall comply with 404.				Separate requirements for doors into R occupancy	
885	**404.1 General.** Doors, doorways, and gates that are part of an *accessible* route shall comply with 404.					
886	**404.1 EXCEPTION:** Doors, doorways, and gates designed to be operated only by security personnel shall not be required to comply with 404.2.7, 404.2.8, 404.2.9, 404.3.2 and 404.3.4 through 404.3.7.		1133B.2.3.4 Turnstiles, rails and pedestrian controls. ... The door or gate may be latched where all gates are restricted and controlled by an attendant and a sign is posted stating, “All gates are restricted and controlled by an attendant”. The accessible door or gate shall provide the same use pattern...	2010 CBC **does not address** 2010 ADA req.	does not include doors, doorways, and gates in the title	1. Pull this exception out of Turnstiles, rails, & pedestrian controls and place under a new header called Doors,, doorways, and gates - word the exception similar to ADA
887	**Advisory 404.1 General Exception.** Security personnel must have sole control of doors that are eligible for the Exception at 404.1. It would not be acceptable for security personnel to operate the doors for people with disabilities while allowing others to have independent access.		NA			
888	**404.2 Manual Doors, Doorways, and Manual Gates.** Manual doors and doorways and manual gates intended for user passage shall comply with 404.2.		NA	2010 CBC does not address 2010 ADA req.	Manual doors, doorways, and gates does not exist as a header in CBC - the header is entrances and ground floor exit doors Separate out accessible routes and entrances similar to ADA 206 and create a new section for what is currently under CBC 1133B.1.1	Create section for Manual Doors, Doorways, and Manual Gates using ADA language

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889	**404.2.1 Revolving Doors, Gates, and Turnstiles.** Revolving doors, revolving gates, and turnstiles shall not be part of an *accessible* route.		1133B.2.3.3 Revolving doors. Revolving doors shall not be used as a required entrance for persons with disabilities. 1133B.2.3.4 Turnstiles, rails and pedestrian controls. Where turnstiles and crowd control barriers are utilized in a facility for the purpose of providing fully controlled access, such as where an admission price is charged, a door or gate that is accessible to persons with disabilities shall be provided adjacent to each turnstile exit or entrance. This alternate passageway shall be maintained in an unlocked condition during business hours and the door or gate shall not activate a publicly audible alarm system. The door or gate may be latched where all gates are restricted and controlled by an attendant and a sign is posted stating, “All gates are restricted and controlled by an attendant”. The accessible door or gate shall provide the same use pattern. Where posts, rails or other pedestrian controls are utilized to create crowd control aisles or lanes, a minimum of one lane shall be accessible and shall provide a minimum aisle width no less than indicated in Figure 11B-5E (a) and (b) with 32 inches (813 mm) of clear opening...	2010 CBC provides **less access** than 2010 ADA.	Incorporate the full language	1. Revolving doors, revolving gates, and turnstiles shall not be part of an *accessible* route
890	**404.2.2 Double-Leaf Doors and Gates.** At least one of the active leaves of doorways with two leaves shall comply with 404.2.3 and 404.2.4.		1133B.2 Doors. 1133B.2.3 Hinged doors. For hinged doors, the opening width… 1133B.2.3.1 Pair of doors. Where a pair of doors is utilized, at least one of the doors shall provide a clear, unobstructed opening width of 32 inches (813 mm) with the leaf positioned at an angle of 90 degrees from its closed position. See Figure 11B-5B(b).	2010 CBC is equivalent to 2010 ADA.		
891	**404.2.3 Clear Width.** Door openings shall provide a clear width of 32 inches (815 mm) minimum. Clear openings of doorways with swinging doors shall be measured between the face of the door and the stop, with the door open 90 degrees. Openings more than 24 inches (610 mm) deep shall provide a clear opening of 36 inches (915 mm) minimum. ...		1133B.2 Doors. ... 1133B.2.2 Width and height. ... ...doors shall be capable of opening at least 90 degrees and shall be so mounted that the clear width of the exitway is not less than 32 inches (813 mm) measured between the face of the door and the opposite stop (see Figure 11B-5B). ...	2010 CBC provides **less access** than 2010 ADA.	CBC does not address openings which are more than 24" deep requiring 36" min clr Also, CBC has this clr width requirement just for exit doors	1. Change the language to read - Door openings shall provide a clear width of 32 inches minimum. Clear openings of doorways with swinging doors shall be measured between the face of the door and the stop, with the door open 90 degrees. Openings more than 24 inches deep shall provide a clear opening of 36 inches minimum.

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892	**404.2.3 Clear Width.** Door openings shall provide a clear width of 32 inches (815 mm) minimum. Clear openings of doorways with swinging doors shall be measured between the face of the door and the stop, with the door open 90 degrees. Openings more than 24 inches (610 mm) deep shall provide a clear opening of 36 inches (915 mm) minimum. ...		1133B.1 Building accessibility. See this chapter. 1133B.1.1 Entrances. 1133B.1.1.1 Entrances and exterior ground floor exit doors. 1133B.1.1.1.1 ... Doorways shall have a minimum clear opening of 32 inches (813 mm) with the door open 90 degrees, measured between the face of the door and the opposite stop (see Figure 11B-5B). Openings more than 24 inches (610 mm) in depth shall comply with Section 1118B. 1118B.4 Clear floor or ground space for wheelchairs. ... 2. Relationship of maneuvering clearances to wheelchair spaces. One full unobstructed side of the clear floor or ground space for a wheelchair shall adjoin or overlap an accessible route or adjoin another wheelchair clear floor space. If a clear floor space is located in an alcove or otherwise confined on all or a part of three sides, additional maneuvering clearances shall be provided as shown in Figure 11B-5A(b).		This is a bit confusing and might be better to just say the clr width of 36" if > 24" deep opening	Add text - Openings more than 24 inches deep shall provide a clear opening of 36 inches minimum.
893	**404.2.3 Clear Width.** ... There shall be no projections into the required clear opening width lower than 34 inches (865 mm) above the finish floor or ground. Projections into the clear opening width between 34 inches (865 mm) and 80 inches (2030 mm) above the finish floor or ground shall not exceed 4 inches (100 mm).		NA	2010 CBC **does not address** 2010 ADA req.		1. Change the language to read - There shall be no projections into the required clear opening width lower than 34 inches above the finish floor or ground. Projections into the clear opening width between 34 inches and 80 inches above the finish floor or ground shall not exceed 4 inches
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895	**404.2.3 EXCEPTIONS: 1.** In *alterations* , a projection of ⅝ inch (16 mm) maximum into the required clear width shall be permitted for the latch side stop. **…**		NA	2010 CBC **does not address** 2010 ADA req.		Add exception - **EXCEPTIONS: 1.** In *alterations* , a projection of ⅝ inch (16 mm) maximum into the required clear width shall be permitted for the latch side stop.
896	**404.2.3 EXCEPTIONS: ...** **2.** Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the finish floor or ground.		1133B.2 Doors. ... 1133B.2.2 Width and height. Every required exit doorway shall be of a size as to permit the installation of a door not less than ... 6 feet 8 inches (2032 mm) in height ...	2010 CBC **does not address** 2010 ADA req.	CBC only address doors at exitways It also does not address door closers and door stops	Add under exceptions **2.** Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the finish floor or ground.
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900	**404.2.4 Maneuvering Clearances.** Minimum maneuvering clearances at doors and gates shall comply with 404.2.4. Maneuvering clearances shall extend the full width of the doorway and the required latch side or hinge side clearance.		1133B.2.4.2 Maneuvering clearances at doors. Minimum maneuvering clearances at doors shall be as shown in Figures 11B-26A, 11B-26B and 11B-26C. …	2010 CBC **does not address** 2010 ADA req.	CBC does not address in this specific language	Adopt the ADA text, **Maneuvering Clearances.** Minimum maneuvering clearances at doors and gates shall comply with 404.2.4. Maneuvering clearances shall extend the full width of the doorway and the required latch side or hinge side clearance.
901	**404.2.4 EXCEPTION:** Entry doors to hospital patient rooms shall not be required to provide the clearance beyond the latch side of the door.		1109B.4 Patient bedroom areas. Accessible patient bedrooms shall comply with the following requirements: ... 3. Each bedroom shall have an accessible door that complies with Section 1133B.2.	2010 CBC provides **greater access** than 2010 ADA.		Adopt the ADA text **EXCEPTION:** Entry doors to hospital patient rooms shall not be required to provide the clearance beyond the latch side of the door.

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902	**404.2.4.1 Swinging Doors and Gates.** Swinging doors and gates shall have maneuvering clearances complying with Table 404.2.4.1.		1133B.2.4.2 Maneuvering clearances at doors. Minimum maneuvering clearances at doors shall be as shown in Figures 11B-26A, 11B-26B and 11B-26C. ... The level area shall have a length in the direction of door swing of at least 60 inches (1524 mm) and the length opposite the direction of door swing of 48 inches (1219 mm) as measured at right angles to the plane of the door in its closed position. Exception: The length opposite the direction of door swing shall be a minimum of 44 inches (1118 mm) where the door has no closer and approach to the door by a person in a wheelchair can be made from the latch side, or if the door has neither latch nor closer and approach can be made from the hinge side. See Figure 11B-26A and 11B-26B. 1133B.2.4.3 The width of the level area on the side to which the door swings shall extend 24 inches (610 mm) past the strike edge of the door for exterior doors and 18 inches (457 mm) past the strike edge for interior doors. Twenty-four inches (610 mm) is preferred for strike-side clearance.	Which Std.provides greater access **depends** on circumstances.	ADA language and diagrams are much clearer than CBC - main difference is CBC requirement of 24" on ext strike side **Front Approach** is same for both **HInge Approach** - ADA allows an alternative of decreasing the 60" deep to 54" deep on Pull side if the strike side increases from 36" clr to 42"; Push side - ADA requires 22" xtra on hinge side rather than CBC of 54" from strike side - equivalent but better to align language; Push side ADA requires 42" deep & CBC requires 44" - CBC has already revised sliding & folding doors to be 42" same as ADA **Latch Approach** - Pull side ADA allows 48" deep without a closer and 54" deep if there is a closer - CBC requires 60"; Push side without a closer ADA allows 42" deep & CBC requires 44" - CBC has already revised sliding & folding doors to be 42" same as ADA	Adopt the ADA text, table, and diagrams from ADA **404.2.4.1 Swinging Doors and Gates.** Swinging doors and gates shall have maneuvering clearances complying with Table 404.2.4.1. Adopt #1 above but add note of 24" on exterior for Front Approach Pull Side Adopt #1 and #2 above but revise all pull sides to have 60" min deep clear
903	**404.2.4.2 Doorways without Doors or Gates, Sliding Doors, and Folding Doors.** Doorways less than 36 inches (915 mm) wide without doors or gates, sliding doors, or folding doors shall have maneuvering clearances complying with Table 404.2.4.2.		1133B.2.4.2 Maneuvering clearances at doors. Minimum maneuvering clearances at doors shall be as shown in Figures ... 11B-26C. …	2010 CBC **does not address** 2010 ADA req.	CBC has no text to describe the ADA requirements for sliding & pocket doors - just the diagram CBC does not show the side approach configuration with no doors CBC shows the dimensioning different than ADA with a side approach with doors which may not comply in all instances with ADA - ADA shows a a pocket approach with an additional 22" on pocket side whereas CBC shows 54" from stop side extending to pocket side - best to adopt ADA	Adopt text, table, and diagrams from ADA **Doorways without Doors or Gates, Sliding Doors, and Folding Doors.** Doorways less than 36 inches (915 mm) wide without doors or gates, sliding doors, or folding doors shall have maneuvering clearances complying with Table 404.2.4.2.
904	**404.2.4.3 Recessed Doors and Gates.** Maneuvering clearances for forward approach shall be provided when any obstruction within 18 inches (455 mm) of the latch side of a doorway projects more than 8 inches (205 mm) beyond the face of the door, measured perpendicular to the face of the door or gate.		1133B.2.4.5 Recessed doors. Where a door required to be accessible by Section 1133B.1.1.1 is located in a recess or alcove where the distance from the face of the wall to the face of the door is greater than 8 inches, strike side clearances as prescribed in Section 1133B.2.4.3 shall be provided. See Figure 11B-33(a).	2010 CBC is **equivalent** to 2010 ADA.	The Figure only shows on the pull side of the door which may be misleading since ADA also allows on the push side of the door an 8" max projection	Revise Figure to show the diagram for Push side with both a latch and a closer
905	**Advisory 404.2.4.3 Recessed Doors and Gates.** A door can be recessed due to wall thickness or because of the placement of casework and other fixed elements adjacent to the doorway. This provision must be applied wherever doors are recessed.		NA		Advisory would be good to include since it clarifies what can create the 8" recess	
906	**404.2.4.4 Floor or Ground Surface.** Floor or ground surface within required maneuvering clearances shall comply with 302. Changes in level are not permitted.		1133B.2.4 Floor level at doors. Regardless of the occupant load, there shall be a floor or landing on each side of a door. ... 1133B.2.4.2 Maneuvering clearances at doors. ... The floor or ground area within the required maneuvering clearances shall be level and clear. ...		2010 CBC is **equivalent** to 2010 ADA.	

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907	**404.2.4.4 Floor or Ground Surface.** Floor or ground surface within required maneuvering clearances shall comply with 302. Changes in level are not permitted.					
908	**404.2.4.4 EXCEPTIONS: 1.** Slopes not steeper than 1:48 shall be permitted. **…**		**1133B.2.4 Floor level at doors.** Regardless of the occupant load, there shall be a floor or landing on each side of a door. ... **1133B.2.4.2 Maneuvering clearances at doors.** ... The floor or ground area within the required maneuvering clearances shall be level and clear. ... **SECTION 1102B** **DEFINITIONS** LEVEL AREA is a specified surface that does not have a slope in any direction exceeding one unit vertical in 50 units horizontal (2-percent slope).	2010 CBC provides **greater access** than 2010 ADA.	ADA states a 1:48 max slope; CBC states a 2% max slope - this is such a minimal difference that it would be better to synchronize with ADA	Change reference to be 1:48 slope for definition of Level Area
909	**404.2.4.4 EXCEPTIONS: ...** **2.** Changes in level at thresholds complying with 404.2.5 shall be permitted.		**133B.2.4 Floor level at doors.** ... **1133B.2.4.1 Thresholds**. The floor or landing shall not be more than ½ inch (12.7 mm) lower than the threshold of the doorway. Change in level between ¼ inch (6 mm) and ½ inch (12.7 mm) shall be beveled with a slope no greater than one unit vertical in 2 units horizontal (50-percent slope). Change in level greater than ½ inch (12.7 mm) shall be accomplished by means of a ramp. See Section 1133B.5.1.	2010 CBC **does not address** 2010 ADA req.	Adopt language of ADA 303 for changes in level	Adopt ADA language **404.2.4.4 EXCEPTIONS: 1.** Slopes not steeper than 1:48 shall be permitted. **2.** Changes in level at thresholds complying with 404.2.5 shall be permitted.
910	**404.2.5 Thresholds.** Thresholds, if provided at doorways, shall be ½ inch (13 mm) high maximum. Raised thresholds and changes in level at doorways shall comply with 302 and 303.		**133B.2.4 Floor level at doors**. ... **1133B.2.4.1 Thresholds.** The floor or landing shall not be more than ½ inch (12.7 mm) lower than the threshold of the doorway. …	2010 CBC **does not address** 2010 ADA req.	The CBC language does not quite address the ADA language since it states that the floor or landing can be lower than the threshold - ADA allows for up to 1/2" change in level at doorways which can be a threshold	Adopt ADA language **Thresholds.** Thresholds, if provided at doorways, shall be ½ inch (13 mm) high maximum. Raised thresholds and changes in level at doorways shall comply with 302 and 303.
911	**404.2.5 Exception:** Existing or *altered* thresholds ¾ inch (19 mm) high maximum that have a beveled edge on each side with a slope not steeper than 1:2 shall not be required to comply with 404.2.5.		**1132A.4.1 Thresholds.** ... Thresholds at secondary exterior doors, including sliding door tracks, shall be no higher than 3/4 inch (19.05 mm). ... Thresholds with a change in height between 1/4 inch (6.35 mm) and 3/4 inch (19.05 mm) shall be beveled with a slope no greater than 1 unit vertical in 2 units horizontal (50-percent slope).	2010 CBC **does not address** 2010 ADA req.	CBC only allows this in 11A	1. **Exception:** Existing or *altered* thresholds ¾ inch (19 mm) high maximum that have a beveled edge on each side with a slope not steeper than 1:2
912	**404.2.6 Doors in Series and Gates in Series.** The distance between two hinged or pivoted doors in series and gates in series shall be 48 inches (1220 mm) minimum plus the width of doors or gates swinging into the space.		**1133B.2.4.4** The space between two consecutive door openings in a vestibule, serving other than a required exit stairway shall provide a minimum of 48 inches (1219 mm) of clear space from any door opening into such vestibule when the door is positioned at an angle of 90 degrees from its closed position. Doors in a series shall swing either in the same direction or away from the space between the doors. See Figures 11B-30 and 11B-31.	2010 CBC provides **greater access** than 2010 ADA.	The CBC figures should be updated to the ADA Figure - ADA shows the dimension from the door face to door face whereas CBC shows it from wall to wall ADA does not limit that the doors either have to swing in the same direction or outwards - If there is 48" between the doors it is not necessary to limit the door swings in this manner - so this requirement should be removed	1. The distance between two hinged or pivoted doors in series and gates in series shall be 48 inches minimum plus the width of doors or gates swinging into the space.
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914	**404.2.7 Door and Gate Hardware.** Handles, pulls, latches, locks, and other *operable parts* on doors and gates shall comply with 309.4. ... Where sliding doors are in the fully open position, operating hardware shall be exposed and usable from both sides.		**1133B.2.5.2** Hand-activated door opening hardware, handles, pulls, latches, locks, and other operating devices on accessible doors shall have a shape that is easy to grasp with one hand and does not require tight grasping, tight pinching or twisting of the wrist to operate. ...	2010 CBC **does not address** 2010 ADA req.	CBC does not address sliding door hardware except in the Figure NOte: CBC Section 1008.1.4.3 addresses horizontal sliding doors if a means of egress which does not meet ADA standards	Add - 1. Where sliding doors are in the fully open position, operating hardware shall be exposed and usable from both sides.

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915	**404.2.7 Door and Gate Hardware.** ... Operable parts of such hardware shall be 34 inches (865 mm) minimum and 48 inches (1220 mm) maximum above the finish floor or ground. …		**1133B.2.5.2** Hand-activated door opening hardware, handles, pulls, latches, locks, and other operating devices on accessible doors ... Hardware shall be centered between 30 inches (762 mm) and 44 inches (1118 mm) above the floor. ...	Which Std.provides greater access **depends** on circumstances.	CBC allows 30" min AFF which does not comply with ADA CBC limits 44" max whereas ADA allows 48" which is within compliant reach range - better to revise the upper limit otherwise the hardware is limited to a small range when the lower limit is adopted - solution #1 CBC states the measurement is taken to the centerline - ADA implies the operable parts are within rather than centered Note: CBC Section 1008.1.9.2 already has correct language	Operable parts of such hardware shall be 34 inches minimum and 48 inches maximum above the finish floor or ground Operable parts of such hardware shall be 34 inches (865 mm) minimum and 44 inches maximum above the finish floor or ground
916	**404.2.7 EXCEPTIONS: 1.** Existing locks shall be permitted in any location at existing glazed doors without stiles, existing overhead rolling doors or grilles, and similar existing doors or grilles that are designed with locks that are activated only at the top or bottom rail. **2.** Access gates in barrier walls and fences protecting pools, spas, and hot tubs shall be permitted to have *operable parts* of the release of latch on self-latching devices at 54 inches (1370 mm) maximum above the finish floor or ground provided the self-latching devices are not also self-locking devices and operated by means of a key, electronic opener, or integral combination lock.		NA	2010 CBC **does not address** 2010 ADA req.		Add - **EXCEPTIONS:** **1. Existing locks shall be permitted in any location at existing glazed doors without stiles, existing overhead rolling doors or grilles, and similar existing doors or grilles that are designed with locks that are activated only at the top or bottom rail.** **2.** Access gates in barrier walls and fences protecting pools, spas, and hot tubs shall be permitted to have *operable parts* of the release of latch on self-latching devices at 54 inches (1370 mm) maximum above the finish floor or ground provided the self-latching devices are not also self-locking devices and operated by means of a key, electronic opener, or integral combination lock.
917	**Advisory 404.2.7 Door and Gate Hardware.** Door hardware that can be operated with a closed fist or a loose grip accommodates the greatest range of users. Hardware that requires simultaneous hand and finger movements require greater dexterity and coordination, and is not recommended.		NA		Advisory is helpful information - include	**Add to Advisory?** **Industry standard recessed hardware for sliding doorsis usually noncompliant. Door width may have to be increased to provide minimum required clear width at sliding doors with exposed and usable hardware.**
918	**404.2.8 Closing Speed.** Door and gate closing speed shall comply with 404.2.8.		**1133B.2.5.1 Door closer.** …	NA	CBC uses different language for this section - to align with ADA, title section Closing Speed	Revise language to read - 1. Door Closing Speed
919	**404.2.8.1 Door Closers and Gate Closers.** Door closers and gate closers shall be adjusted so that from an open position of 90 degrees, the time required to move the door to a position of 12 degrees from the latch is 5 seconds minimum.		**1133B.2.5.1 Door closer.** If the door has a closer, then the sweep period of the closer shall be adjusted so that from an open position of 70 degrees, the door will take at least 3 seconds to move to a point 3 inches (75 mm) from the latch, measured to the leading edge of the door.	2010 CBC provides **less access** than 2010 ADA.		Revise language to read - 1. **Door Closers and Gate Closers.** Door closers and gate closers shall be adjusted so that from an open position of 90 degrees, the time required to move the door to a position of 12 degrees from the latch is 5 seconds minimum.
920	**404.2.8.2 Spring Hinges.** Door and gate spring hinges shall be adjusted so that from the open position of 70 degrees, the door or gate shall move to the closed position in 1.5 seconds minimum.		NA	2010 CBC **does not address** 2010 ADA req.		**1. Spring Hinges.** Door and gate spring hinges shall be adjusted so that from the open position of 70 degrees, the door or gate shall move to the closed position in 1.5 seconds minimum.
920.1					The gravity mechanism on a toilet compartment door is not addressed as to whether it is a closer requiring push side clearance - this is a grey area but some people at the Access Board do not interpret the gravity mechanism as a closer requiring the strike side clearance	**Add -** **Exception - Gravity closing mechanisms on the accessible toilet stall and the ambulatory toilet stall doors do not require an additional 12" clr on the push side of the door** **OR** **Exception - Gravity closing mechanisms on the accessible toilet stall and the ambulatory toilet stall doors do not require an additional 12" clr on the push side of the door if the adjacent partition has 9" min clr AFF for toe clearance** **If recommendation is adopted shouldn't this be located at 604.8.1.2 Doors?**

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921	**404.2.9 Door and Gate Opening Force.** Fire doors shall have a minimum opening force allowable by the appropriate *administrative authority* . The force for pushing or pulling open a door or gate other than fire doors shall be as follows: 1. Interior hinged doors and gates: 5 pounds (22.2 N) maximum. 2. Sliding or folding doors: 5 pounds (22.2 N) maximum. These forces do not apply to the force required to retract latch bolts or disengage other devices that hold the door or gate in a closed position.		**1133B.2.5 Door opening force.** The maximum force required to push or pull open a door shall comply with this section. Push or pull force for a hinged door shall be measured perpendicular to the door face at the door opening hardware or 30 inches (762 mm) from the hinged side, whichever is farther from the hinge. Push or pull force for a sliding or folding door shall be measured parallel to the door at the door pull or latch. Compensating devices or automatic door operators complying with Section 1133B.2.3.2 may be used to meet the maximum force limits. Required fire doors shall have the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbf (66.7 N). Other than required fire doors, interior doors shall have a maximum opening force of 5 lbf (22.2 N). Other than required fire doors, exterior doors shall have a maximum opening force of 5 lbf (22.2 N). **Exceptions:** 1. Exterior doors to machinery spaces including, but not limited to, elevator pits or elevator penthouses; mechanical, electrical or communications equipment rooms; piping or equipment catwalks; electric substations and transformer vaults; and highway and tunnel utility facilities.	Which Std.provides greater access **depends** on circumstances.	CBC requires 5 lbs max on ext doors - ADA does not have a requirement for exterior doors CBC does not address the force for sliding or folding doors CBC does not address bolts or other mechanisms that hold a door closed ADA does not specifically address the exceptions as shown in CBC which does help clarify - so keep this portion	Add the following 2. Sliding or folding doors: 5 pounds (22.2 N) maximum. These forces do not apply to the force required to retract latch bolts or disengage other devices that hold the door or gate in a closed position.
922	**Advisory 404.2.9 Door and Gate Opening Force.** The maximum force pertains to the continuous application of force necessary to fully open a door, not the initial force needed to overcome the inertia of the door. It does not apply to the force required to retract bolts or to disengage other devices used to keep the door in a closed position.		NA		Advisory would be good to include since it adds more clarification	
923	**404.2.10 Door and Gate Surfaces.** Swinging door and gate surfaces within 10 inches (255 mm) of the finish floor or ground measured vertically shall have a smooth surface on the push side extending the full width of the door or gate. Parts creating horizontal or vertical joints in these surfaces shall be within 1/16 inch (1.6 mm) of the same plane as the other. Cavities created by added kick plates shall be capped.		**1133B.2.6 Smooth surface.** The bottom 10 inches (254 mm) of all doors except automatic and sliding shall have a smooth, uninterrupted surface to allow the door to be opened by a wheelchair footrest without creating a trap or hazardous condition. Where narrow frame doors are used, a 10-inch (254 mm) high smooth panel shall be installed on the push side of the door, which will allow the door to be opened by a wheelchair footrest without creating a trap or hazardous condition. **1110B.1.6 Theft prevention barriers**. Where shopping cart theft prevention barriers are used, they shall conform to the following requirements: ... 6. Where a gate is used, the bottom of the gate shall be within 3 inches (76 mm) of the surface of the path of travel. The surface of the gate on each side shall be smooth to present no hazard to persons with disabilities using the gate and shall be structurally adequate to allow it to be opened with the wheelchair foot pedals.	2010 CBC **does not address** 2010 ADA req.	CBC does not address that the smooth surface is only on the push side except on narrow frame doors - it states both sides for shopping cart gates CBC does not describe joint surfaces of 1/16th differential or capped cavities CBC makes a requirement for shopping cart gates to be within 3" from the floor - this is not consistent with other requirements which state if it is within 10" of the floor - this is not a requirement for restroom stall doors - it should be removed	Add - 1. **Door and Gate Surfaces.** Swinging door and gate surfaces within 10 inches (255 mm) of the finish floor or ground measured vertically shall have a smooth surface on the push side extending the full width of the door or gate. Parts creating horizontal or vertical joints in these surfaces shall be within 1/16 inch (1.6 mm) of the same plane as the other. Cavities created by added kick plates shall be capped.

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924	**404.2.10 Door and Gate Surfaces.** Swinging door and gate surfaces within 10 inches (255 mm) of the finish floor or ground measured vertically shall have a smooth surface on the push side extending the full width of the door or gate. Parts creating horizontal or vertical joints in these surfaces shall be within 1/16 inch (1.6 mm) of the same plane as the other. Cavities created by added kick plates shall be capped.					
924.1			... **1110B.1.6 Theft prevention barriers.** Where shopping cart theft prevention barriers are used, they shall conform to the following requirements: 1. Each entrance and exit provided for public use shall be accessible to and usable by persons with disabilities. 2. Shopping cart barriers located at a public entrance or exit shall be designed to provide a clear, unobstructed opening at least 32 inches (813 mm) in width for ingress and egress of persons with disabilities. 3. Where gates are used, they shall open in the direction of travel, provide a clear unobstructed opening 32 inches (813 mm) in width and be maintained unlocked during business hours. Gates shall not operate a publicly audible alarm system or require more than 5 foot-pounds of force (22.2 N·m). 4. Where a clear unobstructed opening is provided, a level area is required on both sides of the clear opening or gate which extends a minimum of 44 inches (1118 mm) on each side of the opening and is at least 48 inches (1219 mm) in width. 5. Where a gate is used, the level area on both sides of the clear opening or gate shall be a minimum of 60 inches (1524 mm) in width and extend a minimum of 60 inches (1524 mm) (measured from the gate in a closed position) in the direction of the gate swing. The level area opposite the gate swing shall be a minimum of 48 inches (1219 mm) in width and extend a minimum of 42 inches (1067 mm). 6. Where a gate is used, the bottom of the gate shall be within 3 inches (76 mm) of the surface of the path of travel. The surface of the gate on each side shall be smooth to present no hazard to persons with disabilities using the gate and shall be structurally adequate to allow it to be		CBC has separate requirements on theft prevention barriers which might be better to be synchronized with the ADA section on gates	Delete CBC 1110B.1.6 since it is redundant to section on Doors & Gates
925	**404.2.10 EXCEPTIONS: 1.** Sliding doors shall not be required to comply with 404.2.10. **2.** Tempered glass doors without stiles and having a bottom rail or shoe with the top leading edge tapered at 60 degrees minimum from the horizontal shall not be required to meet the 10 inch (255 mm) bottom smooth surface height requirement. **3.** Doors and gates that do not extend to within 10 inches (255 mm) of the finish floor or ground shall not be required to comply with 404.2.10. **4.** Existing doors and gates without smooth surfaces within 10 inches (255 mm) of the finish floor or ground shall not be required to provide smooth surfaces complying with 404.2.10 provided that if added kick plates are installed, cavities created by such kick plates are capped.		1110B.1.6 Theft prevention barriers. Where shopping cart theft prevention barriers are used, they shall conform to the following requirements: ... 6. Where a gate is used, the bottom of the gate shall be within 3 inches (76 mm) of the surface of the path of travel. The surface of the gate on each side shall be smooth to present no hazard to persons with disabilities using the gate and shall be structurally adequate to allow it to be opened with the wheelchair foot pedals.	2010 CBC **does not address** 2010 ADA req.	CBC allows for a shopping cart gate requirement to be within 3" of the floor and a requirement to have a smooth surface on both sides - only the push side is necessary	Add the following exceptions/clarifications **EXCEPTIONS: 1.** Sliding doors shall not be required to comply with 404.2.10. **2.** Tempered glass doors without stiles and having a bottom rail or shoe with the top leading edge tapered at 60 degrees minimum from the horizontal shall not be required to meet the 10 inch (255 mm) bottom smooth surface height requirement. **3.** Doors and gates that do not extend to within 10 inches (255 mm) of the finish floor or ground shall not be required to comply with 404.2.10. **4.** Existing doors and gates without smooth surfaces within 10 inches (255 mm) of the finish floor or ground shall not be required to provide smooth surfaces complying with 404.2.10 provided that if added kick plates are installed, cavities created by such kick plates are capped.

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926	**404.2.11 Vision Lights.** Doors, gates, and side lights adjacent to doors or gates, containing one or more glazing panels that permit viewing through the panels shall have the bottom of at least one glazed panel located 43 inches (1090 mm) maximum above the finish floor.		NA	2010 CBC **does not address** 2010 ADA req.		Add - 1. **Vision Lights.** Doors, gates, and side lights adjacent to doors or gates, containing one or more glazing panels that permit viewing through the panels shall have the bottom of at least one glazed panel located 43 inches (1090 mm) maximum above the finish floor.
927	**404.2.11 EXCEPTION:** Vision lights with the lowest part more than 66 inches (1675 mm) from the finish floor or ground shall not be required to comply with 404.2.11.		NA	2010 CBC **does not address** 2010 ADA req.		Add - 1. **EXCEPTION:** Vision lights with the lowest part more than 66 inches (1675 mm) from the finish floor or ground shall not be required to comply
928	**404.3 Automatic and Power-Assisted Doors and Gates.** Automatic doors and automatic gates shall comply with 404.3. Full-powered automatic doors shall comply with ANSI/BHMA A156.10 (incorporated by reference, see “Referenced Standards” in Chapter 1). Low-energy and power-assisted doors shall comply with ANSI/BHMA A156.19 (1997 or 2002 edition) (incorporated by reference, see “Referenced Standards” in Chapter 1).		... **1133B.2.3.2 Automatic and power-assisted doors.** If an automatic door is used, then it shall comply with BHMA A156.10. Slowly opening, low-powered, automatic doors shall comply with BHMA A156.19. Such doors shall not open to back check faster than 3 seconds and shall require no more than 15 lbf (66.72 N) to stop door movement. If a power-assisted door is used, its door-opening force shall comply with 1133B.2.5 and its closing shall conform to the requirements in BHMA A156.19. When an automatic door operator is utilized to operate a pair of doors, at least one of the doors shall provide a clear, unobstructed opening width of 32 inches (813 mm) with the door positioned at an angle of 90 degrees from its closed position. ... 2. When, at a single location, one of every 8 exterior door leafs, or fraction of 8, is a powered door, other exterior doors at the same location, serving the same interior space, may have a maximum opening force of 8.5 lbf (37.8 N). The powered leaf(s) shall be located closest to the accessible route. Powered doors shall comply with Section 1133B.2.3.2. Powered doors shall be fully automatic doors complying with Builders Hardware Manufacturers’ Association (BHMA) A156.10 or low energy operated doors complying with BHMA A156.19. Powered doors serving a building or facility with an occupancy of 150 or more shall be provided with a back-up battery or back-up generator. The back-up power source shall be able to cycle the door a minimum of 100 cycles. Powered doors shall be controlled on both the interior and exterior sides of the doors by sensing devices, push plates, vertical actuation bars or other similar operating devices complying with Section 1117B.6. At each location where push plates are provided there	2010 CBC does not address 2010 ADA req.	This is confusing in the CBC since part is located in a section on door opening force	Create new section on Automatic and Power Assisted doors
929	**404.3.1 Clear Width.** Doorways shall provide a clear opening of 32 inches (815 mm) minimum in power-on and power-off mode. The minimum clear width for automatic door systems in a doorway shall be based on the clear opening provided by all leaves in the open position.		... **1133B.2.3.2 Automatic and power-assisted doors.** ... When an automatic door operator is utilized to operate a pair of doors, at least one of the doors shall provide a clear, unobstructed opening width of 32 inches (813 mm) with the door positioned at an angle of 90 degrees from its closed position. ...	2010 CBC provides **greater access** than 2010 ADA.	ADA allows for the clear width to be determined when all leaves are in the open position - CBC requires one leaf by itself to meet the clr width requirement - this is not necessary if in the power-off condition the doors remain open	**Add -** **1. Clear Width.** Doorways shall provide a clear opening of 32 inches (815 mm) minimum in power-on and power-off mode. The minimum clear width for automatic door systems in a doorway shall be based on the clear opening provided by all leaves in the open position.
930	**404.3.1 Clear Width.** Doorways shall provide a clear opening of 32 inches (815 mm) minimum in power-on and power-off mode. The minimum clear width for automatic door systems in a doorway shall be based on the clear opening provided by all leaves in the open position.					

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931	**404.3.2 Maneuvering Clearance.** Clearances at power-assisted doors and gates shall comply with 404.2.4. Clearances at automatic doors and gates without standby power and serving an *accessible means of egress* shall comply with 404.2.4.		NA	2010 CBC **does not address** 2010 ADA req.	ADA states that maneuvering space for automatic doors WITHOUT standby power needs to comply with door maneuvering space requirements but not otherwise - CBC does not address this for power doors	**Add-** **Maneuvering Clearance.** Clearances at power-assisted doors and gates shall comply with 404.2.4. Clearances at automatic doors and gates without standby power and serving an *accessible means of egress* shall comply with 404.2.4.
932	**404.3.2 EXCEPTION:** Where automatic doors and gates remain open in the power-off condition, compliance with 404.2.4 shall not be required.		NA	2010 CBC **does not address** 2010 ADA req.	ADA states that maneuvering space for automatic doors WITHOUT standby power needs to comply with door maneuvering space requirements but not otherwise - CBC does not address this for power doors	Add - EXCEPTION: Where automatic doors and gates remain open in the power-off condition, compliance with 404.2.4 shall not be required.
933	**404.3.3 Thresholds.** Thresholds and changes in level at doorways shall comply with 404.2.5.		NA	2010 CBC **does not address** 2010 ADA req.	This section in CBC does not specifically state it is for auto & power assisted doors	Add section under Automatic & Power assisted doors **Thresholds.** Thresholds and changes in level at doorways shall comply with 404.2.5.
934	**404.3.4 Doors in Series and Gates in Series.** Doors in series and gates in series shall comply with 404.2.6.		NA	2010 CBC **does not address** 2010 ADA req.	does not address for auto & power assisted doors	Add section under Automatic & Power assisted doors **Doors in Series and Gates in Series.** Doors in series and gates in series shall comply with 404.2.6.
935	**404.3.5 Controls.** Manually operated controls shall comply with 309. The clear floor *space* adjacent to the control shall be located beyond the arc of the door swing.		... **Exceptions:** ... Powered doors shall be controlled on both the interior and exterior sides of the doors by sensing devices, push plates, vertical actuation bars or other similar operating devices complying with Section 1117B.6. ... Where push plates, vertical actuation bars or other similar operating devices are provided, they shall be placed in a conspicuous location. A level and clear floor or ground space for forward or parallel approach complying with Sections 1118B.4 and 1124B.1 shall be provided, centered on the operating device. Doors shall not swing into the required clear floor or ground space. ...	2010 CBC provides **less access** than 2010 ADA.	As a note - this clr flr space should NOT be centered on the control - it is less accessible if centered	Add section - Manually operated controls shall comply with 309. The clear floor *space* adjacent to the control shall be located beyond the arc of the door swing.
936	**404.3.6 Break Out Opening.** Where doors and gates without standby power are a part of a means of egress, the clear break out opening at swinging or sliding doors and gates shall be 32 inches (815 mm) minimum when operated in emergency mode.		NA	2010 CBC **does not address** 2010 ADA req.		Add- **Break Out Opening.** Where doors and gates without standby power are a part of a means of egress, the clear break out opening at swinging or sliding doors and gates shall be 32 inches (815 mm) minimum when operated in emergency mode.
937	**404.3.6 EXCEPTION:** Where manual swinging doors and gates comply with 404.2 and serve the same means of egress compliance with 404.3.6 shall not be required.		NA	2010 CBC **does not address** 2010 ADA req.		Add- **EXCEPTION:** Where manual swinging doors and gates comply with 404.2 and serve the same means of egress compliance with 404.3.6 shall not be required.
938	**404.3.7 Revolving Doors, Revolving Gates, and Turnstiles.** Revolving doors, revolving gates, and turnstiles shall not be part of an *accessible* route.		***1133B.2.3.3 Revolving doors.*** *Revolving doors shall not be used as a required entrance for persons with disabilities.*	2010 CBC **does not address** 2010 ADA req.	Should a	**Add -** **Revolving Doors, Revolving Gates, and Turnstiles.** Revolving doors, revolving gates, and turnstiles shall not be part of an *accessible* route.
939	**405 Ramps**		**1133B.5 Ramps.**	2010 CBC is **equivalent** to 2010 ADA.		

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940	**405.1 General.** *Ramps* on *accessible* routes shall comply with 405.		**1133B.5.1 General**. Ramps shall conform to the provisions of this section. …	2010 CBC provides **greater access** than 2010 ADA.	CBC requirements apply to all ramps whereas 2010 ADA Standards applies to ramps on accessible routes.	1. If the CBC version is adopted, no change is necessary. 2. If the 2010 ADA Standards version is adopted, revise the wording to include all ramps.
941	**405.1 EXCEPTION:** In *assembly areas*, aisle ramps adjacent to seating and not serving *elements* required to be on an *accessible* route shall not be required to comply with 405.		**1133B.5.5.1** Handrails are required on ramps that provide access if slope exceeds one unit vertical in 20 units horizontal (5-percent slope), except that at exterior door landings, handrails are not required on ramps less than 6 inches (152 mm) rise or 72 inches (1829 mm) in length. Handrails shall be placed on each side of each ramp, shall be continuous the full length of the ramp, shall be 34 to 38 inches (864 to 965 mm) above the ramp surface to the top of the handrails, shall extend a minimum of 1 foot (305 mm) beyond the top and bottom of the ramp and shall be parallel with the floor or ground surface. The inside handrail on switchback or dogleg ramps shall always be continuous. Handrails may project into the required clear width a distance of 3-½ inches (89 mm) maximum from each side of a ramp at the handrail height. The ends of handrails shall be either rounded or returned smoothly to floor, wall or post. **Exceptions:** 1. Handrails at ramps immediately adjacent to fixed seating in assembly areas are not required.	2010 CBC provides **greater access** than 2010 ADA.	CBC exception only applies to handrails whereas 2010 ADA Standards exception applies to all ramp requirements, including slope, cross slope, landings and handrails.	1. If the CBC version is adopted, no change is necessary. 2. If the 2010 ADA Standards version is adopted, revise the wording to except only the requirements for handrails.
942	**405.2 Slope.** *Ramp* runs shall have a *running* slope not steeper than 1:12.		**1133B.5.3 Slope.** The least possible slope shall be used for any ramp. The maximum slope of a ramp shall be one unit vertical in 12 units horizontal (8.33-percent slope). …	2010 CBC provides **greater access** than 2010 ADA.	CBC requires that the least possible slope shall be used for any ramp but 2010 ADA Standards does not.	1. If the CBC version is adopted, no change is necessary. 2. If the 2010 ADA Standards version is adopted, incorporate the CBC requirement that the least possible slope be used for any ramp.
943	**405.2 EXCEPTION:** In existing *sites*, *buildings*, and *facilities*, *ramps* shall be permitted to have *running slopes* steeper than 1:12 complying with Table 405.2 where such slopes are necessary due to *space* limitations.		**1133B.5.3 Slope.** The least possible slope shall be used for any ramp. The maximum slope of a ramp shall be one unit vertical in 12 units horizontal (8.33-percent slope). …	2010 CBC provides **greater access** than 2010 ADA.	CBC does not permit the exception under any circumstances.	1. If the CBC version is adopted, no change is necessary. 2. If the 2010 ADA Standards version is adopted, maintain the exception. 3. If the version is adopted, delete the exception.
944	**405.2 EXCEPTION:** In existing *sites*, *buildings*, and *facilities*, *ramps* shall be permitted to have *running slopes* steeper than 1:12 complying with Table 405.2 where such slopes are necessary due to *space* limitations.		**1133B.5.3 Slope.** The least possible slope shall be used for any ramp. The maximum slope of a ramp shall be one unit vertical in 12 units horizontal (8.33-percent slope). …	2010 CBC provides **greater access** than 2010 ADA.	CBC does not permit the exception under any circumstances.	1. If the CBC version is adopted, no change is necessary. 2. If the 2010 ADA Standards version is adopted, maintain the exception. 3. If the version is adopted, delete the exception.
945	**405.2 EXCEPTION:** In existing *sites*, *buildings*, and *facilities*, *ramps* shall be permitted to have *running slopes* steeper than 1:12 complying with Table 405.2 where such slopes are necessary due to *space* limitations.		**1133B.5.3 Slope.** The least possible slope shall be used for any ramp. The maximum slope of a ramp shall be one unit vertical in 12 units horizontal (8.33-percent slope). …	2010 CBC provides **greater access** than 2010 ADA.	CBC does not permit the exception under any circumstances.	1. If the CBC version is adopted, no change is necessary. 2. If the 2010 ADA Standards version is adopted, maintain the exception. 3. If the 2010 ADA Standards version is adopted, delete the exception.
946	**405.2 EXCEPTION:** In existing *sites*, *buildings*, and *facilities*, *ramps* shall be permitted to have *running slopes* steeper than 1:12 complying with Table 405.2 where such slopes are necessary due to *space* limitations.		**1133B.5.3 Slope.** The least possible slope shall be used for any ramp. The maximum slope of a ramp shall be one unit vertical in 12 units horizontal (8.33-percent slope). …	2010 CBC provides **greater access** than 2010 ADA.	CBC does not permit the exception under any circumstances.	1. If the CBC version is adopted, no change is necessary. 2. If the 2010 ADA Standards version is adopted, maintain the exception. 3. If the 2010 ADA Standards version is adopted, delete the exception.
947	**Advisory 405.2 Slope.** To accommodate the widest range of users, provide ramps with the least possible running slope and, wherever possible, accompany ramps with stairs for use by those individuals for whom distance presents a greater barrier than steps, e.g., people with heart disease or limited stamina.		**1133B.5.3 Slope.** The least possible slope shall be used for any ramp. …	2010 CBC **does not address** 2010 ADA req.	Although CBC requires the least possible slope be used for ramps whereas 2010 ADA Standards only includes that in the Advisory, the CBC does not address the recommendation that stairs be provided to accompany ramps where possible.	1. If the CBC version is adopted, include the 2010 ADA Standards advisory regarding providing stairs adjacent to ramps where possible. 2. Adopt the 2010 ADA Standards version.

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948	**405.3 Cross Slope.** *Cross slope* of *ramp* runs shall not be steeper than 1:48.		**1133B.5.3.1** The cross slope of ramp surfaces shall be no greater than 1 unit vertical in 50 units horizontal (2-percent slope).	2010 CBC provides **greater access** than 2010 ADA.	CBC limits ramp cross slope to 1:50 whereas 2010 ADA Standards limits cross slope to 1:48.	1. If the CBC version is adopted, no change is necessary. 2. Adopt the 2010 ADA Standards version. Given that these are standards for objects to be built to, shouldn't the 1:48 standard be recommended, as the small difference between them really doesn't result in increased accessibility but is more useful for the maker/contractor when he attempts his layout in the field?
949	**Advisory 405.3 Cross Slope.** Cross slope is the slope of the surface perpendicular to the direction of travel. Cross slope is measured the same way as slope is measured (i.e., the rise over the run).		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CBC does not provide the explanation for how to measure cross slope.	1. If the CBC version is adopted, include the 2010 ADA Standards advisory regarding how to measure cross slope. 2. Adopt the 2010 ADA Standards version.
950	**405.4 Floor or Ground Surfaces.** Floor or ground surfaces of *ramp* runs shall comply with 302. Changes in level other than the *running slope* and *cross slope* are not permitted on *ramp* runs.		**SECTION 1124B GROUND AND FLOOR SURFACES** **1124B.1 General.** Ground and floor surfaces along accessible routes and in accessible rooms and spaces, including floors, walks, ramps, stairs and curb ramps, shall be stable, firm, slip resistant and shall comply with this section. **1124B.2 Changes in level.** Changes in level up to ¼ inch (6.4 mm) may be vertical and without edge treatment [see Figure 11B-5E(c)]. Changes in level between ¼ inch (6.4 mm) and ½ inch (12.7 mm) shall be beveled with a slope no greater than one unit vertical in 2 units horizontal (50-percent slope) [see Figure 11B-5E(d)]. Changes in level greater than ½ inch (12.7 mm) shall be accomplished by means of a curb ramp, ramp, elevator or platform lift that complies with Sections 1127B.5, 1133B.5, 1116B.1 or 1116B.2, respectively. **1124B.4 Gratings**. If gratings are located in walking surfaces, then they shall have spaces no greater than ½ inch (12.7 mm) wide in one direction (see Figure 11B-7E). If gratings have elongated openings, then they shall be placed so that the long dimension is perpendicular to the dominant direction of travel (see Figure 11B-7E).	2010 CBC **does not address** 2010 ADA req.	CBC does not include the 2010 ADA Standards limitation that changes in level other than the running slope and the cross slope are not permitted. CBC requirements for ground and floor surface apply to all accessible routes, not just ramps.	1. If the CBC version is adopted, incorporate the 2010 ADA Standards requirement that changes in level other than the running slope and cros slope aer not permitted on ramp runs. 2. Adopt the 2010 ADA Standards version verbatim.
951	**405.4 Floor or Ground Surfaces.** Floor or ground surfaces of *ramp* runs shall comply with 302. Changes in level other than the *running slope* and *cross slope* are not permitted on *ramp* runs.		**SECTION 1124B GROUND AND FLOOR SURFACES** **1124B.1 General.** Ground and floor surfaces along accessible routes and in accessible rooms and spaces, including floors, walks, ramps, stairs and curb ramps, shall be stable, firm, slip resistant and shall comply with this section. **1124B.2 Changes in level.** Changes in level up to ¼ inch (6.4 mm) may be vertical and without edge treatment [see Figure 11B-5E(c)]. Changes in level between ¼ inch (6.4 mm) and ½ inch (12.7 mm) shall be beveled with a slope no greater than one unit vertical in 2 units horizontal (50-percent slope) [see Figure 11B-5E(d)]. Changes in level greater than ½ inch (12.7 mm) shall be accomplished by means of a curb ramp, ramp, elevator or platform lift that complies with Sections 1127B.5, 1133B.5, 1116B.1 or 1116B.2, respectively. **1124B.4 Gratings**. If gratings are located in walking surfaces, then they shall have spaces no greater than ½ inch (12.7 mm) wide in one direction (see Figure 11B-7E). If gratings have elongated openings, then they shall be placed so that the long dimension is perpendicular to the dominant direction of travel (see Figure 11B-7E).	2010 CBC **conflicts with** 2010 ADA.	CBC does not include the2010 ADA Standards limitation that changes in level other than the running slope and the cross slope are not permitted. CBC requirements for ground and floor surface apply to all accessible routes, not just ramps.	1. If the CBC version is adopted, incorporate the 2010 ADA Standards requirement that changes in level other than the running slope and cros slope aer not permitted on ramp runs. 2. Adopt the 2010 ADA Standards version verbatim.

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952	**405.5 Clear Width.** The clear width of a *ramp* run and, where handrails are provided, the clear width between handrails shall be 36 inches (915 mm) minimum.		**1133B.5.2 Width.** Ramps shall have a minimum clear width of 48 inches (1219 mm), unless required to be wider by some other provision of this code. Ramps serving entrances to buildings where the ramp is the only exit discharge path and s erves an occupant load of 300 or more shall have a minimum clear width of 60 inches (1524 mm). Ramps serving Group R occupancies may be 36 inches (914 mm) clear width when the occupant load is 50 or less. **1133B.5.5.1.** Handrails may project into the required clear width a distance of 3-½ inches (89 mm) maximum from each side of a ramp at the handrail height.	2010 CBC provides **less access** than 2010 ADA.	CBC is more restrictive except for R occupancies where the occupant load is less than 50 since the clear space between handrails can be reduced to 29" in that condition (36" - 3.5" projection each side = 29"). CBC requirements are all based on ramp width and 1133B.5.5.1 allows handrails to project 3.5" maximum on each side. 2010 ADA Standards requirements are based upon clear width between handrails (where provided).	1. If the CBC version is adopted, revise the requirement for clear width between handrails (instead of ramp width) to be 36" minimum. 2. If the 2010 ADA Standards version is adopted, incorporate the CBC width requirements except for the 36" minimum for R occupancies with OL of 50 or less.
953	**405.5 Clear Width.** The clear width of a *ramp* run and, where handrails are provided, the clear width between handrails shall be 36 inches (915 mm) minimum.		**1133B.5.2 Width.** Ramps shall have a minimum clear width of 48 inches (1219 mm), unless required to be wider by some other provision of this code. Ramps serving entrances to buildings where the ramp is the only exit discharge path and s erves an occupant load of 300 or more shall have a minimum clear width of 60 inches (1524 mm). Ramps serving Group R occupancies may be 36 inches (914 mm) clear width when the occupant load is 50 or less. **1133B.5.5.1.** Handrails may project into the required clear width a distance of 3-½ inches (89 mm) maximum from each side of a ramp at the handrail height.	2010 CBC provides **less access** than 2010 ADA.	CBC is more restrictive except for R occupancies where the occupant load is less than 50 since the clear space between handrails can be reduced to 29" in that condition (36" - 3.5" projection each side = 29"). CBC requirements are all based on ramp width and 1133B.5.5.1 allows handrails to project 3.5" maximum on each side. 2010 ADA Standards requirements are based upon clear width between handrails (where provided).	1. If the CBC version is adopted, revise the requirement for clear width between handrails (instead of ramp width) to be 36" minimum. 2. If the 2010 ADA Standards version is adopted, incorporate the CBC width requirements except for the 36" minimum for R occupancies with OL of 50 or less.
954	**405.5 EXCEPTION:** Within *employee work areas* , the required clear width of *ramps* that are a part of *common use circulation paths* shall be permitted to be decreased by *work area equipment* provided that the decrease is essential to the function of the work being performed.		CBC does not have an equivalent exception.	2010 CBC provides **greater access** than 2010 ADA.		1. If the CBC version is adopted, no change is necessary. 2. Adopt the 2010 ADA Standards version.
955	**405.6 Rise.** The rise for any *ramp* run shall be 30 inches (760 mm) maximum.		**1133B.5.3 Slope.** The least possible slope shall be used for any ramp. ... The maximum rise for any run shall be 30 inches (762 mm). …	2010 CBC is **equivalent** to 2010 ADA.		No change necessary.
956	**405.7 Landings.** *Ramps* shall have landings at the top and the bottom of each *ramp* run. Landings shall comply with 405.7.		**1133B.5.4 Landings**. Level ramp landings shall be installed as follows: **1133B.5.4.1 Location of landings.** Level ramp landings shall be provided at the top and bottom of each ramp. ... Landings shall be level as specified in the definition of “level area” in Section 1102B. **1133B.5.4.2 Size of top and bottom landings.** Top landings shall be not less than 60 inches (1524 mm) wide and shall have a length of not less than 60 inches (1524 mm) in the direction of ramp run. Landings at the bottom of ramps shall have a dimension in the direction of ramp run of not less than 72 inches (1829 mm). **1133B.5.4.3 Doors at ramp landings.** Doors at ramp landings shall comply with the maneuvering clearance requirements of Section 1133B.2.4.2, and the requirements of Section 1133B.5.4.4. **1133B.5.4.5 Landing width.** At bottom and intermediate landings, the width shall be at least the same as required for the ramps. **1133B.5.4.6 Change of direction.** Intermediate and bottom landings at a change of direction in excess of 30 degrees shall have a dimension in the direction of ramp run of not less than 72 inches (1829 mm) to accommodate the handrail extension.	Which Std.provides greater access **depends** on circumstances.	1. CBC is more restrictive regarding landing slope; 1:50 maximum allowed whereas 2010 ADA Standards allows 1:48 maximum slope. 2. Landing width requirements are different between CBC and 2010 ADA Standards since they refer back to the respective ramp width requirements described above. 3. CBC is more restrictive than 2010 ADA Standards for top landing width and bottom landing length. 4. CBC is more restrictive than 2010 ADA Standards for intermediate and bottom landing lengths at a change of direction (72" versus 60") "to accommodate the handrail extension." 5. 2010 ADA Standards is more restrictive than CBC for landing width at a change in direction (60" minimum versus 36" - 48"). 6. CBC and 2010 ADA Standards have similar landing length requirements.	1. If the CBC version is adopted, revise the requirement for ramp width and landing size at a change in direction. 2. If the 2010 ADA Standards version is adopted, incorporate the CBC width requirements for landing slope, top landing width, bottom landing length, intermediate landing lenghts at a change in direction, but not the 36" minimum for R occupancies,

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957	**Advisory 405.7 Landings.** Ramps that do not have level landings at changes in direction can create a compound slope that will not meet the requirements of this document. Circular or curved ramps continually change direction. Curvilinear ramps with small radii also can create compound cross slopes and cannot, by their nature, meet the requirements for accessible routes. A level landing is needed at the accessible door to permit maneuvering and simultaneously door operation.		CBC does not have an equivalent section.	NA	2010 ADA Standards prohibits curvillinear ramps but the Advisory is written for "landings."	Consider adding language to the CBC to prohibit curvillinear ramps.
958	**405.7.1 Slope.** Landings shall comply with 302. Changes in level are not permitted.		**SECTION 1124B GROUND AND FLOOR SURFACES 1124B.1 General.** Ground and floor surfaces along accessible routes and in accessible rooms and spaces, including floors, walks, ramps, stairs and curb ramps, shall be stable, firm, slip resistant and shall comply with this section. **1124B.2 Changes in level.** Changes in level up to ¼ inch (6.4 mm) may be vertical and without edge treatment [see Figure 11B-5E(c)]. Changes in level between ¼ inch (6.4 mm) and ½ inch (12.7 mm) shall be beveled with a slope no greater than one unit vertical in 2 units horizontal (50-percent slope) [see Figure 11B-5E(d)]. Changes in level greater than ½ inch (12.7 mm) shall be accomplished by means of a curb ramp, ramp, elevator or platform lift that complies with Sections 1127B.5, 1133B.5, 1116B.1 or 1116B.2, respectively. **1124B.4 Gratings**. If gratings are located in walking surfaces, then they shall have spaces no greater than ½ inch (12.7 mm) wide in one direction (see Figure 11B-7E). If gratings have elongated openings, then they shall be placed so that the long dimension is perpendicular to the dominant direction of travel (see Figure 11B-7E).	2010 CBC is **equivalent** to 2010 ADA.		No change necessary.
959	**405.7.1 EXCEPTION:** Slopes not steeper than 1:48 shall be permitted.		**1133B.5.4 Landings.** Level ramp landings shall be installed as follows: **1133B.5.4.1 Location of landings.** ... Landings shall be level as specified in the definition of "level area" in Section 1102B.	2010 CBC provides **greater access** than 2010 ADA.	1. CBC is more restrictive regarding landing slope; 1:50 maximum allowed whereas 2010 ADA Standards allows 1:48 maximum slope.	1. Adopt the CBC version. 2. Adopt the 2010 ADA Standards version but incorporate the CBC requirement that ramp landings not exceed 1:50 slope.
960	**405.7.2 Width.** The landing clear width shall be at least as wide as the widest *ramp* run leading to the landing.		**1133B.5.4.2 Size of top and bottom landings.** Top landings shall be not less than 60 inches (1524 mm) wide and shall have a length of not less than 60 inches (1524 mm) in the direction of ramp run. Landings at the bottom of ramps shall have a dimension in the direction of ramp run of not less than 72 inches (1829 mm). **1133B.5.4.5 Landing width**. At bottom and intermediate landings, the width shall be at least the same as required for the ramps.	2010 CBC **does not address** 2010 ADA req.	1. 2010 ADA Standards does not provide specific ramp landing widths but instead requires landing width based upon the widest ramp run leading to the landing (regardless of whether the ramp width is required or not). 2. CBC requirements for ramp landing width are based upon required ramp width for bottom and intermediate landings and 60" x 60" minimum for top landings.	1. If the CBC version is adopted, incorporate the 2010 ADA Standards requirement that ramp landing width be at least as wide as the widest ramp run leading to the landing. 2. If the 2010 ADA Standards version is adopted, incorporate the CBC requirements for minimum top landing width if it exceeds the width of the widest ramp run leading to the landing. Given that these are standards for objects to be built to, shouldn't the 1:48 standard be recommended, as the small difference between them really doesn't result in increased accessibility but is more useful for the maker/contractor when he attempts his layout in the field?
961	**405.7.3 Length.** The landing clear length shall be 60 inches (1525 mm) long minimum.		**1133B.5.4.2 Size of top and bottom landings.** Top landings shall be not less than 60 inches (1524 mm) wide and shall have a length of not less than 60 inches (1524 mm) in the direction of ramp run. Landings at the bottom of ramps shall have a dimension in the direction of ramp run of not less than 72 inches (1829 mm).	2010 CBC provides **greater access** than 2010 ADA.	1. CBC requires a 72" long bottom landing whereas 2010 ADA Standards only requires a 60" deep long bottom landing. 2. Both CBC and 2010 ADA Standards require top landings to be 60" deep minimum.	1. If the CBC version is adopted, no change is necessary. 2. If the 2010 ADA Standards version is adopted, incorporate the CBC requirement that bottom landings be 72 inches minimum length.

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962	**405.7.4 Change in Direction.** *Ramps* that change direction between runs at landings shall have a clear landing 60 inches (1525 mm) minimum by 60 inches (1525 mm) minimum.		**1133B.5.4.6 Change of direction.** Intermediate and bottom landings at a change of direction in excess of 30 degrees shall have a dimension in the direction of ramp run of not less than 72 inches (1829 mm) to accommodate the handrail extension.	2010 CBC **does not address** 2010 ADA req.	1. Although the CBC requires ramp landing length to be 72 inches minimum it does not specify a required width at this condition. 2. The CBC does require a 60" x 60" top landing, but this is not the identical condition described in 2010 ADA Standards.	1. If the CBC version is adopted, incorporate the 2010 ADA Standards requirement that ramp landing width be at least 60 inches minimum at ramps that change direction. 2. If the 2010 ADA Standards version is adopted, incorporate the CBC requirement for 72 inch minimum landing lenght at a change in direction.
963	**405.7.5 Doorways.** Where doorways are located adjacent to a *ramp* landing, maneuvering clearances required by 404.2.4 and 404.3.2 shall be permitted to overlap the required landing area.		**1133B.5.4.3 Doors at ramp landings.** Doors at ramp landings shall comply with the maneuvering clearance requirements of Section 1133B.2.4.2, and the requirements of Section 1133B.5.4.4.	2010 CBC **does not address** 2010 ADA req.	CBC does not mention overlap of maneuvering clearance and ramp landings.	1. Adopt the CBC version as it cannot be any less restrictive than 2010 ADA Standards. 2. Adopt the 2010 ADA Standards version verbatim.
964	**405.8 Handrails.** *Ramp* runs with a rise greater than 6 inches (150 mm) shall have handrails complying with 505.		**1133B.5.5 Handrails for ramps. 1133B.5.5.1** Handrails are required on ramps that provide access if slope exceeds one unit vertical in 20 units horizontal (5-percent slope), except that at exterior door landings, handrails are not required on ramps less than 6 inches (152 mm) rise or 72 inches (1829 mm) in length. Handrails shall be placed on each side of each ramp, shall be continuous the full length of the ramp, shall be 34 to 38 inches (864 to 965 mm) above the ramp surface to the top of the handrails, shall extend a minimum of 1 foot (305 mm) beyond the top and bottom of the ramp and shall be parallel with the floor or ground surface. The inside handrail on switchback or dogleg ramps shall always be continuous. Handrails may project into the required clear width a distance of 3-½ inches (89 mm) maximum from each side of a ramp at the handrail height. The ends of handrails shall be either rounded or returned smoothly to floor, wall or post. Handrails projecting from a wall shall have a space of 1-½ inches (38 mm) between the wall and the handrail. Handrails may be located in a recess if the recess is a maximum of 3 inches (76 mm) deep and extends at least 18 inches (457 mm) above the top of the rail. The grip portion shall not be less than 1-1/4 inches (32 mm) nor more than 1-½ inches (38 mm) in cross-sectional nominal dimension or the shape shall provide an equivalent gripping surface, and all surfaces shall be smooth with no sharp corners. Handrails shall not rotate within their fittings. Any wall or other surface adjacent to the handrail shall be free of sharp or abrasive elements. Edges shall have a minimum radius of 1/8 inch (3 mm).	2010 CBC provides **greater access** than 2010 ADA.	CBC does not include the 2010 ADA Standards exception that ramps less than or equal to 6 inches in rise do not require handrails. CBC requirements for handrails apply to all ramps regardless of rise.	1. If the CBC version is adopted, incorporate the 2010 ADA Standards exception for ramps with rise less than or equal to 6 inches. 2. Adopt CBC verbatim. 3. Adopt the 2010 ADA Standards version verbatim.
965	**405.8 EXCEPTION:** Within *employee work areas* , handrails shall not be required where *ramps* that are part of *common use circulation paths* are designed to permit the installation of handrails complying with 505. *Ramps* not subject to the exception to 405.5 shall be designed to maintain a 36 inch (915 mm) minimum clear width when handrails are installed.		CBC does not have an equivalent exception.	2010 CBC provides **greater access** than 2010 ADA.	CBC does not recognize differing accessibiliy requirements for employee work areas.	1. Adopt the CBC version verbatim. 2. If the CBC version is adopted, incorporate the 2010 ADA Standards exception for employee work areas. 3. Adopt the 2010 ADA Standards version verbatim.

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966	**405.9 Edge Protection.** Edge protection complying with 405.9.1 or 405.9.2 shall be provided on each side of *ramp* runs and at each side of *ramp* landings.		**1133B.5.4.9 Hazards.** Required ramps shall have a curb at least 2 inches (51 mm) high, or a wheel guide rail 2 to 4 inches (51 to 102 mm) high on each side of the ramp landing that has a vertical drop exceeding 4 inches (102 mm) and that is not bounded by a wall or fence.	2010 CBC **does not address** 2010 ADA req.	1. CBC and 2010 ADA Standards wording is misleading in that it requires a curb or wheel guide rail on "each side of the ramp landing" (2010 ADA Standards Exception 2). 2. CBC does not include 2010 ADA Standards exception for edge protection where flared sides are provided per 2010 ADA Standards 406.3. 3. CBC does not include the 2010 ADA Standards exception for edge protection at ramp landings serving an adjoining ramp run or stairway. 4. CBC does not include the 2010 ADA Standards exception for ramp landings with a vertical drop-off of 1/2" maximum within 10 inches horizontally of the minimum required landing area.	Regardless of whether CBC or 2010 ADA Standards is adopted, clarify the requirements for edge protection location to be alongside of ramps and landings.
967	**405.9 EXCEPTIONS: 1.** Edge protection shall not be required on *ramps* that are not required to have handrails and have sides complying with 406.3. **2.** Edge protection shall not be required on the sides of *ramp* landings serving an adjoining ramp run or stairway. **3.** Edge protection shall not be required on the sides of *ramp* landings having a vertical drop-off of ½ inch (13 mm) maximum within 10 inches (255 mm) horizontally of the minimum landing area specified in 405.7.		**1133B.5.4.9 Hazards.** Required ramps shall have a curb at least 2 inches (51 mm) high, or a wheel guide rail 2 to 4 inches (51 to 102 mm) high on each side of the ramp landing that has a vertical drop exceeding 4 inches (102 mm) and that is not bounded by a wall or fence.	2010 CBC **does not address** 2010 ADA req.	1. CBC and 2010 ADA Standards wording is misleading in that it requires a curb or wheel guide rail on "each side of the ramp landing" (2010 ADA Standards Exception 2). 2. CBC does not include 2010 ADA Standards exception for edge protection where flared sides are provided per 2010 ADA Standards 406.3. 3. CBC does not include the 2010 ADA Standards exception for edge protection at ramp landings serving an adjoining ramp run or stairway. 4. CBC does not include the 2010 ADA Standards exception for ramp landings with a vertical drop-off of 1/2" maximum within 10 inches horizontally of the minimum required landing area.	Regardless of whether CBC or 2010 ADA Standards is adopted, clarify the requirements for edge protection location to be alongside of ramps and landings.
968	**405.9.1 Extended Floor or Ground Surface.** The floor or ground surface of the *ramp* run or landing shall extend 12 inches (305 mm) minimum beyond the inside face of a handrail complying with 505.		**1133B.5.4.9 Hazards.** Required ramps shall have a curb at least 2 inches (51 mm) high, or a wheel guide rail 2 to 4 inches (51 to 102 mm) high on each side of the ramp landing that has a vertical drop exceeding 4 inches (102 mm) and that is not bounded by a wall or fence.	2010 CBC **does not address** 2010 ADA req.	Extended floor or ground surfaces do not provide equivalent edge protection to a curb or wheel guide. Wheelchair users can have their front or rear wheels catch on the vertical handrail supports when ascending or descending a ramp (more likely when ascending due to the increased effort required resulting in the wheelchair not ascending in a straight line).	Adopt the CBC version verbatim.
969	**Advisory 405.9.1 Extended Floor or Ground Surface.** The extended surface prevents wheelchair casters and crutch tips from slipping off the ramp surface.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	NA	NA
970	**405.9.2 Curb or Barrier.** A curb or barrier shall be provided that prevents the passage of a 4 inch (100 mm) diameter sphere, where any portion of the sphere is within 4 inches (100 mm) of the finish floor or ground surface.		**1133B.5.4.9 Hazards.** Required ramps shall have a curb at least 2 inches (51 mm) high, or a wheel guide rail 2 to 4 inches (51 to 102 mm) high on each side of the ramp landing that has a vertical drop exceeding 4 inches (102 mm) and that is not bounded by a wall or fence.	2010 CBC provides **less access** than 2010 ADA.	1. 2010 ADA Standards does not provide the exception to provide edge protection where a ramp is bounded by a wall or fence. 2. 2010 ADA Standards does not specify the required curb height as CBC does. 3. 2010 ADA Standards requires the barrier to prevent a 4 inch diameter sphere from passing between the barrier and the ramp surface, whereas CBC requires the wheel guide to be 2" - 4" high.	1. If the CBC version is adopted, clarify the requirements for edge protection location to be alongside of ramps and landings. 2. If the CBC version is adopted, also eliminate the exception for edge protection where ramp landings are bounded by a wall or fence. 3. Adopt the 2010 ADA Standards version verbatim.
971	**405.10 Wet Conditions.** Landings subject to wet conditions shall be designed to prevent the accumulation of water.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CBC would theoretically allow ramp landings to be designed with no slope, which could result in the accumulation of water at exterior or other wet conditions.	1. If the CBC version is adopted, incorporate the 2010 ADA Standards requirement that all landings shall be designed to prevent the accumulation of water. 2. Adopt the 2010 ADA Standards version verbatim.
972	**406 Curb Ramps**		**1127B.5 Curb ramps.**	2010 CBC is **equivalent** to 2010 ADA.	CBC and 2010 ADA Standards section headings are the same.	N/A
973	**406.1 General.** *Curb ramps* on *accessible* routes shall comply with 406, 405.2 through 405.5, and 405.10.		CBC does not have an equivalent section subheading.	2010 CBC **does not address** 2010 ADA req.		1. If the CBC version is adopted, add a section subheading which reads "Protruding objects shall comply with 1133B.8.6" 2. Adopt 2010 ADA Standards version verbatim.

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974	**406.2 Counter Slope.** Counter slopes of adjoining gutters and road surfaces immediately adjacent to the *curb ramp* shall not be steeper than 1:20. The adjacent surfaces at transitions at *curb ramps* to *walks*, gutters, and streets shall be at the same level.		**1127B.5.3 Slope of curb ramps.** ... Transitions from ramps to walks, gutters or streets shall be flush and free of abrupt change. Maximum slopes of adjoining gutters, road surface immediately adjacent to the curb ramp, or accessible route shall not exceed one unit vertical in 20 units horizontal (5-percent slope) within 4 feet (1219 mm) of the bottom of the curb ramp. ...	2010 CBC provides **greater access** than 2010 ADA.	CBC and 2010 ADA Standards both require the counterslope to be 1:20 maximum but the CBC indicates the maximum slope cannot be exceeded within 4 feet of the bottom of the curb ramp whereas 2010 ADA Standards does not indicate a distance. However, the CBC only limits the "slope" while 2010 ADA Standards specifically mentions "counterslope". CBC Fig. 11B-21 shows a counterslope but the wording of the CBC could be interpreted to include a slope in the same direction as the curb ramp slope.	1. If the CBC version is adopted, revise the wording to "maximum counterslope" instead of "maximum slope". 2. If the 2010 ADA Standards version is adopted, add the 4 foot dimension to the maximum 1:20 counterslope requirement.
975	**406.3 Sides of Curb Ramps.** Where provided, *curb ramp* flares shall not be steeper than 1:10.		**1127B.5.3 Slope of curb ramps.** ... The slope of the fanned or flared sides of curb ramps shall not exceed one unit vertical in 10 units horizontal (10 percent slope).	2010 CBC is **equivalent** to 2010 ADA.	2010 ADA Standards spefically mentions that flared sides are not required but when provided, the slope of the flared sides shall not exceed 1:10.	1. If the CBC version is adopted, add the 2010 ADA Standards verbiage "when provided." 2. Adopt the 2010 ADA Standards version verbatim.
976			N/A	NA	N/A	N/A
977	**406.4 Landings.** Landings shall be provided at the tops of *curb ramps*. The landing clear length shall be 36 inches (915 mm) minimum. The landing clear width shall be at least as wide as the *curb ramp*, excluding flared sides, leading to the landing.		**1127B.5.4. Level landing.** A level landing 4 feet (1219 mm) deep shall be provided at the upper end of each curb ramp over its full width to permit safe egress from the ramp surface, …	2010 CBC provides **greater access** than 2010 ADA.	CBC requires the landing to be 4 foot wide minimum and 2010 ADA Standards only requires the landing to be 3 foot wide minimum.	1. If the CBC version is adotped, no change is necessary. 2. If the 2010 ADA Standards version is adopted, revise the minimum landing width to 4 feet.
978	**406.4 EXCEPTION:** In *alterations*, where there is no landing at the top of *curb ramps*, *curb ramp* flares shall be provided and shall not be steeper than 1:12.		**1127B.5.4. Level landing.** A level landing 4 feet (1219 mm) deep shall be provided at the upper end of each curb ramp over its full width to permit safe egress from the ramp surface, or the slope of the fanned or flared sides of the curb ramp shall not exceed one unit vertical in 12 units horizontal (8.33-percent slope).	2010 CBC is **equivalent** to 2010 ADA.	No change is necessary	No change is necessary.
979	**406.5 Location.** *Curb ramps* and the flared sides of *curb ramps* shall be located so that they do not project into vehicular traffic lanes, parking *spaces*, or parking access aisles. …		**1127B.5.1 General.** ... Built-up curb ramps shall be located so that they do not project into vehicular traffic lanes. …	2010 CBC provides **less access** than 2010 ADA.	1. CBC only prohibits built-up curb ramps from projecting into vehicular traffic lanes, while 2010 ADA Standards prohibits all curb ramps from projecting into vehicular traffic lanes, parking spaces or parking access aisles. 2. The CBC essentially prohibits curb ramps from projecting into access aisles since they can only slope 2% maximum. However, parking spaces can have any slope unless they are accessible so a curb ramp could theoretically project into a parking space and still comply with the CBC.	1. If the CBC version is adopted, include the 2010 ADA Standards language that all curb ramps are prohibited from projecting into parking spaces and parking access aisles as well as vehicular traffic lanes. 2. Adopt the 2010 ADA Standards version verbatim.
980	**406.5 Location.** …		**1127B.5.8 Obstructions.** Curb ramps shall be located or protected to prevent their obstruction by parked vehicles.	2010 CBC provides **greater access** than 2010 ADA.	CBC maintained the 1991 ADAAG requirement that curb ramps not be obstructed by parked vehicles.	1. Maintain the CBC requirement. 2. Revise the CBC to remove the requirement that curb ramps shall be located or protected to prevent their obstruction by parked vehicles.
981	**406.5 Location.** ... *Curb ramps* at *marked crossings* shall be wholly contained within the markings, excluding any flared sides.		**1127B.5.1 General.** ... Where it is necessary to locate a curb ramp in the center of the curb return and the street surfaces are marked to identify pedestrian crosswalks, the lower end of the curb ramp shall terminate within such crosswalk areas. See Figure 11B-20C, Case E and Figure 11B-22.	2010 CBC provides **less access** than 2010 ADA.	The CBC requirement that curb ramps be located within marked crossings contains the qualifying language "where it is necessary to locate a curb ramp in the center of the curb return", which 2010 ADA Standards do not. 2010 ADA Standards also requires that the curb ramp be wholly contained within the marking and specifically excludes the flared sides. CBC Fig. 11B-22 uses "marked crossings" whereas 1127B.5.1 uses "pedestrian crosswalks."	1. If the CBC version is adopted, include the 2010 ADA Standards language that curb ramps at marked crossings must be wholly contained within the markings, excluding the flared sides. 2. Revised "pedestrian crosswalks" to "marked crossings." 3. Adopt the 2010 ADA Standards version verbatim.
982	**406.5 Location.** …		**1127B.5.1 General.** …	NA	N/A	N/A

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
983	**406.6 Diagonal Curb Ramps.** Diagonal or corner type *curb ramps* with returned curbs or other well-defined edges shall have the edges parallel to the direction of pedestrian flow. The bottom of diagonal *curb ramps* shall have a clear space 48 inches (1220 mm) minimum outside active traffic lanes of the roadway. Diagonal *curb ramps* provided at *marked crossings* shall provide the 48 inches (1220 mm) minimum clear space within the markings. Diagonal *curb ramps* with flared sides shall have a segment of curb 24 inches (610 mm) long minimum located on each side of the *curb ramp* and within the *marked crossing*.		**1127B.5.9. Diagonal curb ramps.** If diagonal (or corner-type) curb ramps have returned curbs or other well-defined edges, such edges shall be parallel to the direction of pedestrian flow. The bottom of diagonal curb ramps shall have 48 inches (1219 mm) minimum clear space as shown in Figure 11B-22(c) and (d). If diagonal curb ramps are provided at marked crossings, the 48-inch (1219 mm) clear space shall be within the markings [see Figure 11B-22(c) and (d)]. If diagonal curb ramps have flared sides, they shall also have at least a 24 inch (610 mm) long segment of straight curb located on each side of the curb ramp and within the marked crossing [see Figure 11B-22 (c)].	2010 CBC is **equivalent** to 2010 ADA.	CBC requires the 48 clear space to be within the markings per Fig. 11B-22() and (d) whereas 2010 ADA Standards the space to be located "outside active traffic lanes of the roadway."	1. If the CBC version is adopted, incorporate the 2010 ADA Standards language for "located outside active traffic lanes of the roadway.". 2. Adopt the 2010 ADA Standards verbatim 3. Adopt the 2010 ADA Standards version but maintain the 1991 ADAAG requirement that the 24 segment of curb return be straight.
984	**406.6 Diagonal Curb Ramps.** Diagonal or corner type *curb ramps* with returned curbs or other well-defined edges shall have the edges parallel to the direction of pedestrian flow. The bottom of diagonal *curb ramps* shall have a clear space 48 inches (1220 mm) minimum outside active traffic lanes of the roadway. Diagonal *curb ramps* provided at *marked crossings* shall provide the 48 inches (1220 mm) minimum clear space within the markings. Diagonal *curb ramps* with flared sides shall have a segment of curb 24 inches (610 mm) long minimum located on each side of the *curb ramp* and within the *marked crossing*.		**1127B.5.9. Diagonal curb ramps.** If diagonal (or corner-type) curb ramps have returned curbs or other well-defined edges, such edges shall be parallel to the direction of pedestrian flow. The bottom of diagonal curb ramps shall have 48 inches (1219 mm) minimum clear space as shown in Figure 11B-22(c) and (d). If diagonal curb ramps are provided at marked crossings, the 48-inch (1219 mm) clear space shall be within the markings [see Figure 11B-22(c) and (d)]. If diagonal curb ramps have flared sides, they shall also have at least a 24 inch (610 mm) long segment of straight curb located on each side of the curb ramp and within the marked crossing [see Figure 11B-22 (c)].	2010 CBC provides **greater access** than 2010 ADA.	CBC maintained the 1991 ADAAG requirement that the 24 inch segment of curb return be straight.	1. Maintain the CBC requirement. 2. Revise the CBC to remove the requirement that the 24 inch segment of curb return be straight.
985	**406.7 Islands.** Raised islands in crossings shall be cut through level with the street or have *curb ramps* at both sides. Each *curb ramp* shall have a level area 48 inches (1220 mm) long minimum by 36 inches (915 mm) wide minimum at the top of the *curb ramp* in the part of the island intersected by the crossings. ...	**ETA Editor's Note** The Department of Transportation in Appendix F of 36 CFR Part 1191 has added 406.8 as follows: **406.8 Detectable Warnings.** A curb ramp shall have a detectable warning complying with 705. The detectable warning shall extend the full width of the curb ramp (exclusive of flared sides) and shall extend either the full depth of the curb ramp or 24 inches (610 mm) deep minimum measured from the back of the curb on the ramp surface.	CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.		If the CBC version is adopted, incorporate the requirements of 2010 ADA Standards Section 406.7. 2. Adopt the 2010 ADA Standards version.
986	**407 Elevators**		**SECTION 1116B** **ELEVATORS AND PLATFORM (WHEELCHAIR) LIFTS**	2010 CBC is **equivalent** to 2010 ADA.	This is just the section heading	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
986.1	**407 Elevators**		**1117B.5.1.1 ...** see ...**1007.4** for Elevators. See also Section 1116B for additional signage requirements applicable to elevators …	NA	Although the general scoping section in 1117B.5 does include a reference to elevators, most of the scoping is in the Elevator section of the code, along with some of the technical specifications.	Since ADA is being used, move the scoping for elevators to Chapter 2 and refer to Chapter 4, Section 407.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
987	**407.1 General.** Elevators shall comply with 407 and with ASME A17.1 (incorporated by reference, see "Referenced Standards" in Chapter 1). They shall be passenger elevators as classified by ASME A17.1. …		**1116B.1** **Elevators.** Passenger elevators shall be accessible. Elevators required to be accessible shall be designed and constructed to comply with this section and with the ASME A17.1, Safety Code for Elevators and Escalators. Freight elevators shall not be considered as meeting the requirements of this section unless the only elevators provided are used as combination passenger and freight elevators for the public and employees.	2010 CBC is **equivalent** to 2010 ADA.	Review of ASME A17.1 to see if the last sentence of CBC 1116B.1 is consistent with it is beyond the scope of this comparison.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
988	**407.1 General.** ... Elevator operation shall be automatic.		**1116B.1.2** **Operation and leveling**. The elevator shall be automatic and provided with a self-leveling feature that will automatically bring the car to the floor landings within a tolerance of plus or minus ½ inch (12.7 mm) under normal loading and unloading conditions. This self-leveling shall, within its zone, be entirely automatic and independent of the operating device and shall correct the overtravel or undertravel. The car shall also be maintained approximately level with the landing, irrespective of load. ...	2010 CBC is **equivalent** to 2010 ADA.	Although 2010 CBC 1116B.1.2 addresses more than ADA Stds. Section 407.1 relative to automatic operation, CBC is equivalent to ADA Stds. in addressing automatic operation.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
989	**Advisory 407.1 General.** The ADA and other Federal civil rights laws require that accessible features be maintained in working order so that they are accessible to and usable by those people they are intended to benefit. Building owners should note that the ASME Safety Code for Elevators and Escalators requires routine maintenance and inspections. Isolated or temporary interruptions in service due to maintenance or repairs may be unavoidable; however, failure to take prompt action to effect repairs could constitute a violation of Federal laws and these requirements.		**1101B.3** **Maintenance of accessible features.** **1101B.3 #1** A public accommodation shall maintain in operable working condition those features of facilities and equipment that are required to be accessible to and usable by persons with disabilities. **1101B.3 #2** This section does not prohibit isolated or temporary interruptions in service or access due to maintenance or repairs.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC adresses requirements for maintenance of accessible features, but does not provide advisory guidance.	2010 CBC need not be amended
990	**407.2 Elevator Landing Requirements.** Elevator landings shall comply with 407.2.		N/A	NA	2010 CBC does not have a separate paragraph to reference the respective sections/paragraphs pertaining to landing requirements.	2010 CBC need not be amended
991	**407.2.1 Call Controls.** Where elevator call buttons or keypads are provided, they shall comply with 407.2.1 and 309.4. …		N/A	NA	2010 CBC does not have a separate paragraph to reference the respective sections/paragraphs pertaining to landing requirements. 2010 CBC does not address keypads used with destination-oriented elevator systems.	2010 CBC need not be amended, except as required to address destination-oriented elevator system keypads.
992	**407.2.1 Call Controls.** Where elevator call buttons or keypads are provided, they shall comply with ... 309.4. …		N/A	NA	2010 CBC does not have a separate paragraph to reference the respective sections/paragraphs pertaining to landing requirements. 2010 CBC does not address keypads used with destination-oriented elevator systems.	2010 CBC need not be amended, except as required to address destination-oriented elevator system keypads.
993	**407.2.1 Call Controls.** ... Call buttons shall be raised or flush.		**1116B.1.10** **Hall call buttons**. ... Buttons shall be a minimum of ¾ inch (19.1 mm) in size and shall be raised ⅛ inch (3.2 mm) [plus or minus 1/32 inch (0.8 mm)] above the surrounding surface. ...	Which Std.provides greater access **depends** on circumstances.	2010 CBC requires that hall call buttons be raised. 2010 ADA Stds. allows raised or flush buttons.	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to allow both raised and flush hall call buttons.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
994	**407.2.1 EXCEPTION:** Existing elevators shall be permitted to have recessed call buttons.		N/A	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC does not have specific provision to allow recessed call buttons at exisitng elevators.	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to allow recessed call buttons at existing elevators.
995	**407.2.1.1 Height.** Call buttons and keypads shall be located within one of the reach ranges specified in 308, measured to the centerline of the highest *operable part*.		**1116B.1.10** **Hall call buttons**. The centerline of the hall call buttons shall be 42 inches (1067 mm) above the floor. …	Which Std.provides greater access **depends** on circumstances.	2010 CBC requires that the centerline of the hall call buttons to be an absolute 42" above the floor. 2010 ADA Stds. requires that the call button be within one of the reach ranges specified in 308, measured to the highest operable part. Realistically, this means that the centerline of the higher button (or highest keypad key, or edge of a touch screen for destination-oriented elevators) is to be no higher than 48 inches above the floor (unobstructed forward/side reach).	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to adopt reach range per ADA Stds.
996	**407.2.1.1 EXCEPTION:** Existing call buttons and existing keypads shall be permitted to be located at 54 inches (1370 mm) maximum above the finish floor, measured to the centerline of the highest *operable part*.		N/A	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC does not have specific provision to allow a higher reach range at exisitng elevators.	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to allow 54-inch high call buttons at existing elevators.
997	**407.2.1.2 Size.** Call buttons shall be ¾ inch (19 mm) minimum in the smallest dimension.		**1116B.1.10** **Hall call buttons**. ... Buttons shall be a minimum of ¾ inch (19.1 mm) in size ...	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to ADA Stds. regarding the size of the call buttons.	1. 2010 CBC need not be amended.
998	**407.2.1.2 EXCEPTION:** Existing elevator call buttons shall not be required to comply with 407.2.1.2.		N/A	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC does not have specific provision to allow smaller diameter call buttons at exisitng elevators.	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to smaller diameter call buttons at existing elevators.
999	**407.2.1.3 Clear Floor or Ground Space.** A clear floor or ground space complying with 305 shall be provided at call controls.		**1117B.6 Controls and operating mechanisms.** **1117B.6 #1** **General.** Controls and operating mechanisms in accessible spaces, along accessible routes or as parts of accessible elements (for example, light switches and dispenser controls) and those required to be accessible by Section 1.9.1 shall comply with the requirements of this section. **1117B.6 #2** **Clear floor space.** Clear floor space complying with Section 1118B.4 that allows a forward or parallel approach by a person using a wheelchair shall be provided at controls, dispensers, receptacles and other operable equipment.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and 2010 ADA Stds. have equivalent clear floor space requirements.	1. 2010 CBC need not be amended.
1000	**Advisory 407.2.1.3 Clear Floor or Ground Space.** The clear floor or ground space required at elevator call buttons must remain free of obstructions including ashtrays, plants, and other decorative elements that prevent wheelchair users and others from reaching the call buttons. The height of the clear floor or ground space is considered to be a volume from the floor to 80 inches (2030 mm) above the floor. Recessed ashtrays should not be placed near elevator call buttons so that persons who are blind or visually impaired do not inadvertently contact them or their contents as they reach for the call buttons.		NA	NA	NA	NA
1001	**407.2.1.4 Location.** The call button that designates the up direction shall be located above the call button that designates the down direction.		**1116B.1.10** **Hall call buttons**. .... The button designating the up direction shall be on top. ...	2010 CBC is **equivalent** to 2010 ADA.	Although worded differently, both 2010 CBC and ADA Stds. locate the up call button above the down call button.	1. 2010 CBC need not be amended.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1002	**407.2.1.4 EXCEPTION:** Destination-oriented elevators shall not be required to comply with 407.2.1.4.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not address destination-oriented elevator systems.	2010 CBC should be amended to comform to 2010 ADA Stds. for destination -oriented elevators.
1003	**Advisory 407.2.1.4 Location Exception.** A destination-oriented elevator system provides lobby controls enabling passengers to select floor stops, lobby indicators designating which elevator to use, and a car indicator designating the floors at which the car will stop. Responding cars are programmed for maximum efficiency by reducing the number of stops any passenger experiences.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not address destination-oriented elevator systems.	2010 CBC should be amended to comform to 2010 ADA Stds. for destination -oriented elevators.
1004	**407.2.1.5 Signals.** Call buttons shall have visible signals to indicate when each call is registered and when each call is answered.		**1116B.1.10** **Hall call buttons**. ... Visual indication shall be provided to show each call registered and extinguished when answered. ...	2010 CBC is **equivalent** to 2010 ADA.	Although worded differently, both 2010 CBC and ADA Stds. have equivalent requirements to signal when the call is registered and answered.	1. 2010 CBC need not be amended.
1005	**407.2.1.5 EXCEPTIONS:** 1. Destination-oriented elevators shall not be required to comply with 407.2.1.5 provided that visible and audible signals complying with 407.2.2 indicating which elevator car to enter are provided. 2. Existing elevators shall not be required to comply with 407.2.1.5.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not address destination-oriented elevator systems.	2010 CBC should be amended to comform to 2010 ADA Stds. for destination -oriented elevators.
1006	**407.2.1.6 Keypads.** Where keypads are provided, keypads shall be in a standard telephone keypad arrangement and shall comply with 407.4.7.2.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not address keypads used in destination-oriented elevator systems.	2010 CBC should be amended to comform to 2010 ADA Stds. for destination -oriented elevators.
1007	**407.2.2 Hall Signals.** Hall signals, including in-car signals, shall comply with 407.2.2.		N/A	NA	2010 CBC does not have a separate paragraph to reference the respective sections/paragraphs pertaining to hall signals.	2010 CBC need not be amended.
1008	**407.2.2.1 Visible and Audible Signals.** A visible and audible signal shall be provided at each hoistway entrance to indicate which car is answering a call and the car's direction of travel. Where in-car signals are provided, they shall be visible from the floor area adjacent to the hall call buttons.		**1116B.1.13** **Hall lantern.** A visual and audible signal shall be provided at each hoistway entrance indicating to the prospective passenger the car answering the call and its direction of travel as follows: ... The use of in-car lanterns, located in or on the car doorjambs, visible from the proximity of the hall call buttons and conforming to the above requirements, shall be acceptable. The use of arrow shapes is preferred for visible signals.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and 2010 ADA Stds. have equivalent visible and audible signal requirements. The last sentence of 1116B.1.13 expressing preference is advisory in nature and not really enforcable.	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to remove the preference for arrow shapes for visible signals.
1009	**407.2.2.1 EXCEPTIONS: 1.** Visible and audible signals shall not be required at each destination-oriented elevator where a visible and audible signal complying with 407.2.2 is provided indicating the elevator car designation information. **2.** In existing elevators, a signal indicating the direction of car travel shall not be required.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not address destination-oriented elevator systems.	2010 CBC should be amended to comform to 2010 ADA Stds. for destination -oriented elevators.

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1010	**407.2.2.2 Visible Signals.** Visible signal fixtures shall be centered at 72 inches (1830 mm) minimum above the finish floor or ground. The visible signal *elements* shall be 2-½ inches (64 mm) minimum measured along the vertical centerline of the *element* . Signals shall be visible from the floor area adjacent to the hall call button.		**1116B.1.13** **Hall lantern.** ... The visual signal for each direction shall be a minimum of 2½ inches (64 mm) high by 2½ inches (64 mm) wide and visible from the proximity of the hall call button. ... The centerline of the fixture shall be located a minimum of 6 feet (1829 mm) in height from the lobby floor. The use of in-car lanterns, located in or on the car doorjambs, visible from the proximity of the hall call buttons and conforming to the above requirements, shall be acceptable. ...	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC and 2010 ADA Stds. have equivalent requirements for mounting height and adjacency of visible signals. 2010 CBC has minimum dimensions for the visual signal element for both height and width. 2010 ADA Stds. only sets a minimum vertical dimension for the visible signal element.	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to revise the visible signal element dimension to be consistent with ADA Stds.
1011	**407.2.2.2 EXCEPTIONS: 1.** Destination-oriented elevators shall be permitted to have signals visible from the floor area adjacent to the hoistway entrance. **2.** Existing elevators shall not be required to comply with 407.2.2.2.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not address destination-oriented elevator systems.	2010 CBC should be amended to comform to 2010 ADA Stds. for destination -oriented elevators.
1012	**407.2.2.3 Audible Signals.** Audible signals shall sound once for the up direction and twice for the down direction, or shall have verbal annunciators that indicate the direction of elevator car travel. …		**1116B.1.13** **Hall lantern.** ... The audible signal shall sound once for the “up” direction and twice for the “down” direction or shall have verbal annunciators that say “up” or “down.” ...	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and 2010 ADA Stds. are equivalent in the requirements for audible signals. CBC goes futher to specify that verbal annunciators say "up" or "down." ADA Stds. only specify the verbal announcement to indicate the direction of car travel. Thus under a strict interpretation, for example, "going up" would not comply with CBC because it is more than just "up" as in the code language but would comply with ADA Stds.	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to allow more than just one word "up" or "down" to verbally indicate direction, consistent with ADA Stds.
1013	**407.2.2.3 Audible Signals.** ... Audible signals shall have a frequency of 1500 Hz maximum. Verbal annunciators shall have a frequency of 300 Hz minimum and 3000 Hz maximum. The audible signal and verbal annunciator shall be 10 dB minimum above ambient, but shall not exceed 80 dB, measured at the hall call button.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not address the criteria for the audible hall signals.	2010 CBC should be amended to comform to 2010 ADA Stds. for audible hall signal criteria.
1014	**407.2.2.3 EXCEPTIONS: 1.** Destination-oriented elevators shall not be required to comply with 407.2.2.3 provided that the audible tone and verbal announcement is the same as those given at the call button or call button keypad. **2.** Existing elevators shall not be required to comply with the requirements for frequency and dB range of audible signals.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not address destination-oriented elevator systems.	2010 CBC should be amended to comform to 2010 ADA Stds. for destination -oriented elevators.
1015	**407.2.2.4 Differentiation.** Each destination-oriented elevator in a bank of elevators shall have audible and visible means for differentiation.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not address destination-oriented elevator systems.	2010 CBC should be amended to comform to 2010 ADA Stds. for destination -oriented elevators.
1016	**407.2.3 Hoistway Signs.** Signs at elevator hoistways shall comply with 407.2.3.		N/A	NA	2010 CBC does not have a separate paragraph to reference the respective sections/paragraphs pertaining to hoistway sign requirements.	2010 CBC need not be amended.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1016.1	**407.2.3.1 Floor Designation.** Floor designations complying with 703.2 and 703.4.1 shall be provided on both jambs of elevator hoistway entrances. Floor designations shall be provided in both tactile characters and braille. Tactile characters shall be 2 inches (51 mm) high minimum. A tactile star shall be provided on both jambs at the main entry level.		**1116B.1.14 Doorjamb marking.** Passenger elevator landing jambs on all elevator floors shall have the number of the floor on which the jamb is located designated by raised characters that are a minimum of 2 inches (51 mm) in height and conform to Section 1117B.5.5 located 60 inches (1524 mm) on center above the floor on the jamb panels on both sides of the door so that they are visible from within the elevator. On the main entry level, a raised five-pointed star shall be placed to the left of the raised character. The outside diameter of the star shall be 2 inches (51 mm)) and all points shall be of equal length. Raised characters, including the star, shall be white on a black background. Contracted (Grade 2) Braille complying with Section 1117B.5.6 shall be placed below the corresponding raised characters and the star. The Braille translation for the star shall be “MAIN”. The raised characters shall otherwise comply with Sections 1117B.5.2 and 1117B.5.3. See Figure 11B-40C. Permanently applied plates are acceptable if they are permanently fixed to the jambs.		If we could get the national elevator companies to pay attention to California standards, we would have more accessibility for floor levels at elevators. Too often you see distorted stars that are virtually unrecognizable, glaring metals, non-contrasting materials, and floor levels on the egress floor that are not translated into braille. Elevator markings are an important means of independent access for people who are visually impaired.	This could probably be shortened a little. The federal language, for the most part, can be copied, with just the California additions, also shortened. For instance, "so that they are visible from within the elevator" is unnecessary. "Permanently" only needs to be stated once.
1017	**407.2.3.1 Floor Designation.** Floor designations complying with 703.2 and 703.4.1 shall be provided on both jambs of elevator hoistway entrances. Floor designations shall be provided in both *tactile characters* and braille. *Tactile characters* shall be 2 inches (51 mm) high minimum. ...		**1116B.1.14** **Doorjamb marking**. Passenger elevator landing jambs on all elevator floors shall have the number of the floor on which the jamb is located designated by raised characters that are a minimum of 2 inches (51 mm) in height and conform to Section 1117B.5.5 located 60 inches (1524 mm) on center above the floor on the jamb panels on both sides of the door so that they are visible from within the elevator. ... Raised characters, ..., shall be white on a black background. Contracted (Grade 2) Braille complying with Section 1117B.5.6 shall be placed below the corresponding raised characters ... The raised characters shall otherwise comply with Sections 1117B.5.2 and 1117B.5.3. See Figure 11B-40C. Permanently applied plates are acceptable if they are permanently fixed to the jambs.	Which Std.provides greater access **depends** on circumstances.	2010 CBC is mostly equivalent to 2010 ADA Stds. in regards to floor designations. The differences are: 1. ADA Stds. requires floor designations in tactile characters and braille. 2010 CBC also requires the raised characters to be white on a black background, which is a visual character requirement over and above ADA Stds. 2. The referenced sections for character proportions in both the CBC and ADA Stds. are at minor variance with each other. See comments in applicable signage sections of this comparison.	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to have the floor designations to be consistent with ADA Stds. tactile character requirements.
1018	**407.2.3.1 Floor Designation.** ... A *tactile* star shall be provided on both jambs at the main entry level.		**1116B.1.14** **Doorjamb marking**. ... On the main entry level, a raised five-pointed star shall be placed to the left of the raised character. The outside diameter of the star shall be 2 inches (51 mm)) and all points shall be of equal length. Raised characters, including the star, shall be white on a black background. Contracted (Grade 2) Braille complying with Section 1117B.5.6 shall be placed below the corresponding raised characters and the star. The Braille translation for the star shall be “MAIN”. The raised characters shall otherwise comply with Sections 1117B.5.2 and 1117B.5.3. See Figure 11B-40C. Permanently applied plates are acceptable if they are permanently fixed to the jambs.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and 2010 ADA Stds. are essentially equivalent in the requirements for a tactile star. CBC has more detailed written requirments for the shape of the star (five-pointed) and corresponding braille text ("MAIN"). But ADA Stds. Figure 407.2.3.1 illustrates the equivalent requirements even though the written standards are not as detailed. 2010 ADA Stds. references 703.4 which allows a range of 48 inches measured from the baseline of the lowest tactile character to 60 inches measured from the baseline of the highest tactile character; while 2010 CBC states an absolute 60 onches on center, but is not explicit as to the center of what.	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to have the floor designations to be consistent with ADA Stds. tactile character requirements.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1019			**1116B.1.14** **Doorjamb marking**. ... ... Permanently applied plates are acceptable if they are permanently fixed to the jambs.	Which Std.provides greater access **depends** on circumstances.	2010 CBC "Permanently applied plates" language not found in 2010 ADA Stds.	1. 2010 CBC need not be amended.
1020	**407.2.3.2 Car Designations.** Destination-oriented elevators shall provide *tactile* car identification complying with 703.2 on both jambs of the hoistway immediately below the floor designation. Car designations shall be provided in both *tactile characters* and braille. *Tactile characters* shall be 2 inches (51 mm) high minimum.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not address destination-oriented elevator systems.	2010 CBC should be amended to comform to 2010 ADA Stds. for destination -oriented elevators.
1020.1	**407.2.3.2 Car Designations**. Destination-oriented elevators shall provide tactile car identification complying with 703.2 on both jambs of the hoistway immediately below the floor designation. Car designations shall be provided in both tactile characters and braille. Tactile characters shall be 2 inches (51 mm) high minimum.				There is a huge concern by one reviewer about destination-oriented elevators, and the entire topic, including how they should be identified, needs to be carefully considered.	If these elevators are going to be allowed, the hoistway designations need to follow the same standards for contrast, etc, as the standard hoistway designations.
1021	**407.3 Elevator Door Requirements.** Hoistway and car doors shall comply with 407.3.		N/A	NA	2010 CBC does not have a separate paragraph to reference the respective sections/paragraphs pertaining to elevator door requirements.	2010 CBC need not be amended
1022	**407.3.1 Type.** Elevator doors shall be the horizontal sliding type. Car gates shall be prohibited.		**1116B.1.3** **Door operation.** Power-operated horizontally sliding car and hoistway doors ... shall be provided.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC does not specifically prohibit car gates, otherwise CBC is equivalent to ADA Stds..	2010 CBC should be amended to specifcally prohibit car gates.
1023	**407.3.2 Operation.** Elevator hoistway and car doors shall open and close automatically.		**1116B.1.3** **Door operation.** ... car and hoistway doors opened and closed by automatic means shall be provided.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to ADA Stds.	2010 CBC need not be amended
1024	**407.3.2 EXCEPTION:** Existing manually operated hoistway swing doors shall be permitted provided that they comply with 404.2.3 and 404.2.9. Car door closing shall not be initiated until the hoistway door is closed.		N/A	Which Std.provides greater access **depends** on circumstances.	2010 CBC does not address existing elevators with swinging doors.	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to include ADA Stds. exception for existing elevators with manually operated hoistway swing doors.
1025			NA	NA	NA	NA
1026	**407.3.3 Reopening Device.** Elevator doors shall be provided with a reopening device complying with 407.3.3 that shall stop and reopen a car door and hoistway door automatically if the door becomes obstructed by an object or person.		**1116B.1.5** **Door protective and reopening device.** Doors closed by automatic means shall be provided with a door-reopening device that will function to stop and reopen a car door and adjacent hoistway door in case the car door is obstructed while closing. ...	2010 CBC is **equivalent** to 2010 ADA.	Although worded differently, both 2010 CBC and ADA Stds. have equivalent requirements to require a reopening device.	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to adopt wording consistent with ADA Stds.
1027	**407.3.3 EXCEPTION:** Existing elevators with manually operated doors shall not be required to comply with 407.3.3.		N/A	NA	2010 CBC does not have exceptions to reopening devices for existing elevators.	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to include ADA Stds. exception for existing elevators with manually operated hoistway swing doors.
1028	**407.3.3.1 Height.** The device shall be activated by sensing an obstruction passing through the opening at 5 inches (125 mm) nominal and 29 inches (735 mm) nominal above the finish floor.		**1116B.1.5** **Door protective and reopening device.** ... This reopening device shall also be capable of sensing an object or person in the path of a closing door without requiring contact for activation at a nominal 5 inches and 29 inches (127 mm and 737 mm) above the floor. ...	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to ADA Stds.	2010 CBC need not be amended.

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1029	**407.3.3.2 Contact.** The device shall not require physical contact to be activated, although contact is permitted to occur before the door reverses.		**1116B.1.5** **Door protective and reopening device.** Doors closed by automatic means shall be provided with a door-reopening device that will function to stop and reopen a car door and adjacent hoistway door in case the car door is obstructed while closing. This reopening device shall also be capable of sensing an object or person in the path of a closing door without requiring contact for activation at a nominal 5 inches and 29 inches (127 mm and 737 mm) above the floor. ...	2010 CBC is **equivalent** to 2010 ADA.	2010 ADA Stds. clarifies that contact is permitted to occur before the door reverses; 2010 CBC is silent on this.	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to incorporate the clairification per ADA Stds. that contact can occur before the door reverses.
1030	**407.3.3.3 Duration.** Door reopening devices shall remain effective for 20 seconds minimum.		**1116B.1.5** **Door protective and reopening device.** ... Door-reopening devices shall remain effective for a period of not less than 20 seconds. After such an interval, the doors may close in accordance with the requirements of ASME A17.1.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to ADA Stds.	2010 CBC need not be amended.
1031	**407.3.3.3 Duration.** Door reopening devices shall remain effective for 20 seconds minimum.		**1116B.1.5** **Door protective and reopening device.** ... Door-reopening devices shall remain effective for a period of not less than 20 seconds. After such an interval, the doors may close in accordance with the requirements of ASME A17.1.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to ADA Stds.	2010 CBC need not be amended.
1032	**407.3.4 Door and Signal Timing.** The minimum acceptable time from notification that a car is answering a call or notification of the car assigned at the means for the entry of destination information until the doors of that car start to close shall be calculated from the following equation: T = D/(1.5 ft/s) or T = D/(455 mm/s) = 5 seconds minimum where T equals the total time in seconds and D equals the distance (in feet or millimeters) from the point in the lobby or corridor 60 inches (1525 mm) directly in front of the farthest call button controlling that car to the centerline of its hoistway door.		**1116B.1.6** **Hall call.** The minimum acceptable time from notification that a car is answering a call (lantern and audible signal) until the doors of the car start to close shall be calculated by the following equation: T = D / (1.5 ft/s) or T = D / (455 mm/s) Where T is the total time in seconds and D is the distance from a point in the lobby or landing area 60 inches (1524 mm) directly in front of the farthest call button controlling that car to the centerline of its hoistway door (see Figure 11B-40D). For cars with in-car lanterns, T begins when the lantern is visible from the vicinity of hall call buttons and an audible signal is sounded. The minimum acceptable notification time shall be 5 seconds.	Which Std.provides greater access **depends** on circumstances.	2010 CBC is largely equivalent to 2010 ADA Stds., except for: 1. 2010 CBC does not address destination-oriented elevators. 2. 2010 CBC's distance is measured from the lobby or landing, and 2010 ADA Stds. is measured from lobby or corridor.	2010 CBC should be amended to be consistent with 2010 ADA Stds.

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1033	**EXCEPTIONS 1.** For cars with in-car lanterns, T shall be permitted to begin when the signal is visible from the point 60 inches (1525 mm) directly in front of the farthest hall call button and the audible signal is sounded. **...**		**1116B.1.6** **Hall call.** The minimum acceptable time from notification that a car is answering a call (lantern and audible signal) until the doors of the car start to close shall be calculated by the following equation: T = D / (1.5 ft/s) or T = D / (455 mm/s) Where T is the total time in seconds and D is the distance from a point in the lobby or landing area 60 inches (1524 mm) directly in front of the farthest call button controlling that car to the centerline of its hoistway door (see Figure 11B-40D). For cars with in-car lanterns, T begins when the lantern is visible from the vicinity of hall call buttons and an audible signal is sounded. The minimum acceptable notification time shall be 5 seconds.	2010 CBC **conflicts with** 2010 ADA.	The beginning point of T is different in the 2010 CBC and 2010 ADA Stds.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1034	**EXCEPTIONS: ...** **2.** Destination-oriented elevators shall not be required to comply with 407.3.4.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not address destination-oriented elevator systems.	2010 CBC should be amended to comform to 2010 ADA Stds. for destination -oriented elevators.
1035	**407.3.5 Door Delay.** Elevator doors shall remain fully open in response to a car call for 3 seconds minimum.		**1116B.1.7** **Car call.** The minimum acceptable time for doors to remain fully open shall not be less than 5 seconds.	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC has a longer door delay requirement	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to incorporate the shorter door delay per ADA Stds.
1036	**407.3.6 Width.** The width of elevator doors shall comply with Table 407.4.1.		**1116B.1.4** **Door size.** Minimum clear width for elevator doors shall be 36 inches (914 mm).	2010 CBC provides **less access** than 2010 ADA.	2010 ADA Stds. requires a 42 inch minimum wide door at cars with centered doors.	2010 CBC should be amended to require a minimum 42 inch wide width for centered elevator doors.
1037	**407.3.6 EXCEPTION:** In existing elevators, a power-operated car door complying with 404.2.3 shall be permitted.		N/A	2010 CBC **does not address** 2010 ADA req.	ADA Stds. 407.3.6 EXCEPTION would allow existing elevators with centered doors in compliance with prior CBC accessibilty regulations to remain at 36 inches wide.	2010 CBC should be amended to allow existing elevators with centered doors to comply with 36 inch door width.
1038	**407.4 Elevator Car Requirements.** Elevator cars shall comply with 407.4.		N/A	NA	2010 CBC does not have a separate paragraph to reference the respective sections/paragraphs pertaining to elevator car requirements.	2010 CBC need not be amended

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1039	**407.4.1 Car Dimensions.** Inside dimensions of elevator cars and clear width of elevator doors shall comply with Table 407.4.1.		**1116B.1.8** **Car inside.** The car inside shall allow for the turning of a wheelchair. The minimum clear distance between walls or between wall and door, excluding return panels, shall not be less than 80 inches by 54 inches (2032 mm by 1372 mm) for center opening doors, and 68 inches by 54 inches (1727 mm by 1372 mm) for side-slide opening doors. See Figure 11B-40A. Minimum distance from wall to return panel shall not be less than 51 inches (1295 mm). ... The centerline of elevator floor buttons shall be no higher than 54 inches (1372 mm) above the finish floor for side approach and 48 inches (1219 mm) for front approach. Emergency controls, including the emergency stop and alarm, shall be grouped in or adjacent to the bottom of the panel and shall be no lower than 2 feet 11 inches (889 mm) from the floor. For multiple controls only, one set must comply with these height requirements. Floor buttons shall be provided with visual indicators to show when each call is registered. The visual indicators shall be extinguished when each call is answered. Emergency two-way communication systems between the elevator and a point outside the hoistway shall comply with ASME A17.1. The emergency telephone handset shall be positioned no higher than 4 feet (1219 mm) above the floor, and the handset cord shall be a minimum of 2 feet 5 inches (737 mm) in length. It shall be identified by a raised telephone symbol and corresponding Braille lettering complying with Section 1117B.5.1, Item 1, and located adjacent to the device. If the telephone system is located in a closed compartment, the compartment door hardware shall comply with Section 1117B.6 Item 4. Emergency intercommunication shall not require voice communication. Where possible, a 48-inch (1219 mm) maximum height for elevator floor buttons is preferred.	Which Std.provides greater access **depends** on circumstances.	2010 ADA Stds Table 407.4.1 and Figure 407.4.1(c) and (d) describe more varieties of accessible cab configurations than 2010 CBC.	2010 CBC should be amended to be consistent with 2010 ADA Stds.

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1040	**407.4.1 Car Dimensions.** Inside dimensions of elevator cars and clear width of elevator doors shall comply with Table 407.4.1.		**1116B.1.8** **Car inside.** The car inside shall allow for the turning of a wheelchair. The minimum clear distance between walls or between wall and door, excluding return panels, shall not be less than 80 inches by 54 inches (2032 mm by 1372 mm) for center opening doors, and 68 inches by 54 inches (1727 mm by 1372 mm) for side-slide opening doors. See Figure 11B-40A. Minimum distance from wall to return panel shall not be less than 51 inches (1295 mm). ... The centerline of elevator floor buttons shall be no higher than 54 inches (1372 mm) above the finish floor for side approach and 48 inches (1219 mm) for front approach. Emergency controls, including the emergency stop and alarm, shall be grouped in or adjacent to the bottom of the panel and shall be no lower than 2 feet 11 inches (889 mm) from the floor. For multiple controls only, one set must comply with these height requirements. Floor buttons shall be provided with visual indicators to show when each call is registered. The visual indicators shall be extinguished when each call is answered. Emergency two-way communication systems between the elevator and a point outside the hoistway shall comply with ASME A17.1. The emergency telephone handset shall be positioned no higher than 4 feet (1219 mm) above the floor, and the handset cord shall be a minimum of 2 feet 5 inches (737 mm) in length. It shall be identified by a raised telephone symbol and corresponding Braille lettering complying with Section 1117B.5.1, Item 1, and located adjacent to the device. If the telephone system is located in a closed compartment, the compartment door hardware shall comply with Section 1117B.6 Item 4. Emergency intercommunication shall not require voice communication. Where possible, a 48-inch (1219 mm) maximum height for elevator floor buttons is preferred.	Which Std.provides greater access **depends** on circumstances.	2010 ADA Stds Table 407.4.1 and Figure 407.4.1(c) and (d) describe more varieties of accessible cab configurations than 2010 CBC.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1041	**407.4.1 EXCEPTION:** Existing elevator car configurations that provide a clear floor area of 16 square feet (1.5 m2) minimum and also provide an inside clear depth 54 inches (1370 mm) minimum and a clear width 36 inches (915 mm) minimum shall be permitted.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not specifically address permissible existing elevator car configurations.	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to incorporate the exception to permit existing elevators meeting alternate dimensional requirements.
1042	**407.4.1 EXCEPTION:** Existing elevator car configurations that provide a clear floor area of 16 square feet (1.5 m2) minimum and also provide an inside clear depth 54 inches (1370 mm) minimum and a clear width 36 inches (915 mm) minimum shall be permitted.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not specifically address permissible existing elevator car configurations.	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to incorporate the exception to permit existing elevators meeting alternate dimensional requirements.
1043			NA	NA	NA	NA

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1044	**407.4.2 Floor Surfaces.** Floor surfaces in elevator cars shall comply with 302 and 303.		**1116B.1.8** **Car inside.** ... Minimum distance from wall to return panel shall not be less than 51 inches (1295 mm). Elevator floor surfaces shall comply with Section 1124B — Ground and Floor Surfaces. ... The emergency telephone handset shall be positioned no higher than 4 feet (1219 mm) above the floor, and the handset cord shall be a minimum of 2 feet 5 inches (737 mm) in length. It shall be identified by a raised telephone symbol and corresponding Braille lettering complying with ...	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to ADA Stds.	2010 CBC need not be amended
1045	**407.4.3 Platform to Hoistway Clearance.** The clearance between the car platform sill and the edge of any hoistway landing shall be 1¼ inch (32 mm) maximum.		**1116B.1.2** **Operation and leveling**. ... The clearance between the car platform sill and the edge of the hoistway landing shall be no greater than 1¼ inches (32 mm).	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to ADA Stds.	2010 CBC need not be amended
1046	**407.4.4 Leveling.** Each car shall be equipped with a self-leveling feature that will automatically bring and maintain the car at floor landings within a tolerance of ½ inch (13 mm) under rated loading to zero loading conditions.		**1116B.1.2** **Operation and leveling**. The elevator shall be automatic and provided with a self-leveling feature that will automatically bring the car to the floor landings within a tolerance of plus or minus ½ inch (12.7 mm) under normal loading and unloading conditions. This self-leveling shall, within its zone, be entirely automatic and independent of the operating device and shall correct the overtravel or undertravel. The car shall also be maintained approximately level with the landing, irrespective of load. ...	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to ADA Stds. CBC is somewhat more detailed in its requirements.	2010 CBC need not be amended
1047	**407.4.5 Illumination.** The level of illumination at the car controls, platform, car threshold and car landing sill shall be 5 foot candles (54 lux) minimum.		**1116B.1.12** **Minimum illumination.** The minimum illumination at the car controls threshold and the landing when the car and landing doors are open shall not be less than 5 foot-candles (54 lux).	2010 CBC provides **less access** than 2010 ADA.	2010 ADA Stds. additionally includes the platform for required illumination, compared with 2010 CBC.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1048	**407.4.6 Elevator Car Controls.** Where provided, elevator car controls shall comply with 407.4.6 and 309.4.		N/A	NA	2010 CBC does not have a separate paragraph to reference the respective sections/paragraphs pertaining to hall signals.	2010 CBC need not be amended.
1049	**407.4.6 Elevator Car Controls.** Where provided, elevator car controls shall comply with 407.4.6 and 309.4.		N/A	NA	2010 CBC does not have a separate paragraph to reference the respective sections/paragraphs pertaining to hall signals.	2010 CBC need not be amended.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1050	**407.4.6 Elevator Car Controls.** Where provided, elevator car controls shall comply with 407.4.6 and 309.4.		**1116B.1.9** **Car controls**. Identification for the visually impaired shall be as follows: Passenger elevator car controls shall have a minimum dimension of ¾ inch (19.1 mm) and shall be raised ⅛ inch (3.2 mm) plus or minus 1/32 inch (0.8 mm) above the surrounding surface. Control buttons shall be illuminated, shall have square shoulders and shall be activated by a mechanical motion that is detectable. All control buttons shall be designated by ⅝ inch (15.9 mm) minimum raised characters and standard raised symbols that conform to Sections 1117B.5.2, 1117B.5.3, 1117B.5.5 and 1117B.5.7 immediately to the left of the control button. Contracted (Grade 2) Braille that conforms to Section 1117B.5.6 shall be located immediately below the character or symbol. A minimum clear space of ⅜ inch (9.5 mm) or other suitable means of separation shall be provided between rows of control buttons. See Figure 11B-40B. The raised characters and symbols shall be white on a black background. Controls and emergency equipment identified by raised symbols shall include, but not be limited to, “door open,” “door close,” “alarm bell,” “emergency stop” and “telephone.” The call button for the main entry floor shall be designated by a raised star at the left of the floor designation. In elevator cars, a visual car position indicator shall be provided above the car control panel or over the door to show the position of the elevator in the hoistway. As the car passes or stops at a floor served by the elevators, the corresponding numerals shall illuminate, and an audible signal shall sound. Numerals shall be a minimum of ½ inch	2010 CBC provides **less access** than 2010 ADA.	2010 CBC 1116B.1.9 does not specifically address or reference the requirements for accessible operable parts, as they apply to car controls.	2010 CBC should be amended to clarify, either by reference or by stating the requirements, that elevator car controls are required to be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist, and the force required to activate operable parts shall be 5 pounds maximum.
1051	**407.4.6 EXCEPTION:** In existing elevators, where a new car operating panel complying with 407.4.6 is provided, existing car operating panels shall not be required to comply with 407.4.6.		**1116B.1.1, Exc.1** In existing buildings, when the enforcing agency determines that compliance with any regulation under this section would create an unreasonable hardship, an exception to such regulation shall be granted when equivalent facilitation is provided.	2010 CBC **conflicts with** 2010 ADA.	The 2010 CBC exception is broader than this ADA Stds.exception which only addresses car operating panels. The CBC exceptions puts the burden on the enforcing agency to make the determination of unreasonable hardship and equivalent facilitation. The ADA Stds. is more prescriptive in allowing the existing car operating panel to remain as long as an additional new compliant panel is installed.	1. 2010 CBC should be amended to adopt the more prescriptive ADA Stds. exceptions for existing elevators, in lieu of the single broader CBC exception that requires enfocing agency interpretation.
1051.1	**407.4.6 EXCEPTION:** In existing elevators, where a new car operating panel complying with 407.4.6 is provided, existing car operating panels shall not be required to comply with 407.4.6.		**1116B.1.8** **Car inside**. ... For multiple controls only, one set must comply with these height requirements. Floor buttons shall be provided with visual indicators to show when each call is registered. The visual indicators shall be extinguished when each call is answered. ... The emergency telephone handset shall be positioned no higher than 4 feet (1219 mm) above the floor, and the handset cord shall be a minimum of 2 feet 5 inches (737 mm) in length. It shall be identified by a raised telephone symbol and corresponding Braille lettering complying with ...	2010 CBC **conflicts with** 2010 ADA.	In cars with multiple sets of controls, 2010 CBC requires only one set of car operating contols to comply with height requirements. 2010 ADA Stds. allows only existing elevators with one new compliant car operating panel to not have other existing control panels be made compliant.	2010 CBC should be amended to require all new elevators to have all car operating panels be accessible.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1052	**407.4.6.1 Location.** Controls shall be located within one of the reach ranges specified in 308.		**1116B.1.8** **Car inside**. ... The centerline of car control buttons with floor designations shall be located within one of the reach ranges specified in Sections 1118B.5 and 1118B.6. ... ... The emergency telephone handset shall be positioned no higher than 4 feet (1219 mm) above the floor, and the handset cord shall be a minimum of 2 feet 5 inches (737 mm) in length. ... complying with ...	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA Stds.	2010 CBC need not be amended.
1053	**407.4.6.1 Location.** Controls shall be located within one of the reach ranges specified in 308.		NA	NA	NA	NA
1054	**407.4.6.1 EXCEPTIONS: 1.** Where the elevator panel serves more than 16 openings and a parallel approach is provided, buttons with floor designations shall be permitted to be 54 inches (1370 mm) maximum above the finish floor. **2.** In existing elevators, car control buttons with floor designations shall be permitted to be located 54 inches (1370 mm) maximum above the finish floor where a parallel approach is provided.		**1116B.1.8, Exc.1** Where the elevator panel serves more than 16 openings and a parallel approach is provided, buttons with floor designations shall be permitted to be 54 inches (1372 mm) maximum above the finish floor. **1116B.1.8, Exc.2** In existing elevators, car control buttons with floor designations shall be permitted to be located 54 inches (1372 mm) above the finish floor where a parallel approach is provided.	2010 CBC **conflicts with** 2010 ADA.	Although 2010 CBC and 2010 ADA Stds. are essentially equivalent regarding these two exceptions, the metric equivalent dimensions differ. ADA Stds. rounds down the conversion to 1370 mm and CBC provides a more precise conversion of 1372 mm. The ADA conversion is potentially more problematic for enforcement and compliance as its metric equivalent is 2 mm lower than CBC, even though both state a maximum of 54 inches.	2010 CBC should not be amended because the metric equivalent dimension is more precise than ADA Stds., thus minimizing enforcement/compliance conflicts. **The 2 mm difference between these 2 standards is hardly measurable. The 1370 mark on a tape will be easier to find than the 1372 mark. So which will result in "minimizing enforcement/compliance conflicts"?**
1055	**407.4.6.2 Buttons.** Car control buttons with floor designations shall comply with 407.4.6.2 and shall be raised or flush.		**1116B.1.9** **Car controls**. Identification for the visually impaired shall be as follows: Passenger elevator car controls shall have a minimum dimension of ¾ inch (19.1 mm) and shall be raised ⅛ inch (3.2 mm) plus or minus 1/32 inch (0.8 mm) above the surrounding surface. Control buttons shall be illuminated, shall have square shoulders and shall be activated by a mechanical motion that is detectable. ...	Which Std.provides greater access **depends** on circumstances.	2010 CBC require car contol buttons to be raised 1/8" + or - 1/32" above the surrounding surface. ADA Stds. permits raised or flush buttons, and does not prescribe how much the button should be raised.	1 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to allow raised or flush car contol buttons.
1055.1	**407.4.6.2 Buttons**. Car control buttons with floor designations shall comply with 407.4.6.2 and shall be raised or flush.		**1116B.1.9 Car controls.** Identification for the visually impaired shall be as follows: All control buttons shall be designated by ⅝ inch (15.9 mm) minimum raised characters and standard raised symbols that conform to Sections 1117B.5.2, 1117B.5.3, 1117B.5.5 and 1117B.5.7 immediately to the left of to Sections 1117B.5.2, 1117B.5.3, 1117B.5.5 and 1117B.5.7 immediately to the left of the control button. Contracted (Grade 2) Braille that conforms to Section 1117B.5.6 shall be located imm. . . The raised characters and symbols shall be white on a black background.		California's more stringent reqirements for elevator control identifications should be retained and enforced.	Clean up language and retain more stringent requirements.
1056	**407.4.6.2 EXCEPTION:** In existing elevators, buttons shall be permitted to be recessed.		N/A	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC does not specifically allow recessed car control buttons in existing elevators. Any exception would have to come under CBC 1116B.1.1, Exc.1.	1 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to allow recessed car contol buttons in existing elevators.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1057	**407.4.6.2.1 Size.** Buttons shall be ¾ inch (19 mm) minimum in their smallest dimension.		**1116B.1.9** **Car controls.** ... Passenger elevator car controls shall have a minimum dimension of ¾ inch (19.1 mm) …	2010 CBC is **equivalent** to 2010 ADA.	Both 2010 CBC and 2010 ADA Stds. require buttons to be 3/4" minimum. There is a minor difference in wording describing the minumum dimension: CBC is "minimum dimension of" and ADA Stds. is " in their smallest dimension." 2010 ADA Stds. specifically addresses "buttons," while CBC uses a broader description of "car controls."	1 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to be consistent with ADA Stds. description of the button dimension to be in their smalles dimension.
1058	**407.4.6.2.2 Arrangement.** Buttons shall be arranged with numbers in ascending order. When two or more columns of buttons are provided they shall read from left to right.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not have a requirement in the text regarding numbered button arrangement. CBC Figure 11B-40B(a) shows the numbered buttons arranged per ADA Stds., but does not specify that this is a requirement.	2010 CBC should be amended to adopt ADA Stds. requirements for arrangement of numbered buttons.
1059	**407.4.6.3 Keypads.** Car control keypads shall be in a standard telephone keypad arrangement and shall comply with 407.4.7.2.		N/A	2010 CBC **does not address** 2010 ADA req.	Although 2010 CBC has a figure that is consistent with ADA Stds. 407.4.6.3, the CBC Figure is referenced for ATM requirements only. CBC does not address keypads for destination oriented elevators.	2010 CBC should be amended to address keypad contols for elevators.
1060	**407.4.6.4 Emergency Controls.** Emergency controls shall comply with 407.4.6.4.		N/A	NA	2010 CBC does not have a separate paragraph to reference the respective sections/paragraphs pertaining to elevator emergeny control requirements.	2010 CBC need not be amended
1061	**407.4.6.4.1 Height.** Emergency control buttons shall have their centerlines 35 inches (890 mm) minimum above the finish floor.		**1116B.1.8** **Car inside**. ... The centerline of car control buttons with floor designations shall be located within one of the reach ranges specified in Sections 1118B.5 and 1118B.6. Emergency controls, including the emergency stop and alarm, ... shall be no lower than 2 feet 11 inches (889 mm) from the floor. ...	2010 CBC **conflicts with** 2010 ADA.	Although 2010 CBC and 2010 ADA Stds. are essentially equivalent regarding the emergency contol button minimum height, the metric equivalent dimensions differ. ADA Stds. rounds up the conversion to 890 mm and CBC provides a more precise conversion of 889 mm. The ADA conversion is potentially more problematic for enforcement and compliance as its metric equivalent is 1 mm higherr than CBC, even though both state the same minimum height (ADA states it in inches and CBC states it in feet-inches). CBC Figure 11B-40B(b) is not clear that the 35" minimum to the lowest row of buttons is to the emergency control buttons.	The text of 2010 CBC should not be amended because the metric equivalent dimension is more precise than ADA Stds., thus minimizing enforcement/compliance conflicts. CBC Figure 11B-40B(b) should be amended to clarify that the 35" dimension to the lowest row of buttons is to the emergency control buttons. **The 1 mm difference between these 2 standards is hardly measurable. The 890 mark on a tape will be easier to find than the 889 mark. So which will result in "minimizing enforcement/compliance conflicts"?**
1062	**407.4.6.4.2 Location.** Emergency controls, including the emergency alarm, shall be grouped at the bottom of the panel.		**1116B.1.8** **Car inside**. ... ... Emergency controls, including the emergency stop and alarm, shall be grouped in or adjacent to the bottom of the panel ... …	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to ADA Stds., with minor variation in describing the location (CBC: "in or adjacent to the bottom of panel" vs. ADA Stds.: "grouped at the bottom of the panel.")	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to be exactly consistent with wording in ADA Stds.
1063	**407.4.7 Designations and Indicators of Car Controls.** Designations and indicators of car controls shall comply with 407.4.7.		N/A	NA	2010 CBC does not have a separate paragraph to reference the respective sections/paragraphs pertaining to designation and indicators of car controls.	2010 CBC need not be amended

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1063.1	**407.4.7 Designations and Indicators of Car Controls.** Designations and indicators of car controls shall comply with 407.4.7.		**1116B.1.9 Car controls.** Identification for the visually impaired shall be as follows: Passenger elevator car controls shall have a minimum dimension of ¾ inch (19.1 mm) and shall be raised ⅛ inch (3.2 mm) plus or minus 1/32 inch (0.8 mm) above the surrounding surface. Control buttons shall be illuminated, shall have square shoulders and shall be activated by a mechanical motion that is detectable. All control buttons shall be designated by ⅝ inch (15.9 mm) minimum raised characters and standard raised symbols that conform to Sections 1117B.5.2, 1117B.5.3, 1117B.5.5 and 1117B.5.7 immediately to the left of the control button. Contracted (Grade 2) Braille that conforms to Section 1117B.5.6 shall be located immediately below the character or symbol. A minimum clear space of ⅜ inch (9.5 mm) or other suitable means of separation shall be provided between rows of control buttons. See Figure 11B-40B. The raised characters and symbols shall be white on a black background. Controls and emergency equipment identified by raised symbols shall include, but not be limited to, “door open,” “door close,” “alarm bell,” “emergency stop” and “telephone.” The call button for the main entry floor shall be designated by a raised star at the left of the floor designation. In elevator cars, a visual car position indicator shall be provided above the car control panel or over the door to show the position of the elevator in the hoistway. As the car passes or stops at a floor served by the elevators, the corresponding numerals shall illuminate, and an audible signal shall sound. Numerals shall be a minimum of ½ inch (13 mm) high. The audible signal shall be no less than 20	2010 CBC provides **greater access** than 2010 ADA.	All this language could undoubtedly be shortened and still remain clear. Using the chart that shows the symbols along with the braille translations, as ANSI does, would be helpful.	Clean up language and retain more stringent requirements.
1064	**407.4.7 EXCEPTION:** In existing elevators, where a new car operating panel complying with 407.4.7 is provided, existing car operating panels shall not be required to comply with 407.4.7.	N/A		Which Std.provides greater access **depends** on circumstances.	2010 CBC does not have an exception to allow existing non-compliant designations and indicators of car controls to remain if a new compliant car operating panel is also installed. Under 2010 CBC any such exception would have to be granted subject to 1116B.1.1, Exc.1.	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to be consistent with ADA Stds.
1065	**407.4.7.1 Buttons.** Car control buttons shall comply with 407.4.7.1.	N/A		NA	2010 CBC does not have a separate paragraph to reference the respective sections/paragraphs pertaining to buttons.	2010 CBC need not be amended
1065.1	**407.4.7.1 Buttons.** Car control buttons shall comply with 407.4.7.1.		**1116B.1.9…** The raised characters and symbols shall be white on a black background. . . .	2010 CBC provides **greater access** than 2010 ADA.		
1066	**407.4.7.1.1 Type.** Control buttons shall be identified by *tactile characters* complying with 703.2.		**1116B.1.9** **Car controls**. ... All control buttons shall be designated by ⅝ inch (15.9 mm) minimum raised characters and standard raised symbols that conform to Sections 1117B.5.2, 1117B.5.3, 1117B.5.5 and 1117B.5.7 …	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA Stds.	2010 CBC need not be amended.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1067	**407.4.7.1.2 Location.** Raised *character* and Braille designations shall be placed immediately to the left of the control button to which the designations apply.		**1116B.1.9** **Car controls**. ... All control buttons shall be... immediately to the left of the control button. …	2010 CBC is **equivalent** to 2010 ADA.	Although stated somewhat differently, 2010 CBC is equivalent to 2010 ADA Stds.	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to be consistent with wording of ADA Stds.
1068	**407.4.7.1.2 EXCEPTION:** Where *space* on an existing car operating panel precludes tactile markings to the left of the controls, markings shall be placed as near to the control as possible.		N/A	Which Std.provides greater access **depends** on circumstances.	2010 CBC does not have an exception to allow existing car control panels with limited space to have tactile marking to be located as near as possible to the controls. Under 2010 CBC any such exception would have to be granted subject to 1116B.1.1, Exc.1.	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to be consistent with ADA Stds.
1069	**407.4.7.1.3 Symbols.** The control button for the emergency stop, alarm, door open, door close, main entry floor, and phone, shall be identified with *tactile* symbols as shown in Table 407.4.7.1.3.		**1116B.1.9** **Car controls**. ... Controls and emergency equipment identified by raised symbols shall include, but not be limited to, “door open,” “door close,” “alarm bell,” “emergency stop” and “telephone.” …	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA Stds., with minor variations in wording. CBC Figure 11B-40B(a) is incomplete in that it is missing the telephone symbol, and the graphic symbols are proportionally different from ADA Stds. Table 407.4.7.1.3.	2010 CBC Figure 11B-40B(a) should be revised to inlcude the telephone symbol and to have the symbols graphically better mactch the symbols used in the ADA Stds.
1070	**407.4.7.1.4 Visible Indicators.** Buttons with floor designations shall be provided with visible indicators to show that a call has been registered. The visible indication shall extinguish when the car arrives at the designated floor.		**1116B.1.8** **Car inside**. ... ... Floor buttons shall be provided with visual indicators to show when each call is registered. The visual indicators shall be extinguished when each call is answered. ... The emergency telephone handset shall be positioned no higher than 4 feet (1219 mm) above the floor, and the handset cord shall be a minimum of 2 feet 5 inches (737 mm) in length. It shall be identified by a raised telephone symbol and corresponding Braille lettering complying with ...	2010 CBC is **equivalent** to 2010 ADA.	Although worded differently, 2010 CBC and 2010 ADA Stds. are equivalent	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to be consistent with ADA Stds.
1071	**407.4.7.2 Keypads.** Keypads shall be identified by *characters* complying with 703.5 and shall be centered on the corresponding keypad button. The number five key shall have a single raised dot. The dot shall be 0.118 inch (3 mm) to 0.120 inch (3.05 mm) base diameter and in other aspects comply with Table 703.3.1.		N/A	2010 CBC **does not address** 2010 ADA req.	Although 2010 CBC has a figure that is consistent with ADA Stds. 407.4.6.3 (except that ir does not address the single raised dot dimensions, the CBC Figure is referenced for ATM requirements only. CBC does not address keypads for destination oriented elevators.	2010 CBC should be amended to adopt ADA Stds. requirements for keypads at elevators.
1072	**407.4.8 Car Position Indicators.** Audible and visible car position indicators shall be provided in elevator cars.		**1116B.1.9** **Car controls**. ... In elevator cars, a visual car position indicator shall be provided above the car control panel or over the door to show the position of the elevator in the hoistway. As the car passes or stops at a floor served by the elevators, the corresponding numerals shall illuminate, and an audible signal shall sound. Numerals shall be a minimum of ½ inch (13 mm) high. The audible signal shall be no less than 20 decibels with a frequency no higher than 1,500 Hz. An automatic verbal announcement of the floor number at which a car stops or which a car passes may be substituted for the audible signal.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA Stds.	2010 CBC need not be amended.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1072.1	**407.4.8 Car Position Indicators.** Audible and visible car position indicators shall be provided in elevator cars. **407.4.7.1.4 Visible indicators.** Buttons with floor designations shall be provided with visible indicators to show that a call has been registered. The visible indication shall extinguish when the car arrives at the designated floor. **407.4.7.2 Keypads. Keypads** shall be identified by characters complying with 703.5 and shall be centered on the corresponding keypad button. The number five key shall have a single raised dot. The dot shall be 0.118 inch (3 mm) to 0.120 inch (3.05 mm) base diameter and in other aspects comply with Table 703.3.1.		**407.4.8 Car Position Indicators.** Audible and visible car position indicators shall be provided in elevator cars.		The requirements for visible indicators and keypads should be added. One major problem with visible indicators in elevators is that they are often red LEDs on black. These are invisible for many people with even fairly minor color vision impairments. White LEDs are now very bright, or amber or light green lights may provide more contrast.	Add additional requirements, and consider regulating color on signs for elevators to eliminate red on black.
1073	**407.4.8.1 Visible Indicators.** Visible indicators shall comply with 407.4.8.1.		**1116B.1.9** **Car controls**. ... In elevator cars, a visual car position indicator shall be provided above the car control panel or over the door to show the position of the elevator in the hoistway. As the car passes or stops at a floor served by the elevators, the corresponding numerals shall illuminate, and an audible signal shall sound. Numerals shall be a minimum of ½ inch (13 mm) high. ...	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA Stds., with minor variations in wording, i.e., CBC uses "numerals" and ADA Stds. uses "characters." 2010 CBC does not address destination oriented elevators; this is addressed in other line items.	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to be consistent with ADA Stds.
1074	**407.4.8.1.1 Size.** *Characters* shall be ½ inch (13 mm) high minimum.		**1116B.1.9** **Car controls**. ... ... immediately to the left of the control button. Contracted (Grade 2) Braille that conforms to ... ... Numerals shall be a minimum of ½ inch (13 mm) high. …	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA Stds.	2010 CBC need not be amended.
1075	**407.4.8.1.2 Location.** Indicators shall be located above the car control panel or above the door.		**1116B.1.9** **Car controls**. ... In elevator cars, a visual car position indicator shall be provided above the car control panel or over the door to show the position of the elevator in the hoistway. …	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA Stds.	2010 CBC need not be amended.
1076	**407.4.8.1.3 Floor Arrival.** As the car passes a floor and when a car stops at a floor served by the elevator, the corresponding *character* shall illuminate.		**1116B.1.9** **Car controls**. ... ... As the car passes or stops at a floor served by the elevators, the corresponding numerals shall illuminate, …	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA Stds., with minor variations in wording, i.e., CBC uses "numerals" and ADA Stds. uses "characters."	1. 2010 CBC need not be amended. OR 2. 2010 CBC should be amended to be consistent with ADA Stds.
1077	**407.4.8.1.3 EXCEPTION:** Destination-oriented elevators shall not be required to comply with 407.4.8.1.3 provided that the visible indicators extinguish when the call has been answered.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not address destination-oriented elevator systems.	2010 CBC should be amended to adopt ADA Stds. requirements for destination oriented elevators.
1078	**407.4.8.1.4 Destination Indicator.** In destination-oriented elevators, a display shall be provided in the car with visible indicators to show car destinations.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not address destination-oriented elevator systems.	2010 CBC should be amended to adopt ADA Stds. requirements for destination oriented elevators.
1079	**407.4.8.2 Audible Indicators.** Audible indicators shall comply with 407.4.8.2.		N/A	NA	2010 CBC does not have a separate paragraph to reference the respective sections/paragraphs pertaining to audible indicators.	2010 CBC need not be amended

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1080	**407.4.8.2.1 Signal Type.** The signal shall be an automatic verbal annunciator which announces the floor at which the car is about to stop.		**1116B.1.9** **Car controls**. ... ... An automatic verbal announcement of the floor number at which a car stops or which a car passes may be substituted for the audible signal.	2010 CBC **conflicts with** 2010 ADA.	2010 CBC requires an audible signal as the car passes or stops at a floor served by the elevator, and allows an automatic verbal announcement of the floor number to be substituted for the audible signal. 2010 ADA Stds. requires an automatic verbal annunciator which announces the floor at which the car is about to stop, but has a separate exception for certain elevators to have only a non-verbal audible signal.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1081	**407.4.8.2.1 EXCEPTION:** For elevators other than destination-oriented elevators that have a rated speed of 200 feet per minute (1 m/s) or less, a non-verbal audible signal with a frequency of 1500 Hz maximum which sounds as the car passes or is about to stop at a floor served by the elevator shall be permitted.		**1116B.1.9** **Car controls**. ... ... As the car passes or stops at a floor served by the elevators, ... an audible signal shall sound. ... The audible signal shall be no less than 20 decibels with a frequency no higher than 1,500 Hz. …	2010 CBC **conflicts with** 2010 ADA.	2010 ADA Stds. restricts the use of only a non-verbal audble signal to other than destination oriented elevators that have a rated speed of 200 feet per minute, while 2010 CBC does not have such limitations. Both CBC and ADA limit the non-verbal audible signal to 1500 Hz maximum, but only CBC requires the signal to be no less than 20 db. (ADA Stds. only regulates the signal level for verbal signals.)	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1082	**407.4.8.2.2 Signal Level.** The verbal annunciator shall be 10 dB minimum above ambient, but shall not exceed 80 dB, measured at the annunciator.		**1116B.1.9** **Car controls**. ... ... An automatic verbal announcement of the floor number at which a car stops or which a car passes may be substituted for the audible signal.	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not specify a signal level for verbal annunciation, only for audible signals.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1083	**407.4.8.2.3 Frequency.** The verbal annunciator shall have a frequency of 300 Hz minimum to 3000 Hz maximum.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not address the frequency range required for verbal annuciation.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1084	**407.4.8.2.3 Frequency.** The verbal annunciator shall have a frequency of 300 Hz minimum to 3000 Hz maximum.		N/A	NA	NA	NA
1085	**407.4.9 Emergency Communication.** Emergency two-way communication systems shall comply with 308. *Tactile* symbols and *characters* shall be provided adjacent to the device and shall comply with 703.2.		**1116B.1.8** **Car inside**. ... Emergency two-way communication systems between the elevator and a point outside the hoistway shall comply with ASME A17.1. The emergency telephone handset shall be positioned no higher than 4 feet (1219 mm) above the floor, and the handset cord shall be a minimum of 2 feet 5 inches (737 mm) in length. It shall be identified by a raised telephone symbol and corresponding Braille lettering complying with Section 1117B.5.1, Item 1, and located adjacent to the device. ... Emergency intercommunication shall not require voice communication. ...	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC is equivalent to 2010 ADA Stds., and CBC provides further requirements about the minimum length of the handset cord, and addresses telephones located in a closed compartment.	2010 CBC need not be amended.
1086	**407.4.9 Emergency Communication.** Emergency two-way communication systems shall comply with 308. *Tactile* symbols and *characters* shall be provided adjacent to the device and shall comply with 703.2.		N/A	NA	NA	NA
1086.1	**407.4.9 Emergency Communication.** Emergency two-way communication systems shall comply with 308. Tactile symbols and characters shall be provided adjacent to the device and shall comply with 703.2.		**1116B. 1. 8 Car inside. . .** Emergency communication systems. . . . The emergency telephone handset . . .shall be identified by a raised telephone symbol and corresponding braille lettering complying with Section 1117B.5.1, Item 1, and located adjacent to the device.		Because the fedeeral requirement was so vague, Title 24 has a more helpful specific requirement for the tactile symbol.	Retain the more specific language, and also the location adjacent to the device. Previously many of them would be almost on the floor, or sometimes too high.
1086.2			**1116B.2 Platform (wheelchair) lifts.**			
1086.3			Platform (wheelchair) lifts shall comply with this section.			

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1086.4			**1116B.2.7 Restriction sign.** A sign complying with Section 1117B.5.1, Items 2 and 3 shall be securely fastened in a conspicuous place at each landing and on the platform. The sign shall state "No Freight" in letters not less than 5/8 inch (16 mm) high and include the International Symbol of Accessibility.		This standard is more stringent than the federal standard, and should be retained.	Retain more stringent language.
1087	**408 Limited-Use/Limited-Application Elevators**		NA	2010 CBC **does not address** 2010 ADA req.	Section 206.6 of the 2010 ADA addresses scoping of elevators. It states: *Elevators. Elevators provided for passengers shall comply with 407. Where multiple elevators are provided, each elevator shall comply with 407. EXCEPTIONS: 1. In a building or facility permitted to use the exceptions to 206.2.3 or permitted by 206.7 to use a platform lift, elevators complying with 408 shall be permitted. 2. Elevators complying with 408 or 409 shall be permitted in multi-story residential dwelling units.* For reference, Section 206.2.3 of the 2010 ADA states: *Multi-Story Buildings and Facilities. At least one accessible route shall connect each story and mezzanine in multi-story buildings and facilities. EXCEPTIONS: 4. In residential facilities, an accessible route shall not be required to connect stories where residential dwelling units with mobility features required to comply with 809.2 through 809.4, all common use areas serving residential dwelling units with mobility features required to comply with 809.2 through 809.4, and public use areas serving residential dwelling units are on an accessible route. 5. Within multi-story transient lodging guest rooms with mobility features required to comply with 806.2, an accessible route shall not be required to connect stories provided that spaces complying with 806.2 are on an accessible route and sleeping accommodations for two persons minimum are provided on a story served by an accessible route.* Analysis: The 2010 Standards includes the exception that if a facility containing residential dwelling units or transient lodging units, exempt from installing an elevator due to the scoping requirements, voluntarily installs an elevator then that elevator can be a limited-use/limited-application (LULA) elevator. 2010 CBC states that when an elevator is installed in buildings containing multi-story residential dwelling units, it must comply with the provisions for elevators in Chapter 1124A, regardless if the elevator installation was required by the CBC or installation is voluntarily installed. When an elevator is installed in these buildings the building becomes an "elevator building" and is subject to the following provision:	1. Since the 2010 CBC is more restrictive, retain the requirement that elevators in multi-story buildings containing accessible dwelling units must comply with the elevator requirements for CBC Chapter 1124A. 2. Since the 2010 CBC is more restrictive, retain the requirement that elevators in multi-story buildings containing transient lodging units must comply with the elevator requirements for CBC Chapter 1116B. 3. The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use as an alternative to the platform lift. 4. The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use within a multi-story dwelling unit required to be accessible.
1088	**408.1 General.** Limited-use/limited-application elevators shall comply with 408 and with ASME A17.1 (incorporated by reference, see "Referenced Standards" in Chapter 1). They shall be passenger elevators as classified by ASME A17.1. Elevator operation shall be automatic.		NA	2010 CBC **does not address** 2010 ADA req.		1) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use as an alternative to the platform lift. 2) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use within a multi-story dwelling unit required to be accessible.
1089	**408.2 Elevator Landings.** Landings serving limited-use/limited-application elevators shall comply with 408.2.		NA	2010 CBC **does not address** 2010 ADA req.		1) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use as an alternative to the platform lift. 2) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use within a multi-story dwelling unit required to be accessible.

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1090	**408.2.1 Call Buttons.** Elevator call buttons and keypads shall comply with 407.2.1.	NA		2010 CBC **does not address** 2010 ADA req.		1) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use as an alternative to the platform lift. 2) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use within a multi-story dwelling unit required to be accessible.
1091	**408.2.2 Hall Signals.** Hall signals shall comply with 407.2.2.	NA		2010 CBC **does not address** 2010 ADA req.		1) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use as an alternative to the platform lift. 2) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use within a multi-story dwelling unit required to be accessible.
1092	**408.2.3 Hoistway Signs.** Signs at elevator hoistways shall comply with 407.2.3.1.	NA		2010 CBC **does not address** 2010 ADA req.		1) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use as an alternative to the platform lift. 2) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use within a multi-story dwelling unit required to be accessible.
1093	**408.3 Elevator Doors.** Elevator hoistway doors shall comply with 408.3.	NA		2010 CBC **does not address** 2010 ADA req.		1) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use as an alternative to the platform lift. 2) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use within a multi-story dwelling unit required to be accessible.
1094	**408.3.1 Sliding Doors.** Sliding hoistway and car doors shall comply with 407.3.1 through 407.3.3 and 408.4.1.	NA		2010 CBC **does not address** 2010 ADA req.		1) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use as an alternative to the platform lift. 2) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use within a multi-story dwelling unit required to be accessible.
1095	**408.3.2 Swinging Doors.** Swinging hoistway doors shall open and close automatically and shall comply with 404, 407.3.2 and 408.3.2.	NA		2010 CBC **does not address** 2010 ADA req.		1) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use as an alternative to the platform lift. 2) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use within a multi-story dwelling unit required to be accessible.
1096	**408.3.2.1 Power Operation.** Swinging doors shall be power-operated and shall comply with ANSI/BHMA A156.19 (1997 or 2002 edition) (incorporated by reference, see “Referenced Standards” in Chapter 1).	NA		2010 CBC **does not address** 2010 ADA req.		1) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use as an alternative to the platform lift. 2) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use within a multi-story dwelling unit required to be accessible.

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1097	**408.3.2.2 Duration.** Power-operated swinging doors shall remain open for 20 seconds minimum when activated.	NA		2010 CBC **does not address** 2010 ADA req.		1) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use as an alternative to the platform lift. 2) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use within a multi-story dwelling unit required to be accessible.
1098	**408.4 Elevator Cars.** Elevator cars shall comply with 408.4.	NA		2010 CBC **does not address** 2010 ADA req.		1) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use as an alternative to the platform lift. 2) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use within a multi-story dwelling unit required to be accessible.
1099	**408.4.1 Car Dimensions and Doors.** Elevator cars shall provide a clear width 42 inches (1065 mm) minimum and a clear depth 54 inches (1370 mm) minimum. Car doors shall be positioned at the narrow ends of cars and shall provide 32 inches (815 mm) minimum clear width.	NA		2010 CBC **does not address** 2010 ADA req.		1) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use as an alternative to the platform lift. 2) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use within a multi-story dwelling unit required to be accessible.
1100	**408.4.1 EXCEPTIONS:** 1. Cars that provide a clear width 51 inches (1295 mm) minimum shall be permitted to provide a clear depth 51 inches (1295 mm) minimum provided that car doors provide a clear opening 36 inches (915 mm) wide minimum. 2. Existing elevator cars shall be permitted to provide a clear width 36 inches (915 mm) minimum, clear depth 54 inches (1370 mm) minimum, and a net clear platform area 15 square feet (1.4 m2) minimum.	NA		2010 CBC **does not address** 2010 ADA req.		1) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use as an alternative to the platform lift. 2) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use within a multi-story dwelling unit required to be accessible.
1101	**408.4.2 Floor Surfaces.** Floor surfaces in elevator cars shall comply with 302 and 303.	NA		2010 CBC **does not address** 2010 ADA req.		1) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use as an alternative to the platform lift. 2) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use within a multi-story dwelling unit required to be accessible.
1102	**408.4.3 Platform to Hoistway Clearance.** The platform to hoistway clearance shall comply with 407.4.3.	NA		2010 CBC **does not address** 2010 ADA req.		1) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use as an alternative to the platform lift. 2) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use within a multi-story dwelling unit required to be accessible.
1103	**408.4.4 Leveling.** Elevator car leveling shall comply with 407.4.4.	NA		2010 CBC **does not address** 2010 ADA req.		1) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use as an alternative to the platform lift. 2) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use within a multi-story dwelling unit required to be accessible.

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1104	**408.4.5 Illumination.** Elevator car illumination shall comply with 407.4.5.	NA		2010 CBC **does not address** 2010 ADA req.		1) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use as an alternative to the platform lift. 2) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use within a multi-story dwelling unit required to be accessible.
1105	**408.4.6 Car Controls.** Elevator car controls shall comply with 407.4.6. Control panels shall be centered on a side wall.	NA		2010 CBC **does not address** 2010 ADA req.		1) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use as an alternative to the platform lift. 2) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use within a multi-story dwelling unit required to be accessible.
1106	**408.4.7 Designations and Indicators of Car Controls.** Designations and indicators of car controls shall comply with 407.4.7.	NA		2010 CBC **does not address** 2010 ADA req.		1) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use as an alternative to the platform lift. 2) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use within a multi-story dwelling unit required to be accessible.
1107	**408.4.8 Emergency Communications.** Car emergency signaling devices complying with 407.4.9 shall be provided.	NA		2010 CBC **does not address** 2010 ADA req.		1) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use as an alternative to the platform lift. 2) The LULA elevator requirements as addressed in the 2010 ADA should be included in the 2010 CBC, and allowed for use within a multi-story dwelling unit required to be accessible.

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1108	**409 Private Residence Elevators**	NA		2010 CBC **does not address** 2010 ADA req.	2010 CBC Chapter 1124A Elevators and Platform (Wheelchair) Lifts specifically excludes Private Residence Elevators: *1124A.1 General. Elevators provided in covered multifamily buildings shall be accessible. Elevators required to be accessible shall comply with this chapter, ASME A17.1, Safety Code for Elevators and Escalators" Title 8, of the California Code of Regulations,' under "Elevator Safety Orders," and any other applicable safety regulations of other administrative authorities having jurisdiction.* *Exception: Private elevators serving only one dwelling unit.* 2010 California Residential Code addresses accessibility in elevators in a private residence by CBC Chapter 1124A: *SECTION R321* *ELEVATORS AND PLATFORM LIFTS* *R321.1 Elevators. Where provided, passenger elevators, limited-use/limited-application elevators or private residence elevators shall comply with ASME AI7.I.* *R321.3 Accessibility. Elevators or platform (wheelchair) lifts that are part of an accessible route required by Chapter IIA of the California Building Code, shall comply with ASME A 17.1, Safety Code for Elevators and Escalators, Title 8, of the California Code of Regulations, under "Elevator Safety Orders"; ASME A 18.1, Safety Standard for Platform Lifts and Stairway Chair Lifts; the State of California, the Department of Industrial Relations, Division of Occupational Safety and Health, and any applicable safety regulations of other administrative authorities having jurisdiction. See Section 1124A of the California Building Code for additional information.* While elevators serving buildings that contain units required to be accessible are required to comply with CBC Chapter 1124A, the CBC does not address accessibility requirements of a private elevator within a unit that is required to be accessible. The ADA is more stringent in that it does address private elevators in a multi-story unit required to be accessible with this section.	1. The Private Residence Elevator requirements as addressed in the 2010 ADA Section 409 should be included in the 2010 CBC. 2. Qualify in the 1124A.1 Exception that if a private elevator is provided within a dwelling unit that is required to be accessible that it must meet the minimum requirements set forth in the 2010 ADA section 409.
1109	**409.1 General.** Private residence elevators that are provided within a *residential dwelling unit* required to provide mobility features complying with 809.2 through 809.4 shall comply with 409 and with ASME A17.1 (incorporated by reference, see “Referenced Standards” in Chapter 1). They shall be passenger elevators as classified by ASME A17.1. Elevator operation shall be automatic.	NA		2010 CBC **does not address** 2010 ADA req.		1. The Private Residence Elevator requirements as addressed in the 2010 ADA Section 409 should be included in the 2010 CBC. 2. Qualify in the 1124A.1 Exception that if a private elevator is provided within a dwelling unit that is required to be accessible that it must meet the minimum requirements set forth in the 2010 ADA section 409.
1110	**409.2 Call Buttons.** Call buttons shall be ¾ inch (19 mm) minimum in the smallest dimension and shall comply with 309.	NA		2010 CBC **does not address** 2010 ADA req.		1. The Private Residence Elevator requirements as addressed in the 2010 ADA Section 409 should be included in the 2010 CBC. 2. Qualify in the 1124A.1 Exception that if a private elevator is provided within a dwelling unit that is required to be accessible that it must meet the minimum requirements set forth in the 2010 ADA section 409.

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1111	**409.3 Elevator Doors.** Hoistway doors, car doors, and car gates shall comply with 409.3 and 404.	NA		2010 CBC **does not address** 2010 ADA req.		1. The Private Residence Elevator requirements as addressed in the 2010 ADA Section 409 should be included in the 2010 CBC. 2. Qualify in the 1124A.1 Exception that if a private elevator is provided within a dwelling unit that is required to be accessible that it must meet the minimum requirements set forth in the 2010 ADA section 409.
1112	**409.3 EXCEPTION:** Doors shall not be required to comply with the maneuvering clearance requirements in 404.2.4.1 for approaches to the push side of swinging doors.	NA		2010 CBC **does not address** 2010 ADA req.		1. The Private Residence Elevator requirements as addressed in the 2010 ADA Section 409 should be included in the 2010 CBC. 2. Qualify in the 1124A.1 Exception that if a private elevator is provided within a dwelling unit that is required to be accessible that it must meet the minimum requirements set forth in the 2010 ADA section 409.
1113	**409.3.1 Power Operation.** Elevator car and hoistway doors and gates shall be power operated and shall comply with ANSI/BHMA A156.19 (1997 or 2002 edition) (incorporated by reference, see “Referenced Standards” in Chapter 1). Power operated doors and gates shall remain open for 20 seconds minimum when activated.	NA		2010 CBC **does not address** 2010 ADA req.		1. The Private Residence Elevator requirements as addressed in the 2010 ADA Section 409 should be included in the 2010 CBC. 2. Qualify in the 1124A.1 Exception that if a private elevator is provided within a dwelling unit that is required to be accessible that it must meet the minimum requirements set forth in the 2010 ADA section 409.
1114	**409.3.1 EXCEPTION:** In elevator cars with more than one opening, hoistway doors and gates shall be permitted to be of the manual-open, self-close type.	NA		2010 CBC **does not address** 2010 ADA req.		1. The Private Residence Elevator requirements as addressed in the 2010 ADA Section 409 should be included in the 2010 CBC. 2. Qualify in the 1124A.1 Exception that if a private elevator is provided within a dwelling unit that is required to be accessible that it must meet the minimum requirements set forth in the 2010 ADA section 409.
1115	**409.3.2 Location.** Elevator car doors or gates shall be positioned at the narrow end of the clear floor spaces required by 409.4.1.	NA		2010 CBC **does not address** 2010 ADA req.		1. The Private Residence Elevator requirements as addressed in the 2010 ADA Section 409 should be included in the 2010 CBC. 2. Qualify in the 1124A.1 Exception that if a private elevator is provided within a dwelling unit that is required to be accessible that it must meet the minimum requirements set forth in the 2010 ADA section 409.
1116	**409.4 Elevator Cars.** Private residence elevator cars shall comply with 409.4.	NA		2010 CBC **does not address** 2010 ADA req.		1. The Private Residence Elevator requirements as addressed in the 2010 ADA Section 409 should be included in the 2010 CBC. 2. Qualify in the 1124A.1 Exception that if a private elevator is provided within a dwelling unit that is required to be accessible that it must meet the minimum requirements set forth in the 2010 ADA section 409.

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1117	**409.4.1 Inside Dimensions of Elevator Cars.** Elevator cars shall provide a clear floor *space* of 36 inches (915 mm) minimum by 48 inches (1220 mm) minimum and shall comply with 305.	NA		2010 CBC **does not address** 2010 ADA req.		1. The Private Residence Elevator requirements as addressed in the 2010 ADA Section 409 should be included in the 2010 CBC. 2. Qualify in the 1124A.1 Exception that if a private elevator is provided within a dwelling unit that is required to be accessible that it must meet the minimum requirements set forth in the 2010 ADA section 409.
1118	**409.4.2 Floor Surfaces.** Floor surfaces in elevator cars shall comply with 302 and 303.	NA		2010 CBC **does not address** 2010 ADA req.		1. The Private Residence Elevator requirements as addressed in the 2010 ADA Section 409 should be included in the 2010 CBC. 2. Qualify in the 1124A.1 Exception that if a private elevator is provided within a dwelling unit that is required to be accessible that it must meet the minimum requirements set forth in the 2010 ADA section 409.
1119	**409.4.3 Platform to Hoistway Clearance.** The clearance between the car platform and the edge of any landing sill shall be 1½ inch (38 mm) maximum.	NA		2010 CBC **does not address** 2010 ADA req.		1. The Private Residence Elevator requirements as addressed in the 2010 ADA Section 409 should be included in the 2010 CBC. 2. Qualify in the 1124A.1 Exception that if a private elevator is provided within a dwelling unit that is required to be accessible that it must meet the minimum requirements set forth in the 2010 ADA section 409.
1120	**409.4.4 Leveling.** Each car shall automatically stop at a floor landing within a tolerance of ½ inch (13 mm) under rated loading to zero loading conditions.	NA		2010 CBC **does not address** 2010 ADA req.		1. The Private Residence Elevator requirements as addressed in the 2010 ADA Section 409 should be included in the 2010 CBC. 2. Qualify in the 1124A.1 Exception that if a private elevator is provided within a dwelling unit that is required to be accessible that it must meet the minimum requirements set forth in the 2010 ADA section 409.
1121	**409.4.5 Illumination Levels.** Elevator car illumination shall comply with 407.4.5.	NA		2010 CBC **does not address** 2010 ADA req.		1. The Private Residence Elevator requirements as addressed in the 2010 ADA Section 409 should be included in the 2010 CBC. 2. Qualify in the 1124A.1 Exception that if a private elevator is provided within a dwelling unit that is required to be accessible that it must meet the minimum requirements set forth in the 2010 ADA section 409.
1122	**409.4.6 Car Controls.** Elevator car control buttons shall comply with 409.4.6, 309.3, 309.4, and shall be raised or flush.	NA		2010 CBC **does not address** 2010 ADA req.		1. The Private Residence Elevator requirements as addressed in the 2010 ADA Section 409 should be included in the 2010 CBC. 2. Qualify in the 1124A.1 Exception that if a private elevator is provided within a dwelling unit that is required to be accessible that it must meet the minimum requirements set forth in the 2010 ADA section 409.

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1123	**409.4.6.1 Size.** Control buttons shall be ¾ inch (19 mm) minimum in their smallest dimension.	NA		2010 CBC **does not address** 2010 ADA req.		1. The Private Residence Elevator requirements as addressed in the 2010 ADA Section 409 should be included in the 2010 CBC. 2. Qualify in the 1124A.1 Exception that if a private elevator is provided within a dwelling unit that is required to be accessible that it must meet the minimum requirements set forth in the 2010 ADA section 409.
1124	**409.4.6.2 Location.** Control panels shall be on a side wall, 12 inches (305 mm) minimum from any adjacent wall.	NA		2010 CBC **does not address** 2010 ADA req.		1. The Private Residence Elevator requirements as addressed in the 2010 ADA Section 409 should be included in the 2010 CBC. 2. Qualify in the 1124A.1 Exception that if a private elevator is provided within a dwelling unit that is required to be accessible that it must meet the minimum requirements set forth in the 2010 ADA section 409.
1125	**409.4.7 Emergency Communications.** Emergency two-way communication systems shall comply with 409.4.7.	NA		2010 CBC **does not address** 2010 ADA req.		1. The Private Residence Elevator requirements as addressed in the 2010 ADA Section 409 should be included in the 2010 CBC. 2. Qualify in the 1124A.1 Exception that if a private elevator is provided within a dwelling unit that is required to be accessible that it must meet the minimum requirements set forth in the 2010 ADA section 409.
1126	**409.4.7.1 Type.** A telephone and emergency signal device shall be provided in the car.	NA		2010 CBC **does not address** 2010 ADA req.		1. The Private Residence Elevator requirements as addressed in the 2010 ADA Section 409 should be included in the 2010 CBC. 2. Qualify in the 1124A.1 Exception that if a private elevator is provided within a dwelling unit that is required to be accessible that it must meet the minimum requirements set forth in the 2010 ADA section 409.
1127	**409.4.7.2 Operable Parts.** The telephone and emergency signaling device shall comply with 309.3 and 309.4.	NA		2010 CBC **does not address** 2010 ADA req.		1. The Private Residence Elevator requirements as addressed in the 2010 ADA Section 409 should be included in the 2010 CBC. 2. Qualify in the 1124A.1 Exception that if a private elevator is provided within a dwelling unit that is required to be accessible that it must meet the minimum requirements set forth in the 2010 ADA section 409.
1128	**409.4.7.3 Compartment.** If the telephone or device is in a closed compartment, the compartment door hardware shall comply with 309.	NA		2010 CBC **does not address** 2010 ADA req.		1. The Private Residence Elevator requirements as addressed in the 2010 ADA Section 409 should be included in the 2010 CBC. 2. Qualify in the 1124A.1 Exception that if a private elevator is provided within a dwelling unit that is required to be accessible that it must meet the minimum requirements set forth in the 2010 ADA section 409.

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1129	**409.4.7.4 Cord.** The telephone cord shall be 29 inches (735 mm) long minimum.		NA	2010 CBC **does not address** 2010 ADA req.		1. The Private Residence Elevator requirements as addressed in the 2010 ADA Section 409 should be included in the 2010 CBC. 2. Qualify in the 1124A.1 Exception that if a private elevator is provided within a dwelling unit that is required to be accessible that it must meet the minimum requirements set forth in the 2010 ADA section 409.
1130	**410 Platform Lifts**		**1116B.2 Platform (wheelchair) lifts.**	2010 CBC is **equivalent** to 2010 ADA.		
1131	**410.1 General.** …	**UNDER REVIEW** **ACC Note:** The '91 v '10 comparison focuses on scoping issues (4.1). Those should be reserved for section 206.7. The comparison should be concerned about the differences between 4.11 and 410.	**SECTION 1007** **ACCESSIBLE MEANS OF EGRESS** **1007.1 Accessible means of egress required.** Accessible means of egress shall comply with this section. ... **1007.2 Continuity and components.** Each required accessible means of egress shall be continuous to a public way and shall consist of one or more of the following components: **5.** Platform lifts complying ... **[DSA-AC]** See Chapter 11B, Section 1116B.2.5 for additional accessible means of egress requirements at platform (wheelchair) lifts. **...** **SECTION 1116B** **ELEVATORS AND PLATFORM (WHEELCHAIR) LIFTS** **1116B.2 Platform (wheelchair) lifts.** Platform (wheelchair) lifts shall comply with this section. ... **1116B.2.1 General.** When platform (wheelchair) lifts are provided, the vertical distance between landings, as well as the structural design and safeguards, shall be as allowed by ASME A18.1 Safety Standard for Platform Lifts and Stairway Chair Lifts; the Department of Industrial Relations, Division of Occupational Safety and Health; and any applicable safety regulations of other administrative authorities having jurisdiction. **1116B.2.2 Unassisted entry.** Platform (wheelchair) lifts shall be designed and constructed to facilitate unassisted entry, operation and exit from the lift and shall comply with the restrictions and enhancements of this section in conjunction with Title 8, of the California Code of Regulations. **1116B.2.3 Landing size.** In new construction, the minimum size of landings at platform lifts shall be 60 inches by 60 inches (1524 mm by 1524 mm). Other dimensions may be substituted where it can be demonstrated that a person using a wheelchair measuring 30 inches by 48		

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1132	**410.1 General.** Platform lifts shall comply with ASME A18.1 (1999 edition or 2003 edition) (incorporated by reference, see “Referenced Standards” in Chapter 1). …		**SECTION 1116B** **ELEVATORS AND PLATFORM (WHEELCHAIR) LIFTS** **1116B.2 Platform (wheelchair) lifts.** Platform (wheelchair) lifts shall comply with this section. **1116B.2.1 General.** When platform (wheelchair) lifts are provided, the vertical distance between landings, as well as the structural design and safeguards, shall be as allowed by ASME A18.1 Safety Standard for Platform Lifts and Stairway Chair Lifts; the Department of Industrial Relations, Division of Occupational Safety and Health; and any applicable safety regulations of other administrative authorities having jurisdiction.	Which Std.provides greater access **depends** on circumstances.	1) Both standards refer to ASME A18.1 Safety Standard for Platform Lifts and Stairwar Chair Lifts. 410.1 speacks specifically of the 1999 and 2003 editions; 1116B.2.1 does not cite an edition. There are at least two other newer editions - 2008 and 2011. None of these standards has been reviewed. 2) 1116B.2.1 also cites *the Department of Industrial Relations, Division of Occupational Safety and Health; and any applicable safety regulations of other administrative authorities having jurisdiction* . No standards or regulations other than the CBC have been reveiwed.	1) Cite the intended edition(s) of referenced standard ASME A18.1 in 1116B.2.1. **2) or "latest/current/last" edition?**
1133	**410.1 General.** ... Platform lifts shall not be attendant-operated and shall provide unassisted entry and exit from the lift.		**SECTION 1116B** **ELEVATORS AND PLATFORM (WHEELCHAIR) LIFTS** **1116B.2 Platform (wheelchair) lifts.** Platform (wheelchair) lifts shall comply with this section. **1116B.2.2 Unassisted entry.** Platform (wheelchair) lifts shall be designed and constructed to facilitate unassisted entry, operation and exit from the lift and shall comply with the restrictions and enhancements of this section in conjunction with Title 8, of the California Code of Regulations.	Which Std.provides greater access **depends** on circumstances.	1) 410.1 (1) requires unassisted entry and exit from the lift. 1116B.2.2 says that the lifts shall (be designed and constructed to) facilitate unassisted, (operation), and exit from the lift. The term "facilitate" is weaker than "shall"; 1116B.2.2 appears to be less demanding than 410.2 (1). As such, the CBC appears to provide less access than the 2010 ADA Stds. 2) 1116B.2.2 requires unassisted operation, which appears to be stricter than not attendant-operated of 410.1 (1). As such the CBC appears to offer greater access than the 2010 ADA Stds. 3) 1116B.2.2 cites CCR Title 8 - Industrial Relations (OSHA) No standards or regulations other than the CBC have been reveiwed.	1a) Modify 1116B.2.2 to clearly state that the capability for unassisted entry shall be provided. 1b) Leave 1116B.2.2 as it is.

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1134	**Advisory 410.1 General.** Inclined stairway chairlifts and inclined and vertical platform lifts are available for short-distance vertical transportation. Because an accessible route requires an 80 inch (2030 mm) vertical clearance, care should be taken in selecting lifts as they may not be equally suitable for use by people using wheelchairs and people standing. If a lift does not provide 80 inch (2030 mm) vertical clearance, it cannot be considered part of an accessible route in new construction. The ADA and other Federal civil rights laws require that accessible features be maintained in working order so that they are accessible to and usable by those people they are intended to benefit. Building owners are reminded that the ASME A18 Safety Standard for Platform Lifts and Stairway Chairlifts requires routine maintenance and inspections. Isolated or temporary interruptions in service due to maintenance or repairs may be unavoidable; however, failure to take prompt action to effect repairs could constitute a violation of Federal laws and these requirements.		**SECTION 1101B** **SCOPE** **1101B.3 Maintenance of accessible features.** **1.** A public accommodation shall maintain in operable working condition those features of facilities and equipment that are required to be accessible to and usable by persons with disabilities. **2.** This section does not prohibit isolated or temporary interruptions in service or access due to maintenance or repairs. **SECTION 1116B** **ELEVATORS AND PLATFORM (WHEELCHAIR) LIFTS** **1116B.2 Platform (wheelchair) lifts.** Platform (wheelchair) lifts shall comply with this section. **1116B.2.1 General.** When platform (wheelchair) lifts are provided, the vertical distance between landings, as well as the structural design and safeguards, shall be as allowed by ASME A18.1 Safety Standard for Platform Lifts and Stairway Chair Lifts; the Department of Industrial Relations, Division of Occupational Safety and Health; and any applicable safety regulations of other administrative authorities having jurisdiction. **1133B.8.6 Protruding objects.** **1133B.8.6.1 General.** Objects projecting from walls (for example, telephones) with their leading edges between 27 inches (686 mm) and 80 inches (2032 mm) above the finished floor shall protrude no more than 4 inches (102 mm) into walks, halls, corridors, passageways or aisles. Objects mounted with their leading edges at or below 27 inches (686 mm) above the finished floor may protrude any amount. Free-standing objects mounted on posts or pylons may overhang 12 inches (305 mm) maximum from 27 inches (686 mm) to 80 inches (2032 mm) above the ground or finished floor. Protruding objects shall not reduce the clear width of an accessible route or maneuvering space. See Figure 11B-7A. **1133B.8.6.2 Headroom.** Walks, halls, corridors,	2010 CBC is **equivalent** to 2010 ADA.	The issues discussed in Advisory 410.1 - protruding object hazards and headroom clearance, and the maintenance of accessible features - are included in CBC Chapter 11B as enforcable requirements. These issues are also discussed elsewhere in the 2010 ADA Stds. and 28 CFR Part 36 - protruding objects and headroom clearance at 307, and maintenance of accessible features at § 36.211 (a) and (b). Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b). Since the issues are accompanied elsewhere by enforcable requirements, and those requirements are in line with those of the CBC, the standards are equivalent.	

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1135	**410.2 Floor Surfaces.** Floor surfaces in platform lifts shall comply with 302 and 303.		**SECTION 1007** **ACCESSIBLE MEANS OF EGRESS** **1007.1 Accessible means of egress required.** Accessible means of egress shall comply with this section. ... In addition to the requirements of this chapter, means of egress, which provide access to, or egress from, buildings for persons with disabilities, shall also comply with the requirements of Chapters ... 11B, ... **...** **1007.2 Continuity and components.** Each required accessible means of egress shall be continuous to a public way and shall consist of one or more of the following components: **5.** Platform lifts complying with ... Chapter 11B, Section 1116B, ... **[DSA-AC]** See Chapter 11B, Section 1116B.2.5 for additional accessible means of egress requirements at platform (wheelchair) lifts. **...** **SECTION 1116B** **ELEVATORS AND PLATFORM (WHEELCHAIR) LIFTS** **1116B.2 Platform (wheelchair) lifts.** Platform (wheelchair) lifts shall comply with this section. Platform (wheelchair) lifts may be provided as part of an accessible route only for the following conditions: **...** **1114B.1.2 Accessible route of travel.** When a building, or portion of a building, is required to be accessible or adaptable, an accessible route of travel complying with Sections ... 1124B, ... shall be provided to all portions of the building, to accessible building entrances and between the building and the public way. All walks, halls, corridors, aisles, skywalks, tunnels, and other spaces that are part of an accessible route shall comply with the applicable provisions of this code. ... At least one accessible route within the boundary of the site shall be provided from public transportation stops, accessible parking and accessible	2010 CBC is **equivalent** to 2010 ADA.	410.2 requires floor surfaces in platform lifts to comply with the referenced sections - regardless of whether or not they are part of an accessible route. 1116B.2 does not mention floor surfaces, but 1114B.1.2, which is not referenced, nonetheless requires "*All walks, halls, corridors, aisles, skywalks, tunnels, and other spaces that are part of an accessible route shall comply with the applicable provisions of this code* ." 1114B.1.2 cites 1124B (Ground and Floor Surfaces) as one of the sections that must be complied with. 1114B.1.2 also says: "*Where more than one route of travel is provided, all routes shall be accessible* ." So regardless of whether or not a platform lift provides an *accessible means of egress* , it should be part of an accessible route, and subject to 1124B. The analysis above is certainly open to question due to the meandering parth one must take to reach its conclusions. It would be very helpful if the 1116B.2 either cited 1124B as 410.2 cites 302 and 303.	1a) Modify 1116B.2 to state explicitly that platform lifts shall comply with 1124B. 1b) Leave 1116B.2 as it is.

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1136	**410.3 Clear Floor Space.** Clear floor *space* in platform lifts shall comply with 305.		**SECTION 1116B** **ELEVATORS AND PLATFORM (WHEELCHAIR) LIFTS** **1116B.2 Platform (wheelchair) lifts.** Platform (wheelchair) lifts shall comply with this section. Platform (wheelchair) lifts may be provided as part of an accessible route only for the following conditions: **...** Platform (wheelchair) lifts ... shall comply with ... Title 8, of the California Code of Regulations. **...** **SECTION 1117B** **OTHER BUILDING COMPONENTS** **1117B.6 Controls and operating mechanisms.** **1. General.** Controls and operating mechanisms in accessible spaces, along accessible routes or as parts of accessible elements (for example, light switches and dispenser controls) and those required to be accessible by Section 1.9.1 shall comply with the requirements of this section. **2. Clear floor space.** Clear floor space complying with Section 1118B.4 that allows a forward or parallel approach by a person using a wheelchair shall be provided at controls, dispensers, receptacles and other operable equipment. **...** **SECTION 1118B – SPACE ALLOWANCE AND REACH RANGES** **1118B.4 Clear floor or ground space for wheelchairs.** **1. Size and approach.** The minimum clear floor or ground space required to accommodate a single, stationary wheelchair and occupant is 30 inches by 48 inches (762 mm by 1219 mm). The minimum clear floor or ground space for wheelchairs may be positioned for forward or parallel approach to an object. ... **2. Relationship of maneuvering clearances to wheelchair spaces.** ... If a clear floor space is located in an alcove or otherwise confined on all or a part of three sides, additional maneuvering clearances shall be provided as shown in Figure 11B-5A(b)**....**	Which Std.provides greater access **depends** on circumstances.	410.3 requires compliance with 305. Because platfom lifts are enclosed on at least 3 sides (in both directions), 305.7.1 applies, and 305.7.2 may apply depending on how one enters the lift. This means that lift must be at least 36" wide, and they may need to be as much as 60" long. 1116B.2 does not specify a minimum size for the lift, however one can arrive at the requirements of 1118B.4 #2 and Figure 11B-5A(B) through 1117B.6 #1. The connection is a bit thin, perhaps, but it is strong nonetheless, and result is the same. Per Figure 11B-5A(b), and as described above for 305, the CBC requires a minimum clear lift width of 36", and may require a length of 60". The analysis above is certainly open to question due to the meandering parth one must take to reach its conclusions. It would be very helpful if the 1116B.2 either cited 1118B.4 as 410.3 cites 305, or if it simply stated what the minimum dimensions are.	1) Modify 1116B.2 to include a requirement for the size of of the clear floor space within platform lifts by citing 1118B.4 2) Modify 1116B.2 to include a requirement for the size of of the clear floor space within platform lifts by actually stating minimum required sizes (based on configuration).
1137	**410.4 Platform to Runway Clearance.** The clearance between the platform sill and the edge of any runway landing shall be 1¼ inch (32 mm) maximum.	**UNDER REVIEW** **ACC Note:** I did not review ASME 18.1. It may be that requirements for platform sill gaps are stated therein. **ACC Note:** '91 and '10 equivalent? No '91 standard is cited. Isn't '10 more stringent, or did ASME A17.1 1990 have a similar requirement?	**SECTION 1116B** **ELEVATORS AND PLATFORM (WHEELCHAIR) LIFTS** **1116B.2 Platform (wheelchair) lifts.** Platform (wheelchair) lifts shall comply with this section. **1116B.2.1 General.** When platform (wheelchair) lifts are provided, the vertical distance between landings, as well as the structural design and safeguards, shall be as allowed by ASME A18.1 Safety Standard for Platform Lifts and Stairway Chair Lifts; the Department of Industrial Relations, Division of Occupational Safety and Health; and any applicable safety regulations of other administrative authorities having jurisdiction. **...** **1116B.2.4 Relationship to the path of travel.** Level and clear floor areas or landings at platform lifts shall be part of “path of travel” requirements. **...**	2010 CBC provides **less access** than 2010 ADA.	1116B.2 does not cite maximum widths of platform sill gaps.	1) Modify 1116B.2 to include a requirement equivalent to that expressed in 410.4. (See the last paragraph of 1116B.1.2.)

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1138	**410.5 Operable Parts.** Controls for platform lifts shall comply with 309.		**SECTION 1116B** **ELEVATORS AND PLATFORM (WHEELCHAIR) LIFTS** **1116B.2 Platform (wheelchair) lifts.** Platform (wheelchair) lifts shall comply with this section. Platform (wheelchair) lifts may be provided as part of an accessible route only for the following conditions: **...** **1117B.6 Controls and operating mechanisms.** **1. General.** Controls and operating mechanisms in accessible spaces, along accessible routes or as parts of accessible elements (for example, light switches and dispenser controls) and those required to be accessible by Section 1.9.1 shall comply with the requirements of this section. **2. Clear floor space.** Clear floor space complying with Section 1118B.4 that allows a forward or parallel approach by a person using a wheelchair shall be provided at controls, dispensers, receptacles and other operable equipment. **3. Height.** The highest operable part of all controls, dispensers, receptacles and other operable equipment shall be placed within at least one of the reach ranges specified in Sections 1118B.5 and 1118B.6. **Exception:** These requirements do not apply where the use of special equipment dictates otherwise or where electrical and communication systems receptacles are not normally intended for use by building occupants. **4. Operation.** Controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 pounds (22.2 N) of force.	2010 CBC is **equivalent** to 2010 ADA.	410.5 requires compliance with 309. 1116B.2 does not mention controls or operable parts, but 1117B.6 clearly applies to all "*controls and operating mechanisms in accessoble spaces...or as part of accessible elements*".	
1138.1			**SECTION 1007** **ACCESSIBLE MEANS OF EGRESS** **1007.5 Platform lifts.** Platform (wheelchair) lifts shall not serve as part of an accessible means of egress, except where allowed as part of a required accessible route in ... Chapter 11B, Section 1116B.2 Items 1 through 4, as applicable. ... **1007.5.1 Openness.** Platform lifts on an accessible means of egress shall not be installed in a fully enclosed hoistway.	2010 CBC provides **greater access** than 2010 ADA.	An "openness" requirement is not stated in 410.	

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1138.2			**SECTION 1007** **ACCESSIBLE MEANS OF EGRESS** **1007.5 Platform lifts.** Platform (wheelchair) lifts shall not serve as part of an accessible means of egress, except where allowed as part of a required accessible route in ... Chapter 11B, Section 1116B.2 Items 1 through 4, as applicable. ... **SECTION 1116B** **ELEVATORS AND PLATFORM (WHEELCHAIR) LIFTS** **1116B.2 Platform (wheelchair) lifts.** Platform (wheelchair) lifts shall comply with this section. **1116B.2.3 Landing size.** In new construction, the minimum size of landings at platform lifts shall be 60 inches by 60 inches (1524 mm by 1524 mm). Other dimensions may be substituted where it can be demonstrated that a person using a wheelchair measuring 30 inches by 48 inches (762 mm by 1219 mm) can enter and operate the lift safely. **1116B.2.4 Relationship to the path of travel.** Level and clear floor areas or landings at platform lifts shall be part of "path of travel" requirements. **Exceptions:** **1.** The provisions of this section shall not apply to existing buildings when physical constraints will not allow compliance with these regulations or equivalent facilitation without creating an unreasonable hardship. See Section 1.9.1. **2.** When the enforcing agency determines that compliance with any regulation under this section would create an unreasonable hardship, an exception to such regulation shall be granted when equivalent facilitation is provided.	2010 CBC provides **greater access** than 2010 ADA.	A requirement for minimum landing size is not stated in 410.	
1138.3			**SECTION 1007** **ACCESSIBLE MEANS OF EGRESS** **1007.5 Platform lifts.** Platform (wheelchair) lifts shall not serve as part of an accessible means of egress, except where allowed as part of a required accessible route in ... Chapter 11B, Section 1116B.2 Items 1 through 4, as applicable. ... **SECTION 1116B** **ELEVATORS AND PLATFORM (WHEELCHAIR) LIFTS** **1116B.2 Platform (wheelchair) lifts.** Platform (wheelchair) lifts shall comply with this section. **1116B.2.7 Restriction sign.** A sign complying with Section 1117B.5.1, Items 2 and 3 shall be securely fastened in a conspicuous place at each landing and on the platform. The sign shall state "No Freight" in letters not less than 5/8 inch (16 mm) high and include the International Symbol of Accessibility.	2010 CBC provides **greater access** than 2010 ADA.	A requirement for restriction signs is not stated in 410.	

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1139	**410.6 Doors and Gates.** Platform lifts shall have low-energy power-operated doors or gates complying with 404.3. Doors shall remain open for 20 seconds minimum. End doors and gates shall provide a clear width 32 inches (815 mm) minimum. Side doors and gates shall provide a clear width 42 inches (1065 mm) minimum.		**SECTION 1116B** **ELEVATORS AND PLATFORM (WHEELCHAIR) LIFTS** **1116B.2 Platform (wheelchair) lifts.** Platform (wheelchair) lifts shall comply with this section. **1116B.2.6 Doors and gates.** Lifts shall have low energy power-operated doors or gates. Doors and gates shall remain open for 20 seconds minimum. End doors shall be 32 inches (813 mm) minimum clear width. Side doors shall be 42 inches (1067 mm) minimum clear width. **...** **1133B.2.3.2 Automatic and power-assisted doors.** If an automatic door is used, then it shall comply with BHMA A156.10. Slowly opening, low-powered, automatic doors shall comply with BHMA A156.19. Such doors shall not open to back check faster than 3 seconds and shall require no more than 15 lbf (66.72 N) to stop door movement. If a power-assisted door is used, its door-opening force shall comply with 1133B.2.5 and its closing shall conform to the requirements in BHMA A156.19. When an automatic door operator is utilized to operate a pair of doors, at least one of the doors shall provide a clear, unobstructed opening width of 32 inches (813 mm) with the door positioned at an angle of 90 degrees from its closed position. **Exceptions:** **1.** The provisions of Section 1133B.2.3 shall not apply to existing buildings, except when otherwise required under conditions applicable to access for persons with disabilities. In existing buildings, the following shall apply: Where the occupant load is less than 10, except Group I, Division 1 Occupancies, or where the occupant load is greater than 10 and it is determined that compliance with Section 1133B.2.3 would create an unreasonable hardship, a projection of ⅝ inch (16 mm) maximum will be permitted for the latch side stop. **2.** In existing buildings, the provisions of this section shall not apply when legal or physical constraints will not allow compliance with these building standards or equivalent facilitation without creating an unreasonable hardship. See	2010 CBC provides **less access** than 2010 ADA.	1) The stated requirements of 410.6 and 1116B.2.6 are the same, except that the former refers to 404.3, which brings in a number of other requirements related to automatic and power-assisted doors/gates, as well as requirements for clear width, maneuvering clearance, thresholds, and doors/gates in series. Most, if not all, of the requirements stated therin are included in CBC Chapter 11B, but they are not specifically referenced in 1116B.2.6. 2) 404.3 references ANSI/BHMA A156.19 (1997 or 2002 edition). 1133B.2.3.3 references the same standard, but it does not cite editions.	1a) State in 1116B.2.6 that the low energy power-operated doors ar gates shall comply with 1133B.2.3.2. 1b) State in 1116B.2.6 that doors and gates shall comply with applicable sections of Section 1133B.2. 1c) Leave 1116B.2.6 as it is. 2a) Modify 1133B.2.3.3 to cite the intended edition(s) of ANSI/BHMA A156.19. 2b) Leave 1133B.2.3.3 as it is.
1140	**410.6 EXCEPTION:** Platform lifts serving two landings maximum and having doors or gates on opposite sides shall be permitted to have self-closing manual doors or gates.		**SECTION 1116B** **ELEVATORS AND PLATFORM (WHEELCHAIR) LIFTS** **1116B.2 Platform (wheelchair) lifts.** Platform (wheelchair) lifts shall comply with this section. **1116B.2.6 Doors and gates.** Lifts shall have low energy power-operated doors or gates. ... **Exception:** Lifts having doors or gates on opposite sides shall be permitted to have manual doors or gates.	2010 CBC provides **less access** than 2010 ADA.	Both standards allow lifts haing two doors/gates on opposite sides to have manual doors/gates instead of low energy power-operated doors/gates, but 410.6 limits this exception to lifts serving a maximum of two landings.	Modify 1116B.2.6 Exception to allow the exception only on lifts that serve two landings.
1141	**CHAPTER 5: GENERAL SITE AND BUILDING ELEMENTS**					
1142	**501 General**		**SECTION 1114B** **FACILITY ACCESSIBILITY** When buildings are required to be accessible, buildings and facilities shall be accessible as provided in this section. **1114B.1 Design and construction.** **1114B.1.1 General.** …	2010 CBC is **equivalent** to 2010 ADA.		

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1143	**501.1 Scope.** The provisions of Chapter 5 shall apply where required by Chapter 2 or where referenced by a requirement in this document.		**SECTION 1101B** **SCOPE** ... **1101B.1 General.** 1. Buildings or facilities or portions of buildings shall be accessible to persons with disabilities as required by this chapter. 2. Departures from particular technical and scoping requirements of this chapter by the use of other designs and technologies are permitted where the alternative designs and technologies used will provide equivalent or greater access to and usability of the building or facility. 3. In determining equivalent facilitation, consideration shall be given to means that provide for the maximum independence of persons with disabilities while presenting the least risk of harm, injury or other hazard to such persons or others. **1101B.2 Design.** The design and construction of accessible building and facility elements shall be in accordance with this chapter. **SECTION 1103B** **BUILDING ACCESSIBILITY** **1103B.1 Scope.** Accessibility to buildings or portions of buildings shall be provided for all occupancy classifications except as modified or enhanced by this chapter. Occupancy requirements in this chapter may modify general requirements, but never to the exclusion of them. When a building or facility contains more than one use, the occupancy specific accessibility provisions for each portion of the building or facility shall apply. **SECTION 1114B** **FACILITY ACCESSIBILITY** When buildings are required to be accessible, buildings and facilities shall be accessible as provided in this section. **1114B.1 Design and construction.** **1114B.1.1 General.** When accessibility is required by this chapter, it shall be designed and constructed to meet the	2010 CBC is **equivalent** to 2010 ADA.	Although not as concisely stated in the CBC, both standards call for parking space, passenger loading zone, stairway, and handrail requirements to apply as stipulated in the various scoping provisions.	
1144	**502 Parking Spaces**		**SECTION 1129B ACCESSIBLE PARKING REQUIRED**	2010 CBC **does not address** 2010 ADA req.	2010 ADA Standards addresses "accessible" parking requirements in scoping Section 208.	
1145	**502.1 General.** Car and van parking spaces shall comply with 502. …		**1129B.1 General**. Each lot or parking structure where parking is provided for the public as clients, guests or employees, shall provide accessible parking as required by this section. …	2010 CBC **does not address** 2010 ADA req.		
1146	**502.1 General.** ... Where parking *spaces* are marked with lines, width measurements of parking spaces and access aisles shall be made from the centerline of the markings.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	1. While CBC Fig. 11B-18A, 11B-18B & 11B-18C illustrate the CBC requirement that accessible parking spaces and access aisles must be measured to the centerline of the lines, the requirement is not included in the text of the CBC. 2. Neither CBC or 2010 ADA Standards address how to measure when a double line is used.	1. If the CBC version is adopted, incorporate the requirement that accessible parking spaces and access aisles shall be measured to the centerline of the lines. 2. Adopt the 2010 ADA Standards version 3. For either option, add language to indicate that when double lines are used to separate adjacent parking spaces, the measurement can be taken from the midpoint of the two lines.
1147	**502.1 EXCEPTION:** Where parking *spaces* or access aisles are not adjacent to another parking *space* or access aisle, measurements shall be permitted to include the full width of the line defining the parking *space* or access aisle.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	The exception is ambiguous as to when this exception applies.	1. If the CBC version is adopted, incorporate the 2010 ADA Standards exception. 2. Adopt the 2010 ADA Standards version. 3 Recommend providing additional explanation or a figure to illustrate when this exception applies.

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1148	**502.2 Vehicle Spaces.** Car parking *spaces* shall be 96 inches (2440 mm) wide minimum and van parking *spaces* shall be 132 inches (3350 mm) wide minimum, shall be marked to define the width, and shall have an adjacent access aisle complying with 502.3.		**1129B.3 Parking space size.** Accessible parking spaces... shall be sized as follows: 1. Dimensions. Where single spaces are provided, they shall be 14 feet (4267 mm) wide and lined to provide a 9-foot (2743 mm) parking area and a 5-foot (1524 mm) loading and unloading access aisle on the passenger side of the vehicle. ... See Figures 11B-18A, 11B-18B and 11B-18C. **2. Van space(s).** One in every eight accessible spaces, but not less than one, shall be served by a loading and unloading access aisle 96 inches (2438 mm) wide minimum placed on the side opposite the driver's side when the vehicle is going forward into the parking space and shall be designated van accessible as required by Section 1129B.4. All such spaces may be grouped on one level of a parking structure. The loading and unloading access aisle shall be marked by a border painted blue. Within the blue border, hatched lines a maximum of 36 inches (914 mm) on center shall be painted a color contrasting with the parking surface, preferably blue or white.	2010 CBC provides **greater access** than 2010 ADA.	Since CBC requires van accessible spaces to be 9 feet wide with an 8 foot wide access aisle the CBC requirements provide greater access than 2010 ADA Standards. Although the CBC does not allow a 132 inch wide van accessible space, the overall required width of a van accessible space and access aisle of 17 feet exceeds the required width per 2010 ADA Standards (132 inch wide space + 60 inch access aisle = 192 inches or 16 feet overall).	1. If the CBC version is adopted, no changes are necessary. 2. If the 2010 ADA Standards version is adopted, increase the required width of van accessible spaces to 9 feet minimum.
1149	**502.2 Vehicle Spaces.** …		CBC does not have an equivalent section.	NA	NA	N/A
1150	**502.2 Vehicle Spaces.** Car parking spaces shall be 96 inches (2440 mm) wide minimum and van parking spaces shall be 132 inches (3350 mm) wide minimum, shall be marked to define the width, and shall have an adjacent access aisle complying with 502.3.		**1. Dimensions.** Where single spaces are provided, they shall be 14 feet (4267 mm) wide and lined to provide a 9-foot (2743 mm) parking area and a 5-foot (1524 mm) loading and unloading access aisle ... **2. Van space(s).** One in every eight accessible spaces, but not less than one, shall be served by a loading and unloading access aisle 96 inches (2438 mm) wide minimum ...	2010 CBC provides **greater access** than 2010 ADA.	CBC requires 9 foot wide accessible spaces while 2010 ADA Standards requires 8 foot wide spaces.	1. If the CBC version is adopted, no changes are necessary. 2. If the 2010 ADA Standards version is adopted, increase the required width of van accessible spaces to 9 feet minimum.
1151	**502.2 EXCEPTION:** Van parking *spaces* shall be permitted to be 96 inches (2440 mm) wide minimum where the access aisle is 96 inches (2440 mm) wide minimum.		CBC does not have an equivalent exception.	2010 CBC provides **greater access** than 2010 ADA.	Since CBC requires van accessible spaces to be 9 feet wide with an 8 foot wide access aisle the CBC requirements provide greater access than 2010 ADA Standards	1. If the CBC version is adopted, no changes are necessary. 2. If the 2010 ADA Standards version is adopted, increase the required width of van accessible spaces to 9 feet minimum.
1152	**502.3 Access Aisle.** Access aisles serving parking *spaces* shall comply with 502.3. Access aisles shall adjoin an *accessible* route. Two parking *spaces* shall be permitted to share a common access aisle.		**1129B.3 Parking space size.** ... **1. Dimensions.** ... When more than one space is provided in lieu of providing a 14-foot-wide (4267 mm) space for each parking space, two spaces can be provided within a 23-foot-wide (7010 mm) area lined to provide a 9-foot (2743 mm) parking area on each side of a 5-foot (1524 mm) loading and unloading access aisle in the center. **3. Arrangement of parking space.** Pedestrian ways which are accessible to persons with disabilities shall be provided from each such parking space to related facilities, including curb cuts or ramps as needed. ... See Figures 11B-18A through 11B-18C.	2010 CBC is **equivalent** to 2010 ADA.	2010 ADA Standards required access aisles to adjoin an accessible route while CBC requires pedestrian ways to be provided from each accessible parking space to related facilities, including curb ramps or ramps as needed.	1. If the CBC version is adopted, no changes are necessary. 2. If the 2010 ADA Standards version is adopted, no changes are necssary.
1153	**Advisory 502.3 Access Aisle.** Accessible routes must connect parking spaces to accessible entrances.		**1129B.3 Parking space size.** ... **3. Arrangement of parking space.** Pedestrian ways which are accessible to persons with disabilities shall be provided from each such parking space to related facilities, including curb cuts or ramps as needed. ... See Figures 11B-18A through 11B-18C.	2010 CBC is **equivalent** to 2010 ADA.	2010 ADA Standards required accessible parking spaces to connect to "accessible entrances" while CBC requires pedestrian ways to be provided from each accessible parking space to "related facilities", including curb ramps or ramps as needed.	1. If the CBC version is adopted, revise the verbiage to read "accessible entrances of related facilities." 2. If the 2010 ADA Standards version is adopted, no changes are necessary.

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1154	**Advisory 502.3 Access Aisle.** ... In parking facilities where the accessible route must cross vehicular traffic lanes, marked crossings enhance pedestrian safety, particularly for people using wheelchairs and other mobility aids. Where possible, it is preferable that the accessible route not pass behind parked vehicles.		**1129B.3 Parking space size.** ... **1. Arrangement of parking space**. ... Also, the space shall be located so a person with a disability is not compelled to wheel or walk behind parking spaces other than that person's own accessible parking space. ... See Figures 11B-18A through 11B-18C.	2010 CBC provides **greater access** than 2010 ADA.	1. Although 2010 ADA Stds. recommends that marked crossings be provided, they are not required. CBC does not contain a requirement or recommendation for marked crossings. 2. While 2010 ADA Stds. only recommends that the accessible route not pass behind other parked vehicles, the CBC prohibits this condition.	1. If the CBC version is adopted, no changes are necessary. 2. If the 2010 ADA Stds. version is adopted, incorporate the requirement that the accessible route cannot pass behind other parked vehicles. 3. Since marked crossings have not been proven to be safe under all conditions, recommend that DSA commission a study to determine if they should be required when an accessible route crosses a vehicular way.
1155	**502.3.1 Width.** Access aisles serving car ... parking *spaces* shall be 60 inches (1525 mm) wide minimum.		**1129B.3 Parking space size.** ... **1. Dimensions.** Where single spaces are provided, they shall ... provide a ... 5-foot (1524 mm) loading and unloading access aisle ... When more than one space is provided in lieu of providing a 14-foot-wide (4267 mm) space for each parking space, two spaces can be provided within a 23-foot-wide (7010 mm) area lined to provide a 9-foot (2743 mm) parking area on each side of a 5-foot (1524 mm) loading and unloading access aisle in the center.	2010 CBC is **equivalent** to 2010 ADA.	No changes are necessary.	No changes are necessary.
1156	**502.3.1 Width.** Access aisles serving ... van parking *spaces* shall be 60 inches (1525 mm) wide minimum.		**1129B.3 Parking space size.** ... **2. Van space(s).** One in every eight accessible spaces, but not less than one, shall be served by a loading and unloading access aisle 96 inches (2438 mm) wide minimum ... See Figures 11B-18A, 11B-18B and 11B-18C.	2010 CBC is **equivalent** to 2010 ADA.	The CBC does not provide the exception that a van accessible space can provide a 60 inch wide access aisle when the van space is 132 inches wide.	1. If the CBC version is adopted, no change is necessary. 2. If the 2010 ADA Stds. version is adopted, the exception that allows a 60 inch wide access aisle at a van accessible space should be revised to allow this condition if the van space is 144 inches wide.
1157	**502.3.1 Width.** Access aisles serving car ... parking *spaces* shall be 60 inches (1525 mm) wide minimum.		**1129B.3 Parking space size....** **1. Dimensions.** Where single spaces are provided, they shall ... provide a ... 5-foot (1524 mm) loading and unloading access aisle ... When more than one space is provided in lieu of providing a 14-foot-wide (4267 mm) space for each parking space, two spaces can be provided within a 23-foot-wide (7010 mm) area lined to provide a 9-foot (2743 mm) parking area on each side of a 5-foot (1524 mm) loading and unloading access aisle in the center.	2010 CBC is **equivalent** to 2010 ADA.	No changes are necessary.	No changes are necessary.
1158	**502.3.2 Length.** Access aisles shall extend the full length of the parking *spaces* they serve.		**1129B.3 Parking space size.** Accessible parking spaces shall be located as near as practical to a primary entrance and shall be sized as follows: 1. Dimensions. Where single spaces are provided, they shall be 14 feet (4267 mm) wide and lined to provide a 9-foot (2743 mm) parking area and a 5-foot (1524 mm) loading and unloading access aisle on the passenger side of the vehicle. When more than one space is provided in lieu of providing a 14-foot-wide (4267 mm) space for each parking space, two spaces can be provided within a 23-foot-wide (7010 mm) area lined to provide a 9-foot (2743 mm) parking area on each side of a 5-foot (1524 mm) loading and unloading access aisle in the center. ... See Figure 11B-18A. The minimum length of each parking space, shall be 18 feet (5486 mm). See Figures 11B-18A, 11B-18B and 11B-18C.	2010 CBC **does not address** 2010 ADA req.	1. The CBC only indicates the required length of the accessible parking space, not the access aisle. 2. CBC Figures 11B-18A, 11B-18B & 11B-18C all show the length of the access aisle to be 18 feet but that requirement is not included in the text.	1. If the CBC version is adopted, include the requirement that access aisles must be 18 feet long minimum. 2. Adopt the 2010 ADA Stds. version. Will stating the length of the parking space to be 18 feet conflict with any local zoning codes in California?

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1159	**502.3.3 Marking.** Access aisles shall be marked so as to discourage parking in them.		**1129B.3 Parking space size.** ...The words "NO PARKING" shall be painted on the ground within each 5-foot (1524 mm) loading and unloading access aisle. This notice shall be painted in white letters no less than 12 inches (305 mm) high and located so that it is visible to traffic enforcement officials. **2. Van space(s)** The words "NO PARKING" shall be painted on the ground within each 8-foot (2438 mm) loading and unloading access aisle. This notice shall be painted in white letters no less than 12 inches (305 mm) high and located so that it is visible to traffic enforcement officials. See Figures 11B-18A, 11B-18B and 11B-18C.	2010 CBC is **equivalent** to 2010 ADA.	2010 ADA Stds. provides no guidance on how to discourage parking in access aisles. CBC requires the words "No Parking" in 12" high letters within the access aisle.	1. If the CBC version is adopted, no change is necessary. 2. If the 2010 ADA Stds. version is adopted, incorporate the verbiage from the CBC requiring the words "No Parking" in 12" high white letters within the access aisle.
1159.1	**502.3.3 Marking**. Access aisles shall be marked so as to discourage parking in them.		**1129B.3 Parking space size.** ... The words "NO PARKING" shall be painted on the ground within each 5-foot (1524 mm) loading and unloading access aisle. This notice shall be painted in white letters no less than 12 inches (305 mm) high and located so that it is visible to traffic enforce-ment officials. See Figures 11B-18A, 11B-18B and 11B-18.		The access aisle markings in California appear to be quite successful.	Retain specific language for access sisle markings.
1160	**Advisory 502.3.3 Marking.** The method and color of marking are not specified by these requirements but may be addressed by State or local laws or regulations. Because these requirements permit the van access aisle to be as wide as a parking space, it is important that the aisle be clearly marked.		**1129B.3 Parking space size.** ... The words "NO PARKING" shall be painted on the ground within each 5-foot (1524 mm) loading and unloading access aisle. This notice shall be painted in white letters no less than 12 inches (305 mm) high and located so that it is visible to traffic enforcement officials. **2. Van space(s)** The words "NO PARKING" shall be painted on the ground within each 8-foot (2438 mm) loading and unloading access aisle. This notice shall be painted in white letters no less than 12 inches (305 mm) high and located so that it is visible to traffic enforcement officials. See Figures 11B-18A, 11B-18B and 11B-18C.	2010 CBC provides **greater access** than 2010 ADA.	2010 ADA Stds. provides no guidance on how to discourage parking in access aisles and defers to State codes such as the CBC for specifics. CBC requires the words "No Parking" in 12" high letters within the access aisle. As the advisory points out, van accessible access aisles are wide enough to accommodate a vehicle and must be marked in an obvious manner to discourage vehicles from parking within this area.	D
1160.1	**Advisory 502.3.3 Marking.** The method and color of marking are not specified by these requirements but may be addressed by State or local laws or regulations. Because these requirements permit the van access aisle to be as wide as a parking space, it is important that the aisle be clearly marked.		**2. Van space(s).** ...The words "NO PARKING" shall be painted on the ground within each 8-foot (2438 mm) loading and unloading access aisle. This notice shall be access aisle 96 inches (2438 mm) wide minimum placed on the side opposite the driver's side when the vehicle is going forward into the parking space and shall be designated van accessible as required by Section 1129B.4. . . .			
1161	**502.3.4 Location.** Access aisles shall not overlap the *vehicular way*. …		CBC does not have an equivalent requirement..	2010 CBC **does not address** 2010 ADA req.	By virtue of this requirement the 2010 ADA Stds. does not consider an access aisle part of the vehicular way since an access aisle cannot overlap the vehicular way. If the CBC requirement to provide a 36 inch wide band of truncated domes where a pedestrian way abouts a vehicular way and is not separated by a curb is maintained, then a definition / clarification of where a vehicular way occurs should be provided.	1. If the CBC version is adopted, incorpoarate the 2010 ADA Stds. requirement that access aisles shall not overlap the vehicular way. 2. Adopt the 2010 ADA Stds. version.

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1162	**502.3.4 Location.** ... Access aisles shall be permitted to be placed on either side of the parking *space* except for angled van parking *spaces* which shall have access aisles located on the passenger side of the parking *spaces*.		**1129B.3 Parking space size.** 1. Dimensions. Where single spaces are provided, they shall ... provide ... a 5-foot (1524 mm) loading and unloading access aisle on the passenger side of the vehicle. ... **2. Van space(s).** One in every eight accessible spaces, but not less than one, shall be served by a loading and unloading access aisle 96 inches (2438 mm) wide minimum placed on the side opposite the driver's side when the vehicle is going forward into the parking space and shall be designated van accessible as required by Section 1129B.4. See Figures 11B-18A, 11B-18B and11B-18C.	2010 CBC **does not address** 2010 ADA req.	CBC requires access aisles to be on the "passenger side of the vehicle" for standard spaces and on the "side opposite the driver's side" for van accessible spaces. 2010 ADA Stds. allows the access aisle to be on either side of the parking space except for angled parking spaces. The CBC makes no distinction of requirements at angled parking spaces.	1. If the CBC version is adopted, add the 2010 ADA Stds. requirement that the access aisle can be located on either side of the parking space except for angled parking. 2. Adopt the 2010 ADA Stds. version.
1163	**Advisory 502.3.4 Location.** Wheelchair lifts typically are installed on the passenger side of vans. Many drivers, especially those who operate vans, find it more difficult to back into parking spaces than to back out into comparatively unrestricted vehicular lanes. For this reason, where a van and car share an access aisle, consider locating the van space so that the access aisle is on the passenger side of the van space.		**1129B.3 Parking space size.** 1. Dimensions. Where single spaces are provided, they shall ... provide ... a 5-foot (1524 mm) loading and unloading access aisle on the passenger side of the vehicle. ... **2. Van space(s).** One in every eight accessible spaces, but not less than one, shall be served by a loading and unloading access aisle 96 inches (2438 mm) wide minimum placed on the side opposite the driver's side when the vehicle is going forward into the parking space and shall be designated van accessible as required by Section 1129B.4. See Figures 11B-18A, 11B-18B and11B-18C.		CBC requires access aisles to be on the "passenger side of the vehicle" for standard spaces and on the "side opposite the driver's side" for van accessible spaces. 2010 ADA Stds. allows the access aisle to be on either side of the parking space except for angled parking spaces. The CBC makes no distinction of requirements at angled parking spaces.	N/A
1164	**502.4 Floor or Ground Surfaces.** Parking *spaces* and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the parking *spaces* they serve. Changes in level are not permitted.		CBC does not have an equivalent requirement..	2010 CBC **does not address** 2010 ADA req.	CBC does not provide requirements for accessible parking spaces and access aisles similar to 2010 ADA Stds. that they be firm, stable and slip-resistant and not contain openings wider than 1/2".	1. If the CBC version is adopted, incorporate the 2010 ADA Stds. requirements for firm, stable and slip-resistant, not contain openings wider than 1/2" and be at the same level as the parking space. 2. Adopt the 2010 ADA Stds. version.
1165	**502.4 EXCEPTION:** Slopes not steeper than 1:48 shall be permitted.		**1129B.3 Parking space size.** ... **4. Slope of parking space and access aisle.** Surface slopes of accessible parking spaces and access aisles shall be the minimum possible and shall not exceed one unit vertical in 50 units horizontal (2-percent slope) in any direction.	2010 CBC provides **greater access** than 2010 ADA.	CBC requires that accessible parking spaces and access aisles not exceed 1:50 slope while 2010 ADA Stds. allows up to 1:48 maximum slope.	1. If the CBC version is adopted, no change is necessary. 2. If the 2010 ADA Stds. version is adopted, incorporate the CBC requirement that slopes not exceed 1:50 within accessible parking spaces and access aisles. Given that these standards are for an object to be built, shouldn't the 1:48 standard be recommended, as the small difference between them really doesn't result in increased accessibility but is more useful for the maker/contractor when he attempts his layout in the field?
1166	**Advisory 502.4 Floor or Ground Surfaces.** Access aisles are required to be nearly level in all directions to provide a surface for wheelchair transfer to and from vehicles. The exception allows sufficient slope for drainage. Built-up curb ramps are not permitted to project into access aisles and parking spaces because they would create slopes greater than 1:48.		**1129B.3 Parking space size.** ... **4. Slope of parking space and access aisle.** Surface slopes of accessible parking spaces and access aisles shall be the minimum possible and shall not exceed one unit vertical in 50 units horizontal (2-percent slope) in any direction.		CBC requires that accessible parking spaces and access aisles not exceed 1:50 slope while 2010 ADA Stds. allows up to 1:48 maximum slope.	1. If the CBC version is adopted, no change is necessary. 2. If the 2010 ADA Stds. version is adopted, incorporate the CBC requirement that slopes not exceed 1:50 within accessible parking spaces and access aisles. See above.
1167	**502.5 Vertical Clearance.** Parking *spaces* for vans and access aisles and vehicular routes serving them shall provide a vertical clearance of 98 inches (2490 mm) minimum.		**1129B.3 Parking space size.** ... **5. Vertic clearance.** Provide minimum vertical clearance of 98 inches (2489 mm) at accessible parking spaces and along at least one vehicle access route to such spaces from site entrances and exits.	2010 CBC provides **greater access** than 2010 ADA.	CBC requires 98 inch clear height for all accessible parking spaces and access aisles, not just van accessible spaces. CBC also However, 2010 ADA Stds. requires 98 inch clear along ALL vehicular routes serving these spaces whereas the CBC requires the vertical clearance at only one access route.	**This requirement could effectively determine the upper story heights of parking garages throughout the state! Please verify.**
1168	**Advisory 502.5 Vertical Clearance.** Signs provided at entrances to parking facilities informing drivers of clearances and the location of van accessible parking spaces can provide useful customer assistance.		CBC does not have an equivalent requirement..	2010 CBC **does not address** 2010 ADA req.		1. If the CBC version is adopted, incorprate the 2010 ADA Stds. advisory within the text of the code. 2. Adopt the 2010 ADA Stds. version.

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1169	**502.6 Identification.** Parking *space* identification signs shall include the International Symbol of *Accessibility* complying with 703.7.2.1. Signs identifying van parking *spaces* shall contain the designation “van accessible.” …		**1129B.4 Identification of parking spaces for off-street parking facilities.** Van accessible spaces complying with Section 1129B.3, Item 2 shall have an additional sign or additional language stating “Van Accessible” below the symbol of accessibility. Signs identifying accessible parking spaces shall be located so they cannot be obscured by a vehicle parked in the space. In addition to the above requirements, the surface of each accessible parking space or stall shall have a surface identification duplicating either of the following schemes: 2. By outlining a profile view of a wheelchair with occupant in white on blue background. The profile view shall be located so that it is visible to a traffic enforcement officer when a vehicle is properly parked in the space and shall be 36 inches high by 36 inches wide (914 mm by 914 mm). See Figures 11B-18A through 11B-18C.	2010 CBC provides **greater access** than 2010 ADA.	CBC requires that the ISA be located so that it is visible to a traffic enforcement officer whereas 2010 ADA Stds. does not. CBC also indicates that the ISA must be 36" square whereas 2010 ADA Stds. does not inlcude a minimum size.	1. If the CBC version is adopted, no change is necessary. 2. If the 2010 ADA Stds. version is adopted, incorporate the requirement that the ISA be visible to a traffic enforcement officer and that the ISA be 36" square minimum.
1170	**502.6 Identification.** ... Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.		**1129B.4 Identification of parking spaces for off-street parking facilities.** Each parking space reserved for persons with disabilities shall be identified by a reflectorized sign permanently posted immediately adjacent to and visible from each stall or space, consisting of the International Symbol of Accessibility in white on a dark blue background. The sign... when in a path of travel, shall be posted at a minimum height of 80 inches (2032 mm) from the bottom of the sign to the parking space finished grade. Signs may also be centered on the wall at the interior end of the parking space. ...	2010 CBC **does not address** 2010 ADA req.	1. CBC only requires a minimum height to the bottom of the sign if it in a path of travel and that the sign be visible from each stall or space. 2. CBC Section 1133B.8.6 already addresses protruding objects in a path of travel so there is no need to duplicate the requirement under the parking signage requirement.	1. If the CBC version is adopted, incorporate the 2010 ADA Stds. requirement that the bottom of the sign be 60" minimum above the finish floor or ground surface regardless of whether the sign is in a path of travel. 2. Adopt the 2010 ADA Stds. version.
1170.2	Signs identifying van parking spaces shall contain the designation "van accessible."		Van accessible spaces complying with Section 1129B.3, Item 2 shall have an additional sign or additional language stating “Van Accessible” below the symbol of accessibility. Signs identifying acces-sible parking spaces shall be located so they can-not be obscured by a vehicle parked in the space.		It would be good to get the DOT to coordinate with DSA and Title 24 so we would not have two sets of rules for van accessible signs. The DSA signs are much more practical. Using up to three separate pieces for parking signs just makes them flimsy and more expensive.	
1170.3			An additional sign shall also be posted in a conspicuous place at each entrance to off-street parking facilities, or immediately adjacent to and visible from each acces-sible stall or space. The sign shall not be less than 17 inches by 22 inches (432 mm by 559 mm) in size with 1 inch (25 mm) high minimum lettering which clearly and conspicuously states the following: “Unauthorized vehicles parked in desig-nated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner’s expense. Towed vehicles may be reclaimed at _____ or by telephoning _____. Blank spaces are to be filled in with appropriate information as a permanent part of the sign.		In this case, DSA should mandate the color scheme of the DOT towaway sign. The blue and white sign is misleading, and may lead people to think that it is not for the general public to read.	Add requirement for black text on white sign as per DOT drawing.
1171	**Advisory 502.6 Identification.** The required “van accessible” designation is intended to be informative, not restrictive, in identifying those spaces that are better suited for van use. Enforcement of motor vehicle laws, including parking privileges, is a local matter.		**1129B.4 Identification of parking spaces for off-street parking facilities.** Van accessible spaces complying with Section 1129B.3, Item 2 shall have an additional sign or additional language stating “Van Accessible” below the symbol of accessibility. ...		As the 2010 ADA Stds. Advisory points out, the "Van Accessible" sign does not restrict the use of such a space to only vans. Any vehicle displaying the required placard or license plate is permitted to park in the space.	N/A

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1172	**502.7 Relationship to Accessible Routes.** Parking *spaces* and access aisles shall be designed so that cars and vans, when parked, cannot obstruct the required clear width of adjacent *accessible* routes.		**1129B.3 Parking space size.** Accessible parking spaces shall be located as near as practical to a primary entrance and shall be sized as follows: **3. Arrangement of parking space**. In each parking area, a bumper or curb shall be provided if required to prevent encroachment of cars over the required width of walkways.	2010 CBC provides **less access** than 2010 ADA.	1. CBC refers to required width of "walkways" while 2010 ADA Stds. refers to "adjacent accessible routes". Since accessible routes can include ramps, curb ramps and walks the 2010 ADA Stds. language appears more encompassing.	1. If the CBC version is adopted, revise "walkways" to "adjacent accessible routes." 2. Adopt the 2010 ADA Stds. version.
1173	**Advisory 502.7 Relationship to Accessible Routes.** Wheel stops are an effective way to prevent vehicle overhangs from reducing the clear width of accessible routes.					
1174	**503 Passenger Loading Zones**		**SECTION 1131B** **PASSENGER DROP-OFF AND LOADING ZONES**	2010 CBC is **equivalent** to 2010 ADA.		
1175	**503.1 General.** Passenger loading zones shall comply with 503.		**SECTION 1131B** **PASSENGER DROP-OFF AND LOADING ZONES** **1131B.1 Location.** When provided, passenger drop-off and loading zones shall ... comply with 1131B.2. **…**	2010 CBC is **equivalent** to 2010 ADA.		
1176	**503.2 Vehicle Pull-Up Space.** Passenger loading zones shall provide a vehicular pull-up *space* 96 inches (2440 mm) wide minimum and 20 feet (6100 mm) long minimum.		**1131B.2 Passenger loading zones.** **1. General.** Where provided, one passenger drop-off and loading zone shall provide an access aisle ... adjacent and parallel to the vehicle pull-up space. …		1131B.2 #1 acknowledges the pressence of a vehicle pull-up space, but it does not specify its size. The absence of a specified size does not necessarily mean that the CBC is less strict, or that it provides less access, but from a practical point of view, it would be very helpful if it did. This is especially true given that 1131B.2 #1 requires the vehicle standing space (and access aisle) to slope no more than 2%. Without a specified minimum size for the vehicle standing space, it is not possible to determine whether or not this requirement has been met. Figure 11B-24 is provided, but it is not referenced anywhere in the text of 1131B.2.	1) Specify a minimum size for the vehicle pull-up/standing space.
1177	**503.2 Vehicle Pull-Up Space.** Passenger loading zones shall provide a vehicular pull-up *space* 96 inches (2440 mm) wide minimum and 20 feet (6100 mm) long minimum.		**1131B.2 Passenger loading zones.** **1. General.** Where provided, one passenger drop-off and loading zone shall provide an access aisle ... adjacent and parallel to the vehicle pull-up space. ...	2010 CBC is **equivalent** to 2010 ADA.	1131B.2 #1 (and 4.6.6) state that access aisles must be adjacent and parallel to the vehicle pull-up space. 503 says that the access aisle must be adjacent to (503.3), and extend for the full length of (503.3.2) the passenger pull up space. There is no difference in result between these statements. 1) Except that "parallel" assumes that spaces are rectangular. If the vehicle pull-up space is curved, by definition it is not possible for the access aisle to be parallel to it. It may be concentric, but it cannot be parallel. Nothing in the text of the standards that prevents PLZs from being curved.	1) Adopt the 2010 ADA Stds. Language regarding the relationship between the vehicle pull-up space and its access aisle.
1178	**503.3 Access Aisle.** Passenger loading zones shall provide access aisles complying with 503 adjacent to the vehicle pull-up *space*. Access aisles shall adjoin an *accessible* route and shall not overlap the *vehicular way*.		**1131B.1 Location.** When provided, passenger drop-off and loading zones shall be located on an accessible route of travel (complying with Section 1114B.1.2) and shall comply with 1131B.2. **1131B.2 Passenger loading zones.** **1. General.** Where provided, one passenger drop-off and loading zone shall provide an access aisle ... adjacent and parallel to the vehicle pull-up space. ...	2010 CBC provides **greater access** than 2010 ADA.	503.3 clarifies that access aisles shall not overlap the vehicular way. This seems obvious since it is the passenger loading zone one might assume that it would be on the passenger side of the vehicle, but assumptions can prove false. To ensure that there is no conflict, it might be better if the text stated that access aisels shall not overlap a vehicular way.	1) Modify 1131B.2 #1 to include language that clarifies that access aisles may not overlap a vehicular way.

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1178.1	**503.3 Access Aisle**. Passenger loading zones shall provide access aisles complying with 503 adjacent to the vehicle pull-up space. Access aisles shall adjoin an accessible route and shall not overlap the vehicular way. _____**503.3.3 Marking**. Access aisles shall be marked so as to discourage parking in them.		**1131B.2 Passenger loading zones.** 1. General. . . .Each passenger drop-off and loading zone designed for persons with disabilities shall be identified by a reflectorized sign, complying with Section 1117B.5.1 Items 2 and 3, permanently posted immediately adjacent to and visible from the passenger drop-off or loading zone stating "Passenger Loading Zone Only" and including the International Symbol of Accessibility, in white on dark blue background.		ADA has dropped the sign requirement. Suggest we retain requirement.	Retain this language in Title 24.
1179	**503.3.1 Width.** Access aisles serving vehicle pull-up *spaces* shall be 60 inches (1525 mm) wide minimum.		**1131B.2 Passenger loading zones.** **1. General.** Where provided, one passenger drop-off and loading zone shall provide an access aisle at least 60 inches (1524 mm) wide …	2010 CBC is **equivalent** to 2010 ADA.		
1180	**503.3.2 Length.** Access aisles shall extend the full length of the vehicle pull-up *spaces* they serve.		**1131B.2 Passenger loading zones.** **1. General.** Where provided, one passenger drop-off and loading zone shall provide an access aisle at least ... 20 feet (6096 mm) long …	2010 CBC is **equivalent** to 2010 ADA.	503 starts with the vehicle pull-up space (503.2) - calling for it to be a minimum of (96" wide and) 20' long, and calling for the access aisle to extend for its full length. 1131B.2 #1 starts with the access aisle - calling for it to be a minimum of (60" wide and) 20' long, and calling for it to be adjacent and parallel to the vehicle pull-up space of unspecified length. 503 is written so that the access aisle must be at least 20' long; 1131B.2 #1 states that the access aisle must be at least 20' long. In this regard, they are equivalent.	
1181	**503.3.3 Marking.** Access aisles shall be marked so as to discourage parking in them.		**1131B.2 Passenger loading zones.** **1. General.** ... Each passenger drop-off and loading zone designed for persons with disabilities shall be identified by a reflectorized sign, complying with Section 1117B.5.1 Items 2 and 3, permanently posted immediately adjacent to and visible from the passenger drop-off or loading zone stating "Passenger Loading Zone Only" and including the International Symbol of Accessibility, in white on dark blue background.	Which Std.provides greater access **depends** on circumstances.	Although not explicitly stated, 503.3.3 appears to call for pavement markings to discourage parking in access aisles, as opposed to a sign; 1131B.2 #1 calls for a sign. Whether one type of "marking" provides greater access than the other is dependent on the effectiveness of the device, and that is difficult to determine. Providing both could be beneficial, but that may be something that should be decided on a facility-by-facility basis. Too much marking and signage, especially at a building's entrance, can be esthetically displeasing.	1) Modify 1131B.2 #1 to include language that calling for surface makings in addition to the sign. 2) Modify 1131B.2 #1 to call for surface markings only. 3) Adopt the 503.3.3 language, and leave it up to each facility to determine the best way to mark the PLZs and access aisles. 4) Leave 1131B.2 #1 as-is.
1182	**503.4 Floor and Ground Surfaces.** Vehicle pull-up *spaces* and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the vehicle pull-up *space* they serve. Changes in level are not permitted.		**...** **1131B.2 Passenger loading zones.** **1. General.** ...Vehicle standing spaces and access aisles shall be level with surface slopes not exceeding one unit vertical in 50 units horizontal (2-percent slope) in all directions. If there are curbs between the access aisle and the vehicle pull-up space, a curb ramp shall be provided. ...	2010 CBC provides **less access** than 2010 ADA.	1111B.2 #1 calls for access aisles and vehicle standing spaces to be level (slope </= 2%), but it does not explicitly say that the two must be level with each other. The rather confusing statement regarding curbs between access aisles and vehicle pull-up spaces appears to inidicate that 1131B.2 #1 does not require the two to be level with each other.	1) Modify 1131B.2 #1 to include language requiring access aisles and vehicle standing/pull-up spaces to be level with each other. Remove the statement regarding curbs between the two.
1183	**503.4 Floor and Ground Surfaces.** Vehicle pull-up *spaces* and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the vehicle pull-up *space* they serve. Changes in level are not permitted.	**UNDER REVIEW** **ACC note:** Comment b) in Column N is incorrect. 503.4 Exception addresses slope. One may say that the conclusion is correct - that 1991's 1:50 is more stringent than 2010"s 1:48, but it is not correct to say that 503.4 does not speak to slope. This line should be removed. The discussion about slope should take place at 503.4 Exception.	**SECTION 1131B** **PASSENGER DROP-OFF AND LOADING ZONES** **...** **1131B.2 Passenger loading zones.** **1. General.** ... Vehicle standing spaces and access aisles shall be level with surface slopes not exceeding one unit vertical in 50 units horizontal (2-percent slope) in all directions. ...	2010 CBC provides **greater access** than 2010 ADA.	Surface slopes are mentioned in 503.4 Exception, which allows for slopes no steeper than 1:48 (2.08%, 1/4" per foot). 1131B.2 #1 calls for cross slopes no steeper than 1:50 (2%). One could argue that the CBC language is more restrictive, and therefore provides greater access, but the difference in the two standards is quite minor. The ADA requirement recognizes that elements are commonly constructed in terms of inches, not percentages, and it allows for cross slopes of up to 1/4" per foot. While it is perhaps less restrictive, 1:48 recognizes and allows for common construction industry practice without significantly impacting accessibility.	1) Maintain the current language of 1131B.2 #1, which calls for maximum cross slopes of 1:50. 2) Modify 1131B.2 #1 to agree with 503.4 Exception by calling for maximum cross slopes of 1:48.

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1184	**503.4 EXCEPTION:** Slopes not steeper than 1:48 shall be permitted.		**1131B.2 Passenger loading zones.** **1. General.** ... Vehicle standing spaces and access aisles shall be level with surface slopes not exceeding one unit vertical in 50 units horizontal (2-percent slope) in all directions. …	2010 CBC provides **greater access** than 2010 ADA.	Surface slopes are mentioned in 503.4 Exception, which allows for slopes no steeper than 1:48 (2.08%, 1/4" per foot). 1131B.2 #1 calls for cross slopes no steeper than 1:50 (2%). One could argue that the CBC language is more restrictive, and therefore provides greater access, but the difference in the two standards is quite minor. The ADA requirement recognizes that elements are commonly constructed in terms of inches, not percentages, and it allows for cross slopes of up to 1/4" per foot. While it is perhaps less restrictive, 1:48 recognizes and allows for common construction industry practice without significantly impacting accessibility.	1) Maintain the current language of 1131B.2 #1, which calls for maximum cross slopes of 1:50. 2) Modify 1131B.2 #1 to agree with 503.4 Exception by calling for maximum cross slopes of 1:48.
1185	**503.5 Vertical Clearance.** Vehicle pull-up *spaces* , access aisles serving them, and a vehicular route from an *entrance* to the passenger loading zone, and from the passenger loading zone to a vehicular exit shall provide a vertical clearance of 114 inches (2895 mm) minimum.		**1131B.2 Passenger loading zones.** **2. Vertical clearance.** Provide minimum vertical clearance of 114 inches (2896 mm) at accessible passenger loading zones and along at least one vehicle access route to such areas from site entrances and exits.	2010 CBC is **equivalent** to 2010 ADA.		
1186	**504 Stairways**		**1133B.4 Stairways**	NA	Just a Section Heading	
1187	**504.1 General.** Stairs shall comply with 504.		**1133B.4 Stairways**	NA	Just a Section Heading	
1188	**504.2 Treads and Risers.** All steps on a flight of stairs shall have uniform riser heights and uniform tread depths. …		**1133B.4.5 Stair treads, risers and nosing.** ... On any given flight of stairs, all steps shall have uniform riser height and uniform tread widths.	2010 CBC is **equivalent** to 2010 ADA.		
1189	**504.2 Treads and Risers.** ... Risers shall be 4 inches (100 mm) high minimum and 7 inches (180 mm) high maximum. …		**1133B.4.5 Stair treads, risers and nosing.** .... Stair riser heights shall be 7 inches maximum and 4 inches minimum. …	2010 CBC is **equivalent** to 2010 ADA.		
1190	**504.2 Treads and Risers.** ... Treads shall be 11 inches (280 mm) deep minimum.		**1133B.4.5 Stair treads, risers and nosing**. Stair treads shall be no less than 11 inches deep, measured from riser to riser. …	2010 CBC is **equivalent** to 2010 ADA.		
1191	**504.3 Open Risers.** Open risers are not permitted.		**1133B.4.5.2 Risers.** ... Open risers are not permitted.	2010 CBC is **equivalent** to 2010 ADA.	Same language	
1192	**504.4 Tread Surface.** Stair treads shall comply with 302. Changes in level are not permitted.		No equivalent	2010 CBC provides **less access** than 2010 ADA.	The ADA provides a greater level of access by ensuring that treads are at the same level.	ADA Language from section 504.4 should be added to the CBC
1193	**504.4 EXCEPTION:** Treads shall be permitted to have a slope not steeper than 1:48.		No equivalent	2010 CBC provides **less access** than 2010 ADA.	There is no language in the CBC that specifies slope in for stair treads.	ADA Language from section 504.4 exception should be added to the CBC
1194	**Advisory 504.4 Tread Surface.** Consider providing visual contrast on tread nosings, or at the leading edges of treads without nosings, so that stair treads are more visible for people with low vision.		**1133B.4.4 Striping for the visually impaired.** Interior stairs shall have the upper approach and lower tread marked by a stripe providing clear visual contrast. Exterior stairs shall have the upper approach and all treads marked by a stripe providing clear visual contrast. The stripe shall be a minimum of 2 inches wide to a maximum of 4 inches wide placed parallel to, and not more than 1 inch from, the nose of the step or upper approach. The stripe shall extend the full width of the step or upper approach and shall be of a material that is at least as slip resistant as the other treads of the stair. A painted stripe shall be acceptable.	2010 CBC provides **greater access** than 2010 ADA.	The CBC requires striping on the nose of treads	
1195	**504.5 Nosings.** The radius of curvature at the leading edge of the tread shall be ½ inch (13 mm) maximum. Nosings that project beyond risers shall have the underside of the leading edge curved or beveled. Risers shall be permitted to slope under the tread at an angle of 30 degrees maximum from vertical. The permitted projection of the nosing shall extend 1½ inches (38 mm) maximum over the tread below.		**1133B.4.5.3 Nosing.** The radius of curvature at the leading edge (nosing) of the tread shall be no greater than ½ inch. …	2010 CBC is **equivalent** to 2010 ADA.		

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1195.1	**504.5 Nosings.** ... Nosings that project beyond risers shall have the underside of the leading edge curved or beveled. …		**1133B.4.5.3 Nosing.** ... Beveling of nosings shall not exceed ½ inch. …	Which Std.provides greater access **depends** on circumstances.	CBC allow a 1/2 inch bevel whereas the ADA does not. It is unclear if this option is equivalent to a curved nosing as required in the ADA	Remove the option for a beveled nosing to be consistent with ADA
1195.2	**504.5 Nosings.** ... Risers shall be permitted to slope under the tread at an angle of 30 degrees maximum from vertical. …		**1133B.4.5.3 Nosing.** ... Nosings that project beyond risers shall have the underside of the leading edge beveled at an angle not more than 30 degrees from the vertical …	2010 CBC provides **greater access** than 2010 ADA.	CBC requires nosings that project beyond the riser to be beveled at 30 degrees whereas the ADA only "permits" it	
1195.3	**504.5 Nosings.** ... The permitted projection of the nosing shall extend 1½ inches (38 mm) maximum over the tread below.		**1133B.4.5.3 Nosing.** ... Nosings shall not project more than 1¼ inches past the face of the riser below. …	2010 CBC provides **greater access** than 2010 ADA.	The CBC limits the projection of nosings to 11/4 inches whereas the ADA allows 11/2 inches.	
1196	**504.6 Handrails.** Stairs shall have handrails complying with 505.		See section 505 for comparison			
1197	**504.7 Wet Conditions.** Stair treads and landings subject to wet conditions shall be designed to prevent the accumulation of water.		**1133B.4.5.1 Treads**. ... Weather-exposed stairs and their approaches shall be designed so that water will not accumulate on the walking surfaces. …	2010 CBC provides **less access** than 2010 ADA.	CBC limits water accumulation to exterior stairs and the ADA applies to any stair that may accumulate water such as stairs leading to indoor pools or spas, and shower rooms.	Remove the term "weather-exposed" from the section.
1198	**505 Handrails**		**1009.12 Handrails; 1012 Handrails; 1028.13 Handrails; 1133B.4.1 Handrails; 1133B.5.5 Handrails for ramps.**	2010 CBC is **equivalent** to 2010 ADA.	Section Headings	**General recommendation:** Put all handrail requirements that are the same for stairs in ramps in one section. Only include specific additional requirements in the ramp and stair sections for handrails.
1199	**505.1 General.** Handrails provided along walking surfaces complying with 403, required at *ramps* complying with 405, and required at stairs complying with 504 shall comply with 505.		**1009.12 Handrails; 1012 handrails; 1028.13 Handrails; 1133B.4.1 Handrails; 1133B.5.5 Handrails for ramps.**	2010 CBC is **equivalent** to 2010 ADA.	Section Headings	
1200	**Advisory 505.1 General.** Handrails are required on ramp runs with a rise greater than 6 inches (150 mm) (see 405.8) and on certain stairways (see 504). Handrails are not required on walking surfaces with running slopes less than 1:20. However, handrails are required to comply with 505 when they are provided on walking surfaces with running slopes less than 1:20 (see 403.6). Sections 505.2, 505.3, and 505.10 do not apply to handrails provided on walking surfaces with running slopes less than 1:20 as these sections only reference requirements for ramps and stairs.		Advisory is not part of the regulations	NA		
1201	**505.2 Where Required.** Handrails shall be provided on both sides of stairs		**1009.12 Handrails.** ... 2. Stairways within dwelling units, ... are permitted to have a handrail on one side only. …	2010 CBC provides **less access** than 2010 ADA.	CBC allow dwelling units to have handrails on one side only. This would require a change in 11A because 11B does not deal with dwellings unless they are publically funded which refers you to 11A	Require handrails on both sides of stairs in dwelling units.
1202	**505.2 Where Required.** Handrails shall be provided on both sides of ... *ramps* .		**1009.12 Handrails**. ... 4. In Group R-3 occupancies, a continuous run of treads or flight of stairs with less than four risers does not require handrails. …	2010 CBC provides **less access** than 2010 ADA.	CBC allow dwelling units with less than four risers not to have handrails. This would require a change in 11A because 11B does not deal with dwellings unless they are publically funded which refers you to 11A	Handrails should be required on all stairways
1203	**505.2 EXCEPTION:** In *assembly areas* , handrails shall not be required on both sides of aisle *ramps* where a handrail is provided at either side or within the aisle width.		**1133B.5.5 Handrails for ramps.** **1133B.5.5.1** ... Exceptions: 1. Handrails at ramps immediately adjacent to fixed seating in assembly areas are not required.	2010 CBC provides **greater access** than 2010 ADA.	Only one handrail is required for assembly areas per the ADA whereas the CBC only exempts assembly areas with **fixed seating** from having any handrails in section 1133B.5.5. (see also the exception 505.3) **Note:** Section 1028.13 exempts handrails in assembly areas where the ramp is no greater than 1:8 with fixed seating on both sides.	Modify the CBC to include the language in the exception to 505.2 in the ADA

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1204	**505.3 Continuity.** Handrails shall be continuous within the full length of each stair flight .... Inside handrails on switchback or dogleg stairs ...*s* shall be continuous between flights …		**1133B.4.2.2** ... 1. In new construction, the inside handrail on switchback or dogleg stairs shall always be continuous. …	2010 CBC is **equivalent** to 2010 ADA.	Similar language	
1205	**505.3 Continuity.** Handrails shall be continuous within the full length of each stair flight .... Inside handrails on switchback or dogleg stairs ... shall be continuous between flights …		**1133B.4.1.1 Required handrails**. ... Handrails shall be continuous along both sides of a stairway. …	2010 CBC is **equivalent** to 2010 ADA.	Similar language	
1206	**505.3 Continuity.** Handrails shall be continuous within the full length of each ... *ramp* run. Inside handrails on switchback or dogleg ... *ramps* shall be continuous between... runs.		**1133B.5.5.1** ... Handrails ... shall be continuous the full length of the ramp, …	2010 CBC is **equivalent** to 2010 ADA.	Similar language	
1206.1	**505.3 Continuity.** ... Inside handrails on switchback or dogleg ... *ramps* shall be continuous between... runs.		**1133B.5.5.1** ... The inside handrail on switchback or dogleg ramps shall always be continuous ...	2010 CBC is **equivalent** to 2010 ADA.	Similar language	
1207	**505.3 EXCEPTION:** In *assembly areas* , handrails on *ramps* shall not be required to be continuous in aisles serving seating.		**1133B.5.5 Handrails for ramps.** **1133B.5.5.1** ... Exceptions: 1. Handrails at ramps immediately adjacent to fixed seating in assembly areas are not required.	2010 CBC is **equivalent** to 2010 ADA.		
1208	**505.4 Height.** Top of gripping surfaces of handrails shall be 34 inches (865 mm) minimum and 38 inches (965 mm) maximum vertically above... stair nosings,... Handrails shall be at a consistent height above ... stair nosings, …		No equivalent section in the CBC	2010 CBC provides **less access** than 2010 ADA.	Walking surfaces do not require handrails in the CBC	Add the Exception to section 505.6 to the new general section in 1133B Handrails
1209	**505.4 Height.** Top of gripping surfaces of handrails shall be 34 inches (865 mm) minimum and 38 inches (965 mm) maximum vertically above ... *ramp* surfaces. Handrails shall be at a consistent height above ... *ramp* surfaces.		**1133B.4.2.1** The top of handrail gripping surface shall be mounted between 34 to 38 inches above the nosing of the treads.	2010 CBC is **equivalent** to 2010 ADA.	Similar language	
1209.1	**505.4 Height.** Top of gripping surfaces of handrails shall be 34 inches (865 mm) minimum and 38 inches (965 mm) maximum vertically above... *ramp* surfaces. …		**1133B.5.5 Handrails for ramps**. **1133B.5.5.1** ... Handrails ... shall be 34 to 38 inches above the ramp surface to the top of the handrails, …	2010 CBC is **equivalent** to 2010 ADA.	similar language	
1209.2	**505.4 Height.** ... Handrails shall be at a consistent height above walking surfaces, …		No equivalent section in the CBC	2010 CBC provides **less access** than 2010 ADA.	Walking surfaces do not require handrails in the CBC	Add the Exception to section 505.6 to the new general section in 1133B Handrails
1209.3	**505.4 Height.** ... Handrails shall be at a consistent height above ... stair nosings, ...		No equivalent section in the CBC	2010 CBC provides **less access** than 2010 ADA.	The CBC does not require a consistent height. The handrail could fluctuate from 34 to 38 inches.	Add language to 1133B.4.2.1 requiring consistent height. See ADA **505 Handrail** for recommendation.
1209.4	**505.4 Height.** .... Handrails shall be at a consistent height above ... *ramp* surfaces.		No equivalent section in the CBC	2010 CBC provides **less access** than 2010 ADA.	The CBC does not require a consistent height. The handrail could fluctuate from 34 to 38 inches.	Add language to 1133B.5.5.1 requiring consistent height. See ADA **505 Handrail** for recommendation.
1210	**Advisory 505.4 Height.** The requirements for stair and ramp handrails in this document are for adults. When children are the principal users in a building or facility (e.g., elementary schools), a second set of handrails at an appropriate height can assist them and aid in preventing accidents. A maximum height of 28 inches (710 mm) measured to the top of the gripping surface from the ramp surface or stair nosing is recommended for handrails designed for children. Sufficient vertical clearance between upper and lower handrails, 9 inches (230 mm) minimum, should be provided to help prevent entrapment.		Advisory not part of the regulations	NA		
1211	**505.5 Clearance.** Clearance between handrail gripping surfaces and adjacent surfaces shall be 1½ inches (38 mm) minimum.		**1133B.4.2.5** Handrails projecting from a wall shall have a space of 1-½ inches between the wall and the handrail.	2010 CBC provides **less access** than 2010 ADA.	CBC only requires 1-1/2 inches adjacent to a wall where as the ADA requires 1-1/2 inches to adjacent surfaces. Per CBC the clearance would not technically be required next to a fence. Note: The CBC may be more restrictive in that the clearance required is an absolute.	Should modify the language in 1133B.4.2.5 to state " adjacent surface" and make the dimension a minimum. The 1-1/2 absolute dimension is only relevant at grab bars. **See ADA 505 Handrail for recommendation.**

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1212	**505.5 Clearance.** Clearance between handrail gripping surfaces and adjacent surfaces shall be 1½ inches (38 mm) minimum.		**1133B.5.5.1** ... Handrails projecting from a wall shall have a space of 1-½ inches between the wall and the handrail. …	2010 CBC provides **less access** than 2010 ADA.	CBC only requires 1-1/2 inches adjacent to a wall where as the ADA requires 1-1/2 inches to adjacent surfaces. Per CBC the clearance would not technically be required next to a fence. Note: The CBC may be more restrictive in that the clearance required is an absolute.	Should modify the language in 1133B.5.5.1 to state " adjacent surface" and make the dimension a minimum. The 1-1/2 absolute dimension is only relevant at grab bars. See ADA **505 Handrail** for recommendation.
1213	**505.6 Gripping Surface.** Handrail gripping surfaces shall be continuous along their length and shall not be obstructed along their tops or sides. The bottoms of handrail gripping surfaces shall not be obstructed for more than 20 percent of their length. ...		**1133B.4.2.6 Handgrips**. ... Gripping surfaces (top or sides) shall be uninterrupted by newel posts, other construction elements or obstructions. …	2010 CBC provides **less access** than 2010 ADA.	The CBC does not give specific limits to obstructions for Stair handrails	See ADA **505 Handrail** for recommendation.
1214	**505.6 Gripping Surface.** Handrail gripping surfaces shall be continuous along their length and shall not be obstructed along their tops or sides. The bottoms of handrail gripping surfaces shall not be obstructed for more than 20 percent of their length. ...		No equivalent section in the ramp handrail section 1133B.5.5.1	2010 CBC provides **less access** than 2010 ADA.	The CBC does not address obstructions at ramp handrails.	See ADA **505 Handrail** for recommendation.
1215	**505.6 Gripping Surface.** ... Where provided, horizontal projections shall occur 1½ inches (38 mm) minimum below the bottom of the handrail gripping surface.		No Equivalent section for ramp or stair handrails. The figure is the only place where you can find the dimension of 1-1/2 inches from the bollom of the rail to the support. The Figure is not enforceable.	2010 CBC provides **less access** than 2010 ADA.		Add the language in the last sentence of 505.6 to a new general handrail section in 1133B See ADA **505 Handrail** for recommendation.
1216	**EXCEPTIONS: 1.** Where handrails are provided along walking surfaces with slopes not steeper than 1:20, the bottoms of handrail gripping surfaces shall be permitted to be obstructed along their entire length where they are integral to crash rails or bumper guards. **2.** The distance between horizontal projections and the bottom of the gripping surface shall be permitted to be reduced by ⅛ inch (3.2 mm) for each ½ inch (13 mm) of additional handrail perimeter dimension that exceeds 4 inches (100 mm).		no equivalent section in the CBC for walking surfaces	2010 CBC provides **less access** than 2010 ADA.	If handrails are installed at walking surface the handrail should have a similar degree of compliance as stated in Exception 1 to Section 505.6	Add the Exception to section 505.6 to the new general section in 1133B Handrails
1217	**Advisory 505.6 Gripping Surface.** People with disabilities, older people, and others benefit from continuous gripping surfaces that permit users to reach the fingers outward or downward to grasp the handrail, particularly as the user senses a loss of equilibrium or begins to fall.		Advisory is not part of the regulations			
1218	**505.7 Cross Section.** Handrail gripping surfaces shall have a cross section complying with 505.7.1 or 505.7.2.		Section Heading only	NA		
1219	**505.7.1 Circular Cross Section.** Handrail gripping surfaces with a circular cross section shall have an outside diameter of 1¼ inches (32 mm) minimum and 2 inches (51 mm) maximum.		**1133B.4.2.6 Handgrips.** The handgrip portion of handrails shall be not less than 1-¼ inches nor more than 1-½ inches in cross-sectional nominal dimension or the shape shall provide an equivalent gripping surface. ... **1133B.5.5.1** ... The grip portion shall not be less than 1-1/4 inches nor more than 1-½ inches in cross-sectional nominal dimension or the shape shall provide an equivalent gripping surface, ...	Which Std.provides greater access **depends** on circumstances.	The CBC requires a smaller maximum cross section, but it is hard to say if a smaller maximum provides greater access or not. Additionally, the CBC allows an "equivalent gripping surface" which is undefined.	Provide a method to determine what an "equivalent gripping surface" is similar to ADA 505.7.2
1220	**505.7.2 Non-Circular Cross Sections.** Handrail gripping surfaces with a non-circular cross section shall have a perimeter dimension of 4 inches (100 mm) minimum and 6¼ inches (160 mm) maximum, and a cross-section dimension of 2¼ inches (57 mm) maximum.		**1133B.4.2.6 Handgrips.** The handgrip portion of handrails shall be not less than 1-¼ inches nor more than 1-½ inches in cross-sectional nominal dimension or the shape shall provide an equivalent gripping surface. ... **1133B.5.5.1** ... The grip portion shall not be less than 1-1/4 inches nor more than 1-½ inches in cross-sectional nominal dimension or the shape shall provide an equivalent gripping surface, ...	Which Std.provides greater access **depends** on circumstances.	The CBC requires a smaller maximum cross section, but it is hard to say if a smaller maximum provides greater access or not. Additionally, the CBC allows an "equivalent gripping surface" which is undefined.	Provide a method to determine what an "equivalent gripping surface" is similar to ADA 505.7.2
1221						

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1222	**505.8 Surfaces.** Handrail gripping surfaces and any surfaces adjacent to them shall be free of sharp or abrasive *elements* and shall have rounded edges.		**1133B.4.2.6 Handgrips.** ... The handgrip portion of handrails shall have a smooth surface with no sharp corners. .... Any wall or other surface adjacent to the handrail shall be free of sharp or abrasive elements. Edges shall have a minimum radius of ⅛ inch. **1133B.5.5.1**... The grip portion ... and all surfaces shall be smooth with no sharp corners. .... Any wall or other surface adjacent to the handrail shall be free of sharp or abrasive elements. Edges shall have a minimum radius of 1/8 inch.	2010 CBC is **equivalent** to 2010 ADA.	The CBC is slightly more restrictive in that it specifies a minimum radius	
1223	**505.9 Fittings.** Handrails shall not rotate within their fittings.		**1133B.5.5.1** Handrails are required on ramps that provide access if slope exceeds one unit vertical in 20 units horizontal (5-percent slope), except that at exterior door landings, handrails are not required on ramps less than 6 inches rise or 72 inches in length. Handrails shall be placed on each side of each ramp, shall be continuous the full length of the ramp, shall be 34 to 38 inches above the ramp surface to the top of the handrails, shall extend a minimum of 1 foot beyond the top and bottom of the ramp and shall be parallel with the floor or ground surface. The inside handrail on switchback or dogleg ramps shall always be continuous. Handrails may project into the required clear width a distance of 3-½ inches maximum from each side of a ramp at the handrail height. The ends of handrails shall be either rounded or returned smoothly to floor, wall or post. Handrails projecting from a wall shall have a space of 1-½ inches between the wall and the handrail. Handrails may be located in a recess if the recess is a maximum of 3 inches deep and extends at least 18 inches above the top of the rail. The grip portion shall not be less than 1-1/4 inches nor more than 1-½ inches in cross-sectional nominal dimension or the shape shall provide an equivalent gripping surface, and all surfaces shall be smooth with no sharp corners. Handrails shall not rotate within their fittings. Any wall or other surface adjacent to the handrail shall be free of sharp or abrasive elements. Edges shall have a minimum radius of 1/8 inch.			
1224	**505.9 Fittings.** Handrails shall not rotate within their fittings.		**1133B.5.5.1** ... Handrails shall not rotate within their fittings. …	2010 CBC provides **less access** than 2010 ADA.	Handrails for ramps have identical requirement as the ADA but there are no requirements for rotation in the stairway section.	Add the requirement for no rotation to section 1133B.4.2.6. See ADA **505 Handrail** for recommendation.
1225	**505.10 Handrail Extensions.** Handrail gripping surfaces shall extend beyond and in the same direction of stair flights ... in accordance with 505.10.					
1226	**505.10 Handrail Extensions.** Handrail gripping surfaces shall extend beyond and in the same direction of stair flights ... in accordance with 505.10.		**1133B.5.5.1.1 Ramp handrails**. In existing buildings or facilities, where the extension of the handrail in the direction of the ramp run would create a hazard, the extension on the handrail may be turned 90 degrees to the run of the ramp.	Which Std.provides greater access **depends** on circumstances.	CBC is equivalent except for existing buildings	
1227	**505.10 Handrail Extensions.** Handrail gripping surfaces shall extend beyond and in the same direction of ... *ramp* runs in accordance with 505.10.		**1133B.4.2.4** The orientation of at least one handrail shall be in the direction of the run of the stair and perpendicular to the direction of the stair nosing, and shall not reduce the minimum required width of the stairs.	2010 CBC provides **less access** than 2010 ADA.	CBC only requires one handrail to be perpendicular to the nosing.	Include the language in ADA505.10

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1228	**EXCEPTIONS: 1.** Extensions shall not be required for continuous handrails at the inside turn of switchback or dogleg stairs and *ramps*. **2.** In *assembly areas*, extensions shall not be required for *ramp* handrails in aisles serving seating where the handrails are discontinuous to provide access to seating and to permit crossovers within aisles. **3.** In *alterations*, full extensions of handrails shall not be required where such extensions would be hazardous due to plan configuration.					
1228.1	**EXCEPTIONS: 1.** Extensions shall not be required for continuous handrails at the inside turn of switchback or dogleg stairs and *ramps*. **....**		**1133B.5.5.1** ... The inside handrail on switchback or dogleg ramps shall always be continuous. …	2010 CBC provides **greater access** than 2010 ADA.	CBC provides greater access for ramps because the handrail is required to be continuous on the inside.	**What the ADA language is stating is that railings at this type of turn shall be continuous and that extensions are not requiredat this type of turn. This isn't a question of greater access or not.**
1228.2	**EXCEPTIONS: 1.** Extensions shall not be required for continuous handrails at the inside turn of switchback or dogleg stairs and *ramps*. **…**		There is no language for stairs that talks about continuous handrails for stairs only a figure that shows the inside to be continuous which is un-enforceable.	2010 CBC is **equivalent** to 2010 ADA.		
1228.3	**EXCEPTIONS: ....** **2.** In *assembly areas*, extensions shall not be required for *ramp* handrails in aisles serving seating where the handrails are discontinuous to provide access to seating and to permit crossovers within aisles. **…**		1028.13 **1133B.5.5 Handrails for ramps**. ... Exceptions: 1. Handrails at ramps immediately adjacent to fixed seating in assembly areas are not required.	2010 CBC is **equivalent** to 2010 ADA.	similar language	
1228.4	**EXCEPTIONS: ...** **3.** In *alterations*, full extensions of handrails shall not be required where such extensions would be hazardous due to plan configuration.		**1133B.4.2.2** ... 2. In existing buildings and facilities, full extension of handrails at stairs shall not be required in alterations where such extensions would be hazardous or impossible due to plan configuration. **1133B.5.5.1.1** Ramp handrails. In existing buildings or facilities, where the extension of the handrail in the direction of the ramp run would create a hazard, the extension on the handrail may be turned 90 degrees to the run of the ramp.	2010 CBC is **equivalent** to 2010 ADA.		
1229	**505.10.1 Top and Bottom Extension at Ramps.** *Ramp* handrails shall extend horizontally above the landing for 12 inches (305 mm) minimum beyond the top and bottom of *ramp* runs. Extensions shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent *ramp* run.		**1133B.5.5.1**...handrails, shall extend a minimum of 1 foot beyond the top and bottom of the ramp and shall be parallel with the floor or ground surface. ... The ends of handrails shall be either rounded or returned smoothly to floor, wall or post. …	2010 CBC provides **less access** than 2010 ADA.	Very similar text except the CBC lacks clarity and therefore less restrictive with the term "rounded".	Remove the term "rounded"
1230	**505.10.2 Top Extension at Stairs.** At the top of a stair flight, handrails shall extend horizontally above the landing for 12 inches (305 mm) minimum beginning directly above the first riser nosing. Extensions shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent stair flight.		**1133B.4.2.2** Handrails shall extend a minimum of 12 inches beyond the top nosing and 12 inches, plus the tread width, beyond the bottom nosing. At the top, the extension shall be parallel with the floor or ground surface. …	2010 CBC is **equivalent** to 2010 ADA.		
1231	**505.10.3 Bottom Extension at Stairs.** At the bottom of a stair flight, handrails shall extend at the slope of the stair flight for a horizontal distance at least equal to one tread depth beyond the last riser nosing. Extension shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent stair flight.		**1133B.4.2.2** ... At the bottom, the handrail shall continue to slope for a distance of the width of one tread from the bottom riser; the remainder of the extension shall be horizontal. See Figures 11B-35 and 11B-37.	2010 CBC provides **greater access** than 2010 ADA.	The CBC Handrail is longer and has a 12 inches of flat surface at the landing providing greater access.	
1232	**CHAPTER 6: PLUMBING ELEMENTS AND FACILITIES**		CBC has no equivalent section header.	**NA**		
1233	**601 General**		**1115B** **BATHING AND TOILET FACILITIES (SANITARY FACILITIES)**	Which Std.provides greater access **depends** on circumstances.	2010 CBC 1115B addresses plumbing elements and facilities as they apply to bathing and toilet facilities (sanitary facilities) only.	1. 2010 CBC should be amended to consolidate all accessible plumbing fixture requirements of 1115B and 1117B into one section, consistent with ADA Stds.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1233			**1117B** **OTHER BUILDING COMPONENTS**	Which Std.provides greater access **depends** on circumstances.	Portions of 2010 CBC 1117B address plumbing elements as they apply to other than bathing and toilet facilities (sanitary facilities).	1. 2010 CBC should be amended to consolidate all accessible plumbing fixture requirements of 1115B and 1117B into one section, consistent with ADA Stds.
1234	**601.1 Scope.** The provisions of Chapter 6 shall apply where required by Chapter 2 or where referenced by a requirement in this document.		**1115B.1** **General.** Bathing and toilet facilities that serve buildings, facilities or portions of buildings or facilities that are required by these standards to be accessible to persons with disabilities, shall be on an accessible route and shall conform to the following requirements. The accessible fixtures and controls required in this section shall be on an accessible route. An unobstructed turning space complying with Section 1115B.3.1, Item 1, or 1115B.3.2, Item 1, as applicable, shall be provided within an accessible toilet facility. The clear floor spaces at fixtures and controls, the accessible route and the turning space may overlap. See Section 1111B.4.6 and Chapter 11A for bathrooms in residential occupancies.			
1235	**602 Drinking Fountains**		**1117B.1 Accessible Drinking Fountains**	Which Std.provides greater access **depends** on circumstances.	2010 2010 ADA Stds. is only titlted "Drinking Fountains" while the CBC section is titled "Accessible Drinking Fountains". The scoping requirements for which and how many drinking fountains must be accessible are covered in scoping Section 211 Drinking Fountains. 2010 ADA Stds. references Section 307 (Protruding Objects) while CBC does not reference the comparable Section 1133B.8.6.1. CBC 1117B.1.3 requires drinking fountains to be located within alcoves, between wing walls or positioned so as to not encroach into pedestrian ways. This is more accessible than 2010 ADA Stds. in that it provides a more uniform "shoreline" for people with visual impairments.	1) If the CBC format is followed, add a reference to Section 1117B.1.3 indicating that drinking fountains shall comply with CBC 1133B.8.6.1. 2) If the 2010 ADA Stds. format is followed, incorporate Section 602 verbatim.
1236	**602.1 General.** Drinking fountains shall comply with 307 and 602.		NA	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC Section 1117B.1.2 requires that the clear floor space be centered on the "low" fountain fixture at a "hi-low" type fountain. The 2010 ADA Stds. scoping requirements indicate that the clear floor space centered on the unit applies to the low drinking fountain.	NA
1237	**602.2 Clear Floor Space.** Units shall have a clear floor or ground space complying with 305 positioned for a forward approach and centered on the unit. …		**1117B.1 Accessible drinking fountains.** Where drinking fountains are provided, they shall comply with this section:	2010 CBC is **equivalent** to 2010 ADA.	Protruding objects requirements covered by 2010 2010 ADA Stds. Section 307 are covered by CBC requirement for alcoves in Section 1117B.1.3 Alcoves. CBC 1117B.1.3 requires drinking fountains to be located within alcoves, between wing walls or positioned so as to not encroach into pedestrian ways. This is more accessible than 2010 ADA Stds. in that it provides a more uniform "shoreline" for people with visual impairments.2010 2010 ADA Stds. no longer includes water coolers as did the 1991 ADAAG. 2010 ADA Stds. does not include an Unreasonable Hardship Exemption.	1) If the CBC format is adopted, add a reference to Section 1117B.1.3 indicating that drinking fountains shall comply with CBC 1133B.8.6.1. 2) If the 2010 ADA Stds. format is adopted, incorporate Section 602.1 verbatim.
1238	**602.2 Clear Floor Space.** Units shall have a clear floor or ground *space* complying with 305 positioned for a forward approach and centered on the unit. …		**1117B.1#2 ...** A clear floor space at least 30 inches (762 mm) by 48 inches (1219 mm) complying with Section 1118B.4 shall be provided in front of the drinking fountain to allow forward approach. At “hi-low” type fountains, center the 30 inch (762 mm) by 48 inch (1219 mm) clear floor space on the “low” fountain fixture. ...	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC Section 1117B.1.2 requires that the clear floor space be centered on the "low" fountain fixture at a "hi-low" type fountain. The 2010 ADA Stds. scoping requirements indicate that the clear floor space centered on the unit applies to the low drinking fountain.	1) If the CBC format is adopted, use Section 1117B.1.2 verbatim. 2) If the 2010 ADA Stds. format is adopted, incorporate Section 602.2 verbatim.

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1239	**602.2 Clear Floor Space.** ... Knee and toe clearance complying with 306 shall be provided.		**1117B.1#2 ...** A clear floor space at least 30 inches (762 mm) by 48 inches (1219 mm) complying with Section 1118B.4 shall be provided in front of the drinking fountain to allow forward approach. At “hi-low” type fountains, center the 30 inch (762 mm) by 48 inch (1219 mm) clear floor space on the “low” fountain fixture. A side approach drinking fountain is not acceptable.	2010 CBC is **equivalent** to 2010 ADA.	Although CBC 1117B.1.2 has specific language indicating that a side approach is not acceptable, 2010 ADA Stds. 602.2 indicates that clear floor space positioned for a forward approach is required and that knee and toe clearance complying with Section 306 shall be provided.	1) If the CBC format is adopted, use Section 1117B.1.2 verbatim. 2) If the 2010 ADA Stds. format is adopted, incorporate Section 602.2 verbatim.
1240			**1117B.1#2 Clearances.** Wall- and post-mounted cantilevered drinking fountains shall be a minimum of 18 inches (457 mm) and a maximum of 19 inches (483 mm) in depth and shall have a clear knee space between the bottom of the apron and the floor or ground not less than 27 inches (686 mm) in height, 30 inches (762 mm) in width, and 8 inches (203 mm) in depth, the depth measurements being taken from the front edge of the fountain back toward the wall or mounting post. The knee clearance space must be free of equipment or obstructions. Additionally, there shall be toe clearance of 9 inches (229 mm) in height above the floor and 17 inches (432 mm) in depth from the front edge of the fountain. The toe clearance space must be free of equipment or obstructions. ...	Which Std.provides greater access **depends** on circumstances.	1) 2010 ADA Stds. does not specify required depth of fixture per CBC. 2) 2010 ADA Stds. limits toe and knee clearance depth to 25" maximum. 3) 2010 ADA Stds. requires additional 11" deep knee clearance at +9" AFF. 4) 2010 ADA Stds. and CBC both require 27 inch high knee space 8 inches minimum in depth. 5) CBC includes specific language that the measurements are to be taken from the front edge of the fountain back toward the wall or mounting post and that the toe and knee clearance must be free of equipment or obstructions.	1) 1) If the CBC format is adopted, limit toe and knee clearance to 25" maximum and require additional knee clearance per 2010 ADA Stds.. 3) If the 2010 ADA Stds. format is adopted, incorporate Section 602.2 verbatim.
1241	**602.2 EXCEPTION:** A parallel approach complying with 305 shall be permitted at units for *children's use* where the spout is 30 inches (760 mm) maximum above the finish floor or ground and is 3½ inches (90 mm) maximum from the front edge of the unit, including bumpers.		**1115B.1#2 Where used by children.** Where facilities are to be used solely by small children, the specific heights and clearances may be adjusted to meet their accessibility needs. See Table 1115B-1 for suggested mounting heights and clearances.	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC does not provide an exception that allows a parallel approach for childrens's use. Table 1115B-1 is titled "Suggested Dimensions for Children's Use" and is therefore not required but is a guideline when providing drinking fountains used solely by small children.	1) Do not incorporate Section 602.2 exception for children's use. 2) Incorporate Section 602.2 exception for children's use.
1242	**602.3 Operable Parts.** *Operable parts* shall comply with 309.		**1117B.1#2 (truncated)** A clear floor space at least 30 inches (762 mm) by 48 inches (1219 mm) complying with Section 1118B.4 shall be provided in front of the drinking fountain to allow forward approach. At “hi-low” type fountains, center the 30 inch (762 mm) by 48 inch (1219 mm) clear floor space on the “low” fountain fixture. A side approach drinking fountain is not acceptable. **1117B.6.3. Height.** The highest operable part of all controls, dispensers, receptacles and other operable equipment shall be placed within at least one of the reach ranges specified in Sections 1118B.5 and 1118B.6. Exception: These requirements do not apply where the use of special equipment dictates otherwise or where electrical and communication systems receptacles are not normally intended for use by building occupants. **1117B.6.4. Operation.** Controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 pounds (22.2 N) of force.	2010 CBC provides **less access** than 2010 ADA.	CBC 1117B.1 does not explicitly refer to Section 1117B.6.3, which allows a 54" maximum high side reach per 1118B.6 (48" maximum per 7/1/2012 Supplement). It also does not refer to Section 1117B.6.4, which requires that all operating mechanisms be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist and that the operating force not exceed 5 lbf. The exception in CBC 1117B.6.3 is similar to the scoping exception in ADA Section 203.5 Machinery Spaces but the CBC language permits braoder exceptions for electrical and communication systems receptacles not normally intended for building occupants. CBC 1117B.6.4 is comparable to 2010 ADA Stds. 309.4 except CBC uses "controls and operating mechanisms" and 2010 ADA Stds. uses "operable parts".	1) If the CBC format is adopted, revise or eliminate exception language in 1117B.6.3 to coincide with 2010 ADA Stds. Section 203.5. 3) If the 2010 ADA Stds. format is adopted, incorporate Section 602.3 verbatim.
1243	**602.4 Spout Height.** Spout outlets shall be 36 inches (915 mm) maximum above the finish floor or ground.		**1117B.1#4** ... The bubbler outlet orifice shall be located... within 36 inches (914 mm) of the floor. …	2010 CBC is **equivalent** to 2010 ADA.	CBC only refers to "floor" and not "ground".	1) If the CBC format is adopted, add "ground' to Section 1117B.1.4. 3) If the 2010 ADA Stds. format is adopted, incorporate Section 602.4 verbatim.

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1244	**602.5 Spout Location.** The spout shall be located 15 inches (380 mm) minimum from the vertical support and 5 inches (125 mm) maximum from the front edge of the unit, including bumpers.		**1117B.1#4** The bubbler shall be ... front mounted or side mounted and located within 6 inches (152 mm) of the front edge of the fountain or an electronically controlled device. The bubbler outlet orifice shall be located within 6 inches (152 mm) of the front edge of the drinking fountain ...	2010 CBC provides **less access** than 2010 ADA.	1) ADA limits spout to within 5" of the front of the fixure (including bumpers) and 15" maximum from the vertical support. 2) CBC limits the spout to 6" maximum from the front of the fixture but does not mention bumpers. 3) CBC does not include a maximum distance from the vertical support. 4) CBC allows the bubbler to be front- or side-mounted. 5) 2010 ADA Stds. does not offer the option for an electronically controlled device in lieu of complying with dimensional requirements.	1) If the CBC format is adopted, revise Section 1117B.1.4 to reflect 2010 ADA Stds. 602.5 requirements (limit spout to within 5" of the front & 15" maximum from the vertical support and add bumper language). 2) If the 2010 ADA Stds. format is adopted, incorporate Section 602.5 verbatim.
1245	**602.6 Water Flow.** The spout shall provide a flow of water 4 inches (100 mm) high minimum and shall be located 5 inches (125 mm) maximum from the front of the unit. The angle of the water stream shall be measured horizontally relative to the front face of the unit. Where spouts are located less than 3 inches (75 mm) of the front of the unit, the angle of the water stream shall be 30 degrees maximum. Where spouts are located between 3 inches (75 mm) and 5 inches (125 mm) maximum from the front of the unit, the angle of the water stream shall be 15 degrees maximum.		**1117B.1#4** The bubbler shall be ... front mounted or side mounted and located within 6 inches (152 mm) of the front edge of the fountain or an electronically controlled device. The bubbler outlet orifice shall be located within 6 inches (152 mm) of the front edge of the drinking fountain and within 36 inches (914 mm) of the floor. The water stream from the bubbler shall be substantially parallel to the front edge of the drinking fountain. **1117B.1..5.** The spout shall provide a flow of water at least 4 inches (102 mm) high so as to allow the insertion of a cup or glass under the flow of water. On an accessible drinking fountain with a round or oval bowl, the spout must be positioned so the flow of water is within 3 inches (75 mm) of the front edge of the fountain.	2010 CBC provides **less access** than 2010 ADA.	10 CBC uses the tem "substantially parallel" as opposed to the 2010 ADA Stds.'s "horizontally" relative to the front face of the unit. 2) 2010 ADA Stds. has additional requirements for the angle of water flow if the spout is within 3" of the front of the unit and between 3" - 5" of the front of the unit. CBC has a similar requirement that the spout must be within 3" of the front of the fountain, but only for round or oval bowls..	1) If the CBC format is adopted, revise Section 1117B.1.4 to incorporate 2010 ADA Stds. requirements (limit spout to within 5" of the front & angle of stream to be 30 degrees maximum if spout is within 3" - 5" of front of unit and 15 degrees maximum if spout is within 3" of front of unit). 2) If the 2010 ADA Stds. format is adopted, incorporate Section 602.6 verbatim.
1246	**Advisory 602.6 Water Flow.** The purpose of requiring the drinking fountain spout to produce a flow of water 4 inches (100 mm) high minimum is so that a cup can be inserted under the flow of water to provide a drink of water for an individual who, because of a disability, would otherwise be incapable of using the drinking fountain.		**1117B.1#5** The spout shall provide a flow of water at least 4 inches (102 mm) high so as to allow the insertion of a cup or glass under the flow of water.	2010 CBC is **equivalent** to 2010 ADA.	1) Both CBC and 2010 ADA Stds. require the water flow to be 4" high minimum. 2) CBC incorporates the ADA Advisory language within the code verbiage.	No change required.
1247	**602.7 Drinking Fountains for Standing Persons.** Spout outlets of drinking fountains for standing persons shall be 38 inches (965 mm) minimum and 43 inches (1090 mm) maximum above the finish floor or ground.		**1117B.1#1 General.** Where only one drinking fountain area is provided on a floor, there shall be a drinking fountain that is accessible to individuals who use wheelchairs in accordance with this section and one accessible to those who have difficulty bending or stooping. This can be accommodated by the use of “hi-low” fountains, or by such other means as would achieve the required accessibility for each group on each floor. ...	2010 CBC provides **less access** than 2010 ADA.	1) CBC refers to "individuals who have difficulty bending or stooping and 2010 ADA Stds. refers to "standing persons". 2) CBC does not include height range for spout height for standing persons. 3) CBC indicates "such other means" can achieve the required accessibility for each group on each floor. 4) Scoping requirements for how many accessible drinking fountains are required per floor is contained in 2010 ADA Stds. Section 211.3.	1) If the CBC format is adopted, revise Section 1117B.1.1 to incorporate 2010 ADA Stds. height limit range for standing persons. 2) Revise CBC language regarding "other such means" to specifically explain that 2 separate fixtures can be used instead of a "hi-low" fixture. 3) If the 2010 ADA Stds. format is adopted, incorporate Section 602.7 verbatim.
1248	**603 Toilet and Bathing Rooms**		**1115B**	2010 CBC is **equivalent** to 2010 ADA.	This is just a section heading.	1. Rename 2010 CBC section heading to be consistent with 2010 ADA Stds.

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1249	**603.1 General.** Toilet and bathing rooms shall comply with 603.		**1115B.1** **General.** Bathing and toilet facilities that serve buildings, facilities or portions of buildings or facilities that are required by these standards to be accessible to persons with disabilities, shall be on an accessible route and shall conform to the following requirements. The accessible fixtures and controls required in this section shall be on an accessible route. An unobstructed turning space complying with Section 1115B.3.1, Item 1, or 1115B.3.2, Item 1, as applicable, shall be provided within an accessible toilet facility. The clear floor spaces at fixtures and controls, the accessible route and the turning space may overlap. See Section 1111B.4.6 and Chapter 11A for bathrooms in residential occupancies.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC 1115B.1 includes both scoping and references to technical requirements.	2010 CBC should be amended to follow the subject matter format of the ADA Stds., i.e., separating scopng from technical requirements.
1250	**603.1 General.** Toilet and bathing rooms shall comply with 603.		N/A	NA	N/A	N/A
1251	**603.2 Clearances.** Clearances shall comply with 603.2.		N/A	NA	2010 CBC does not have a separate heading for clearances. Toilet and bathing room clearances are addressed over multiple subsections.	2010 CBC should be amended to follow the subject matter format of the ADA Stds.
1252	**603.2 Clearances.** Clearances shall comply with 603.2.		N/A	NA	N/A	N/A
1253	**603.2 Clearances.** Clearances shall comply with 603.2.		N/A	NA	N/A	N/A
1254	**603.2.1 Turning Space.** Turning *space* complying with 304 shall be provided within the room.		**1115B.3.1 #1** **Wheelchair clearance.** A clear space measured from the floor to a height of 27 inches (686 mm) above the floor, within the sanitary facility room, of sufficient size to inscribe a circle with a diameter not less than 60 inches (1524 mm) in size. Other than the door to the accessible water closet compartment, a door, in any position, may encroach into this space by not more than 12 inches (305 mm).	Which Std.provides greater access **depends** on circumstances.	CBC 1115B.3.1 #1 addresses only multiple-accommodation toilet facilities. 2010 ADA Stds. make no such distinction for turning space in toilet rooms. 2010 ADA Stds. have additional requirements for the turning space by referencing 302 (stable, firm, and slip resistant), specifying that the slope not be steeper than 1:48, and allowing a T-shaped space per 304.3.2.	2010 CBC should be amended to conform to the additional requirements in the ADA Stds.
1255	**603.2.1 Turning Space.** Turning *space* complying with 304 shall be provided within the room.		**1115B.3.2 #1** **Wheelchair clearance.** There shall be sufficient space in the toilet room for a wheelchair measuring 30 inches (762 mm) wide by 48 inches (1219 mm) long to enter the room and permit the door to close. There shall be in the room a clear floor space of at least 60 inches (1524 mm) in diameter, or a T-shaped space complying with Figure 11B-12 (a) and (b). No door shall encroach into this space for more than 12 inches (305 mm). See Figure 11B-1A.	2010 CBC is **equivalent** to 2010 ADA.	CBC 1115B.3.2 #1 addresses only single-accommodation toilet facilities. 2010 ADA Stds. make no such distinction for turning space in toilet rooms.	N/A
1256	**603.2.1 Turning Space.** Turning *space* complying with 304 shall be provided within the room.		N/A	NA	N/A	N/A

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1257	**603.2.2 Overlap.** Required clear floor *spaces* , clearance at fixtures, and turning *space* shall be permitted to overlap.		**1115B.1** General. Bathing and toilet facilities that serve buildings, facilities or portions of buildings or facilities that are required by these standards to be accessible to persons with disabilities, shall be on an accessible route and shall conform to the following requirements. The accessible fixtures and controls required in this section shall be on an accessible route. An unobstructed turning space complying with Section 1115B.3.1, Item 1, or 1115B.3.2, Item 1, as applicable, shall be provided within an accessible toilet facility. The clear floor spaces at fixtures and controls, the accessible route and the turning space may overlap. See Section 1111B.4.6 and Chapter 11A for bathrooms in residential occupancies.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC additionally mentions that the clear floor space at controls and accessible route may overlap the turning space. 2010 ADA Stds. provide clarity that it is the "required" clear floor spaces that are covered.	2010 CBC should be amended to be consistent with 2010 ADA Stds. This would not materially change the equivalency.
1258	**603.2.2 Overlap.** Required clear floor *spaces* , clearance at fixtures, and turning *space* shall be permitted to overlap.		N/A	NA	N/A	N/A
1259	**603.2.3 Door Swing.** Doors shall not swing into the clear floor *space* or clearance required for any fixture. …		**1115B.3.1 #2** **Clear floor space at fixtures.** Doors shall not swing into the clear floor space required for any fixture. Doors may swing into that portion of maneuvering space which does not overlap the fixture's required clear floor space. See Figures 11B-1E (c) and (e).	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC figures provide some added clarity.	1. 2010 CBC should be amended to be consistent with ADA Stds. or 2. 2010 CBC should retain current language as the figures provide added clarity.
1260	**603.2.3 Door Swing.** Doors shall not swing into the clear floor *space* or clearance required for any fixture. …		**1115B.3.2 #2** **Clear floor space at fixtures.** Doors shall not swing into the clear floor space required for any fixture. Doors may swing into that portion of maneuvering space which does not overlap the fixture's required clear floor space. See Figure 11B-1E (a).	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC figures provide some added clarity.	1. 2010 CBC should be amended to be consistent with ADA Stds. or 2. 2010 CBC should retain current language as the figures provide added clarity.
1261	**603.2.3 Door Swing.** ... Doors shall be permitted to swing into the required turning *space* .		**1115B.3.1 #1** **1. Wheelchair clearance.** A clear space measured from the floor to a height of 27 inches (686 mm) above the floor, within the sanitary facility room, of sufficient size to inscribe a circle with a diameter not less than 60 inches (1524 mm) in size. Other than the door to the accessible water closet compartment, a door, in any position, may encroach into this space by not more than 12 inches (305 mm).	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC 1115B.3.1 #1 addresses multiple-accommodation toilet facilities only, and allows only up to a 12" encroachment into the turning space. 2010 ADA Stds. 603.2.3 does not limit the encroachment.	1. 2010 CBC should be amended to be consistent with ADA Stds. or 2. 2010 CBC should retain the more restrictive encroachment limit.
1261	**603.2.3 Door Swing.** ... Doors shall be permitted to swing into the required turning *space* .		**1115B.3.2 #2** **1. Wheelchair clearance.** There shall be sufficient space in the toilet room for a wheelchair measuring 30 inches (762 mm) wide by 48 inches (1219 mm) long to enter the room and permit the door to close. There shall be in the room a clear floor space of at least 60 inches (1524 mm) in diameter, or a T-shaped space complying with Figure 11B-12 (a) and (b). No door shall encroach into this space for more than 12 inches (305 mm). See Figure 11B-1A.	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC 1115B.3.2 #1 addresses single-accommodation toilet facilities only, and allows only up to a 12" encroachment into the turning space. 2010 ADA Stds. 603.2.3 does not limit the encroachment.	1. 2010 CBC should be amended to be consistent with ADA Stds. or 2. 2010 CBC should retain the more restrictive encroachment limit.
1262	**603.2.3 EXCEPTIONS: 1.** Doors to a toilet room or bathing room for a single occupant accessed only through a private office and not for *common use* or public use shall be permitted to swing into the clear floor *space* or clearance provided the swing of the door can be reversed to comply with 603.2.3. **2.** Where the toilet room or bathing room is for individual use and a clear floor *space* complying with 305.3 is provided within the room beyond the arc of the door swing, doors shall be permitted to swing into the clear floor *space* or clearance required for any fixture.		N/A	2010 CBC **does not address** 2010 ADA req.	N/A	1. 2010 CBC should adopt exceptions consistent with 2010 ADA Stds. or 2. 2010 CBC should not adopt exceptions consistent with 2010 ADA Stds.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1263	**Advisory 603.2.3 Door Swing Exception 1.** At the time the door is installed, and if the door swing is reversed in the future, the door must meet all the requirements specified in 404. Additionally, the door swing cannot reduce the required width of an accessible route. Also, avoid violating other building or life safety codes when the door swing is reversed.		N/A	2010 CBC **does not address** 2010 ADA req.	If 2010 CBC adopts the exceptions in 2010 ADA Stds. 603.2.3, then the code should also state that the plans shall show the alternate reverse swing to confirm that the required width of the accessible route will not be reduced and that the alternate reverse swing complies with egress requirements.	
1264	**603.3 Mirrors.** Mirrors located above lavatories or countertops shall be installed with the bottom edge of the reflecting surface 40 inches (1015 mm) maximum above the finish floor or ground. …		**1115B.8.1.1** All mirrors located above accessible lavatories or countertops shall be installed with the bottom edge of the reflecting surface 40 inches (1016 mm) maximum above the finish floor or ground.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC wording differs slightly from 2010 ADA Stds. In that CBC incorporates scoping into 1115B.8.1.1 and ADA Stds. rely on Chapter 2 for scoping.	1. If 2010 CBC is amended to separate scoping requirements into a different section, then technical requirements should be made identical to ADA Stds. or 2. 2010 CBC should not be amended since it is equivalent to 2010 ADA Stds.
1265	**603.3 Mirrors. ...** Mirrors not located above lavatories or countertops shall be installed with the bottom edge of the reflecting surface 35 inches (890 mm) maximum above the finish floor or ground.		**1115B.8.1.2** *When mirrors are provided at locations other than above lavatories or countertops, at least one shall be installed with the bottom edge of the reflecting surface 35 inches (890 mm) maximum above the finish floor or ground.*	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC wording differs slightly from 2010 ADA Stds. In that CBC incorporates scoping into 1115B.8.1.1 and ADA Stds. rely on 213.3.5 for scoping "at least one shall comply."	1. If 2010 CBC is amended to separate scoping requirements into a different section, then technical requirements should be made identical to ADA Stds. or 2. 2010 CBC should not be amended since it is equivalent to 2010 ADA Stds.
1266	**Advisory 603.3 Mirrors.** A single full-length mirror can accommodate a greater number of people, including children. In order for mirrors to be usable by people who are ambulatory and people who use wheelchairs, the top edge of mirrors should be 74 inches (1880 mm) minimum from the floor or ground.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not directly address the requirements for full length mirrors (except see CBC 1117B.8 for camparison to ADA Stds. 803 for fitting and dressing rooms).	1. 2010 CBC need not address full length mirrors in toilet and bathing facilities. or 2. 2010 CBC should be amended to incorporate ADA Stds. Advisory criteria for full length mirrors as an alternate means of compliance in toilet and bathing facilities.
1267	**603.4 Coat Hooks and Shelves.** Coat hooks shall be located within one of the reach ranges specified in 308. …		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not directly regulate the height of coat hooks in toilet and bathing facilites. 2010 CBC 1118B.5 and 1118B.6 regulate reach ranges in general, but are not applicable because the lower range dimension is not functional for a coat hook.	1. 2010 CBC should be amended to conform to ADA Stds.
1268	**603.4 Coat Hooks and Shelves.** Coat hooks shall be located within one of the reach ranges specified in 308. …		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not directly regulate the height of coat hooks in toilet and bathing facilites. 2010 CBC 1118B.5 and 1118B.6 regulate reach ranges in general, but are not applicable because the lower range dimension is not functional for a coat hook.	1. 2010 CBC should be amended to conform to ADA Stds.
1269	**603.4 Coat Hooks and Shelves.** ... Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not directly regulate the height of shelves in toilet and bathing facilites. 2010 CBC 1118B.5 and 1118B.6 regulate reach ranges in general, but are not applicable because the lower range dimension is not functional for a coat hook.	
1270	**603.4 Coat Hooks and Shelves.** ... Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not directly regulate the height of shelves in toilet and bathing facilites. 2010 CBC 1118B.5 and 1118B.6 regulate reach ranges in general, but are not applicable because the lower range dimension is not functional for a coat hook.	
1271	**604 Water Closets and Toilet Compartments**		**1115B.4 Accessible fixtures.**	2010 CBC is **equivalent** to 2010 ADA.	This is just a section heading.	1. If 2010 CBC is amended to separate requirements for water closets and toilet compartments into a different section than other accessible fixtures per ADA Stds., then section heading should be made identical to ADA Stds. or 2. 2010 CBC should not be amended since it is equivalent to 2010 ADA Stds.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1272	**604 Water Closets and Toilet Compartments**		**1115B.4 Accessible fixtures.**	2010 CBC is **equivalent** to 2010 ADA.	This is just a section heading.	1. If 2010 CBC is amended to separate requirements for water closets and toilet compartments into a different section than other accessible fixtures per ADA Stds., then section heading should be made identical to ADA Stds. or 2. 2010 CBC should not be amended since it is equivalent to 2010 ADA Stds.
1273	**604.1 General.** Water closets and toilet compartments shall comply with 604.2 through 604.8.		**1115B3.1 #4** **Accessible water closet compartment.** Accessible water closet compartments shall comply with the following:	2010 CBC is **equivalent** to 2010 ADA.	Although 2010 CBC is equivalent to 2010 ADA Stds., the wording is slightly different, reflecting the different organization between the two regulations.	1. If 2010 CBC is amended to separate requirements for water closets and toilet compartments into a different section than other accessible fixtures per ADA Stds., then section heading should be made identical to ADA Stds. or 2. 2010 CBC should not be amended since it is equivalent to 2010 ADA Stds.
1274	**604.1 General.** Water closets and toilet compartments shall comply with 604.2 through 604.8.		**1115B.4.1** **Accessible water closet**s. Water closets required to be accessible shall comply with this subsection:	2010 CBC is **equivalent** to 2010 ADA.	Although 2010 CBC is equivalent to 2010 ADA Stds., the wording is slightly different, reflecting the different organization between the two regulations.	1. If 2010 CBC is amended to separate requirements for water closets and toilet compartments into a different section than other accessible fixtures per ADA Stds., then section heading should be made identical to ADA Stds. or 2. 2010 CBC should not be amended since it is equivalent to 2010 ADA Stds.
1275	**604.1 General.** Water closets and toilet compartments shall comply with 604.2 through 604.8.		**1115B3.1 #4** **Accessible water closet compartment.** Accessible water closet compartments shall comply with the following:	2010 CBC is **equivalent** to 2010 ADA.	Although 2010 CBC is equivalent to 2010 ADA Stds., the wording is slightly different, reflecting the different organization between the two regulations.	1. If 2010 CBC is amended to separate requirements for water closets and toilet compartments into a different section than other accessible fixtures per ADA Stds., then section heading should be made identical to ADA Stds. or 2. 2010 CBC should not be amended since it is equivalent to 2010 ADA Stds.
1276	**604.1 EXCEPTION:** Water closets and toilet compartments for *children's use* shall be permitted to comply with 604.9.		**1115B.1.2** **Where used by children.** Where facilities are to be used solely by small children, the specific heights and clearances may be adjusted to meet their accessibility needs. See Table 1115B-1 for suggested mounting heights and clearances.	2010 CBC **conflicts with** 2010 ADA.	Both 2010 CBC and 2010 ADA Stds. allow alternate dimensions for children's use. CBC qualifies that alternate dimensions are permitted where used "solely" by "small" children; ADA Stds. do not make such explicit distinction. Dimensions are conflicting between the CBC and ADA Stds. ADA Stds. do not provide any additional clarity in Chapter 2 scoping provisions nor in an Advisory. How is a plan checker or building official to determine what toilet room is "solely" for use by children? This may be an undue burden of proof. The qualifier "small" may be misleading given that alternate dimensions are provided for different age groups.	1. 2010 CBC should be amended to be consistent with ADA Stds. or 2. Amend CBC 1115B.1.2 to delete "solely" and replace with "primarily" or just delete. Delete "small" as a describer of children; allow age groups in Table 1115B-1 to suffice. **3. Or identify which building uses require this and coordinate to other building code requirements?**

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1277	**604.2 Location.** The water closet shall be positioned with a wall or partition to the rear and to one side. The centerline of the water closet shall be 16 inches (405 mm) minimum to 18 inches (455 mm) maximum from the side wall or partition, …		**1115B.4.1 #1.** The centerline of the water closet fixture shall be 18 inches (457 mm) from the side wall or partition. On the other side of the water closet, provide a minimum of 28 inches (711 mm) wide clear floor space if the water closet is adjacent to a fixture or a minimum of 32 inches (813 mm) wide clear floor space if the water closet is adjacent to a wall or partition. This clear floor space shall extend from the rear wall to the front of the water closet.	Which Std.provides greater access **depends** on circumstances.	2010 ADA Stds. in effect establishes a tolerance range, which is more realistic for construction and enforcement.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1278	**604.2 Location.** ... except that the water closet shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum from the side wall or partition in the ambulatory accessible toilet compartment specified in 604.8.2. …		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not regulate the distance of the water closet from the side wall or partition in the ambulatory accessible compartment.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1279	**604.2 Location.** ... Water closets shall be arranged for a left-hand or right-hand approach.		**1115B.3.1 #4-4.3** If the compartment has an end-opening door (facing the water closet), either in-swinging or out-swinging, a minimum 60 inches (1524 mm) wide and 48 inches (1219 mm) deep maneuvering space shall be provided in front of the water closet. The door shall be located in front of the clear floor space and diagonal to the water closet, with a maximum stile width of 4 inches (102 mm).	2010 CBC is **equivalent** to 2010 ADA.	The 2010 CBC requirement that the compartment door be located "diagonal" to the water closet is clearer than the ADA Stds. Description of a "left-hand or right-hand approach."	Maintain 2010 CBC language as clearer and equivalent to 2010 ADA Stds.
1280	**604.3 Clearance.** Clearances around water closets and in toilet compartments shall comply with 604.3.		**1115B.4.1 #2** Provide clear floor space and maneuvering space at accessible water closets in compliance with Section 1115B.4.1, Item 2. Refer to Section 1115B.3.1, Items 4.2 and 4.3 for additionally required maneuvering space at multiple-accommodation toilet facilities. Refer to Section 1115B.3.2, Item 3 for additionally required maneuvering space at single-accommodation toilet facilities.	2010 CBC is **equivalent** to 2010 ADA.	Both 2010 CBC and 2010 ADA Stds. make reference to other sections for specific technical requirements. CBC 1115B.4.1 #2 also references sections pertaining to compartments and signle accommodation toilets. ADA Stds. requirements for compartments are covered in sections separate from clearance requirements.	1. If 2010 CBC is amended to conform to format of ADA Stds., then this CBC section should only address clearance and not make reference to compartments and single accommodation toilets. or 2. If 2010 CBC retains current format/organization, then no need to amend.
1281	**604.3.1 Size.** Clearance around a water closet shall be 60 inches (1525 mm) minimum measured perpendicular from the side wall and 56 inches (1420 mm) minimum measured perpendicular from the rear wall.		**1115B.4.1 #2-2.1** Where a water closet is not within a water closet compartment, clear floor space around the water closet shall be 60 inches (1524 mm) minimum measured perpendicular from the side wall closest to the water closet and 56 inches (1422 mm) minimum measured perpendicular from the rear wall. See Figure 11B-1E (a).	2010 CBC is **equivalent** to 2010 ADA.	Minor difference between 2010 CBC and 2010 ADA Stds.: CBC 1115B.4.1 #2-2.1 is for water closets not in a compartment and ADA 604.3.1 generally applies to all water closets with compartment requirements addressed separately.	1. If 2010 CBC is amended to conform to format of ADA Stds., then this CBC section should only address clearance and not make reference to compartments and single accommodation toilets. or 2. If 2010 CBC retains current format/organization, then no need to amend.
1282	**604.3.2 Overlap.** The required clearance around the water closet shall be permitted to overlap the water closet, associated grab bars, dispensers, sanitary napkin disposal units, coat hooks, shelves, *accessible routes*, clear floor *space* and clearances required at other fixtures, and the turning *space*. ...		N/A	2010 CBC **does not address** 2010 ADA req.	2010 ADA Stds. Provide clarity that is missing from CBC.	2010 CBC should be amended to conform to the additional requirements in the ADA Stds.
1283	**604.3.2 Overlap. ...** No other fixtures or obstructions shall be located within the required water closet clearance.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 ADA Stds. Provide clarity that is missing from CBC.	2010 CBC should be amended to conform to the additional requirements in the ADA Stds.

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1284	**604.3.2 EXCEPTION:** In *residential dwelling units* , a lavatory complying with 606 shall be permitted on the rear wall 18 inches (455 mm) minimum from the water closet centerline where the clearance at the water closet is 66 inches (1675 mm) minimum measured perpendicular from the rear wall.		**1134A.7** **Water closets.** Water closets in bathrooms or powder rooms required to be accessible shall comply with this section. **1. Floor Space.** The minimum floor space provided at a water closet shall be 48 inches (1219 mm) in clear width. The clear floor space shall extend past the front edge of the water closet at least 36 inches (914 mm). See Figure 11A-9M. **Exception:** The 48-inch (1219 mm) minimum clear width may be reduced to 36 inches (914 mm) for lavatories, cabinets, wing walls, or privacy walls located immediately adjacent to a water closet which extend no more than 24 inches (610 mm) in depth. Water closets shall be located within bathrooms in a manner that permits a grab bar to be installed on one side of the fixture. In locations where water closets are adjacent to walls vanities, lavatories or bathtubs, the centerline of the fixture shall be a minimum of 18 inches (457 mm) from the obstacle.	2010 CBC is **equivalent** to 2010 ADA.		
1284	**604.3.2 EXCEPTION:** In *residential dwelling units* , a lavatory complying with 606 shall be permitted on the rear wall 18 inches (455 mm) minimum from the water closet centerline where the clearance at the water closet is 66 inches (1675 mm) minimum measured perpendicular from the rear wall.		**1134A.7 #1** **Floor Space.** The minimum floor space provided at a water closet shall be 48 inches (1219 mm) in clear width. The clear floor space shall extend past the front edge of the water closet at least 36 inches (914 mm). See Figure 11A-9M.	2010 CBC provides **less access** than 2010 ADA.	2010 CBC provides equivalent access as far as the minimum distance from the lavatory to the water closet centerline, but CBC only requires at least 36 inches from the front edge of the water closet. This could result in less than the 66 inches from the rear wall required by ADA Stds. if a short water closet is installed.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1285	**Advisory 604.3.2 Overlap.** When the door to the toilet room is placed directly in front of the water closet, the water closet cannot overlap the required maneuvering clearance for the door inside the room.		**1115B.3.2 #2** **Clear floor space at fixtures.** Doors shall not swing into the clear floor space required for any fixture. Doors may swing into that portion of maneuvering space which does not overlap the fixture's required clear floor space. See Figure 11B-1E (a).	2010 CBC provides **greater access** than 2010 ADA.	The way 2010 ADA Stds. Advfisory is worded the water closet itself cannot overlap the the door maneuvering clearance. 2010 CBC does not allow the door to swing into the entire clear floor space for the water closet, not just the fixture itself.	2010 CBC need not be amended.
1286	**604.4 Seats.** The seat height of a water closet above the finish floor shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum measured to the top of the seat. …		**1115B.4.1 #4** The height of accessible water closets shall be a minimum of 17 inches (432 mm) and a maximum of 19 inches (483 mm) measured to the top of a maximum 2-inch (51 mm) high toilet seat.	Which Std.provides greater access **depends** on circumstances.	2010 CBC is equivalent to 2010 ADA Stds, but CBC has additional provision limiting height of the seat itself.	1. 2010 CBC should be amended to be consistent with 2010 ADA Stds. Or 2. 2010 CBC provision for seat height of seat itself should be retained.
1286	**604.4 Seats.** The seat height of a water closet above the finish floor shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum measured to the top of the seat. …		**1115B.4.1 #4, Exc.** A 3-inch (76 mm) high seat shall be permitted only in alterations where the existing fixture is less than 15 inches (381 mm) high.	2010 CBC provides **greater access** than 2010 ADA.	2010 ADA Stds. does not address exception for use of high rise seat on existing water closets to achieve compliance since it does not address the seat thickness itself in the regulations.	1. 2010 CBC should be amended to be consistent with 2010 ADA Stds. or 2. 2010 CBC exception should be retained.
1287	**604.4 Seats.** ... Seats shall not be sprung to return to a lifted position.		**1115B.4.1 #7** Automatic spring to lifted position seats are not allowed.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA Stds.	2010 CBC need not be amended.
1288	**604.4 EXCEPTIONS: 1.** A water closet in a toilet room for a single occupant accessed only through a private office and not for *common use* or *public use* shall not be required to comply with 604.4. **2.** In *residential dwelling units* , the height of water closets shall be permitted to be 15 inches (380 mm) minimum and 19 inches (485 mm) maximum above the finish floor measured to the top of the seat.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not address exception for single occupant toilet rooms accessed through private offices.	1. 2010 CBC should be amended to include the ADA Stds. Exception for consistency. or 2. CBC should not adopt the ADA Stds. Exception as it provides less access.

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1288	**604.4 EXCEPTIONS: ...** **2.** In *residential dwelling units* , the height of water closets shall be permitted to be 15 inches (380 mm) minimum and 19 inches (485 mm) maximum above the finish floor measured to the top of the seat.		**1134A.7 #3** **Seat Height.** The minimum height of water closet seats shall be 15 inches (381 mm) above the floor.	2010 CBC provides **less access** than 2010 ADA.	2010 CBC 1134A.7 #3 provides a minimum height for residential dwelling unit water closet seats, but no maximum height.	2010 CBC should be amended to include a maximum height of 19 inches for water closet seats in residential dwelling units.
1289	**604.5 Grab Bars.** Grab bars for water closets shall comply with 609. Grab bars shall be provided on the side wall closest to the water closet and on the rear wall.		**1115B.4.1 #3** Grab bars for water closets not located within a compartment shall comply with Section 1115B.7 and shall be provided on the side wall closest to the water closet and on the rear wall. Grab bars for water closets located within an accessible compartment shall comply with Section 1115B.7 and shall be provided on the side wall closest to the water closet and on the rear wall. Grab bars for water closets located within ambulatory accessible compartments shall comply with Section 1115B.7 and shall be provided on both sides of the compartment. Grab bars shall not project more than 3 inches (76 mm) into the required clear floor space.	2010 CBC is **equivalent** to 2010 ADA.	Although the 2010 CBC section addressing grab bars has more detail than ADA Stds. 604.5, the ADA Stds. requirements are equivalently addressed by the CBC.	1. If the 2010 CBC is amended to reflect the formatting of the ADA Stds., then this CBC section should be amended to be consistent. or 2. 2010 CBC need not be amended as it is equivalent to the ADA Stds.
1290	**604.5 EXCEPTIONS: 1.** Grab bars shall not be required to be installed in a toilet room for a single occupant accessed only through a private office and not for *common use* or *public use* provided that reinforcement has been installed in walls and located so as to permit the installation of grab bars complying with 604.5.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not address exception for single occupant toilet rooms accessed through private offices.	1. 2010 CBC should be amended to include the ADA Stds. Exception for consistency, and it allows for future installation of compliant grab bars.
1291	**604.5 EXCEPTIONS:** **2.** In *residential dwelling units* , grab bars shall not be required to be installed in toilet or bathrooms provided that reinforcement has been installed in walls and located so as to permit the installation of grab bars complying with 604.5. **3.** In detention or correction *facilities,* grab bars shall not be required to be installed in housing or holding cells that are specially designed without protrusions for purposes of suicide prevention.		**1134A.7 #2** **Reinforced Walls for Grab Bars.** Where the water closet is not placed adjacent to a side wall, the bathroom shall have provisions for installation of floor-mounted, foldaway or similar alternative grab bars. Where the water closet is placed adjacent to a side wall, reinforcement shall be installed on both sides or one side and the back. If reinforcement is installed at the back, it shall be installed between 32 inches (813 mm) and 38 inches (965 mm) above the floor. The grab bar reinforcement shall be a minimum of 6 inches (152.4 mm) nominal in height. The backing shall be a minimum of 40 inches (1016 mm) in length. Reinforcement installed at the side of the water closet shall be installed 32 inches to 38 inches (813mmto 965 mm) above the floor. The reinforcement shall be installed a maximum of 12 inches (305 mm) from the rear wall and shall extend a minimum of 26 inches (660 mm) in front of the water closet. The grab bar reinforcement shall be a minimum of 6 inches (152.4 mm) nominal in height.	Which Std.provides greater access **depends** on circumstances.	CBC provisoins are more specific but 604.5 Exc.3 is not worded the same in CBC.	
1291	**604.5 EXCEPTIONS:** **...** **3.** In detention or correction *facilities,* grab bars shall not be required to be installed in housing or holding cells that are specially designed without protrusions for purposes of suicide prevention.		**1105B.3.5 #3** At least one detention cell facility with supporting sanitary facilities shall be made accessible	Which Std.provides greater access **depends** on circumstances.	It is beyond the scope of this comparison to determine if suicide prevention concerns overide state accessibility civil rights obligations. At the Federal level, it is clear that suicide prevention overides providing accessible grab bars.	DSA should consult with appropriate State agency to determine if amendments to the 2010 CBC are required to address correctional/detention concerns
1292	**Advisory 604.5 Grab Bars Exception 2.** Reinforcement must be sufficient to permit the installation of rear and side wall grab bars that fully meet all accessibility requirements including, but not limited to, required length, installation height, and structural strength.		N/A	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC adresses grab bar reinforcement, and dimensional requirements for residential dwelling units, but does not address strength quantitatively.	1. 2010 CBC does not need to be amended, as it is consistent with ADA Stds.

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1293	**604.5.1 Side Wall.** The side wall grab bar shall be 42 inches (1065 mm) long minimum, located 12 inches (305 mm) maximum from the rear wall and extending 54 inches (1370 mm) minimum from the rear wall.		**1115B.4.1 #3-3.1** **Side wall.** The side grab bar shall be 42 inches (1067 mm) long minimum, located 12 inches (305 mm) maximum from the rear wall and extend 54 inches (1372 mm) minimum from the rear wall with the front end positioned 24 inches (610 mm) minimum in front of the water closet. The side grab bar shall be securely attached and centered 33 inches (838 mm) above and parallel to the floor.	Which Std.provides greater access **depends** on circumstances.	2010 CBC has additional requirement that the side grab bar extend a minimum 24 inches in front of the water closet, to account for different water closet bowl lengths. While this may theoretically assure greb bar accessibilty regardless of bowl length, the additional 24 inches in front of the bowl is more difficult to measure accurately in the field, and may prompt more disagreements during inspection and enforcement.	2010 CBC should be amended to be consistent with the 2010 ADA Stds.
1294	**604.5.2 Rear Wall.** The rear wall grab bar shall be 36 inches (915 mm) long minimum …		**1115B.4.1 #3-3.2** **Rear wall.** The rear grab bar shall be 36 inches (914 mm) long minimum and extend from the centerline of the water closet 12 inches (305 mm) minimum on one side and 24 inches (610 mm) minimum on the other side. The rear grab bar shall be securely attached and centered 33 inches (838 mm) above and parallel to the floor, except that where a tank-type toilet is used which obstructs placement at 33 inches (838 mm), the grab bar may be as high as 36 inches (914 mm) and the space between the grab bar and the top of the tank shall be 1½ inches (38 mm) minimum.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA with regard to rear grab bar length.	2010 CBC need not be amended.
1295	**604.5.2 Rear Wall.** The rear wall grab bar shall ... extend from the centerline of the water closet 12 inches (305 mm) minimum on one side and 24 inches (610 mm) minimum on the other side.		**1115B.4.1 #3-3.2** **Rear wall.** The rear grab bar shall be 36 inches (914 mm) long minimum and extend from the centerline of the water closet 12 inches (305 mm) minimum on one side and 24 inches (610 mm) minimum on the other side. The rear grab bar shall be securely attached and centered 33 inches (838 mm) above and parallel to the floor, except that where a tank-type toilet is used which obstructs placement at 33 inches (838 mm), the grab bar may be as high as 36 inches (914 mm) and the space between the grab bar and the top of the tank shall be 1½ inches (38 mm) minimum.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA with regard to rear grab bar location.	2010 CBC need not be amended.
1296	**604.5.2 EXCEPTIONS: 1.** The rear grab bar shall be permitted to be 24 inches (610 mm) long minimum, centered on the water closet, where wall *space* does not permit a length of 36 inches (915 mm) minimum due to the location of a recessed fixture adjacent to the water closet. **2.** Where an *administrative authority* requires flush controls for flush valves to be located in a position that conflicts with the location of the rear grab bar, then the rear grab bar shall be permitted to be split or shifted to the open side of the toilet area.		**1115B.4.1 #3-3.2** **Rear wall.** The rear grab bar shall be 36 inches (914 mm) long minimum and extend from the centerline of the water closet 12 inches (305 mm) minimum on one side and 24 inches (610 mm) minimum on the other side. The rear grab bar shall be securely attached and centered 33 inches (838 mm) above and parallel to the floor, except that where a tank-type toilet is used which obstructs placement at 33 inches (838 mm), the grab bar may be as high as 36 inches (914 mm) and the space between the grab bar and the top of the tank shall be 1½ inches (38 mm) minimum.	Which Std.provides greater access **depends** on circumstances.	Conflicts between CBC rear grab bar placement and plumbing code requirements for flush valves are a common occurances in construction. The ADA Stds. Exceptions appropriately address such common conflicts in construction.	2010 CBC should be amended to be consistent with ADA Stds.
1297	**604.6 Flush Controls.** Flush controls shall be hand operated or automatic. Hand operated flush controls shall comply with 309. …		**1115B.4.1 #5** Controls shall be operable with one hand and shall not require tight grasping, pinching or twisting. Controls for the flush valves shall be mounted on the wide side of toilet areas, no more than 44 inches (1118 mm) above the floor. The force required to activate controls shall be no greater than 5 pounds-force (lbf) (22.2 N).	Which Std.provides greater access **depends** on circumstances.	2010 CBC water closet control requirements do not specifically allow automatic operation.	2010 CBC should be amended to allow use of automatic flush controls.
1298	**604.6 Flush Controls.** …		**1115B.4.1 #5** Controls shall be operable with one hand and shall not require tight grasping, pinching or twisting. Controls for the flush valves shall be mounted on the wide side of toilet areas, no more than 44 inches (1118 mm) above the floor. The force required to activate controls shall be no greater than 5 pounds-force (lbf) (22.2 N).	Which Std.provides greater access **depends** on circumstances.	2010 ADA Stds does not provide a special limitation, meaning the flush control can be mounted as high as 48" AFF.	2010 CBC should be amended to be consistent with 2010 ADA Stds.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1299	**604.6 Flush Controls.** ... Flush controls shall be located on the open side of the water closet ...		**1115B.4.1 #5** Controls shall be operable with one hand and shall not require tight grasping, pinching or twisting. Controls for the flush valves shall be mounted on the wide side of toilet areas, no more than 44 inches (1118 mm) above the floor. The force required to activate controls shall be no greater than 5 pounds-force (lbf) (22.2 N).	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA Stds., but there is a slight difference in terminology: "open side" vs. "wide side." Both terms are equally clear as to intent.	1. 2010 CBC should be amended to use the term "open side" in lieu of "wide side" to be consistent with ADA Stds. or 2. 2010 CBC need not be amended since the term "wide side" is equally clear.
1300	**604.6 Flush Controls.** ... Flush controls shall be located on the open side of the water closet except in ambulatory accessible compartments complying with 604.8.2.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 ADA Stds adds comment that flush controls do not have to be mounted on the open side in ambulatory accessible compartments.	2010 CBC should be amended to be consistent with ADA Stds.
1301	**Advisory 604.6 Flush Controls.** If plumbing valves are located directly behind the toilet seat, flush valves and related plumbing can cause injury or imbalance when a person leans back against them. To prevent causing injury or imbalance, the plumbing can be located behind walls or to the side of the toilet; or if approved by the local authority having jurisdiction, provide a toilet seat lid.		N/A	2010 CBC **does not address** 2010 ADA req.	Some owners may consider locating the flush valve behind the wall more costly to maintain and repair. It is beyond the scope of this comparison to determine if a side-located flush valve or toilet seat lid is compliant with LAHJ's.	2010 CBC need not be amended.
1302	**604.7 Dispensers.** Toilet paper dispensers shall comply with 309.4 and shall be 7 inches (180 mm) minimum and 9 inches (230 mm) maximum in front of the water closet measured to the centerline of the dispenser. The outlet of the dispenser shall be 15 inches (380 mm) minimum and 48 inches (1220 mm) maximum above the finish floor and shall not be located behind grab bars. ...		**1115B.8.4** **Toilet tissue dispensers.** Toilet tissue dispensers shall be located on the wall within 12 inches (305 mm) of the front edge of the toilet seat, mounted below the grab bar, at a minimum height of 19 inches (485 mm), and 36 inches (914 mm) maximum to the far edge from the rear wall. Dispensers that control delivery or that do not permit continuous paper flow shall not be used. See Figure 11B-1A.	2010 CBC **conflicts with** 2010 ADA.	Although it is possible to meet both CBC and 2010 ADA, it is extremely difficult to coordinate all of the elements to do it. 2010 ADA Stds requirements differ substantially from 2010 CBC, and are more definitive. CBC 1115B.8.4 does not define what vertical datum to measure the dispenser (Fig. 11B-1A shows to the centerline) whereas ADA Stds. define the vertical datum as the outlet of the dispenser. CBC also does not specifically reference requirements that operable parts shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist and that the force required to activate operable parts shall be 5 pounds (22.2 N) maximum, whereas ADA Stds. references such requirements in 309.4.	2010 CBC should be amended to be consistent with ADA Stds., including the use of the term "toilet paper" in lieu of "toilet tissue."
1303	**604.7 Dispensers.** ...Dispensers shall not be of a type that controls delivery or that does not allow continuous paper flow.		**1115B.8.4** **Toilet tissue dispensers.** Toilet tissue dispensers shall be located on the wall within 12 inches (305 mm) of the front edge of the toilet seat, mounted below the grab bar, at a minimum height of 19 inches (485 mm), and 36 inches (914 mm) maximum to the far edge from the rear wall. Dispensers that control delivery or that do not permit continuous paper flow shall not be used. See Figure 11B-1A.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to ADA Stds. with regard to this specific requirement.	2010 CBC need not be amended, unless full consistency with ADA Stds. is desired.
1304	**Advisory 604.7 Dispensers.** If toilet paper dispensers are installed above the side wall grab bar, the outlet of the toilet paper dispenser must be 48 inches (1220 mm) maximum above the finish floor and the top of the gripping surface of the grab bar must be 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not allow toilet paper dispenser to be placed above grab bars. If 2010 CBC is amended to allow toilet paper dispensers to be located above grab bars, then the ADA Stds. Advisory criteria should be incorporated into the CBC amendment.	If 2010 CBC is amended to allow toilet paper dispensers to be located above grab bars, then the ADA Stds. Advisory criteria should be incorporated into the CBCamendment.
1305	**604.8 Toilet Compartments.** Wheelchair *accessible* toilet compartments shall meet the requirements of 604.8.1 and 604.8.3. …		**1115B.3.1 #4** **Accessible water closet compartment.** Accessible water closet compartments shall comply with the following:	2010 CBC is **equivalent** to 2010 ADA.	This is just a section heading.	If 2010 CBC is amended to be consistent with the format of the 2010 ADA Stds., then the term "accessible water closet compartment" should be changed to the ADA Stds. term "wheelchair accessible toilet compartment"
1306	**604.8 Toilet Compartments.** ... Ambulatory *accessible* compartments shall comply with 604.8.2 and 604.8.3.		**1115B.3.1 #5** **Large toilet rooms.** Where six or more compartments are provided within a multiple-accommodation toilet room, in addition to the water closet and compartment required by Items 3 and 4 above, provide at least one ambulatory accessible compartment. The ambulatory accessible compartment shall be 36 inches (914 mm) wide with an outward swinging self-closing door and parallel grab bars complying with Section 1115B.4.1, Item 3.	Which Std.provides greater access **depends** on circumstances.	See comments under 2010 ADA Stds. 604.8.2 and 604.8.3 for applicable comments.	If 2010 CBC is amended to be consistent with the format of the 2010 ADA Stds., then the requirements of 1115B.3.1 #5 should be incorporated into the corresponding revised sections.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1307	**604.8 Toilet Compartments.** …		N/A	NA	N/A	N/A
1308	**604.8 Toilet Compartments.** ...Compartments containing more than one plumbing fixture shall comply with 603....		N/A	2010 CBC **does not address** 2010 ADA req.	CBC does not specifically address multiple fixtures (such as a lavatory and toilet) in a toilet compartment. 2010 should specifically allow multiple fixtues within a compartment via reference to regulations per 2010 ADA Stds.	2010 CBC should be amended to specifcally address multiple fixtures in a compartment consistent with ADA Stds.
1309	**604.8.1 Wheelchair Accessible Compartments.** Wheelchair *accessible* compartments shall comply with 604.8.1.		**1115B.3.1 #4** **Accessible water closet compartment.** Accessible water closet compartments shall comply with the following:	2010 CBC is **equivalent** to 2010 ADA.	ADA Stds. provide greater clarity by distinguishing wheelchair accessible compartments from ambulatory accessible compartments.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1310	**604.8.1.1 Size.** Wheelchair *accessible* compartments shall be 60 inches (1525 mm) wide minimum measured perpendicular to the side wall, and 56 inches (1420 mm) deep minimum for wall hung water closets and 59 inches (1500 mm) deep minimum for floor mounted water closets measured perpendicular to the rear wall.		**1115B.3.1 #4-4.1** The compartment shall be a minimum of 60 inches (1524 mm) wide.	2010 CBC is **equivalent** to 2010 ADA.	ADA Stds. provide additional clarity by specifying that the compartment width is measured perpendicular to the side wall.	2010 CBC need not be amended since the perpendicular measurement requirement is found in CBC 1115B.4.1 #2-2.2.
1310	**604.8.1.1 Size.** Wheelchair *accessible* compartments shall be 60 inches (1525 mm) wide minimum measured perpendicular to the side wall, and 56 inches (1420 mm) deep minimum for wall hung water closets and 59 inches (1500 mm) deep minimum for floor mounted water closets measured perpendicular to the rear wall. ...		**1115B.4.1 #2-2.2** Where a wall mounted water closet is installed within an accessible water closet compartment, clear floor space around the water closet shall be 60 inches (1524 mm) minimum measured perpendicular from the side wall closest to the water closet and 56 inches (1422 mm) minimum measured perpendicular from the rear wall. Where a floor mounted water closet is installed within an accessible water closet compartment, clear floor space around the water closet shall be 60 inches (1524 mm) minimum measured perpendicular from the side wall and 59 inches (1499 mm) minimum measured perpendicular from the rear wall. See Figures 11B-1E (b), (c), (d) and (e).	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA Stds. 2010 ADA uses the term "wheelchair accessible compartments" which makes a more clear distinction from ambulatory accessible compartments than the CBC.	2010 CBC should be amended to use the term "wheelchair accessible compartment" to be consistent with 2010 ADA Stds.
1311	**604.8.1.1 Size.** ...Wheelchair *accessible* compartments for *children's use* shall be 60 inches (1525 mm) wide minimum measured perpendicular to the side wall, and 59 inches (1500 mm) deep minimum for wall hung and floor mounted water closets measured perpendicular to the rear wall.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not have a separate requirement for depth of compartments for children's use.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1312	**Advisory 604.8.1.1 Size.** The minimum space required in toilet compartments is provided so that a person using a wheelchair can maneuver into position at the water closet. This space cannot be obstructed by baby changing tables or other fixtures or conveniences, except as specified at 604.3.2 (Overlap). If toilet compartments are to be used to house fixtures other than those associated with the water closet, they must be designed to exceed the minimum space requirements. Convenience fixtures such as baby changing tables must also be accessible to people with disabilities as well as to other users. Toilet compartments that are designed to meet, and not exceed, the minimum space requirements may not provide adequate space for maneuvering into position at a baby changing table.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not specifically address baby changing tables or other convenience fixtures. Since these are now more commnonly found in toilet facilities, access requirements for these fixtures should be considered.	1. 2010 CBC should be amended to include baby changing tables as an accessory requiring accessible clear floor space and maneuvering clearances when deployed. 2. If 2010 CBC is amended to address consistency with ADA Stds. reference to multiple fixtures in a compartment, baby changing tables should be included as a possible fixture to be regulated.

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1313	**604.8.1.2 Doors.** Toilet compartment doors, including door hardware, shall comply with 404 except that if the approach is to the latch side of the compartment door, clearance between the door side of the compartment and any obstruction shall be 42 inches (1065 mm) minimum. ...		**1115B.3.1 #4-4.5** The inside and outside of the compartment door shall be equipped with a loop or U-shaped handle immediately below the latch. The latch shall be flip-over style, sliding or other hardware not requiring the user to grasp or twist. Except for door-opening widths and door swings, a clear, unobstructed access of not less than 44 inches (1118 mm) shall be provided to water closet compartments designed for use by persons with disabilities. Maneuvering space at the compartment door shall comply with Sections 1133B.2.4.2 and 1133B.2.4.3, and in no case shall the space immediately outside of the water closet compartment door be less than 48 inches (1219 mm) as measured perpendicular to the compartment door in its closed position.	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC requires a minimum of 48 inches clear immediately outside of the closed compartment door; 2010 ADA Stds. will allow 42 inches minimum for a latch side approach.	1. Retain 2010 CBC requirement because it affords greater maneuvering clearance. or 2. 2010 CBC should be amended to be consistent with 2010 ADA Stds.
1314	**604.8.1.2 Doors.** ... Doors shall be located in the front partition or in the side wall or partition farthest from the water closet. Where located in the front partition, the door opening shall be 4 inches (100 mm) maximum from the side wall or partition farthest from the water closet. Where located in the side wall or partition, the door opening shall be 4 inches (100 mm) maximum from the front partition. ...		**1115B.3.1 #4-4.2** If the comp -inches (1524 mm) wide and 60 inches (1524 mm) deep maneuvering space shall be provided in front of the water closet. *[There is a typo in the Word file provided by DSA. The following wording is from the CBSC website: If the compartment has a side-opening door, either in-swinging or out-swinging, a minimum 60 inches (1524 mm) wide and 60 inches (1524 mm) deep maneuvering space shall be provided in front of the water closet.]* **1115B.3.1 #4-4.3** If the compartment has an end-opening door (facing the water closet), either in-swinging or out-swinging, a minimum 60 inches (1524 mm) wide and 48 inches (1219 mm) deep maneuvering space shall be provided in front of the water closet. The door shall be located in front of the clear floor space and diagonal to the water closet, with a maximum stile width of 4 inches (102 mm).	2010 CBC provides **less access** than 2010 ADA.	2010 CBC 1115B.3.1 #4.2 is silent on requirements for side-opening doors to be located in the side wall farthest from the water closet and that the door opening shall be 4 inches maximum from the front partition.	2010 CBC should be amended to include the ADA Stds. requirements for side-opening doors.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1315	**604.8.1.2 Doors.** ... The door shall be self-closing. A door pull complying with 404.2.7 shall be placed on both sides of the door near the latch. …		**1115B.3.1 #4-4.4** The water closet compartment shall be equipped with a door that has an automatic-closing device, and shall have a clear, unobstructed opening width of 32 inches (813 mm) when located at the end and 34 inches (864 mm) when located at the side with the door positioned at an angle of 90 degrees from its closed position. **1115B.3.1 #4-4.5** The inside and outside of the compartment door shall be equipped with a loop or U-shaped handle immediately below the latch. The latch shall be flip-over style, sliding or other hardware not requiring the user to grasp or twist. Except for door-opening widths and door swings, a clear, unobstructed access of not less than 44 inches (1118 mm) shall be provided to water closet compartments designed for use by persons with disabilities. Maneuvering space at the compartment door shall comply with Sections 1133B.2.4.2 and 1133B.2.4.3, and in no case shall the space immediately outside of the water closet compartment door be less than 48 inches (1219 mm) as measured perpendicular to the compartment door in its closed position.	Which Std.provides greater access **depends** on circumstances.	2010 CBC and 2010 ADA Stds. are equivalent on the issue of self-closing doors. 2010 CBC is more specific in giving examples of compliant latch types; 2010 ADA Stds. relies on reference to 404.2.7. 2010 CBC is more specific on the shape of the door pull and requires the handle to be located immediately below the latch, but does not quantify the pull height. 2010 ADA Stds. relies on reference to 404.2.7 for pull type which has a range of 34-48 inches high for hardware location and no requirement that the pull be located immediately below the latch.	The specifictiy of 2010 CBC generally makes it easier than ADA Stds. to understand how to comply with this section. 2010 CBC should be amended to include dimensional height range for door pull and latch, while maintaining the requirement to locate door pull immediately below the latch.
1316	**604.8.1.2 Doors.** ...Toilet compartment doors shall not swing into the minimum required compartment area.		**1115B.3.1 #2** Clear floor space at fixtures. Doors shall not swing into the clear floor space required for any fixture. Doors may swing into that portion of maneuvering space which does not overlap the fixture's required clear floor space. See Figures 11B-1E (c) and (e).	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and 2010 ADA Stds. Are equivalent, but are worded differently. 2010 ADA Stds. Is more simply worded, but the 2010 CBC wording in conjunction with the figures may ultimately more clear for some readers.	1 2010 CBC should be amended to be consistent with ADA Stds. Or 2. Retain current equivalent language of the 2010 CBC and figures.
1317	**604.8.1.3 Approach.** Compartments shall be arranged for left-hand or right-hand approach to the water closet.		**1115B.3.1 #4-4.2** If the comp -inches (1524 mm) wide and 60 inches (1524 mm) deep maneuvering space shall be provided in front of the water closet. *[There is a typo in the Word file provided by DSA. The following wording is from the CBSC website: If the compartment has a side-opening door, either in-swinging or out-swinging, a minimum 60 inches (1524 mm) wide and 60 inches (1524 mm) deep maneuvering space shall be provided in front of the water closet.]* **1115B.3.1 #4-4.3** If the compartment has an end-opening door (facing the water closet), either in-swinging or out-swinging, a minimum 60 inches (1524 mm) wide and 48 inches (1219 mm) deep maneuvering space shall be provided in front of the water closet. The door shall be located in front of the clear floor space and diagonal to the water closet, with a maximum stile width of 4 inches (102 mm).	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC approaches the issue of what side to approach the toilet differently than 2010 ADA Stds. For front-entry compartments, 2010 CBC 1115B.3.1 #4-4.3 describes the requirement as placing the door diagonal to the water closet, and while not explicitly saying that it could be either a left or right hand approach, it is implied that a left or right had approach is acceptable. 2010 CBC 1115B.3.1 #4.2 is silent on requirements for side-opening doors to be located in the side wall farthest from the water closet.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1318	**604.8.1.4 Toe Clearance.** The front partition and at least one side partition shall provide a toe clearance of 9 inches (230 mm) minimum above the finish floor …		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC is silent on required toe space at toilet compartement partitions.	2010 CBC should be amended to include 2010 ADA Stds. requirements for toe clearance at toilet compartment partions.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1319	**604.8.1.4 Toe Clearance.** The front partition and at least one side partition shall provide a toe clearance ... 6 inches (150 mm) deep minimum beyond the compartment-side face of the partition, exclusive of partition support members. …		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC is silent on required toe space at toilet compartement partitions.	2010 CBC should be amended to include 2010 ADA Stds. requirements for toe clearance at toilet compartment partions.
1320	**604.8.1.4 Toe Clearance.** ... Compartments for *children's use* shall provide a toe clearance of 12 inches (305 mm) minimum above the finish floor.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC is silent on required toe space at toilet compartement partitions for children's use.	2010 CBC should be amended to include 2010 ADA Stds. requirements for toe clearance at toilet compartment partions for children's use.
1321	**604.8.1.4 EXCEPTION:** Toe clearance at the front partition is not required in a compartment greater than 62 inches (1575 mm) deep with a wall-hung water closet or 65 inches (1650 mm) deep with a floor-mounted water closet. Toe clearance at the side partition is not required in a compartment greater than 66 inches (1675 mm) wide. Toe clearance at the front partition is not required in a compartment for *children's use* that is greater than 65 inches (1650 mm) deep.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC is silent on required toe space at toilet compartement partitions.	2010 CBC should be amended to include 2010 ADA Stds. requirements for toe clearance at toilet compartment partions including this exception.
1322	**604.8.1.5 Grab Bars.** Grab bars shall comply with 609. A side-wall grab bar complying with 604.5.1 shall be provided and shall be located on the wall closest to the water closet. In addition, a rear-wall grab bar complying with 604.5.2 shall be provided.		**1115B.4.1 #3** Grab bars for water closets not located within a compartment shall comply with Section 1115B.7 and shall be provided on the side wall closest to the water closet and on the rear wall. Grab bars for water closets located within an accessible compartment shall comply with Section 1115B.7 and shall be provided on the side wall closest to the water closet and on the rear wall. Grab bars for water closets located within ambulatory accessible compartments shall comply with Section 1115B.7 and shall be provided on both sides of the compartment.	2010 CBC is **equivalent** to 2010 ADA.	Both 2010 CBC and 2010 ADA Stds. require a side grab bar and rear grab bar in wheelchair accessible toilet compartments.	No substantive change required to 2010 CBC, however, if 2010 CBC is otherwise amended to conform to format of 2010 ADA Stds., then this CBC section should be amended for consistency.
1323	**604.8.2 Ambulatory Accessible Compartments.** Ambulatory *accessible* compartments shall comply with 604.8.2.		**1115B.3.1 #5** Large toilet rooms. Where six or more compartments are provided within a multiple-accommodation toilet room, in addition to the water closet and compartment required by Items 3 and 4 above, provide at least one ambulatory accessible compartment. The ambulatory accessible compartment shall be 36 inches (914 mm) wide with an outward swinging self-closing door and parallel grab bars complying with Section 1115B.4.1, Item 3.	2010 CBC is **equivalent** to 2010 ADA.	The conflict between the 2010 CBC and this particular 2010 ADA Stds. Section is mainly the organization of the regulations itself.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1324	**604.8.2.1 Size.** Ambulatory *accessible* compartments shall have ... a width of 35 inches (890 mm) minimum and 37 inches (940 mm) maximum.		**1115B.3.1 #5** Large toilet rooms. Where six or more compartments are provided within a multiple-accommodation toilet room, in addition to the water closet and compartment required by Items 3 and 4 above, provide at least one ambulatory accessible compartment. The ambulatory accessible compartment shall be 36 inches (914 mm) wide with an outward swinging self-closing door and parallel grab bars complying with Section 1115B.4.1, Item 3.	Which Std.provides greater access **depends** on circumstances.	2010 CBC compartment width is an absolute dimension, and 2010 ADA Stds. compartment width is a dimensional range. The dimensional range is makes it easier to achieve compliant construction and field inspection.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1325	**604.8.2.1 Size.** Ambulatory *accessible* compartments shall have a depth of 60 inches (1525 mm) minimum …		1115B.3.1 #5 Large toilet rooms. Where six or more compartments are provided within a multiple-accommodation toilet room, in addition to the water closet and compartment required by Items 3 and 4 above, provide at least one ambulatory accessible compartment. The ambulatory accessible compartment shall be 36 inches (914 mm) wide with an outward swinging self-closing door and parallel grab bars complying with Section 1115B.4.1, Item 3.	2010 CBC provides **less access** than 2010 ADA.	2010 CBC is silent on the depth of an ambulatory accessible stall; most will assume that the CPC requirements for non-accessible water closets will apply, which could result in a stall depth of less than 60 inches.	2010 CBC should be amended to include the minimum stall depth per 2010 ADA Stds.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1326	**604.8.2.2 Doors.** Toilet compartment doors, including door hardware, shall comply with 404, except that if the approach is to the latch side of the compartment door, clearance between the door side of the compartment and any obstruction shall be 42 inches (1065 mm) minimum. ...		N/A	Which Std.provides greater access **depends** on circumstances.	2010 CBC does not separately address ambulatory accessible compartment door clearances. The 2010 ADA Stds. allowance of 42 inch clearance between the door side of the compartment and an obstruction could provide less accessibilty than 2010 CBC under some circumstances.	The 2010 CBC should be amended to clarify door clearances for ambulatory accessible compartments, but not adopt the ADA Stds. allowance for 42 inches clear between the door side of the compartment and an obstruction.
1327	**604.8.2.2 Doors.** ... Toilet compartment doors shall not swing into the minimum required compartment area.		1115B.3.1 #5 Large toilet rooms. Where six or more compartments are provided within a multiple-accommodation toilet room, in addition to the water closet and compartment required by Items 3 and 4 above, provide at least one ambulatory accessible compartment. The ambulatory accessible compartment shall be 36 inches (914 mm) wide with an outward swinging self-closing door and parallel grab bars complying with Section 1115B.4.1, Item 3.	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC does not allow the compartment door to swing into the ambulatory accessible compartment under any circumstance. Although 2010 ADA Stds. Allow an in-swinging door as long as it does not swing into the minimum required compartment area, this design flexibility is probably going to occur very rarely. 2010 CBC is more straightforward and easy to understand and enforce.	2010 CBC should not be amended to allow in-swinging doors at ambulatory accessible stalls. Or amended to use the ADA language to provide for greater flexibility for designers in those rare circumstances where an ambulatory stall might be at least 92" long.
1328	**604.8.2.2 Doors.** ... The door shall be self-closing. …		1115B.3.1 #5 Large toilet rooms. Where six or more compartments are provided within a multiple-accommodation toilet room, in addition to the water closet and compartment required by Items 3 and 4 above, provide at least one ambulatory accessible compartment. The ambulatory accessible compartment shall be 36 inches (914 mm) wide with an outward swinging self-closing door and parallel grab bars complying with Section 1115B.4.1, Item 3.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and 2010 ADA Stds. both require self- closing doors.	2010 CBC need not be amended.
1329	**604.8.2.2 Doors.** .... A door pull complying with 404.2.7 shall be placed on both sides of the door near the latch. …		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not have specific requirements for the door hardware at ambulatory accesible compartments.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1330	**604.8.2.2 Doors.** ...Toilet compartment doors shall not swing into the minimum required compartment area.		1115B.3.1 #5 Large toilet rooms. Where six or more compartments are provided within a multiple-accommodation toilet room, in addition to the water closet and compartment required by Items 3 and 4 above, provide at least one ambulatory accessible compartment. The ambulatory accessible compartment shall be 36 inches (914 mm) wide with an outward swinging self-closing door and parallel grab bars complying with Section 1115B.4.1, Item 3.	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC does not allow the compartment door to swing into the ambulatory accessible compartment under any circumstance. Although 2010 ADA Stds. Allow an in-swinging door as long as it does not swing into the minimum required compartment area, this design flexibility is probably going to occur very rarely. 2010 CBC is more straightforward and easy to understand and enforce.	2010 CBC should not be amended to allow in-swinging doors at ambulatory accessible stalls. Or amended to use the ADA language to provide for greater flexibility for designers in those rare circumstances where an ambulatory stall might be at least 92" long.
1331	**604.8.2.3 Grab Bars.** Grab bars shall comply with 609. A side-wall grab bar complying with 604.5.1 shall be provided on both sides of the compartment.		**1115B.4.1 #3** Grab bars for water closets not located within a compartment shall comply with Section 1115B.7 and shall be provided on the side wall closest to the water closet and on the rear wall. Grab bars for water closets located within an accessible compartment shall comply with Section 1115B.7 and shall be provided on the side wall closest to the water closet and on the rear wall. Grab bars for water closets located within ambulatory accessible compartments shall comply with Section 1115B.7 and shall be provided on both sides of the compartment. Grab bars shall not project more than 3 inches (76 mm) into the required clear floor space.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and 2010 ADA Stds. both require grab bars on both sides of the compartment.	2010 CBC need not be amended.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1332	**604.8.3 Coat Hooks and Shelves.** Coat hooks shall be located within one of the reach ranges specified in 308. …		N/A	2010 CBC **does not address** 2010 ADA req.	Coat hooks were not mentioned specifically in connection with toilet compartments in the 2010 CBC.	2010 CBC should be amended to incorporate 2010 ADA Stds. requirements for coat hooks in toilet compartments.
1333	**604.8.3 Coat Hooks and Shelves.** ... Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.		N/A	2010 CBC **does not address** 2010 ADA req.	Shelves were not mentioned specifically in connection with toilet compartments in the 2010 CBC.	2010 CBC should be amended to incorporate 2010 ADA Stds. requirements for shelves in toilet compartments.
1334	**604.9 Water Closets ... for Children's Use.** Water closets ...s for *children's use* shall comply with 604.9.		**1115B.1.2** **Where used by children.** Where facilities are to be used solely by small children, the specific heights and clearances may be adjusted to meet their accessibility needs. See Table 1115B-1 for suggested mounting heights and clearances.	2010 CBC provides **less access** than 2010 ADA.	2010 CBC limits application of children's use dimensions to facilities "used solely by small children." This allows accessible fixtures in fewer appropriate locations than the 2010 ADA Stds. Chapter 1 definition of children's use as "spaces and elements specifically designed for use primarily by people 12 years old and younger."	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1335	**604.9 ... Toilet Compartments for Children's Use.** ... toilet compartments for *children's use* shall comply with 604.9.		**1115B.1.2** **Where used by children.** Where facilities are to be used solely by small children, the specific heights and clearances may be adjusted to meet their accessibility needs. See Table 1115B-1 for suggested mounting heights and clearances.	2010 CBC provides **less access** than 2010 ADA.	2010 CBC limits application of children's use dimensions to facilities "used solely by small children." This allows accessible fixtures in fewer appropriate locations than the 2010 ADA Stds. Chapter 1 definition of children's use as "spaces and elements specifically designed for use primarily by people 12 years old and younger."	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1336	**Advisory 604.9 Water Closets and Toilet Compartments for Children's Use.** The requirements in 604.9 are to be followed where the exception for children's water closets in 604.1 is used. The following table provides additional guidance in applying the specifications for water closets for children according to the age group served and reflects the differences in the size, stature, and reach ranges of children ages 3 through 12. The specifications chosen should correspond to the age of the primary user group. The specifications of one age group should be applied consistently in the installation of a water closet and related elements.		Table 1115B-1	2010 CBC **conflicts with** 2010 ADA.	The age divisions in the 2010 CBC Table 1115B-1 are in conflict with 2010 ADA Stds. Advisory table, as are some of the dimensions.	2010 CBC should be amended to be consistent with ADA Stds. Advisory dimensions.
1337	**604.9.1 Location.** The water closet shall be located with a wall or partition to the rear and to one side. The centerline of the water closet shall be 12 inches (305 mm) minimum and 18 inches (455 mm) maximum from the side wall or partition, except that the water closet shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum from the side wall or partition in the ambulatory *accessible* toilet compartment specified in 604.8.2. Compartments shall be arranged for left-hand or right-hand approach to the water closet.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 ADA Stds. codifies the dimensional requirements for water closet location for children's use. The age ranges in the Advisory table are just that -- advisory. 2010 CBC merely relies on Table 1115B-1 for "suggested" dimensions.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1338	**604.9.2 Clearance.** Clearance around a water closet shall comply with 604.3.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not explicity state that clearance around a water closet is the same as for adult use.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1339	**604.9.3 Height.** The height of water closets shall be 11 inches (280 mm) minimum and 17 inches (430 mm) maximum measured to the top of the seat. Seats shall not be sprung to return to a lifted position.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 ADA Stds. codifies the dimensional requirements for water closet height for children's use. The age ranges in the Advisory table are just that -- advisory. 2010 CBC merely relies on Table 1115B-1 for "suggested" dimensions. Also, 2010 CBC does not separately prohibit seats that are sprung to return to a lifted position for children's use.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1340	**604.9.4 Grab Bars.** Grab bars for water closets shall comply with 604.5.		Table 1115B-1	2010 CBC **conflicts with** 2010 ADA.	The age divisions in the 2010 CBC Table 1115B-1 are in conflict with 2010 ADA Stds. Advisory table, as are some of the dimensions.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1341	**604.9.5 Flush Controls.** Flush controls shall be hand operated or automatic. Hand operated flush controls shall comply with 309.2 and 309.4 and shall be installed 36 inches (915 mm) maximum above the finish floor. Flush controls shall be located on the open side of the water closet except in ambulatory *accessible* compartments complying with 604.8.2.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not address height of water closet flush controls for children's use.	2010 CBC should be amended to be consistent with 2010 ADA Stds.

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1342	**604.9.6 Dispensers.** Toilet paper dispensers shall comply with 309.4 and shall be 7 inches (180 mm) minimum and 9 inches (230 mm) maximum in front of the water closet measured to the centerline of the dispenser. The outlet of the dispenser shall be 14 inches (355 mm) minimum and 19 inches (485 mm) maximum above the finish floor. There shall be a clearance of 1½ inches (38 mm) minimum below the grab bar. Dispensers shall not be of a type that controls delivery or that does not allow continuous paper flow.		Table 1115B-1	2010 CBC provides **less access** than 2010 ADA.	2010 CBC toilet paper dispenser location in front of the water closet conflicts with 2010 ADA Stds. 2010 CBC does not address dispenser outlet location, clearance below the grab bar, and type of toilet paper dispenser specifically for children's use.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1343	**604.9.7 Toilet Compartments.** Toilet compartments shall comply with 604.8.		**1115B.1.2** **Where used by children.** Where facilities are to be used solely by small children, the specific heights and clearances may be adjusted to meet their accessibility needs. See Table 1115B-1 for suggested mounting heights and clearances.	2010 CBC is **equivalent** to 2010 ADA.	The difference between 2010 CBC and 2010 ADA Stds. is that CBC infers that adult dimensions can be used in children's use toilet facilities, ADA Stds. is more explicit that adult dimensions can be used in children's use toilet facilities. They are otherwise equivalent in this regard.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1344	**605 Urinals**		N/A	NA	This is just a section heading.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1345	**605.1 General.** Urinals shall comply with 605.		**1115B.4.2** **Accessible urinals.** Urinals required to be accessible shall comply with this subsection.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1346	**Advisory 605.1 General.** Stall-type urinals provide greater accessibility for a broader range of persons, including people of short stature.		N/A	NA	This ADA Stds. Advisory is not suitable as code language.	2010 CBC need not be amended.
1347	**605.2 Height and Depth.** Urinals shall be the stall-type or the wall-hung type with the rim 17 inches (430 mm) maximum above the finish floor or ground. …		**1115B.4.2 #1** Urinals shall be floor mounted, stall-type or wall hung. Where one or more wall-hung urinals are provided, at least one with an elongated rim projecting a minimum of 14 inches (356 mm) from the wall and a maximum of 17 inches (432 mm) from the wall and a maximum of 17 inches (432 mm) above the floor shall be provided.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1348	**605.2 Height and Depth.** ... Urinals shall be 13½ inches (345 mm) deep minimum measured from the outer face of the urinal rim to the back of the fixture.		**1115B.4.2 #1** Urinals shall be floor mounted, stall-type or wall hung. Where one or more wall-hung urinals are provided, at least one with an elongated rim projecting a minimum of 14 inches (356 mm) from the wall and a maximum of 17 inches (432 mm) from the wall and a maximum of 17 inches (432 mm) above the floor shall be provided.	Which Std.provides greater access **depends** on circumstances.	2010 CBC minimum depth is 1/2 inch longer than 2010 ADA Stds.	1. 2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable. or 2. 2010 CBC should be amended to be consistent with 2010 ADA Stds.
1349	**605.3 Clear Floor Space.** A clear floor or ground *space* complying with 305 positioned for forward approach shall be provided.		**1115B.4.2 #3** Where urinals are provided, at least one shall have a clear floor space 30 inches by 48 inches (762 mm by 1219 mm) in front of the urinal to allow forward approach. This clear space shall comply with Section 1118B.4.	2010 CBC provides **less access** than 2010 ADA.	2010 CBC requirements referenced elsewhere for the clear floor space do not include a level floor (1:48 max.), nor prohibit level changes.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1350	**605.3 Clear Floor Space.** A clear floor or ground space complying with 305 positioned for forward approach shall be provided.		N/A	NA	N/A	N/A
1351	**605.3 Clear Floor Space.** …		N/A	NA	N/A	N/A
1352	**605.4 Flush Controls.** Flush controls shall be hand operated or automatic. …		**1115B.4.2 #2** **Flush Controls.** Flush controls shall be operable with one hand, shall not require tight grasping, pinching or twisting of the wrist and shall be mounted no more than 44 inches (1118 mm) above the floor. The force required to activate controls shall be no greater than 5 pound-force (lbf) (22.2 N). Electronic automatic flushing controls are acceptable and preferable.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA Stds., but CBC goes further to state that automatic controls are preferable, which may not be quite appropriate for code language.	2010 CBC should be amended to be consistent with 2010 ADA Stds.

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1353	**605.4 Flush Controls.** ... Hand operated flush controls shall comply with 309.		**1115B.4.2 #2** **Flush Controls.** Flush controls shall be operable with one hand, shall not require tight grasping, pinching or twisting of the wrist and shall be mounted no more than 44 inches (1118 mm) above the floor. The force required to activate controls shall be no greater than 5 pound-force (lbf) (22.2 N). Electronic automatic flushing controls are acceptable and preferable.	Which Std.provides greater access **depends** on circumstances.	2010 CBC limits height of flush controls to 44 inches max. and 2010 ADA Stds. limits height of flush controls to 48 inches.	1. 2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable. or 2. 2010 CBC should be amended to be consistent with 2010 ADA Stds.
1354	**606 Lavatories and Sinks**		N/A	NA	This is just a section heading.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1355	**606 Lavatories and Sinks**		N/A	NA	This is just a section heading.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1356	**606.1 General.** Lavatories... shall comply with 606.		**1115B.4.3** **Accessible lavatories.** Lavatories required to be accessible shall comply with this subsection. The requirements of this subsection shall apply to lavatory fixtures, vanities and built-in lavatories.	2010 CBC is **equivalent** to 2010 ADA.	This just references requirements for lavatories.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1357	**606.1 General**.... sinks shall comply with 606.		**1117B.9** **Accessible sinks.** Sinks required to be accessible shall comply with this subsection.	2010 CBC is **equivalent** to 2010 ADA.	This just references requirements for sinks.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1358	**606.1 General.** Lavatories and sinks shall comply with 606.		N/A	NA	N/A	N/A
1359	**Advisory 606.1 General.** If soap and towel dispensers are provided, they must be located within the reach ranges specified in 308. Locate soap and towel dispensers so that they are conveniently usable by a person at the accessible lavatory.		N/A	NA	ADA Stds. Advisory is good judgement but difficult to codify to address all possible conditions.	N/A
1360	**606.2 Clear Floor Space.** A clear floor *space* complying with 305, positioned for a forward approach, ... shall be provided.		**1115B.4.3 #3** A clear floor space 30 inches by 48 inches (762 mm by 1219 mm) complying with Section 1118B.4 shall be provided in front of a lavatory to allow forward approach. Such clear floor space shall adjoin or overlap an accessible route and shall extend a maximum of 19 inches (483 mm) into knee and toe space underneath the lavatory. See Figure 11B-1D, Knee Clearance.	2010 CBC provides **less access** than 2010 ADA.	2010 CBC requirements referenced elsewhere for the clear floor space do not include a level floor (1:48 max.), nor prohibit level changes.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1361	**606.2 Clear Floor Space.** ... and knee and toe clearance complying with 306 shall be provided.		**1115B.4.3 #3** A clear floor space 30 inches by 48 inches (762 mm by 1219 mm) complying with Section 1118B.4 shall be provided in front of a lavatory to allow forward approach. Such clear floor space shall adjoin or overlap an accessible route and shall extend a maximum of 19 inches (483 mm) into knee and toe space underneath the lavatory. See Figure 11B-1D, Knee Clearance.	2010 CBC **conflicts with** 2010 ADA.	There are differences in the referenced requirements for knee and toe clearance between 2010 CBC and 2010 ADA Stds. CBC requires 29" clear at the front edge of the lav. but without any minimum depth (like the 1991 ADA). The 19" maximum allowed for the CLFS to extend under the lav has been dropped by the 2010 ADA Stds. as it serves little purpose with the new knee and toe profiles. Also, there is an error in the amended CBC figure number.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1361.1	**606.2 Clear Floor Space.** ... and knee and toe clearance complying with 306 shall be provided.		**1117B.9 #1 Accessible Sinks** A clear floor space ... complying with Section 1118B.4 shall be provided in front of a sink to allow forward approach. The clear floor space ... shall extend a maximum of 19 inches (485 mm) underneath the sink (see Figure 11B-1D).	2010 CBC **conflicts with** 2010 ADA.	Accessible Sinks have technical requirements but are not scoped anywhere. The required knee space cannot be determined by tracing through 1118B.4 but only by looking at the unamended 2010 CBC Figure 11B-1D.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1362	**606.2 Clear Floor Space.** A clear floor *space* complying with 305, positioned for a forward approach, ... shall be provided.		**1115B.4.3 #3** A clear floor space 30 inches by 48 inches (762 mm by 1219 mm) complying with Section 1118B.4 shall be provided in front of a lavatory to allow forward approach. Such clear floor space shall adjoin or overlap an accessible route and shall extend a maximum of 19 inches (483 mm) into knee and toe space underneath the lavatory. See Figure 11B-1D, Knee Clearance.	2010 CBC provides **less access** than 2010 ADA.	2010 CBC requirements referenced elsewhere for the clear floor space do not include a level floor (1:48 max.), nor prohibit level changes.	2010 CBC should be amended to be consistent with 2010 ADA Stds.

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1362.1	**606.2 Clear Floor Space.** A clear floor *space* complying with 305, positioned for a forward approach, ... shall be provided.		**1117B.9 #1 Accessible Sinks** A clear floor space at least 30 inches by 48 inches (762 mm by 1219 mm) complying with Section 1118B.4 shall be provided in front of a sink to allow forward approach. The clear floor space shall be on an accessible route ... (see Figure 11B-1D).	2010 CBC provides **less access** than 2010 ADA.	Accessible Sinks have technical requirements but are not scoped anywhere. This section is equivalent except that it does not require the clear floor space to be level and does not prohibit changes in level in the CLFS as do the ADA Stds.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1363	**606.2 EXCEPTIONS: 1.** A parallel approach complying with 305 shall be permitted to a kitchen sink in a *space* where a cook top or conventional range is not provided and to wet bars. **2.** A lavatory in a toilet room or bathing *facility* for a single occupant accessed only through a private office and not for *common use* or *public use* shall not be required to provide knee and toe clearance complying with 306. **3.** In *residential dwelling units*, cabinetry shall be permitted under lavatories and kitchen sinks provided that all of the following conditions are met: (a) the cabinetry can be removed without removal or replacement of the fixture; (b) the finish floor extends under the cabinetry; and (c) the walls behind and surrounding the cabinetry are finished. **4.** A knee clearance of 24 inches (610 mm) minimum above the finish floor or ground shall be permitted at lavatories and sinks used primarily by children 6 through 12 years where the rim or counter surface is 31 inches (785 mm) maximum above the finish floor or ground. **5.** A parallel approach complying with 305 shall be permitted to lavatories and sinks used primarily by children 5 years and younger. **6.** The dip of the overflow shall not be considered in determining knee and toe clearances. **7.** No more than one bowl of a multi-bowl sink shall be required to provide knee and toe clearance complying with 306.		**1117B.3** **Kitchens.** See Section 1133A. **1133A.2 #2** A clear floor space at least 30 inches (762 mm) by 48 inches (1219 mm) that allows either a parallel or forward approach shall be provided at the kitchen sink and all other fixtures or appliances including the oven, dishwasher, refrigerator/freezer and trash compactor	Which Std.provides greater access **depends** on circumstances.	Kitchen sinks covered by 2010 CBC 1133A.2 #2 allow a parallel approach, but it is not subject to limitations in ADA Stds. 606.2 EXCEPTIONS. There is a conflict within 2010 CBC between 1117B.9 and 1117B.3, in that both appear to potentially regulate the sink, but one allows a parallel approach and the other does not.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1363	**606.2 EXCEPTIONS: ...** shall be permitted to a kitchen sink in a... **2.** A lavatory in a toilet room or bathing *facility* for a single occupant accessed only through a private office and not for *common use* or *public use* shall not be required to provide knee and toe clearance complying with 306. **...**		N/A	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC does not allow exception for single occupant toilet room with only private access.	1. 2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable. or 2. 2010 CBC should be amended to be consistent with 2010 ADA Stds.
1363	**606.2 EXCEPTIONS: ...** shall be permitted to a kitchen sink in a... **3.** In *residential dwelling units*, cabinetry shall be permitted under lavatories ... provided that all of the following conditions are met: (a) the cabinetry can be removed without removal or replacement of the fixture; (b) the finish floor extends under the cabinetry; and (c) the walls behind and surrounding the cabinetry are finished. **...**		**1115B.1** **General.** Bathing and toilet facilities that serve buildings, facilities or portions of buildings or facilities that are required by these standards to be accessible to persons with disabilities, shall be on an accessible route and shall conform to the following requirements. The accessible fixtures and controls required in this section shall be on an accessible route. An unobstructed turning space complying with Section 1115B.3.1, Item 1, or 1115B.3.2, Item 1, as applicable, shall be provided within an accessible toilet facility. The clear floor spaces at fixtures and controls, the accessible route and the turning space may overlap. See Section 1111B.4.6 and Chapter 11A for bathrooms in residential occupancies. **1134A.8 #3.** **Cabinets.** Cabinets under lavatories are acceptable-provided the bathroom has space to allow a parallel approach by a person in a wheelchair and the lavatory cabinets are designed with adaptable knee and toe space.	Which Std.provides greater access **depends** on circumstances.	2010 CBC definition of what consitutes an adaptable cabinet under the lavatory or sink is not as detailed as 2010 ADA Stds. The second section of this comment addresses residential facilities which are defined differently under the ADA and CBC but are referenced here.	2010 CBC should be amended to be consistent with 2010 ADA Stds.

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1363	**606.2 EXCEPTIONS: ...** shall be permitted to a kitchen sink in a... **3.** In *residential dwelling units* , cabinetry shall be permitted under ... kitchen sinks provided that all of the following conditions are met: (a) the cabinetry can be removed without removal or replacement of the fixture; (b) the finish floor extends under the cabinetry; and (c) the walls behind and surrounding the cabinetry are finished. **...**		**1117B.3** **Kitchens.** See Section 1133A. **1133A.3** **Removable base cabinets.** Base cabinets directly under the kitchen sink counter area, including toeboard and shelving, shall be removable without the use of specialized tools or specialized knowledge in order to provide clearance for a wheelchair. The finish floor beneath the kitchen sink counter area shall be extended to the wall.	Which Std.provides greater access **depends** on circumstances.	Scoping for kitchens in CBC is not clear and the definition of what consitutes an adaptable cabinet under the lavatory or sink is not as detailed as the 2010 ADA Stds. are for residential facilities. However, non-residential kitchens are not required to be adaptable under the 2010 ADA Stds. and may not require a forward approach.	2010 CBC should be amended to be consistent with 2010 ADA Stds. Or clean up the scoping language to be clear about which types of non-residential kitchens are covered by which requirements and copy the "Removable Base Cabinet" language into the non-residential kitchens section(s) in the CBC.
1363	**606.2 EXCEPTIONS: ...** shall be permitted to a kitchen sink in a... **4.** A knee clearance of 24 inches (610 mm) minimum above the finish floor or ground shall be permitted at lavatories and sinks used primarily by children 6 through 12 years where the rim or counter surface is 31 inches (785 mm) maximum above the finish floor or ground. **...**		Table 1115B-1	2010 CBC **conflicts with** 2010 ADA.	2010 CBC lavatory/sink rim/counter surface for elementary age children is 29 inches max. vs. ADA Stds. height of 31 inches max.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1364	**606.2 EXCEPTIONS: ...** shall be permitted to a kitchen sink in a ... **5.** A parallel approach complying with 305 shall be permitted to lavatories and sinks used primarily by children 5 years and younger. **...**		**1115B.1.2** Where used by children. Where facilities are to be used solely by small children, the specific heights and clearances may be adjusted to meet their accessibility needs. See Table 1115B-1 for suggested mounting heights and clearances.	Which Std.provides greater access **depends** on circumstances.	2010 CBC does not specifically allow a parallel approach to a sink serving primarily children 5 years old and younger.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1364	**606.2 EXCEPTIONS: ...** shall be permitted to a kitchen sink in a ... **6.** The dip of the overflow shall not be considered in determining knee and toe clearances. **...**		N/A	2010 CBC **does not address** 2010 ADA req.	The subject of the dip of the overflow has been subject to varying interpretations and opinions. 2010 CBC is silent on this. 2010 ADA Stds. specifically addresses it and provides clarity.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1364	**606.2 EXCEPTIONS: ...** shall be permitted to a kitchen sink in a ... **7.** No more than one bowl of a multi-bowl sink shall be required to provide knee and toe clearance complying with 306.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC is written to address single bowl lavatories and does not really address multiple lavatories housed in a single fixture. 2010 ADA Stds. provide greater clarity as to the intent.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1364	**606.3 Height.** Lavatories ... shall be installed with the front of the higher of the rim or counter surface 34 inches (865 mm) maximum above the finish floor or ground.		**1115B.4.3 #2** ... All lavatories that are designated to be accessible shall be... mounted with the rim or counter edge no higher than 34 inches (864 mm) above the finished floor …	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and ADA Stds. Have same max. height for lavatory rim/counter.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1365	**606.3 Height.** ... sinks shall be installed with the front of the higher of the rim or counter surface 34 inches (865 mm) maximum above the finish floor or ground.		**1117B.9 Accessible sinks.** Sinks required to be accessible shall comply with this subsection. **...** Sinks shall be mounted with the counter or rim no higher than 34 inches (865 mm) above the finish floor. ... **1115B.4.3 #2** ... All lavatories that are designated to be accessible shall be ... mounted with the rim or counter edge no higher than 34 inches (864 mm) above the finished floor ...	2010 CBC is **equivalent** to 2010 ADA.	1117B.9 covers sinks that are required to be accessible but that section number is not referenced by any other section in the CBC. So does that mean that sinks are covered by the lavatory section? In 11A, "lavatory" is sometimes written as "lavatory (sink)". In any case, 2010 CBC and ADA Stds. have same max. height for sink rim/counter.	2010 CBC should be amended to conform to ADA Stds. formatting as applicable and, if ADA Standards are not adopted in full, to clarify when the sink requirements are to be used instead of the lavatory requirements. (Along with other differences, sinks do not have the 18" to the adjacent wall requirement.)
1366	**606.3 Height.** …		**1115B.4.3 #2** .... All lavatories that are designated to be accessible shall ... vertical clearance measured from the bottom of the apron or the outside bottom edge of the lavatory of 29 inches (737 mm) reducing to 27 inches (686 mm) at a point located 8 inches (203 mm) back from the front edge. ...	2010 CBC provides **greater access** than 2010 ADA.	Although 2010 CBC has a vertical clearance under the lavatory/sink from 29 inches at the bottom of the apron shown in the figure as reducing to 27 inches at a point 8 inches back from the front edge (like the 1991 ADA) the profile is otherwise undefined. The 2010 ADA Stds. do not require this 29" dimension.	2010 CBC should be amended to be consistent with 2010 ADA Stds. with the centering requirement, if desired.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1367	**606.3 EXCEPTIONS: 1.** A lavatory in a toilet or bathing *facility* for a single occupant accessed only through a private office and not for *common use* or *public use* shall not be required to comply with 606.3. **2.** In *residential dwelling unit* kitchens, sinks that are adjustable to variable heights, 29 inches (735 mm) minimum and 36 inches (915 mm) maximum, shall be permitted where rough-in plumbing permits connections of supply and drain pipes for sinks mounted at the height of 29 inches (735 mm).		N/A	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC makes no exception for single occupant toilet rooms accessed through a private office.	1. 2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable. or 2. 2010 CBC should be amended to be consistent with 2010 ADA Stds.
1367	**606.3 EXCEPTIONS: ...** **2.** In *residential dwelling unit* kitchens, sinks that are adjustable to variable heights, 29 inches (735 mm) minimum and 36 inches (915 mm) maximum, shall be permitted where rough-in plumbing permits connections of supply and drain pipes for sinks mounted at the height of 29 inches (735 mm).		**1117B.3** **Kitchens.** See Section 1133A. **1133A.4.1 #1.** The kitchen sink and work surface space required by Section 1133A.4 shall be designed to enable repositioning to a minimum height of 28 inches (711 mm)	Which Std.provides greater access **depends** on circumstances.	2010 CBC has a different minimum and no maximum height for repositionable kitchen sinks. Scoping for non-residential kitchens in CBC is not clear so it is not clear where and how this requirement applies.	2010 CBC should be amended to be consistent with 2010 ADA Stds. With the possible addition of the slightly lower mounting height allowed if knee space is provided where required.
1368	**606.4 Faucets.** Controls for faucets shall comply with 309. …		**1115B.4.3 #1.** Faucet controls and operating mechanisms shall be operable with one hand in accordance with this chapter and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2 N). Lever-operated, push-type and electronically controlled mechanisms (preferable) are examples of acceptable designs. Self-closing valves are allowed if the faucet remains open for at least 10 seconds.	2010 CBC provides **less access** than 2010 ADA.	2010 ADA Stds. references 309 which in turn references 308, requiring that faucets comply with accessible reach ranges. 2010 CBC does not address reach range for lavatory faucets directly or by reference.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1369	**606.4 Faucets.** Controls for faucets shall comply with 309. …		**1117B.9 #3**. Faucet controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be not greater than 5 lbf (22.2 N). Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs. Self-closing valves are allowed if the faucet remains open for at least 10 seconds.	2010 CBC provides **less access** than 2010 ADA.	2010 ADA Stds. references 309 which in turn references 308, requiring that faucets comply with accessible reach ranges. 2010 CBC does not address reach range for sink faucets directly or by reference.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1370	**606.4 Faucets.** …		N/A	NA	N/A	N/A
1371	**606.4 Faucets.** …		N/A	NA	N/A	N/A
1372	**606.4 Faucets.** ... Hand-operated metering faucets shall remain open for 10 seconds minimum.		**1115B.4.3 #1** Faucet controls and operating mechanisms shall be operable with one hand in accordance with this chapter and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2 N). Lever-operated, push-type and electronically controlled mechanisms (preferable) are examples of acceptable designs. Self-closing valves are allowed if the faucet remains open for at least 10 seconds.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC uses the term "self-closing valves" vs. ADA Stds. term "hand-operated metering faucets."	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1372.1	**606.4 Faucets.** ... Hand-operated metering faucets shall remain open for 10 seconds minimum.		**1117B.9 #3** Faucet controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be not greater than 5 lbf (22.2 N). Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs. Self-closing valves are allowed if the faucet remains open for at least 10 seconds.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC uses the term "self-closing valves" vs. ADA Stds. term "hand-operated metering faucets."	2010 CBC should be amended to be consistent with 2010 ADA Stds.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1373	**606.5 Exposed Pipes and Surfaces.** Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. …		**1115B.4.3 #4** Hot water and drainpipes accessible under lavatories shall be insulated or otherwise covered. There shall be no sharp or abrasive surfaces under lavatories.	2010 CBC provides **less access** than 2010 ADA.	2010 CBC does not require insulation on all lavatory water supply pipes, per 2010 ADA Stds.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1374	**606.5 Exposed Pipes and Surfaces.** Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. …		**1117B.9 #2** Each accessible sink shall be a maximum of 6½ inches (165 mm) deep. Sinks shall be mounted with the counter or rim no higher than 34 inches (865 mm) above the finish floor. Knee clearance that is at least 27 inches (685 mm) high, 30 inches (762 mm) wide and 19 inches (485 mm) deep shall be provided underneath sinks. Hot water and drain pipes exposed under sinks shall be insulated or otherwise configured so as to protect against contact. There shall be no sharp or abrasive surfaces under sinks.	2010 CBC provides **less access** than 2010 ADA.	2010 CBC does not require insulation on all sink water supply pipes, per 2010 ADA Stds.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1375	**606.5 Exposed Pipes and Surfaces.** ... There shall be no sharp or abrasive surfaces under lavatories and sinks.		**1115B.4.3 #4** Hot water and drainpipes accessible under lavatories shall be insulated or otherwise covered. There shall be no sharp or abrasive surfaces under lavatories.	2010 CBC is **equivalent** to 2010 ADA.	Both 2010 CBC and 2010 ADA Stds. prohibit sharp or abrasive surfaces under lavatories.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1376	**606.5 Exposed Pipes and Surfaces.** ... There shall be no sharp or abrasive surfaces under lavatories and sinks.		**1117B.9 #2** Each accessible sink shall be a maximum of 6½ inches (165 mm) deep. Sinks shall be mounted with the counter or rim no higher than 34 inches (865 mm) above the finish floor. Knee clearance that is at least 27 inches (685 mm) high, 30 inches (762 mm) wide and 19 inches (485 mm) deep shall be provided underneath sinks. Hot water and drain pipes exposed under sinks shall be insulated or otherwise configured so as to protect against contact. There shall be no sharp or abrasive surfaces under sinks.	2010 CBC is **equivalent** to 2010 ADA.	Both 2010 CBC and 2010 ADA Stds. prohibit sharp or abrasive surfaces under sinks.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1377	**607 Bathtubs**		N/A	NA	This is just a section heading.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1378	**607.1 General.** Bathtubs shall comply with 607.		**1115B.4.5** **Accessible bathtubs.** Bathtubs required to be accessible shall comply with this subsection.	2010 CBC is **equivalent** to 2010 ADA.	This section of 2010 CBC merely references the technical requirements that apply to bathtubs, similar to 2010 ADA Stds.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1379	**607.2 Clearance.** Clearance in front of bathtubs shall extend the length of the bathtub and shall be 30 inches (760 mm) wide minimum. …		**1115B.4.5 #1.** **Floor space.** Clear floor space at bathtubs shall be as shown in Figure 11B-8.	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC Fig. 11B-8 requires 48" minimum width for a forward approach to the bathtub, whereas 2010 ADA Stds. does not make this distinction.	1. 2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable. or 2. 2010 CBC should be amended to be consistent with 2010 ADA Stds.
1380	**607.2 Clearance.** ... A lavatory complying with 606 shall be permitted at the control end of the clearance. …		**1115B.4.5 #1.** **Floor space.** Clear floor space at bathtubs shall be as shown in Figure 11B-8.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC Fig. 11B-8 shows a lavatory in the clearance in front of the bathtub, but it would be clearer if the code language stated that an accessible lavatory was permitted.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1381	**607.2 Clearance.** ... Where a permanent seat is provided at the head end of the bathtub, the clearance shall extend 12 inches (305 mm) minimum beyond the wall at the head end of the bathtub.		**1115B.4.5 #1.** **Floor space.** Clear floor space at bathtubs shall be as shown in Figure 11B-8.	2010 CBC provides **less access** than 2010 ADA.	2010 CBC Fig. 11B-8 shows a 15 inch ~~extension~~ seat with no clear floor space extension behind it vs. the 2010 ADA Stds. 12 inch extension. The extra space allows wheelchair users to transfer sideways onto the seat instead of diagonally backwards over their wheels.	1. 2010 CBC ~~need not be amended, other than to conform to ADA Stds. formatting as applicable.~~ ~~or~~ ~~2. 2010 CBC~~ should be amended to be consistent with 2010 ADA Stds.
1382	**607.3 Seat.** A permanent seat at the head end of the bathtub or a removable in-tub seat shall be provided. Seats shall comply with 610.		**1115B.4.5 #2** **Seat.** An in-tub seat or a seat at the head end of the tub shall be provided as shown in Figures 11B-8 and 11B-9. The structural strength of seats and their attachments shall comply with Section 1115B.7.2. Seats shall be mounted securely and shall not slip during use.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC does not state that the seat at the head end of the tub is "permanent" as does 2010 ADA Stds.	2010 CBC should be amended to be consistent with 2010 ADA Stds.

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1383	**607.3 Seat.** A permanent seat at the head end of the bathtub or a removable in-tub seat shall be provided. Seats shall comply with 610.		**1115B.4.5 #2** **Seat.** An in-tub seat or a seat at the head end of the tub shall be provided as shown in Figures 11B-8 and 11B-9. The structural strength of seats and their attachments shall comply with Section 1115B.7.2. Seats shall be mounted securely and shall not slip during use.	NA	2010 CBC structural strength is discussed under comments for 2010 ADA Stds. 610.4.	N/A
1384	**607.4 Grab Bars.** Grab bars for bathtubs shall comply with 609 and shall be provided in accordance with 607.4.1 or 607.4.2.		**1115B.4.5 #3** **Grab bars.** Grab bars complying with Section 1115B.7 shall be provided as shown in Figure 11B-9.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and 2010 ADA Stds. merely reference applicable technical requirements.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1385			N/A	NA	N/A	N/A
1386	**607.4 EXCEPTIONS: 1.** Grab bars shall not be required to be installed in a bathtub located in a bathing *facility* for a single occupant accessed only through a private office and not for *common use* or *public use* provided that reinforcement has been installed in walls and located so as to permit the installation of grab bars complying with 607.4. **2.** In *residential dwelling units*, grab bars shall not be required to be installed in bathtubs located in bathing *facilities* provided that reinforcement has been installed in walls and located so as to permit the installation of grab bars complying with 607.4.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not make exception for single occupant bathing facility accessed only through a private office.	1. 2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable. or 2. 2010 CBC should be amended to be consistent with 2010 ADA Stds.
1386.1	**607.4 EXCEPTIONS: ...** **2.** In *residential dwelling units*, grab bars shall not be required to be installed in bathtubs located in bathing *facilities* provided that reinforcement has been installed in walls and located so as to permit the installation of grab bars complying with 607.4.		**1115B.1** **General.** Bathing and toilet facilities that serve buildings, facilities or portions of buildings or facilities that are required by these standards to be accessible to persons with disabilities, shall be on an accessible route and shall conform to the following requirements. The accessible fixtures and controls required in this section shall be on an accessible route. An unobstructed turning space complying with Section 1115B.3.1, Item 1, or 1115B.3.2, Item 1, as applicable, shall be provided within an accessible toilet facility. The clear floor spaces at fixtures and controls, the accessible route and the turning space may overlap. See Section 1111B.4.6 and Chapter 11A for bathrooms in residential occupancies.	Which Std.provides greater access **depends** on circumstances.	2010 CBC references Chapter 11A requirements for residential occupancies which could be interpreted to mean not just the dwelling unit but common areas as well. 2010 ADA Stds. uses the term "residential dwelling units" which would exclude common areas.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1387	**607.4.1 Bathtubs With Permanent Seats.** For bathtubs with permanent seats, grab bars shall be provided in accordance with 607.4.1.		**1115B.4.5 #3** **Grab bars.** Grab bars complying with Section 1115B.7 shall be provided as shown in Figure 11B-9.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and 2010 ADA Stds. merely reference applicable technical requirements.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1388	**607.4.1.1 Back Wall.** Two grab bars shall be installed on the back wall, one located in accordance with 609.4 and the other located 8 inches (205 mm) minimum and 10 inches (255 mm) maximum above the rim of the bathtub. …		**1115B.4.5 Accessible bathtubs.** Bathtubs required to be accessible shall comply with this subsection. **3. Grab bars.** Grab bars complying with Section 1115B.7 shall be provided as shown in Figure 11B-9.	Which Std.provides greater access **depends** on circumstances.	2010 CBC is equivalent to 2010 ADA Stds. for the upper grab bar. For the lower grab bar, 2010 CBC has an absolute dimension and 2010 ADA Stds. has a dimensional range. The dimensional range is easier for construction and field inspection. Compliance depends on very accurate installation under CBC.	2010 CBC should be amended to be consistent with 2010 ADA Stds. For both written requirements and figures.
1389	**607.4.1.1 Back Wall.** ... Each grab bar shall be installed 15 inches (380 mm) maximum from the head end wall and 12 inches (305 mm) maximum from the control end wall.		Figure 11B-9	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC requirements are shown in the Figures only.but are equivalent to the 2010 ADA Stds. language.	2010 CBC should be amended to include written requirements consistent with 2010 ADA Stds.
1390			N/A	NA	N/A	N/A
1391	**607.4.1.2 Control End Wall.** A grab bar 24 inches (610 mm) long minimum shall be installed on the control end wall at the front edge of the bathtub.		Figure 11B-9	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC requirements are shown in the Figures only.but are equivalent to the 2010 ADA Stds. language.	2010 CBC should be amended to include written requirements consistent with 2010 ADA Stds.
1392			N/A	NA	N/A	N/A
1393	**607.4.2 Bathtubs Without Permanent Seats.** For bathtubs without permanent seats, grab bars shall comply with 607.4.2.		**1115B.4.5 #3** **Grab bars.** Grab bars complying with Section 1115B.7 shall be provided as shown in Figure 11B-9.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC and 2010 ADA Stds. merely reference applicable technical requirements.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1394			N/A	NA	N/A	N/A
1395			N/A	NA	N/A	N/A

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1396	**607.4.2.1 Back Wall.** Two grab bars shall be installed on the back wall, one located in accordance with 609.4 and other located 8 inches (205 mm) minimum and 10 inches (255 mm) maximum above the rim of the bathtub. …		**1115B.4.5 Accessible bathtubs.** Bathtubs required to be accessible shall comply with this subsection. **3. Grab bars.** Grab bars complying with Section 1115B.7 shall be provided as shown in Figure 11B-9.	Which Std.provides greater access **depends** on circumstances.	2010 CBC is equivalent to 2010 ADA Stds. for the upper grab bar. For the lower grab bar, 2010 CBC has an absolute dimension and 2010 ADA Stds. has a dimensional range. The dimensional range is easier for construction and field inspection. Compliance depends on very accurate installation under CBC.	2010 CBC should be amended to be consistent with 2010 ADA Stds. For both written requirements and figures.
1397	**607.4.2.1 Back Wall.** ... Each grab bar shall be 24 inches (610 mm) long minimum and shall be installed 24 inches (610 mm) maximum from the head end wall and 12 inches (305 mm) maximum from the control end wall.		Figure 11B-9	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC requirements are shown in the Figures only.but are equivalent to the 2010 ADA Stds. language.	2010 CBC should be amended to include written requirements consistent with 2010 ADA Stds.
1398	**607.4.2.2 Control End Wall.** A grab bar 24 inches (610 mm) long minimum shall be installed on the control end wall at the front edge of the bathtub.		Figure 11B-9	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC requirements are shown in the Figures only.but are equivalent to the 2010 ADA Stds. language.	2010 CBC should be amended to include written requirements consistent with 2010 ADA Stds.
1399	**607.4.2.3 Head End Wall.** A grab bar 12 inches (305 mm) long minimum shall be installed on the head end wall at the front edge of the bathtub.		Figure 11B-9	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC requirements are shown in the Figures only.but are equivalent to the 2010 ADA Stds. language.	2010 CBC should be amended to include written requirements consistent with 2010 ADA Stds.
1400			N/A	NA	N/A	N/A
1401	**607.5 Controls.** Controls, other than drain stoppers, shall be located on an end wall. …		**1115B.4.5 #4** **Controls.** Faucets and other controls shall be located as shown in Figure 11B-9. They shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2 N).	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC requirements are shown in the Figures only.but are equivalent to the 2010 ADA Stds. language.	2010 CBC should be amended to include written requirements consistent with 2010 ADA Stds.
1402	**607.5 Controls.** ... Controls shall be between the bathtub rim and grab bar, and between the open side of the bathtub and the centerline of the width of the bathtub. Controls shall comply with 309.4.		**1115B.4.5 #4** **Controls.** Faucets and other controls shall be located as shown in Figure 11B-9. They shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2 N).	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC requirements are shown in the Figures only.but are equivalent to the 2010 ADA Stds. language. 2010 CBC figures are too vague to definitively locate the controls.	2010 CBC should be amended to include written requirements consistent with 2010 ADA Stds.
1403	**607.6 Shower Spray Unit and Water.** A shower spray unit with a hose 59 inches (1500 mm) long minimum…		**1115B.4.5 #5** **Shower unit.** A shower spray unit with a hose at least 60 inches (1524 mm) long that can be used both as a fixed shower head and as a hand-held shower shall be provided.	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC requires a minimum hose length that is 1 inch longer than 2010 ADA Stds.	1. 2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable. or 2. 2010 CBC should be amended to be consistent with 2010 ADA Stds.
1404	**607.6 Shower Spray Unit and Water.** A shower spray unit ... that can be used both as a fixed-position shower head and as a hand-held shower shall be provided. …		**1115B.4.5 #5** **Shower unit.** A shower spray unit with a hose at least 60 inches (1524 mm) long that can be used both as a fixed shower head and as a hand-held shower shall be provided.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA Stds.	2010 CBC need not be amended.
1405	**607.6 Shower Spray Unit and Water.** ... The shower spray unit shall have an on/off control with a non-positive shut-off. If an adjustable-height shower head on a vertical bar is used, the bar shall be installed so as not to obstruct the use of grab bars. Bathtub shower spray units shall deliver water that is 120°F (49°C) maximum.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not address these particular requirements	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1406	**Advisory 607.6 Shower Spray Unit and Water.** Ensure that hand-held shower spray units are capable of delivering water pressure substantially equivalent to fixed shower heads.		N/A	NA	The ADA Stds. Advisory notes are not enforceable requirements.	N/A
1407	**607.7 Bathtub Enclosures.** Enclosures for bathtubs shall not obstruct controls, faucets, shower and spray units or obstruct transfer from wheelchairs onto bathtub seats or into bathtubs. …		**1115B.4.5 #6** **Bathtub enclosures.** If provided, enclosures for bathtubs shall not obstruct controls or transfer from wheelchairs onto bathtub seats or into tubs. Enclosures on bathtubs shall not have tracks mounted on their rims.	2010 CBC provides **less access** than 2010 ADA.	2010 ADA Stds. has additional requirements.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1408	**607.7 Bathtub Enclosures.** ... Enclosures on bathtubs shall not have tracks installed on the rim of the open face of the bathtub.		**1115B.4.5 #6** **Bathtub enclosures.** ... Enclosures on bathtubs shall not have tracks mounted on their rims.	2010 CBC is **equivalent** to 2010 ADA.	2010 ADA Stds. clarify that this requirement applies to the open face of the bathtub.	2010 CBC should be amended to use language consistent with 2010 ADA Stds.

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1409	**608 Shower Compartments**		N/A	NA	This is just a section heading.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1410	**608.1 General.** Shower compartments shall comply with 608.		**1115B.4.4 Accessible showers.** Showers required to be accessible shall comply with this subsection:	2010 CBC is **equivalent** to 2010 ADA.	This section of 2010 CBC merely references the technical requirements that apply to showers, similar to 2010 ADA Stds.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1411	**Advisory 608.1 General.** Shower stalls that are 60 inches (1525 mm) wide and have no curb may increase the usability of a bathroom because the shower area provides additional maneuvering space.		N/A	NA	N/A	N/A
1412	**608.2 Size and Clearances for Shower Compartments.** Shower compartments shall have sizes and clearances complying with 608.2.		**1115B.4.4.1 Size and clearances.** Accessible showers shall comply with one of the following:	2010 CBC is **equivalent** to 2010 ADA.	This section of 2010 CBC merely references the technical requirements that apply to showers, similar to 2010 ADA Stds.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1413	**608.2.1 Transfer Type Shower Compartments.** Transfer type shower compartments shall be 36 inches (915 mm) by 36 inches (915 mm) clear inside dimensions measured at the center points of opposing sides and shall have a 36 inch (915 mm) wide minimum entry on the face of the shower compartment. Clearance of 36 inches (915 mm) wide minimum by 48 inches (1220 mm) long minimum measured from the control wall shall be provided.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not allow the ADA Stds. transfer type shower.	2010 CBC need not be amended.
1414	**608.2.2 Standard Roll-In Type Shower Compartments.** Standard roll-in type shower compartments shall be 30 inches (760 mm) wide minimum by 60 inches (1525 mm) deep minimum clear inside dimensions measured at center points of opposing sides and shall have a 60 inches (1525 mm) wide minimum entry on the face of the shower compartment.		**1115B.4.4.1 #1** Roll-in shower 60 inches (1524 mm) minimum in width between wall surfaces and 30 inches (762 mm) minimum in depth with a full opening width on the long side. Shower compartment size and clear floor space shall comply with Figure 11B-2A.	Which Std.provides greater access **depends** on circumstances.	2010 ADA Stds. specify where the measuring points are for the stall depth, whereas 2010 CBC does not. 2010 ADA Stds. state that the stall entry be 60 inches wide minimum, while 2010 CBC requires the stall entry to be open the full length of the long side.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1415	**608.2.2.1 Clearance.** A 30 inch (760 mm) wide minimum by 60 inch (1525 mm) long minimum clearance shall be provided adjacent to the open face of the shower compartment.		Figure 11B-2A	2010 CBC provides **greater access** than 2010 ADA.	2010 ADA Stds decreases the clearance width at a 30" x 60" shower from 36" to 30".	2010 CBC should not change the 36 inch wide clearance, but should be amended to state the dimension in the code language and not rely solely on the figure.
1416	**608.2.2.1 EXCEPTION:** A lavatory complying with 606 shall be permitted on one 30 inch (760 mm) wide minimum side of the clearance provided that it is not on the side of the clearance adjacent to the controls or, where provided, not on the side of the clearance adjacent to the shower seat.		**1115B.4.4.1 Size and clearances.** Accessible showers shall comply with one of the following: 1. Roll-in shower 60 inches (1524 mm) minimum in width between wall surfaces and 30 inches (762 mm) minimum in depth with a full opening width on the long side. Shower compartment size and clear floor space shall comply with Figure 11B-2A.	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC figure shows no lavatory so it does not specifically allow a lavatory overlap. When a folding seat is installed as required by 1115B.4.4.8 #1, the controls will be adjacent to the seat so they will not be in conflict with the end lavatory location for a parallel transfer. However, for a diagonal transfer in a 60" long shower, there might be as little as 12" clear from the front of a counter-mounted lavatory to the front of the seat.	1. 2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable. or 2. 2010 CBC can be amended to be consistent with the 2010 ADA Stds. if only side transfers are anticipated.
1417	**608.2.3 Alternate Roll-In Type Shower Compartments.** Alternate roll-in type shower compartments shall be 36 inches (915 mm) wide and 60 inches (1525 mm) deep minimum clear inside dimensions measured at center points of opposing sides. A 36 inch (915 mm) wide minimum entry shall be provided at one end of the long side of the compartment.		**1115B.4.4.1 #2** Alternate roll-in shower 60 inches (1524 mm) minimum in width between wall surfaces and 36 inches (914 mm) in depth with an entrance opening width of 36 inches (914 mm) minimum. Shower compartment size and clear floor space shall comply with Figure 11B-2B.	2010 CBC is **equivalent** to 2010 ADA.	2010 ADA Stds. specify where the measuring points are for the stall depth, whereas 2010 CBC does not. Otherwise, 2010 CBC and 2010 ADA Stds. are equivalent.	2010 CBC should be amended to incorporate the measuring points per 2010 ADA Stds.
1417.1			**1115B.4.4.1 #3** Alternate roll-in shower with optional enclosure 60 inches (1524 mm) minimum in width between wall surfaces and 36 inches (914 mm) minimum in depth as long as the entrance opening width is a minimum 36 inches (914 mm). Shower compartment size and clear floor space shall comply with Figure 11B-2C.	2010 CBC **conflicts with** 2010 ADA.	2010 ADA Stds. does not address an alternate roll-in shower with optional enclosure per 2010 CBC Fig. 11B-2C. Combining separate ADA Stds. requirements for shower stall, controls and seat locations, and clear floor area in front of shower does not produce a stall equivalent to Fig. 11B-2C.	2010 CBC should be amended to delete the alternate shower stall described in 1115B.4.4.1 #3, along with Fig. 11B-2C or adopt an alternate design that mirrors the shower stall portion of the drawing leaving the accessible route as configured (entry from the left) and places the seat on the left wall adjacent to the entry point. Coordinate all other requirements with the ADA.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1418	**608.3 Grab Bars.** Grab bars shall comply with 609 and shall be provided in accordance with 608.3. Where multiple grab bars are used, required horizontal grab bars shall be installed at the same height above the finish floor.		1115B.4.4.8 #2.Grab bars located on walls adjacent to and opposite the seat. Grab bars shall also comply with the diameter, loading and projection requirements of Section 1115B.7. Grab bars shall be mounted between a minimum of 33 inches (838 mm) and a maximum of 36 inches (914 mm) above the shower floor with an L-shaped grab bar mounted on walls opposite and adjacent to the front edge of the seat, but not extended to include that portion of wall over the seat. See Figure 11B-2A or 11B-2B.	2010 CBC is **equivalent** to 2010 ADA.	Both 2010 CBC and 2010 DA Stds. use this section to refer to requirements in other sections.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1419	**608.3 Grab Bars.** ... Where multiple grab bars are used, required horizontal grab bars shall be installed at the same height above the finish floor.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not require that where multiple horizontal grab bars are used, that they be installed at the same height within a given area.	1. 2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1420	**608.3 EXCEPTIONS: 1.** Grab bars shall not be required to be installed in a shower located in a bathing *facility* for a single occupant accessed only through a private office, and not for *common use* or *public use* provided that reinforcement has been installed in walls and located so as to permit the installation of grab bars complying with 608.3. **2.** In *residential dwelling units*, grab bars shall not be required to be installed in showers located in bathing *facilities* provided that reinforcement has been installed in walls and located so as to permit the installation of grab bars complying with 608.3.		N/A	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC makes no exception for single occupant bathing facility accessed through a private office.	1. 2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable. or 2. 2010 CBC should be amended to be consistent with 2010 ADA Stds.
1420.1	**608.3 EXCEPTIONS: ...** **2.** In *residential dwelling units*, grab bars shall not be required to be installed in showers located in bathing *facilities* provided that reinforcement has been installed in walls and located so as to permit the installation of grab bars complying with 608.3.		**1134A.6 #4.** **Reinforced Walls for Grab Bars.** Grab bar reinforcement shall be installed continuous in the walls of showers 32 inches to 38 inches (813 mm to 965 mm) above the floor. The grab bar reinforcement shall be a minimum of 6 inches (152.4 mm) nominal in height. Glass-walled shower stalls shall provide reinforcement for installation of floor-mounted or ceiling-mounted grab bars.	Which Std.provides greater access **depends** on circumstances.	2010 CBC is equivalent to 2010 ADA Stds., except that 2010 ADA Stds. do not address glass-walled shower stalls. For purposes of ADA Stds. compliance, residential dwelling units subject to scoping under ADA Stds. should not be allowed the qualification for glass-walled shower stalls. Residential dwelling units not subject to ADA Stds., but subject to Fair Housing Act Guidelines may be allowed the qualification, but Fair Housing Act comparison is the beyond the scope of this analysis.	1. 2010 CBC should be amended to delete qualification for glass-walled shower stalls, only for residential dwelling units subject to ADA Stds.
1421	**608.3.1 Transfer Type Shower Compartments.** In transfer type compartments, grab bars shall be provided across the control wall and back wall to a point 18 inches (455 mm) from the control wall.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not allow the ADA Stds. transfer type shower.	2010 CBC need not be amended.
1422	**608.3.2 Standard Roll-In Type Shower Compartments.** Where a seat is provided in standard roll-in type shower compartments, grab bars shall be provided on the back wall and the side wall opposite the seat. Grab bars shall not be provided above the seat. Where a seat is not provided in standard roll-in type shower compartments, grab bars shall be provided on three walls. Grab bars shall be installed 6 inches (150 mm) maximum from adjacent walls.		**1115B.4.4.8** **Shower accessories.** Shower accessories shall include: **1115B.4.4.8 #2** Grab bars located on walls adjacent to and opposite the seat. Grab bars shall also comply with the diameter, loading and projection requirements of Section 1115B.7. Grab bars shall be mounted between a minimum of 33 inches (838 mm) and a maximum of 36 inches (914 mm) above the shower floor with an L-shaped grab bar mounted on walls opposite and adjacent to the front edge of the seat, but not extended to include that portion of wall over the seat. See Figure 11B-2A or 11B-2B.	Which Std.provides greater access **depends** on circumstances.	2010 CBC requirements differ slightly from 2010 ADA Stds. CBC describes the one grab bar to be located on the wall "adjacent to" the seat, and ADA Stds. describes the same grab bar as provided on the "back wall." CBC requires an L-shaped grab bar; ADA Stds. permits the use of separate straight grab bars, but does not specifically preclude the use of an L-shaped grab bar (or other shape of contiunous grab bar since a seat is not mandatory except at transient lodging guest rooms with mobility features).	1. 2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable. or 2. 2010 CBC should be amended to be consistent with 2010 ADA Stds.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1423	**608.3.3 Alternate Roll-In Type Shower Compartments.** In alternate roll-in type shower compartments, grab bars shall be provided on the back wall and the side wall farthest from the compartment entry. Grab bars shall not be provided above the seat. Grab bars shall be installed 6 inches (150 mm) maximum from adjacent walls.		**1115B.4.4.8** **Shower accessories.** Shower accessories shall include: **1115B.4.4.8 #2** Grab bars located on walls adjacent to and opposite the seat. Grab bars shall also comply with the diameter, loading and projection requirements of Section 1115B.7. Grab bars shall be mounted between a minimum of 33 inches (838 mm) and a maximum of 36 inches (914 mm) above the shower floor with an L-shaped grab bar mounted on walls opposite and adjacent to the front edge of the seat, but not extended to include that portion of wall over the seat. See Figure 11B-2A or 11B-2B.	Which Std.provides greater access **depends** on circumstances.	2010 CBC requirements differ somewhat from 2010 ADA Stds. CBC describes the one grab bar to be located on the wall "adjacent to" the seat, and ADA Stds. describes the same grab bar as provided on the "back wall." CBC describes the other grab bar as located on the wall "adjacent" to the seat; ADA Stds. describes the same bar as being on the "side furthest frrom the compartment entry" (a seat is not required except at transient lodging guest rooms with mobility features). CBC requires an L-shaped grab bar; ADA Stds. permits the use of separate straight grab bars, but does not specifically preclude the use of an L-shaped grab bar.	1. 2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable. or 2. 2010 CBC should be amended to be consistent with 2010 ADA Stds.
1424	**608.4 Seats.** A folding or non-folding seat shall be provided in transfer type shower compartments. A folding seat shall be provided in roll-in type showers required in *transient lodging* guest rooms with mobility features complying with 806.2. Seats shall comply with 610.		**1115B.4.4.8** **Shower accessories.** Shower accessories shall include: **1115B.4.4.8 #1** A folding seat mounted 18 inches (457 mm) above the floor, and with a minimum space of 1 inch (25 mm) and maximum space of 1½ inches (38 mm) allowed between the edge of the seat and any wall. When folded, the seat shall not extend more than 6 inches (152 mm) from the mounting wall. The seat dimensions and mounting position shall comply with Figures 11B-2A, 11B-2B, 11B-2C and 11B-2D. The structural strength of seats and their attachments shall comply with 1115B.7.2.	Which Std.provides greater access **depends** on circumstances.	2010 CBC does not allow transfer type shower compartments. 2010 CBC requires a folding seat in all accessible roll-in type shower compartments, whereas 2010 ADA Stds. requires a folding seat in roll-in type showers only in transient lodging guest rooms with mobility features	1. 2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable. or 2. 2010 CBC should be amended to be consistent with 2010 ADA Stds.
1425	**608.4 EXCEPTION:** In *residential dwelling units*, seats shall not be required in transfer type shower compartments provided that reinforcement has been installed in walls so as to permit the installation of seats complying with 608.4.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not permit transfer type shower stalls confomring to 2010 ADA Stds.	2010 CBC need not be amended.
1426	**608.5 Controls.** Controls, faucets, and shower spray units shall comply with 309.4.		**1115B.4.4.4** **Water controls.** Water controls shall be of a single-lever design, operable with one hand, and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2N). ...	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC spells out controls requirements in this section vs. 2010 ADA Stds. references controls requirements contained in another section. Otherwise, they are equivalent, except that 2010 CBC further specifies that the controls be a single-lever design.	1. 2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable. or 2. 2010 CBC should be amended to be consistent with 2010 ADA Stds. by allowing any lever design that complies with controls requirements.
1427	**608.5.1 Transfer Type Shower Compartments.** In transfer type shower compartments, the controls, faucets, and shower spray unit shall be installed on the side wall opposite the seat 38 inches (965 mm) minimum and 48 inches (1220 mm) maximum above the shower floor and shall be located on the control wall 15 inches (380 mm) maximum from the centerline of the seat toward the shower opening.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not permit transfer type shower stalls confomring to 2010 ADA Stds.	2010 CBC need not be amended.

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1428	**608.5.2 Standard Roll-In Type Shower Compartments.** In standard roll-in type shower compartments, the controls, faucets, and shower spray unit shall be located above the grab bar, but no higher than 48 inches (1220 mm) above the shower floor. Where a seat is provided, the controls, faucets, and shower spray unit shall be installed on the back wall adjacent to the seat wall and shall be located 27 inches (685 mm) maximum from the seat wall.		**1115B.4.4.4** **Water controls.** Water controls shall be of a single-lever design, operable with one hand, and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2N). The centerline of the controls shall be located 39 inches (991 mm) to 41 inches (1041 mm) above the shower floor. **1115B.4.4.4 #1** Controls in a 60-inch (1524 mm) minimum by 30-inch (762 mm) minimum roll-in shower shall be located on the back wall of the compartment adjacent to the seat and the centerline of the controls shall be within a range of no less than 19 inches (457 mm) and no more than 27 inches (610 mm) from the seat wall as shown in Figure 11B-2A. **1115B.4.4.5** **Hand-held sprayer unit.** A flexible hand-held sprayer unit with a hose at least 60 inches (1524 mm) long that can be used both as a fixed shower head and as a hand-held shower shall be provided. This unit shall be mounted such that the top of the mounting bracket is at a maximum height of 48 inches (1219 mm) above the shower floor. **1115B.4.4.5 #1** The hand-held sprayer unit in a 60-inch (1524 mm) minimum by 30-inch (762 mm) minimum roll-in shower shall be located on the back wall of the compartment adjacent to the seat and the centerline of the unit shall be no more than 27 inches (610 mm) from the seat wall as shown in Figure 11B-2A.	Which Std.provides greater access **depends** on circumstances.	2010 CBC sets a dimensional range for the centerline of the height of the controls at 39-41 inches. 2010 ADA Stds. sets the range at above the grab bar but no higher than 48 inches (it is implied that any part of the operable parts of controls, faucets and shower spray is to be within this range). 2010 CBC locates the contols horizontally from the seat wall to be a range of 19-27 inches. 2010 ADA Stds. only sets a maximum dimension of 27 inches.	1. 2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable. or 2. 2010 CBC should be amended to be consistent with 2010 ADA Stds. by allowing any lever design that complies with controls requirements, and it should be made clear that the measuring point is to the operable parts of the controls, faucets and shower spray (by reference to 309.4 would be adequate).
1429	**Advisory 608.5.2 Standard Roll-in Type Shower Compartments.** In standard roll-in type showers without seats, the shower head and operable parts can be located on any of the three walls of the shower without adversely affecting accessibility.		N/A	NA	2010 CBC does not allow standard roll-in type shower compartments without shower seats.	2010 CBC need not be amended.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1430	**608.5.3 Alternate Roll-In Type Shower Compartments.** In alternate roll-in type shower compartments, the controls, faucets, and shower spray unit shall be located above the grab bar, but no higher than 48 inches (1220 mm) above the shower floor. Where a seat is provided, the controls, faucets, and shower spray unit shall be located on the side wall adjacent to the seat 27 inches (685 mm) maximum from the side wall behind the seat or shall be located on the back wall opposite the seat 15 inches (380 mm) maximum, left or right, of the centerline of the seat. Where a seat is not provided, the controls, faucets, and shower spray unit shall be installed on the side wall farthest from the compartment entry.		**1115B.4.4.4** **Water controls.** Water controls shall be of a single-lever design, operable with one hand, and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2N). The centerline of the controls shall be located 39 inches (991 mm) to 41 inches (1041 mm) above the shower floor. **1115B.4.4.4 #2** Controls in a 60-inch (1524 mm) minimum by 36-inch (914 mm) alternate roll-in shower shall be located on the side wall of the compartment adjacent to the seat and the centerline of the controls shall be within a range of no less than 19 inches (457 mm) and no more than 27 inches (610 mm) from the seat wall as shown in Figure 11B-2B. **1115B.4.4.5** **Hand-held sprayer unit.** A flexible hand-held sprayer unit with a hose at least 60 inches (1524 mm) long that can be used both as a fixed shower head and as a hand-held shower shall be provided. This unit shall be mounted such that the top of the mounting bracket is at a maximum height of 48 inches (1219 mm) above the shower floor. **1115B.4.4.5 #2** The hand-held sprayer unit in a 60-inch (1524 mm) minimum by 36-inch (914 mm) alternate roll-in shower shall be located on the side wall of the compartment adjacent to the seat and the centerline of the unit shall be 18 inches (457 mm) from the seat wall as shown in Figure 11B-2B.	Which Std.provides greater access **depends** on circumstances.	2010 CBC sets a dimensional range for the centerline of the height of the controls at 39-41 inches. 2010 ADA Stds. sets the range at above the grab bar but no higher than 48 inches (it is implied that any part of the operable parts of controls, faucets and shower spray is to be within this range). 2010 CBC locates the contols horizontally from the side wall adjacent to the seat to be a range of 19-27 inches. 2010 ADA Stds. only sets a maximum dimension of 27 inches, and also allows installation on the back wall opposite the seat within 15 inches of the centerline of the seat. 2010 CBC Fig. 11B-2B locates the centerline of the hand-held sprayer mounting bracket to be an absolute 18 inches from the front/seat wall, but this is not codified in writing; 2010 ADA Stds. does not have this further requirement.	1. 2010 CBC should be amended to codify the horizontal location of the hand-held sprayer to a range of 17-19 inches. or 2. 2010 CBC should be amended to be consistent with 2010 ADA Stds. including allowing any lever design that complies with controls requirements, and it should be made clear that the measuring point is to the operable parts of the controls, faucets and shower spray (by reference to 309.4 would be adequate).
1431	**608.6 Shower Spray Unit and Water.** A shower spray unit with a hose 59 inches (1500 mm) long minimum that can be used both as a fixed-position shower head and as a hand-held shower shall be provided. …		**1115B.4.4.5** **Hand-held sprayer unit.** A flexible hand-held sprayer unit with a hose at least 60 inches (1524 mm) long that can be used both as a fixed shower head and as a hand-held shower shall be provided. This unit shall be mounted such that the top of the mounting bracket is at a maximum height of 48 inches (1219 mm) above the shower floor.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA Stds.	2010 CBC need not be amended.
1432	**608.6 Shower Spray Unit and Water.** ... The shower spray unit shall have an on/off control with a non-positive shut-off. If an adjustable-height shower head on a vertical bar is used, the bar shall be installed so as not to obstruct the use of grab bars. Shower spray units shall deliver water that is 120°F (49°C) maximum.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not address these particular requirements	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1433	**608.6 Shower Spray Unit and Water.** …		N/A	NA	N/A	N/A

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1434	**608.6 EXCEPTION:** A fixed shower head located at 48 inches (1220 mm) maximum above the shower finish floor shall be permitted instead of a hand-held spray unit in *facilities* that are not medical care *facilities*, long-term care *facilities*, *transient lodging* guest rooms, or *residential dwelling units*.		**1115B.4.4.6** **Sprayer unit alternative**. Except within guest rooms and suites in hotels, motels and similar transient lodging establishments, where accessible shower facilities are provided in areas subject to excessive vandalism, in lieu of providing the fixed flexible hose, two wall-mounted shower heads shall be installed. Each shower head shall be installed so that it can be operated independently of the other and shall have swivel angle adjustments, both vertically and horizontally. One shower head shall be located at a height of 48 inches (1219 mm) above the floor.	Which Std.provides greater access **depends** on circumstances.	2010 CBC allows two wall-mounted independently controled fixed shower heads instead of hand-held sprayers at areas subject to excessive vandalism, except within guest rooms and suites in hotels, motels and similar transient lodging establishments. 2010 ADA Stds.allow one fixed shower head instead of hand-held sprayers except at medical care facilities, long-term care facilities, transient lodging guest rooms, or residential dwelling units. The 2010 CBC is less prescriptive in application, thus is subject to greater interpretation as to what constitutes excessive vandalism where the exception applies. 2010 ADA Stds. is broader in the prescriptive list of facilities where the exception does not apply, but does not restrict the exception to apply only where subject to excessive vandalism.	1. 2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable. or 2. 2010 CBC should be amended to be consistent with 2010 ADA Stds. Or 3. 2010 CBC should be amended only to more prescriptively define where the sprayer unit alternative can be used, to minimize the need for interpretation by the LAHJ as to what constitutes "excessive vandalism."
1435	**Advisory 608.6 Shower Spray Unit and Water.** Ensure that hand-held shower spray units are capable of delivering water pressure substantially equivalent to fixed shower heads.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not require hand-held shower spray units to deliver equivalent water pressure.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1436	**608.7 Thresholds.** Thresholds in roll-in type shower compartments shall be ½ inch (13 mm) high maximum in accordance with 303. …		**1115B.4.4.2** **Thresholds.** Thresholds in roll-in type showers shall be ½ inch (12.7 mm) high maximum and shall comply with Section 1124B.2.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA.	2010 CBC need not be amended.
1437	**608.7 Thresholds.** ... In transfer type shower compartments, thresholds ½ inch (13 mm) high maximum shall be beveled, rounded, or vertical.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not permit transfer type shower stalls confomring to 2010 ADA Stds.	2010 CBC need not be amended.
1438	**608.7 EXCEPTION:** A threshold 2 inches (51 mm) high maximum shall be permitted in transfer type shower compartments in existing *facilities* where provision of a ½ inch (13 mm) high threshold would disturb the structural reinforcement of the floor slab.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not permit transfer type shower stalls confomring to 2010 ADA Stds.	2010 CBC need not be amended.
1439	**608.8 Shower Enclosures.** Enclosures for shower compartments shall not obstruct controls, faucets, and shower spray units or obstruct transfer from wheelchairs onto shower seats.		**1115B.4.4.10** **Enclosures.** Enclosures, when provided for shower compartments, shall not obstruct controls or obstruct transfer from wheelchairs onto shower seats. See Figures 11B-2A, 11B-2B, 11B-2C and 11B-2D.	2010 CBC provides **less access** than 2010 ADA.	2010 ADA Stds. further requires that enclosures shall not obstruct faucets and shower spray units.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1439			**1115B.4.4.9** **Soap dish.** When a soap dish is provided, it shall be located on the control wall at a maximum height of 40 inches (1016 mm) above the shower floor, and within reach limits from the seat.	2010 CBC provides **greater access** than 2010 ADA.	2010 ADA Stds. do not specifcally address soap dishes in shower enclosures.	2010 CBC need not be amended.
1440	**609 Grab Bars**		N/A	NA	This is just a section heading.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1441	**609.1 General.** Grab bars in toilet *facilities* and bathing *facilities* shall comply with 609.		**1115B.7** **Grab bars, tub and shower seats.** All grab bars, tub and shower seats shall comply with this section.	2010 CBC is **equivalent** to 2010 ADA.	This section of 2010 CBC merely references the technical requirements that apply to showers, similar to 2010 ADA Stds.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1442	**609.2 Cross Section.** Grab bars shall have a cross section complying with 609.2.1 or 609.2.2.		**1115B.7.1** **Diameter or width.** The diameter or width of the gripping surfaces of a grab bar shall be 1¼ inches to 1½ inches (32 mm to 38 mm) or the shape shall provide an equivalent gripping surface. If grab bars are mounted adjacent to a wall, the space between the wall and the grab bars shall be 1½ inches (38 mm). See Figure 11B-1C.	NA	See comments in 609.2.1 and 609.2.2 below.	See comments in 609.2.1 and 609.2.2 below.
1443	**609.2.1 Circular Cross Section.** Grab bars with circular cross sections shall have an outside diameter of 1¼ inches (32 mm) minimum and 2 inches (51 mm) maximum.		**1115B.7.1** **Diameter or width.** The diameter or width of the gripping surfaces of a grab bar shall be 1¼ inches to 1½ inches (32 mm to 38 mm) or the shape shall provide an equivalent gripping surface. If grab bars are mounted adjacent to a wall, the space between the wall and the grab bars shall be 1½ inches (38 mm). See Figure 11B-1C.	Which Std.provides greater access **depends** on circumstances.	2010 ADA Stds. allows a larger outside diameter for circular cross section grab bars than 2010 CBC.	1. 2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable. or 2. 2010 CBC should be amended to be consistent with 2010 ADA Stds.
1444	**609.2.2 Non-Circular Cross Section.** Grab bars with non-circular cross sections shall have a cross-section dimension of 2 inches (51 mm) maximum and a perimeter dimension of 4 inches (100 mm) minimum and 4.8 inches (120 mm) maximum.		**1115B.7.1** **Diameter or width.** The diameter or width of the gripping surfaces of a grab bar shall be 1¼ inches to 1½ inches (32 mm to 38 mm) or the shape shall provide an equivalent gripping surface. If grab bars are mounted adjacent to a wall, the space between the wall and the grab bars shall be 1½ inches (38 mm). See Figure 11B-1C.	Which Std.provides greater access **depends** on circumstances.	2010 CBC does not quantify what an "equivalent gripping surface" is which makes it difficult to achieve consistent plan checking and enforcement. 2010 ADA Stds. provide dimensional parameters for non-circular cross sections.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1445	**609.3 Spacing.** The *space* between the wall and the grab bar shall be 1½ inches (38 mm). …		**1115B.7.1** **Diameter or width.** The diameter or width of the gripping surfaces of a grab bar shall be 1¼ inches to 1½ inches (32 mm to 38 mm) or the shape shall provide an equivalent gripping surface. If grab bars are mounted adjacent to a wall, the space between the wall and the grab bars shall be 1½ inches (38 mm). See Figure 11B-1C.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1446	**609.3 Spacing.** ... The *space* between the grab bar and projecting objects below and at the ends shall be 1½ inches (38 mm) minimum. The *space* between the grab bar and projecting objects above shall be 12 inches (305 mm) minimum.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not address clear space above, below and at the ends of grab bars.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1447	**609.3 EXCEPTION:** The *space* between the grab bars and shower controls, shower fittings, and other grab bars above shall be permitted to be 1½ inches (38 mm) minimum.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not address clear space above, below and at the ends of grab bars.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1448	**609.4 Position of Grab Bars.** Grab bars shall be installed... 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface, …		**1115B.4.1 #3-3.1.** **Side wall.** The side grab bar shall be 42 inches (1067 mm) long minimum, located 12 inches (305 mm) maximum from the rear wall and extend 54 inches (1372 mm) minimum from the rear wall with the front end positioned 24 inches (610 mm) minimum in front of the water closet. The side grab bar shall be securely attached and centered 33 inches (838 mm) above and parallel to the floor.	Which Std.provides greater access **depends** on circumstances.	2010 CBC states an absolute grab bar height of 33 inches measured to the centerline of the bar vs. 2010 ADA Stds. allows a dimensional range of 33-36 inches measured to the top of the gripping surface. The 2010 ADA Stds. provide for easier compliance and enforcement.	2010 CBC should be amended to be consistent with 2010 ADA Stds.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1448	**609.4 Position of Grab Bars.** Grab bars shall be installed... 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface, …		**1115B.4.1 #3-3.2** **Rear wall.** The rear grab bar shall be 36 inches (914 mm) long minimum and extend from the centerline of the water closet 12 inches (305 mm) minimum on one side and 24 inches (610 mm) minimum on the other side. The rear grab bar shall be securely attached and centered 33 inches (838 mm) above and parallel to the floor, except that where a tank-type toilet is used which obstructs placement at 33 inches (838 mm), the grab bar may be as high as 36 inches (914 mm) and the space between the grab bar and the top of the tank shall be 1½ inches (38 mm) minimum.	Which Std.provides greater access **depends** on circumstances.	2010 CBC states an absolute grab bar height of 33 inches measured to the centerline of the bar with exceptions for tank type toilets vs. 2010 ADA Stds. allows a dimensional range of 33-36 inches measured to the top of the gripping surface. The 2010 ADA Stds. provide for easier compliance and enforcement.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1448	**609.4 Position of Grab Bars.** Grab bars shall be installed ..., 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface, …		**1115B.4.4.8 #2.** Grab bars located on walls adjacent to and opposite the seat. Grab bars shall also comply with the diameter, loading and projection requirements of Section 1115B.7. Grab bars shall be mounted between a minimum of 33 inches (838 mm) and a maximum of 36 inches (914 mm) above the shower floor with an L-shaped grab bar mounted on walls opposite and adjacent to the front edge of the seat, but not extended to include that portion of wall over the seat. See Figure 11B-2A or 11B-2B.	Which Std.provides greater access **depends** on circumstances.	2010 CBC states dimensional range of grab bar height of 33 inches to 36 inches which is equivalent to 2010 ADA Stds., but does not provide a measuring datum vs. 2010 ADA Stds. which does clairify that grab bars are measured to the top of the gripping surface.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1449	**609.4 Position of Grab Bars.** Grab bars shall be installed in a horizontal position, 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface, …		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC has no requirement for grab bars to be mounted in a horizontal position. CBC's absoulte mounting height makes it impossible to fully comply when the floor is allowed to slope up to 1:48 -- at what point do you measure the bar height when the floor below it is sloping? Allowing for a dimensional range combined with the horizontal mouting requirement will make compliance and enforcement easier.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1450	**609.4 Position of Grab Bars.** Grab bars shall be installed in a horizontal position,…		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC has no requirement for grab bars to be mounted in a horizontal position. CBC's absoulte mounting height makes it impossible to fully comply when the floor is allowed to slope up to 1:48 -- at what point do you measure the bar height when the floor below it is sloping? Allowing for a dimensional range combined with the horizontal mouting requirement will make compliance and enforcement easier.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1451	**609.4 Position of Grab Bars.** Grab bars shall be installed in a horizontal position, …		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC has no requirement for grab bars to be mounted in a horizontal position. CBC's absoulte mounting height makes it impossible to fully comply when the floor is allowed to slope up to 1:48 -- at what point do you measure the bar height when the floor below it is sloping? Allowing for a dimensional range combined with the horizontal mouting requirement will make compliance and enforcement easier.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1452	**609.4 Position of Grab Bars.** ... except that at water closets for *children's use* complying with 604.9, grab bars shall be installed in a horizontal position 18 inches (455 mm) minimum and 27 inches (685 mm) maximum above the finish floor measured to the top of the gripping surface. ...		**1115B.1.2 Where used by children**. Where facilities are to be used solely by small children, the specific heights and clearances may be adjusted to meet their accessibility needs. See Table 1115B-1 for suggested mounting heights and clearances.	2010 CBC **conflicts with** 2010 ADA.	2010 CBC children's dimensions for grab bar height conflict with 2020 ADA Stds. 604.9.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1453	**609.4 Position of Grab Bars.** ... The height of the lower grab bar on the back wall of a bathtub shall comply with 607.4.1.1 or 607.4.2.1.		N/A	Which Std.provides greater access **depends** on circumstances.	This is covered in comments for 607.4.2.1.	This is covered in comments for 607.4.2.1.
1454			N/A	NA	N/A	N/A

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1455	**609.5 Surface Hazards.** Grab bars and any wall or other surfaces adjacent to grab bars shall be free of sharp or abrasive *elements* and shall have rounded edges.		**1115B.7.3** **Surface.** A grab bar and any wall or other surface adjacent to it shall be free of any sharp or abrasive elements. Edges shall have a minimum radius of ⅛ inch (3.2 mm).	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC provides quantitative criteria for what constitutes a rounded edge. This is helpful for design and enforcement.	2010 CBC need not be amended.
1456	**609.6 Fittings.** Grab bars shall not rotate within their fittings.		**1115B.7.2 #5** Grab bars shall not rotate within their fittings.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA.	2010 CBC need not be amended.
1457	**609.7 Installation.** Grab bars shall be installed in any manner that provides a gripping surface at the specified locations and that does not obstruct the required clear floor space.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 ADA Stds. 604.3.2 allows grab bars to overlap required clearance around water closets. This sets up a possible interpretational conflict with 609.7.	2010 CBC should be amended to incorporate 609.7, but provide further clarity to avoid possible conflict with 604.3.2.
1458	**609.8 Structural Strength.** Allowable stresses shall not be exceeded for materials used when a vertical or horizontal force of 250 pounds (1112 N) is applied at any point on the grab bar, fastener, mounting device, or supporting structure.		**1115B.7.2** **Structural strength.** The structural strength of grab bars, tub and shower seats, fasteners and mounting devices shall meet the following specifications: **1115B.7.2 #1** Bending stress in a grab bar or seat induced by the maximum bending moment from the application of a 250-pound (1112 N) point load shall be less than the allowable stress for the material of the grab bar or seat. **1115B.7.2 #2** Shear stress induced in a grab bar or seat by the application of a 250-pound (1112 N) point load shall be less than the allowable shear stress for the material of the grab bar or seat, and its mounting bracket or other support is considered to be fully restrained, then direct and torsional shear stresses shall not exceed the allowable shear stress. **1115B.7.2 #3** Shear force induced in fastener or mounting device from the application of a 250-pound (1112 N) point load shall be less than the allowable lateral load of either the fastener or mounting device or the supporting structure, whichever is the smaller allowable load. **1115B.7.2 #4** Tensile force induced in a fastener by a direct tension force of a 250-pound (1112 N) point load, plus the maximum moment from the application of a 250-pound (1112 N) point load, shall be less than the allowable withdrawal load between the fastener and supporting structure. **1607.7.2** **Grab bars, shower seats and dressing room bench seats.** Grab bars, shower seats and dressing room bench seat systems shall be designed to resist a single concentrated load of 250 pounds (1.11 kN) applied in any direction at any point. [DSA-AC] See Chapter 11A, Section	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA. Given the significant increase in obesity in the American population since the 250-pound standard was established, consideration should be given to increasing the standard to 450-pounds. There is at least anecdotal evidence that 450 pounds is being adopted privately by some health care facilities.	1. 2010 CBC should be amended to apply the criteria of a 450-pound force, to accommodate a more realistic range of the population. or 2. 2010 CBC need not be amended as it is consistent with 2010 ADA Stds.
1459	**610 Seats**		N/A	NA	This is just a section heading.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1460	**610 Seats**		N/A	NA	This is just a section heading.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1461	**610.1 General.** Seats in bathtubs and shower compartments shall comply with 610.		N/A	NA	2010 CBC requirements are not separately referenced from a general paragraph/section.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.
1462	**610.1 General.** Seats in bathtubs and shower compartments shall comply with 610.		N/A	NA	2010 CBC requirements are not separately referenced from a general paragraph/section.	2010 CBC need not be amended, other than to conform to ADA Stds. formatting as applicable.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1463	**610.2 Bathtub Seats.** The top of bathtub seats shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum above the bathroom finish floor. …		**1115B.4.5 #2** **Seat.** An in-tub seat or a seat at the head end of the tub shall be provided as shown in Figures 11B-8 and 11B-9. The structural strength of seats and their attachments shall comply with Section 1115B.7.2. Seats shall be mounted securely and shall not slip during use.	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not provide a requirement for bathtub seat height.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1464			N/A	NA	N/A	N/A
1465	**610.2 Bathtub Seats.** ... The depth of a removable in-tub seat shall be 15 inches (380 mm) minimum and 16 inches (405 mm) maximum. …		**1115B.4.5 #2** **Seat.** An in-tub seat or a seat at the head end of the tub shall be provided as shown in Figures 11B-8 and 11B-9. The structural strength of seats and their attachments shall comply with Section 1115B.7.2. Seats shall be mounted securely and shall not slip during use.	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not provide a requirement for bathtub seat depth.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1466	**610.2 Bathtub Seats.** ...The seat shall be capable of secure placement. …		**1115B.4.5 #2** **Seat.** An in-tub seat or a seat at the head end of the tub shall be provided as shown in Figures 11B-8 and 11B-9. The structural strength of seats and their attachments shall comply with Section 1115B.7.2. Seats shall be mounted securely and shall not slip during use.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA Stds., but the ADA Stds. wording is clearer since a removable seat is not going to be permanently "mounted."	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1467	**610.2 Bathtub Seats.** ... Permanent seats at the head end of the bathtub shall be 15 inches (380 mm) deep minimum and shall extend from the back wall to or beyond the outer edge of the bathtub.		**1115B.4.5 #2** **Seat.** An in-tub seat or a seat at the head end of the tub shall be provided as shown in Figures 11B-8 and 11B-9. The structural strength of seats and their attachments shall comply with Section 1115B.7.2. Seats shall be mounted securely and shall not slip during use.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA Stds., but relies on the figures to illustrate some requirements not fully written in the code. 2010 CBC is not explicit in stating that the seat at the head end is "permanent."	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1468			N/A	NA	N/A	N/A
1469	**610.3 Shower Compartment Seats.** Where a seat is provided in a standard roll-in shower compartment, it shall be a folding type, shall be installed on the side wall adjacent to the controls, and shall extend from the back wall to a point within 3 inches (75 mm) of the compartment entry. ...		**1115B.4.4.8** **Shower accessories.** Shower accessories shall include: **1115B.4.4.8 #1.** A folding seat mounted 18 inches (457 mm) above the floor, and with a minimum space of 1 inch (25 mm) and maximum space of 1½ inches (38 mm) allowed between the edge of the seat and any wall. When folded, the seat shall not extend more than 6 inches (152 mm) from the mounting wall. The seat dimensions and mounting position shall comply with Figures 11B-2A, 11B-2B, 11B-2C and 11B-2D. The structural strength of seats and their attachments shall comply with 1115B.7.2.	Which Std.provides greater access **depends** on circumstances.	2010 CBC and 2010 ADA Stds. specify equivalent locations. 2010 ADA Stds. specify dimensions for extension from back wall vs. 2010 CBC does not provide corresponding written dimension but just relies on figures without this criteria dimensioned.	2010 CBC should be amended to be consistent with 2010 ADA Stds.

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1470	**610.3 Shower Compartment Seats.** ... Where a seat is provided in an alternate roll-in type shower compartment, it shall be a folding type, shall be installed on the front wall opposite the back wall, and shall extend from the adjacent side wall to a point within 3 inches (75 mm) of the compartment entry....		**1115B.4.4.8** **Shower accessories.** Shower accessories shall include: **1115B.4.4.8 #1.** A folding seat mounted 18 inches (457 mm) above the floor, and with a minimum space of 1 inch (25 mm) and maximum space of 1½ inches (38 mm) allowed between the edge of the seat and any wall. When folded, the seat shall not extend more than 6 inches (152 mm) from the mounting wall. The seat dimensions and mounting position shall comply with Figures 11B-2A, 11B-2B, 11B-2C and 11B-2D. The structural strength of seats and their attachments shall comply with 1115B.7.2.	Which Std.provides greater access **depends** on circumstances.	2010 CBC and 2010 ADA Stds. specify equivalent locations. 2010 ADA Stds. specify dimensions for extension from back wall vs. 2010 CBC does not provide corresponding written dimension but just relies on figures without this criteria dimensioned.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1471	**610.3 Shower Compartment Seats.** ... In transfer-type showers, the seat shall extend from the back wall to a point within 3 inches (75 mm) of the compartment entry. …		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not permit transfer type shower stalls confomring to 2010 ADA Stds.	2010 CBC need not be amended.
1472	**610.3 Shower Compartment Seats.** ... The top of the seat shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum above the bathroom finish floor. Seats shall comply with 610.3.1 or 610.3.2.		**1115B.4.4.8** **Shower accessories.** Shower accessories shall include: **1115B.4.4.8 #1.** A folding seat mounted 18 inches (457 mm) above the floor, and with a minimum space of 1 inch (25 mm) and maximum space of 1½ inches (38 mm) allowed between the edge of the seat and any wall. When folded, the seat shall not extend more than 6 inches (152 mm) from the mounting wall. The seat dimensions and mounting position shall comply with Figures 11B-2A, 11B-2B, 11B-2C and 11B-2D. The structural strength of seats and their attachments shall comply with 1115B.7.2.	Which Std.provides greater access **depends** on circumstances.	2010 CBC specifies an absolute height diemnsion vs. 2010 ADA Stds. which specifies a dimensional range. The dimensional range is easier to design to and to enforce.	2010 CBC should be amended to be consistent with 2010 ADA Stds.
1473	**610.3.1 Rectangular Seats.** The rear edge of a rectangular seat shall be 2½ inches (64 mm) maximum and the front edge 15 inches (380 mm) minimum and 16 inches (405 mm) maximum from the seat wall. The side edge of the seat shall be 1½ inches (38 mm) maximum from the adjacent wall.		**1115B.4.4.8** **Shower accessories.** Shower accessories shall include: **1115B.4.4.8 #1.** A folding seat mounted 18 inches (457 mm) above the floor, and with a minimum space of 1 inch (25 mm) and maximum space of 1½ inches (38 mm) allowed between the edge of the seat and any wall. When folded, the seat shall not extend more than 6 inches (152 mm) from the mounting wall. The seat dimensions and mounting position shall comply with Figures 11B-2A, 11B-2B, 11B-2C and 11B-2D. The structural strength of seats and their attachments shall comply with 1115B.7.2.	Which Std.provides greater access **depends** on circumstances.	2010 CBC specifies a range of 1 to 1 1/2 inches from the edge of the seat and any wall. 2010 ADA Stds. specifies the rear seat edge to be 2 1/2 inches max. from the seat wall and the side seat edge to be 1 1/2 inches max. from the adjacent wall, with no minimum distance from the wall. A minimum distance may be useful to avoid trapping fingers. 2010 ADA Stds. specifies a range of 15-16 inches for the front seat edge to the seat wall. 2010 CBC only shows a 16 inch absolute dimension in the figure. CBC does not specify rectangular seat application in writing; it only shows one in Fig. 11B-2B for alternate roll-in shower.	2010 CBC should be amended to be consistent with 2010 ADA Stds., with the additional specification of a minimum 1 inch space between the seat edge and any wall, and also specifying that a rectangular seat is to be provided in alternate roll-in showers.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1474	**610.3.2 L-Shaped Seats.** The rear edge of an L-shaped seat shall be 2½ inches (64 mm) maximum and the front edge 15 inches (380 mm) minimum and 16 inches (405 mm) maximum from the seat wall. The rear edge of the "L" portion of the seat shall be 1½ inches (38 mm) maximum from the wall and the front edge shall be 14 inches (355 mm) minimum and 15 inches (380 mm) maximum from the wall. The end of the "L" shall be 22 inches (560 mm) minimum and 23 inches maximum (585 mm) from the main seat wall.		**1115B.4.4.8** **Shower accessories.** Shower accessories shall include: **1115B.4.4.8 #1.** A folding seat mounted 18 inches (457 mm) above the floor, and with a minimum space of 1 inch (25 mm) and maximum space of 1½ inches (38 mm) allowed between the edge of the seat and any wall. When folded, the seat shall not extend more than 6 inches (152 mm) from the mounting wall. The seat dimensions and mounting position shall comply with Figures 11B-2A, 11B-2B, 11B-2C and 11B-2D. The structural strength of seats and their attachments shall comply with 1115B.7.2.	Which Std.provides greater access **depends** on circumstances.	2010 CBC specifies a range of 1 to 1 1/2 inches from the edge of the seat and any wall. 2010 ADA Stds. specifies the rear seat edge to be 2 1/2 inches max. from the seat wall and the side seat edge to be 1 1/2 inches max. from the adjacent wall, with no minimum distance from the wall. A minimum distance may be useful to avoid trapping fingers. 2010 ADA Stds. specifies a range of 15-16 inches for teh front seat edge to the seat wall. 2010 CBC only shows a 16 inch absolute dimension in the figure. CBC does not specify rectangular seat application in writing; it only shows one in Fig. 11B-2B for alternate roll-in shower.	2010 CBC should be amended to be consistent with 2010 ADA Stds., with the additional specification of a minimum 1 inch space between the seat edge and any wall, and also specifying that a rectangular seat is to be provided in alternate roll-in showers.
1475	**610.3.2 L-Shaped Seats.** The rear edge of an L-shaped seat shall be 2½ inches (64 mm) maximum and the front edge 15 inches (380 mm) minimum and 16 inches (405 mm) maximum from the seat wall. The rear edge of the "L" portion of the seat shall be 1½ inches (38 mm) maximum from the wall and the front edge shall be 14 inches (355 mm) minimum and 15 inches (380 mm) maximum from the wall. The end of the "L" shall be 22 inches (560 mm) minimum and 23 inches maximum (585 mm) from the main seat wall.		**1115B.4.4.8** **Shower accessories.** Shower accessories shall include: **1115B.4.4.8 #1.** A folding seat mounted 18 inches (457 mm) above the floor, and with a minimum space of 1 inch (25 mm) and maximum space of 1½ inches (38 mm) allowed between the edge of the seat and any wall. When folded, the seat shall not extend more than 6 inches (152 mm) from the mounting wall. The seat dimensions and mounting position shall comply with Figures 11B-2A, 11B-2B, 11B-2C and 11B-2D. The structural strength of seats and their attachments shall comply with 1115B.7.2.	Which Std.provides greater access **depends** on circumstances.	2010 CBC specifies a range of 1 to 1 1/2 inches from the edge of the seat and any wall. 2010 ADA Stds. specify several dimensions to define the seat size and clearances, with no minimum distance from the wall. A minimum distance may be useful to avoid trapping fingers. 2010 CBC does not specify size of seat in writing, only shows an undimensioned L-shaped seat in Fig. 11B-2A. CBC does not specify L-shaped seat application in writing; it only shows one in Fig. 11B-2a for roll-in shower.	2010 CBC should be amended to be consistent with 2010 ADA Stds., with the additional specification of a minimum 1 inch space between the seat edge and any wall, and also specifying that an L-shaped seat is to be provided in roll-in showers.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1476	**610.4 Structural Strength.** Allowable stresses shall not be exceeded for materials used when a vertical or horizontal force of 250 pounds (1112 N) is applied at any point on the seat, fastener, mounting device, or supporting structure.		**1115B.7.2** **Structural strength.** The structural strength of grab bars, tub and shower seats, fasteners and mounting devices shall meet the following specifications: **1115B.7.2 #1** Bending stress in a grab bar or seat induced by the maximum bending moment from the application of a 250-pound (1112 N) point load shall be less than the allowable stress for the material of the grab bar or seat. **1115B.7.2 #2** Shear stress induced in a grab bar or seat by the application of a 250-pound (1112 N) point load shall be less than the allowable shear stress for the material of the grab bar or seat, and its mounting bracket or other support is considered to be fully restrained, then direct and torsional shear stresses shall not exceed the allowable shear stress. **1115B.7.2 #3** Shear force induced in fastener or mounting device from the application of a 250-pound (1112 N) point load shall be less than the allowable lateral load of either the fastener or mounting device or the supporting structure, whichever is the smaller allowable load. **1115B.7.2 #4** Tensile force induced in a fastener by a direct tension force of a 250-pound (1112 N) point load, plus the maximum moment from the application of a 250-pound (1112 N) point load, shall be less than the allowable withdrawal load between the fastener and supporting structure. **1607.7.2** **Grab bars, shower seats and dressing room bench seats.** Grab bars, shower seats and dressing room bench seat systems shall be designed to resist a single concentrated load of 250 pounds (1.11 kN) applied in any direction at any point. [DSA-AC] See Chapter 11A, Section	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC is equivalent to 2010 ADA. Given the significant increase in obesity in the American population since the 250-pound standard was established, consideration should be given to increasing the standard to 450-pounds. There is at least anecdotal evidence that 450 pounds is being adopted privately by some health care facilities.	1. 2010 CBC should be amended to apply the criteria of a 450-pound force, to accommodate a more realistic range of the population. or 2. 2010 CBC need not be amended as it is consistent with 2010 ADA Stds.
1477	**611 Washing Machines and Clothes Dryers**		NA	NA		1. Create section addressing washer dryers under 1126B and remove from R occupancies
1478	**611.1 General.** Washing machines and clothes dryers shall comply with 611.		**1111B.2 Public *and common use rooms or areas.*** ... ...(such as washers, dryers and similar equipment installed for the use of occupants) ... ***SECTION 1105B*** ***ACCESSIBILITY FOR GROUP B OCCUPANCIES*** ... **1105B.3.1 Facilities covered.** Facilities covered in this section are those that are used by the public as customers, clients, visitors or which are potentially places of employment and shall include, but not be limited to, the following requirements: ... ...launder mats, cleaning and laundry outlets...	2010 CBC provides **less access** than 2010 ADA.	CBC addresses only washers & dryers in R occupancies It ignores it in locations such as transient lodging, laundromats	1. Create section addressing washer dryers under 1126B
1479	**611.2 Clear Floor Space.** A clear floor or ground *space* complying with 305 positioned for parallel approach shall be provided. The clear floor or ground *space* shall be centered on the appliance.		***1111B.2 Public and common use rooms or areas.*** ... At least one of each type of amenity (such as washers, dryers and similar equipment installed for the use of occupants) in each common area shall be accessible and shall be located on an accessible route to any accessible unit or sleeping accommodation. **...**	2010 CBC **does not address** 2010 ADA req.	CBC does not address the clr flr space - only the accessible route is addressed	1. Adopt ADA language and criteria

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1480	**611.3 Operable Parts.** *Operable parts* , including doors, lint screens, and detergent and bleach compartments shall comply with 309.		NA	2010 CBC **does not address** 2010 ADA req.	CBC does not specifically address the required elements to be accessible	1. Adopt ADA language and criteria
1481	**611.4 Height.** Top loading machines shall have the door to the laundry compartment located 36 inches (915 mm) maximum above the finish floor. Front loading machines shall have the bottom of the opening to the laundry compartment located 15 inches (380 mm) minimum and 36 inches (915 mm) maximum above the finish floor.		**1118B.6.2 Obstructed high reach.** Where a clear floor or ground space allows a parallel approach to an element and the high side reach is over an obstruction, the height of the obstruction shall be 34 inches (864 mm) maximum and the depth of the obstruction shall be 24 inches (610 mm) maximum. The high side reach shall be 48 inches (1219 mm) maximum for a reach depth of 10 inches (254 mm) maximum. Where the reach depth exceeds 10 inches (254 mm), the high side reach shall be 46 inches (1168 mm) maximum for a reach depth of 24 inches (610 mm) maximum. See Figure 11B-5D (b) and (c). **Exception:** The top of washing machines and clothes dryers shall be permitted to be 36 inches (914 mm) maximum above the finish floor.	2010 CBC provides **less access** than 2010 ADA.	The CBC July 1 Supplement addresses the top parameter of the range but does not address the lower parameter for front-loading machines.	1.) Adopt ADA language and criteria 2.) Add language "Front loading machines shall have the bottom of the opening to the laundry compartment located 15 inches (380 mm) minimum and 36 inches (915 mm) maximum above the finish floor." 3.) It would be less confusing if this were to be located in a section dedicated to washer/dryers
1482	**612 Saunas and Steam Rooms**		**1111B.4.6 Bathrooms in hotels, motels, inns, dormitories, resorts, homeless shelters, halfway houses, transient group homes and similar places of transient lodging.** Required accessible bathrooms for places of transient lodging shall comply with the following provisions: ... **1111B.4.6 #7. Toilet facilities.** Toilet facilities shall comply with Section 1111B.4.6, as modified for hotel, motel and dormitory accommodations. Hotel and motel bathrooms beyond those specified in Section 1111B.4 shall provide the following features:	2010 CBC **does not address** 2010 ADA req.		1.) Include the requirements for access to steam rooms and saunas from the 2010 ADA
1483	**612.1 General.** Saunas and steam rooms shall comply with 612.		**1111B.4.6 #7.1** All bathroom fixtures shall be in a location that allows a person using a wheelchair measuring 30 inches by 48 inches (762 mm by 1219 mm) to touch the wheelchair to any... sauna, ... and any other similar sanitary installation, if provided.	2010 CBC **does not address** 2010 ADA req.	1111B.4.6 #7.1 is the only place in the 2010 CBC that addresses "saunas" and does not mention "steam rooms at all. Only requires a person in a wheelchair to "touch" the fixture or element.	1.) Include the requirements in the CBC for access to steam rooms and saunas from the 2010 ADA Section 612
1484	**612.2 Bench.** Where seating is provided in saunas and steam rooms, at least one bench shall comply with 903. Doors shall not swing into the clear floor *space* required by 903.2.			2010 CBC **does not address** 2010 ADA req.	The 2010 CBC only provides req. for benches within fitting and dressing rooms	1.) Remove the requirements for benches in dressing rooms from 1117B.8 and add a new section addressing only benches in section 1117B. 2.) Retain 2010 ADA language allowing a fixed bench fixed to a wall or a removable bench with a seat back per 2010 ADA 903.4 2.) Require benches to provide CFS on the short axis allowing a perpendicular approach to comply with the 2010 ADA Section 903.2. 3.) Allow all benches to be a min. of 42 inches in length and 20 to 24 inches in width to comply with 2010 ADA 903.3 4.) As an equivalent facilitation, allow benches to be fixed to the floor as well as the wall.
1484	**612.2 Bench.** Where seating is provided in saunas and steam rooms, at least one bench shall comply with 903. Doors shall not swing into the clear floor *space* required by 903.2.		2010 CBC Section 1117B.8	2010 CBC provides **greater access** than 2010 ADA.	The CBC requires that water be not allowed to accumulate and shall have a slip-resistant surface on benches that are located in wet areas	Retain the CBC requirement disallowing water retention

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1485	**612.2 EXCEPTION:** A readily removable bench shall be permitted to obstruct the turning *space* required by 612.3 and the clear floor or ground space required by 903.2.			2010 CBC **does not address** 2010 ADA req.		Include the exception for a readily removable bench with a backrest per ADA 612.2
1486	**612.3 Turning Space.** A turning *space* complying with 304 shall be provided within saunas and steam rooms.			2010 CBC **does not address** 2010 ADA req.		Add the requirement for a turning space per ADA 612.3
1487	**CHAPTER 7: COMMUNICATIONS ELEMENTS AND FEATURES**		There is no equivalent heading in the 2010 CBC	NA		
1488	**701 General**		There is no equivalent heading in the 2010 CBC	NA		
1489	**701.1 Scope.** The provisions of Chapter 7 shall apply where required by Chapter 2 or where referenced by a requirement in this document.		**1111B.4.2 Guest rooms and suites**. Places of transient lodging shall incorporate the accessibility requirements of this code as modified by this chapter in at least one guest room or dormitory room together with their sanitary facilities as required in Table 11B-3. All accessible sleeping rooms or suites required by Table 11B-3 shall comply with the requirements of Section 1111B.4.5 for hearing impaired guests. **1111B.4.2.4 Alterations in existing facilities**. When guest rooms are being altered in an existing facility, or portion thereof, subject to the requirements of this section, at least one guest room or suite that complies with the accessibility requirements of this code as modified by this chapter shall be provided for each 25 guest rooms, or fraction thereof, of rooms being altered until the number of such rooms provided equals the number required to be accessible in Table 11B-3. In addition, at least one guest room or suite that complies with the requirements of Section 1111B.4.5 shall be provided for each 25 guest rooms, or fraction thereof, of rooms being altered until the number of such rooms equals the number required to be accessible in Table 11B-4. **1111B.4.5 Visible alarms, notification devices and telephones for persons with hearing impairments**. In addition to those accessible sleeping rooms and suites required by Section 1111B.4.2 (Guest rooms and suites), additional sleeping rooms and suites shall be provided with the following features as required by Table 11B-4 as follows: 1111B.4.5.1 Visible alarms. Visible alarms shall be provided and shall comply with NFPA 72 and Chapter 9, Section 907.5.2.3. 1111B.4.5.2 Visual notification devices. Visual notification devices shall also be provided in units, sleeping rooms and suites to alert room occupants of incoming telephone calls and a door knock or bell. Notification devices shall not be connected to visible alarm signal appliances	NA	ADA equivalent sections to the CBC will be analyzed in the appropriate ADA Section. See 806.3, 803.1, 803.2, 807.3.1, 809.5, 809.5.1, 809.5.1.1, 809.5.1.2, 809.5.3	
1490	**702 Fire Alarm Systems**		There is no equivalent heading in the 2010 CBC	NA		
1491	**702.1 General.** Fire alarm systems shall have ... audible and visible alarms complying with NFPA 72 (1999 ... edition) (incorporated by reference, see “Referenced Standards” in Chapter 1), ...		**1114B.2.2 Alarms/emergency warning systems/accessibility**. If emergency warning systems are provided, they shall include both audible alarms and visible alarms complying with NFPA 72 and Chapter 9, Sections 907.5.2.1 and 907.5.2.3.	2010 CBC is **equivalent** to 2010 ADA.		
1492	**702.1 General.** ... permanently installed ... visible alarms complying with NFPA 72 (1999 ... edition) (incorporated by reference, see “Referenced Standards” in Chapter 1), …			2010 CBC provides **less access** than 2010 ADA.	There is no language in the CBC that requires the alarms to be permanent	

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1493	**702.1 General.** Fire alarm systems shall have ... visible alarms complying with NFPA 72 (1999 ... edition) (incorporated by reference, see “Referenced Standards” in Chapter 1), …		**1114B.2.2 Alarms/emergency warning systems/accessibility**. If emergency warning systems are provided, they shall include both audible alarms and visible alarms complying with NFPA 72 and Chapter 9, Sections 907.5.2.1 and 907.5.2.3.	2010 CBC is **equivalent** to 2010 ADA.		
1494	**702.1 General.** Fire alarm systems shall have ... visible alarms complying with NFPA 72 (1999 ... edition) (incorporated by reference, see “Referenced Standards” in Chapter 1), …		**1114B.2.2 Alarms/emergency warning systems/accessibility**. If emergency warning systems are provided, they shall include both audible alarms and visible alarms complying with NFPA 72 and Chapter 9, Sections 907.5.2.1 and 907.5.2.3.	2010 CBC is **equivalent** to 2010 ADA.		
1495	**702.1 General.** Fire alarm systems shall have ... visible alarms complying with NFPA 72 (1999... edition) (incorporated by reference, see “Referenced Standards” in Chapter 1), …		**1114B.2.2 Alarms/emergency warning systems/accessibility**. If emergency warning systems are provided, they shall include both audible alarms and visible alarms complying with NFPA 72 and Chapter 9, Sections 907.5.2.1 and 907.5.2.3.	2010 CBC is **equivalent** to 2010 ADA.		
1496	**702.1 General.** Fire alarm systems shall have... visible alarms complying with NFPA 72 (1999 ... edition) (incorporated by reference, see “Referenced Standards” in Chapter 1), …		**1114B.2.2 Alarms/emergency warning systems/accessibility**. If emergency warning systems are provided, they shall include both audible alarms and visible alarms complying with NFPA 72 and Chapter 9, Sections 907.5.2.1 and 907.5.2.3.	2010 CBC is **equivalent** to 2010 ADA.		
1497	**702.1 General.** Fire alarm systems shall have ... audible and visible alarms complying with NFPA 72 (1999 ... edition) (incorporated by reference, see “Referenced Standards” in Chapter 1), …		**1114B.2.2 Alarms/emergency warning systems/accessibility**. If emergency warning systems are provided, they shall include both audible alarms and visible alarms complying with NFPA 72 and Chapter 9, Sections 907.5.2.1 and 907.5.2.3.	2010 CBC is **equivalent** to 2010 ADA.		
1498	**702.1 General.** Fire alarm systems shall have ... visible alarms complying with NFPA 72 (1999 ... edition) (incorporated by reference, see “Referenced Standards” in Chapter 1), …		**1114B.2.2 Alarms/emergency warning systems/accessibility**. If emergency warning systems are provided, they shall include both audible alarms and visible alarms complying with NFPA 72 and Chapter 9, Sections 907.5.2.1 and 907.5.2.3.	2010 CBC is **equivalent** to 2010 ADA.		
1499	**702.1 General.** Fire alarm systems shall have... alarms complying with NFPA 72 (1999 ... edition) (incorporated by reference, see “Referenced Standards” in Chapter 1), ...		**1114B.2.2 Alarms/emergency warning systems/accessibility**. If emergency warning systems are provided, they shall include both audible alarms and visible alarms complying with NFPA 72 and Chapter 9, Sections 907.5.2.1 and 907.5.2.3.	2010 CBC is **equivalent** to 2010 ADA.		
1500	**702.1 General.** ... except that the maximum allowable sound level of audible notification appliances complying with section 4-3.2.1 of NFPA 72 (1999 edition) shall have a sound level no more than 110 dB at the minimum hearing distance from the audible appliance. ...		**907.5.2.1.2 Maximum sound pressure**. The maximum sound pressure level for audible alarm notification appliances shall be 110 dBA at the minimum hearing distance from the audible appliance. Where the average ambient noise is greater than 95 dBA, visible alarm notification appliances shall be provided in accordance with NFPA 72 and audible alarm notification appliances shall not be required.	2010 CBC is **equivalent** to 2010 ADA.		
1501	**702.1 General.** ... except that the maximum allowable sound level of audible notification appliances complying with section 4-3.2.1 of NFPA 72 (1999 edition) shall have a sound level no more than 110 dB at the minimum hearing distance from the audible appliance. ...		**907.5.2.1.2 Maximum sound pressure**. The maximum sound pressure level for audible alarm notification appliances shall be 110 dBA at the minimum hearing distance from the audible appliance. Where the average ambient noise is greater than 95 dBA, visible alarm notification appliances shall be provided in accordance with NFPA 72 and audible alarm notification appliances shall not be required.	2010 CBC is **equivalent** to 2010 ADA.		
1502	**702.1 General.** Fire alarm systems shall have permanently installed ... visible alarms ...		See above	See above	See above	
1503	**702.1 General.** Fire alarm systems shall have ... audible and visible alarms complying with NFPA 72 (1999 ... edition) (incorporated by reference, see “Referenced Standards” in Chapter 1), ...		See above	See above	See above	
1504	**702.1 General.** Fire alarm systems shall have ... visible alarms complying with NFPA 72 (1999 ... edition) (incorporated by reference, see “Referenced Standards” in Chapter 1), …		See above	See above	See above	

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1505	**702.1 General.** Fire alarm systems shall have ... visible alarms complying with NFPA 72 (1999 ... edition) (incorporated by reference, see “Referenced Standards” in Chapter 1), …		See above		See above	See above
1506	**702.1 General.** Fire alarm systems shall have ... visible alarms complying with NFPA 72 (1999 ... edition) (incorporated by reference, see “Referenced Standards” in Chapter 1),…		See above		See above	See above
1507	**702.1 EXCEPTION:** Fire alarm systems in medical care *facilities* shall be permitted to be provided in accordance with industry practice.		**907.5.2.1 Audible alarms.** Audible alarm notification appliances shall be provided and emit a distinctive sound that is not to be used for any purpose other than that of a fire alarm. In Group I-2 occupancies, audible appliances located in patient areas shall be only chimes or similar sounding appliances for alerting staff. See Section 907.6.5. **Exception:** Visible alarm notification appliances shall be allowed in lieu of audible alarm notification appliances in patient areas of Group I-2 occupancies.	2010 CBC provides **greater access** than 2010 ADA.	ADA is vague in that it does not describe industry practice.	Adopt CBC lanuage
1508	**703 Signs**		**1117B.5 Signs and identification.** ... **Section 4.30** …	2010 CBC is **equivalent** to 2010 ADA.	Actually, the only way I can think of to make a really useful reommendation, given the complexity of the sign regulations, is to rewrite the entire sign section. I plan to write one set using ANSI, and one set using 2010 ADA.	I will send attachments with two sets of complete code recommendations. **I will review when I receive the new lanuage**
1508.1	**703 Signs**		**1117B.5 Signs and identification.** California’s standards for signage are more stringent than **Section 4.30** of the ADA Standards for Accessible Design.	Which Std.provides greater access **depends** on circumstances.	The note is no longer relevant and must be removed or a more accurate note written. Neither the ADA nor CBC address multiple language signs. Consider clarifying whether signs provided in multiple languages must meet all signage requirements or only the text in English or the primary language provided.	Remove note. If California has more stringent standards, then the note belongs at the beginning of the entire code, since other sections are also more stringent. Consider clarifying language intent.
1509	**703.1 General.** .... Where both visual and *tactile characters* are required, either one sign with both visual and *tactile characters*, or two separate signs, one with visual, and one with *tactile characters*, shall be provided.	This applies to signs that identify rooms and spaces. When the same characters are both visual and tactile, they compromise visual quality for ease in tactile reading. Therefore, this standard allows you to separate the visual characters from equivalent tactile characters. Tactile characters can be smaller and more widely spaced, with thinner strokes, and no contrast or glare requirements, while visual characters can be larger, bolder,, be more tightly spaced, and do have finish requirements. They can also be upper and lower case.	**1117B.5.1 General.** …	2010 CBC **does not address** 2010 ADA req.	Although equivalent facilitation in California allows for the divided tactile/visual sign, there is no explicit standard. This standard should be added, but written more clearly. Best language is in **1998 ANSI A117.1.** or in most current ANSI.	Rewrite section so it is closer to ANSI language. Add after "required," "raised characters on a single sign can also be visual, or separate raised and visual characters can be provided, either on the same sign or on two, separate signs," Add simple drawings illustrating the concept of separate tactile and visual sign sections.
1510	**703.1 General.** Signs shall comply with **703**. …		**1117B.5.1 General.** …	2010 CBC **does not address** 2010 ADA req.	Although equivalent facilitation in California allows for the divided tactile/visual sign, there is no explicit standard. This standard should be added, but written more clearly. Best language is in **1998 ANSI A117.1.** or in most current ANSI.	Rewrite section so it is closer to ANSI **(ADA**) language. Add after "required," "raised characters on a single sign can also be visual, or separate raised and visual characters can be provided, either on the same sign or on two, separate signs," Add simple drawings illustrating the concept of separate tactile and visual sign sections.

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1510	703.1 General. …		**1117B.5.1 General.** ... The addition of or replacement of signs and/or identification devices shall not trigger any additional path of travel requirements	NA	This is actually a scoping statement that was added to reassure legislators that the rewritten signage section did not add new costs.	Move to scoping section or which ever section of code covers path of travel requirements.
1510.2			**1117B.5.1.1** ... See also ... Section 1115B.6 for sanitary facilities.	Which Std.provides greater access **depends** on circumstances.	This scoping refers to the unique California requirement for geometric symbol signs on doors, which was the original means California chose to identify restrooms for persons who read by touch, and visually, but with impaired vision, as well as those with cognitive impairments. The braille and raised character signs provide some duplication of that.	Although it would seem practical to eliminate the code requirement for the geometric signs, they are so much a part of California disabled access history that it may not be worth the ruckus that would probably occur.
1511	**703.2 Raised Characters.** ... Raised *characters* shall be installed in accordance with 703.4.		**1117B.5.1.1 Identification signs.** When signs identify permanent rooms and spaces of a building or site, they shall comply with Sections 1117B.5.2, 1117B.5.3, 1117B.5.5, 1117B.5.6 and 1117B.5.7. …	Which Std.provides greater access **depends** on circumstances.	2010 ADA refers to the entire section on tactile characters, whereas Title 24 refers to scattered sections of the regulations that apply to tactile characters. The matching section of 2010 ADA is 216.2, the scoping section on signs. Some requirements for tactile characters remain more stringent in 2010 Title 24, than in 2010 ADA.	Requirements foir room identification signs need to be rewritten to comply with ANSI (**ADA**)standards. Scoping can then remain in this section. Second choice would be to rewrite standards to comply with 2010 ADA and move all scoping to Chapter 2.
1512	**703.2 Raised Characters.** ... shall be duplicated in Braille complying with 703.3. …		**1117B.5.6 Braille**. Contracted (Grade 2) Braille shall be used wherever Braille is required in other portions of these standards. Dots shall be 1/10 inch (2.54 mm) on center in each cell with 2/10-inch (5.08 mm) space between cells, measured from the second column of dots in the first cell to the first column of dots in the second cell. Dots shall be raised a minimum of 1/40 inch (0.635 mm) above the background. Braille dots shall be domed or rounded.	Which Std.provides greater access **depends** on circumstances.	2010 ADA has additional specifications for braille dot size and interline spacing. Should California allow a range of measurements for braille spacing and dot height?	Add ranges for dot base size and interline spacing. Consider the possibility of adding some range to all braille measurements.
1512.1	**703.2 Raised Characters.** Raised *characters* shall comply with 703.2 …		**1117B.5.1.1 Identification signs.** When signs identify permanent rooms and spaces of a building or site, they shall comply with Sections **1117B.5.2, 1117B.5.3, 1117B.5.5, 1117B.5.6 and 1117B.5.7.** …	Which Std.provides greater access **depends** on circumstances.	2010 ADA refers to the entire section on tactile characters, whereas Title 24 refers to scattered sections of the regulations that apply to tactile characters. The matching section of 2010 ADA is 216.2, the scoping section on signs. Some requirements for tactile characters remain more stringent in 2010 Title 24, than in 2010 ADA.	Requirements foir room identification signs need to be rewritten to comply with ANSI standards. Scoping can then remain in this section. Second choice would be to rewrite standards to comply with 2010 ADA and move all scoping to Chapter 2.
1512.2	**703.2 Raised Characters.** Raised *characters* shall comply with 703.2 …		**1117B.5.5 Raised characters and pictorial symbol signs.** When raised characters are required ... they shall conform to the following requirements:	Which Std.provides greater access **depends** on circumstances.	Some requirements for tactile characters remain more stringent in 2010 Title 24, than in 2010 ADA.	
1512.3	**703.2 Raised Characters.** Raised *characters* shall comply with 703.2 …		**1117B.5.5... pictorial symbol signs.** When ... pictorial symbols (pictograms) are used on such signs, they shall conform to the following requirements:	2010 CBC is **equivalent** to 2010 ADA.	The section of 2010 ADA that most closely matches this section of Title 24 is the scoping of room designators in **216.1** (Pictograms).	
1512.4	**703.2 Raised Characters.** Raised *characters* shall comply with 703.2 …		**1117B.5.1.1 Identification signs.** ... For other means of egress signs and identification provisions adopted by SFM and DSA-AC, see Chapter 10, Sections 1011.3 for Tactile Exit Signs, 1022.8 for Floor Identification Signs, 1008.1.9.7 for Delayed Egress Locks, 1007.9, 1007.10 and 1007.11 for Accessible Means of Egress, and 1007.4 for Elevators. See also Section 1116B for additional signage requirements applicable to elevators and Section 1115B.6 for sanitary facilities.	Which Std.provides greater access **depends** on circumstances.	Matching sections of 2010 ADA are to be found in Chapter 2, Scoping, and in the separate technical section for elevators. There is no matching section for some of the egress signs, or for sanitary facility door signs (geometric symbol signs).	These sections must be dealt with individually, and either added to scoping, or to technical sections of the code.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1513	**Advisory 703.2 Raised Characters.** Signs that are designed to be read by touch should not have sharp or abrasive edges.		**1115B.6 Identification symbols.** Doorways leading to sanitary facilities shall be identified by a geometric symbol in compliance with this section. Geometric symbols shall be centered horizontally on the door at a height of 60 inches (1524 mm) above the finish floor or ground surface measured to the center of the symbol. Edges of signs shall be rounded, chamfered or eased. Corners of signs shall have a minimum radius of ⅛ inch (3.2 mm). ...	Which Std.provides greater access **depends** on circumstances.	It is important to add comments that emphasize the preference for beveled or rounded raised characters. _____Although Title 24 does not address sharp edges on tactile characters, it does address them on the edges of sanitary facility geometric door signs.	Title 24 should address sharp edges on raised characters, as well as on edges of signs that may be touched. However, the terms "rounded" and "chamfered" should be removed from the geometric door symbol sign section, and the maximum radius should be 1/8 in, since it may make the triangle edges feel too rounded if there is a larger radius or the edges are not distinct. Easing will remove any dangerous sharpness from the signs.
1514	**703.2.1 Depth.** Raised *characters* shall be 1/32 inch (0.8 mm) minimum above their background.		**1117B.5.5.1. Character type.** Characters on signs shall be raised 1/32 inch (0.794 mm) minimum …	2010 CBC is **equivalent** to 2010 ADA.	Dividing the attributes of raised characters into separate sections may make them easier to understand and follow.	Divide raised character attributes as in ADA and ANSI. It would be an improvement to either put in a maximum height, or to add an advisory stating that raising characters much more than 1/32 in above the surface makes them more difficult to read by touch.
1515	**703.2.2 Case.** *Characters* shall be uppercase.		**1117B.5.5.1. Character type.** Characters on signs shall be ... uppercase characters …	2010 CBC is **equivalent** to 2010 ADA.	Dividing the attributes of raised characters into separate sections may make them easier to understand and follow.	Divide raised character attributes as in ADA and ANSI.
1516	**703.2.3 Style.** *Characters* shall be sans serif. …		**1117B.5.5.1. Character type.** Characters on signs shall be ... sans serif …	2010 CBC is **equivalent** to 2010 ADA.	Title 24 has always used ANSI standard for sans serif characters, so no change is necessary.	Divide raised character attributes as in ADA and ANSI.
1517	**703.2.3 Style.** ... *Characters* shall not be italic, oblique, script, highly decorative, or of other unusual forms.			2010 CBC provides **less access** than 2010 ADA.	Add this to Title 24 to bring it into total compliance with federal and ANSI standards.	Add "style" section.
1518	**703.2.4 Character Proportions.** *Characters* shall be selected from fonts where the width of the uppercase letter “O” is 55 percent minimum and 110 percent maximum of the height of the uppercase letter “I”.		**1117B.5.3 Proportions.** Characters on signs shall be selected from fonts that have a width-to-height ratio of between 3:5 (60 percent) and 1:1 (100 percent) measured by the width of the uppercase letter “O” and height of the uppercase letter “I”, …	Which Std.provides greater access **depends** on circumstances.	It may improve clarity if the character width and the stroke width are divided into two sections, as in ADA and ANSI. _____ The increase in width may provide for slightly more open characters, which will provide greater readability but the lower minimum allows more condensed characters, which are not as easy to read. _____It is imperative to widen the width of the "O" in CBC, because there has been an unintended consequence of not doing so, of shutting out many highly readable and commonly used sans serif fonts because the "O" is slightly wider than 100 percent of the height of the "I."	First choice would be to increase the upper width limit to 110 percent to accommodate the increased width of "O" in many standard fonts, but to retain the more stringent lower limit of 60 percent for condensed characters. There was no reason to lower this limit, and condensed characters are extremely difficult to read, especially by touch. Divide character width and stroke width into two different sections. Make the language clear that the standard of measurement character must be from the chosen font. Otherwise, you may find people choosing characters from different fonts in order to meet the standards.
1519	**703.2.5 Character Height.** *Character* height ... shall be ⅝ inch (16 mm) minimum and 2 inches (51 mm) maximum …		**1117B.5.5.2. Character size.** Raised characters shall be a minimum of ⅝ inch (15.9 mm) and a maximum of 2 inches (51 mm) high.	2010 CBC is **equivalent** to 2010 ADA.	When changing character proportions, California adopted the use of the "I" for character height, but neglected to add it to the specific section on character height.	Add the uppercase "I" as the standard for measuring character height to this section. Language should make clear that the "I" must be from the chosen font.
1520	**703.2.5 Character Height.** *Character* height measured vertically from the baseline of the *character* …		**1117B.5.5.2. Character size.** …	2010 CBC **does not address** 2010 ADA req.	California does not specify how to measure character height.	Bring this section into compliance with ADA and ANSI.
1521	**703.2.5 EXCEPTION:** Where separate raised and visual *characters* with the same information are provided, raised *character* height shall be permitted to be ½ inch (13 mm) minimum.			2010 CBC **does not address** 2010 ADA req.	There is no corresponding exception in current Title 24, because there is no provision for two separate sets of characters, raised and visual.	Add the provision for two separate sets of characters, with the exception. The ANSI standard should be used, which also includes a maximum height of the raised character of 3/4 inch.
1522	**703.2.6 Stroke Thickness.** Stroke thickness of the uppercase letter “I” shall be 15 percent maximum of the height of the *character*.	UNDER REVIEW The previous comparison is not correct, since stroke thickness in the 1991 standards did not apply to raised character signs, but only to signs with visual characters.	**1117B.5.3 Proportions.** Characters on signs shall be selected from fonts that have a ... stroke width-to-height ratio of between 1:5 (20 percent) and 1:10 (10 percent) measured by the width and height of the uppercase letter “I”.	Which Std.provides greater access **depends** on circumstances.	Characters that are both raised and visual should be allowed to have a rounded profile, as long as the base is wide enough to provide adequate access by persons with impaired vision. The wider character stroke is more accessible for readers who use their vision, but less so for touch readers, unless the character is beveled so that the top surface is thinner than the base..	The ANSI standard is clearer on choosing a font where the "I" has the correct stroke width. The "Minimum" section in ANSI should be clear that it is the base of the character that is being measured, not the top surface.

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1523	**703.2.7 Character Spacing.** *Character* spacing shall be measured between the two closest points of adjacent raised *characters* within a message, excluding word spaces. Where *characters* have rectangular cross sections, spacing between individual raised characters shall be ⅛ inch (3.2 mm) minimum and 4 times the raised *character* stroke width maximum. Where *characters* have other cross sections, spacing between individual raised *characters* shall be 1/16 inch (1.6 mm) minimum and 4 times the raised *character* stroke width maximum at the base of the cross sections, and ⅛ inch (3.2 mm) minimum and 4 times the raised *character* stroke width maximum at the top of the cross sections. *Characters* shall be separated from raised borders and decorative elements ⅜ inch (9.5 mm) minimum.			2010 CBC **does not address** 2010 ADA req.	There is no corresponding exception in current Title 24, because there is no provision for two separate sets of characters, raised and visual.	Add the provision for two separate sets of characters, with the exception. The ANSI **(ADA)**standard should be used, which also includes a maximum height of the raised character of 3/4 inch.
1524	**703.2.8 Line Spacing.** Spacing between the baselines of separate lines of raised *characters* within a message shall be 135 percent minimum and 170 percent maximum of the raised *character* height.			2010 CBC **does not address** 2010 ADA req.	There is no corresponding section on interline spacing in Title 24.	Add section on interline spacing to Title 24.
1525	**703.3 Braille.** Braille shall be contracted (Grade 2) and shall comply with 703.3 and 703.4.		**1117B.5.6 Braille.** Contracted (Grade 2) Braille shall be used wherever Braille is required in other portions of these standards. …	2010 CBC provides **less access** than 2010 ADA.	California standards have always been far more stringent than federal standards. However, 2010 ADA has standards for dot base size and interline spacing that are not in Title 24, so must be added.	Standards for dot base size and interline spacing must be added in Title 24. The question is, should ranges be used for all braille specifications, none of them, or just the new measurements.
1526	**703.3.1 Dimensions and Capitalization.** Braille dots shall have a domed or rounded shape and shall comply with Table 703.3.1. …		**1117B.5.6 Braille**. Contracted (Grade 2) Braille shall be used wherever Braille is required in other portions of these standards. Dots shall be 1/10 inch (2.54 mm) on center in each cell with 2/10-inch (5.08 mm) space between cells, measured from the second column of dots in the first cell to the first column of dots in the second cell. Dots shall be raised a minimum of 1/40 inch (0.635 mm) above the background. Braille dots shall be domed or rounded.	2010 CBC provides **less access** than 2010 ADA.	Standards for dot base size and interline spacing must be added to Title 24. The major question is whether a range should be provided for those measurements, and for dot and cell spacing and dot height, that are already in the California standard.Some manufacturing tolerance for braille measurements must be allowed, at minimum.	Add dot base size range and interline spacing to Title 24.
1526	**703.3.1 Dimensions and Capitalization.** ... The indication of an uppercase letter or letters shall only be used before the first word of sentences, proper nouns and names, individual letters of the alphabet, initials, and acronyms.		**1117B.5.6 Braille**. …	2010 CBC **does not address** 2010 ADA req.	Title 24 does not have a standard on the capitalization of braille, although best practice has usually been to omit most capitalization.	Add standard for braille capitalization to Title 24.
1527	**703.3.2 Position.** Braille shall be positioned below the corresponding text. If text is multi-lined, Braille shall be placed below the entire text. Braille shall be separated ⅜ inch (9.5 mm) minimum from any other *tactile characters* and ⅜ inch (9.5 mm) minimum from raised borders and decorative *elements* .		**1117B.5.5.4. Character placement.** ... Braille shall be placed a minimum of ⅜ inch (9.5 mm) and a maximum of ½ inch (12.7 mm) directly below the tactile characters; flush left or centered. When tactile text is multilined, all Braille shall be placed together below all lines of tactile text.	2010 CBC provides **greater access** than 2010 ADA.	The braille is easier to locate when it is placed near the raised characters. Federal standard allows the braille to be many inches below the characters, since it does not provide a maximum distance.	Retain the California maximum distance of 1/2 inch.
1527.1	**703.3.2 Position. …**		**1117B.5.5.4. Character placement.** Characters and Braille shall be in a horizontal format. …	2010 CBC provides **greater access** than 2010 ADA.	ANSI and ADA have no correponding regulation for horizontal characters and braille. The standard became necessary when designers began to ask for verticalor even diagonal text and braille	Retain character placement regulation for horizontal characters and braille in Title 24.
1528	**703.3.2 EXCEPTION:** Braille provided on elevator car controls shall be separated 3/16 inch (4.8 mm) minimum and shall be located either directly below or adjacent to the corresponding raised *characters* or symbols.			2010 CBC provides **greater access** than 2010 ADA.	More space between the tactile characters and braille makes the braille easier to read, especially for non-skilled readers.	If elevator manufacturers are ignoring California spacing, it may be best to adopt the exception even though it may be more difficut to read the braille.
1529	**703.4 Installation Height and Location.** Signs with *tactile characters* shall comply with 703.4.		**1117B.5.7 Mounting location and height.** …	NA	California does not include a general charging statement. The technical requirements and the charging title are all included in one section of the code.	It may help to break the technical requirements up and to introduce them with a "General" statement. ANSI also omits such a general statement for installation.

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1530	**703.4.1 Height Above Finish Floor or Ground.** *Tactile characters* on signs shall be located 48 inches (1220 mm) minimum above the finish floor or ground surface, measured from the baseline of the lowest *tactile character* and 60 inches (1525 mm) maximum above the finish floor or ground surface, measured from the baseline of the highest *tactile character*.		**1117B.5.7 Mounting location and height.** Where permanent identification signs are provided for rooms and spaces, signs shall be installed on the wall adjacent to the latch side of the door. Where there is no wall space on the latch side, including at double leaf doors, signs shall be placed on the nearest adjacent wall, preferably on the right.Where permanent identification signage is provided for rooms and spaces they shall be located on the approach side of the door as one enters the room or space. Signs that identify exits shall be located on the approach side of the door as one exits the room or space .Mounting height shall be 60 inches (1524 mm) above the finish floor to the center line of the sign. ...	2010 CBC **conflicts with** 2010 ADA.	CBC not only conflicts with 2010 ADA, but does, except for fairly tall people, provide less access in many cases, because the most important sections of the room identification are often too high to read for visual readers who must get their eyes very close to the characters. The new standard provides much needed flexibility for populations such as young children or people of short stature or those who use walkers or wheelchairs.	Adopt the new standard. Use the baseline of the braille for the requirement of 48 inches.
1531	**703.4.1 EXCEPTION:** *Tactile characters* for elevator car controls shall not be required to comply with 703.4.1.			2010 CBC **does not address** 2010 ADA req.		
1532	**703.4.2 Location.** Where a *tactile* sign is provided at a door, the sign shall be located alongside the door at the latch side. …		**1117B.5.7 Mounting location and height.** Where permanent identification signs are provided for rooms and spaces, signs shall be installed on the wall adjacent to the latch side of the door. Where there is no wall space on the latch side, including at double leaf doors, signs shall be placed on the nearest adjacent wall, preferably on the right.Where permanent identification signage is provided for rooms and spaces they shall be located on the approach side of the door as one enters the room or space. Signs that identify exits shall be located on the approach side of the door as one exits the room or space .Mounting height shall be 60 inches (1524 mm) above the finish floor to the center line of the sign. ...	2010 CBC **conflicts with** 2010 ADA.	CBC not only conflicts with 2010 ADA, but does, except for fairly tall people, provide less access in many cases, because the most important sections of the room identification are often too high to read for visual readers who must get their eyes very close to the characters. The new standard provides much needed flexibility for populations such as young children or people of short stature or those who use walkers or wheelchairs.	Adopt the new **(ADA)** standard. Use the baseline of the braille for the requirement of 48 inches.
1533	**703.4.2 Location.** ... Where a *tactile* sign is provided at double doors with one active leaf, the sign shall be located on the inactive leaf. …		**1117B.5.7 Mounting location ...** Where there is no wall space on the latch side, including at double leaf doors, signs shall be placed on the nearest adjacent wall, preferably on the right.Where permanent identification signage is provided for rooms and spaces they shall be located on the approach side of the door as one enters the room or space. Signs that identify exits shall be located on the approach side of the door as one exits the room or space ...	2010 CBC **does not address** 2010 ADA req.	This standard merely acknowledges the fact that unused door leafs can be treated as walls so that signs can be installed next to the latch side of such double doors.	Add to Title 24.
1534	**703.4.2 Location.** ... Where a *tactile* sign is provided at double doors with two active leafs, the sign shall be located to the right of the right hand door. …		**1117B.5.7 Mounting location ...** Where there is no wall space on the latch side, including at double leaf doors, signs shall be placed on the nearest adjacent wall, preferably on the right.Where permanent identification signage is provided for rooms and spaces they shall be located on the approach side of the door as one enters the room or space. Signs that identify exits shall be located on the approach side of the door as one exits the room or space	2010 CBC is **equivalent** to 2010 ADA.	Admittedly, Title 24 only lists a "preference" rather than a requirement, but there are so many exception as to where signs must be installed because of obstructions, that the requirement is actually just a preference, anyway.	Change "preference" to requirement.

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1535	**703.4.2 Location.** ... Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall. …		**1117B.5.7 Mounting location and height.** ... Where there is no wall space on the latch side, including at double leaf doors, signs shall be placed on the nearest adjacent wall,…	2010 CBC is **equivalent** to 2010 ADA.	The major problem arises when the "nearest accessible wall" is so far away from the door that is to be identified by the sign that the sign has no practical application for anyone, sighted or blind. Sometimes there is an alcove opening at the corridor, and the sign can be placed there, treating the opening as a doorway. If that is not possible, the sign should only be placed directly on the door if the door does not swing out toward the sign reader. If there is no safe location, it is best, according to the Access Board staff to replace the raised character and braille sign with a large visual sign that can be read easily by someone with a vision impairment, and place it on or above the door to provide identification to the majority of persons with disabilities.	I would recommend that we somehow reorganize this standard in Title 24 so that becomes clear. Too often, inspectors read only the first portion of the regulation, and insist that the sign be installed on the latch side, even when there are obvious obstacles. I would also recommend a regulation that spells out a maximum distance that the sign can be from the door or doorway it identifies. Signs that are located far away do not actually identify rooms or spaces in any meaningful way.
1536	**703.4.2 Location.** ... Signs containing *tactile characters* shall be located so that a clear floor space of 18 inches (455 mm) minimum by 18 inches (455 mm) minimum, centered on the *tactile characters*, is provided beyond the arc of any door swing between the closed position and 45 degree open position.		**1117B.5.7 Mounting location and height.** ...Mounting location shall be determined so that a person may approach within 3 inches (76 mm) of signage without encountering protruding objects or standing within the swing of a door. **1115B.6 Identification symbols.** Doorways leading to sanitary facilities shall be identified by a geometric symbol in compliance with this section. Geometric symbols shall be centered horizontally on the door at a height of 60 inches (1524 mm) above the finish floor or ground surface measured to the center of the symbol. Edges of signs shall be rounded, chamfered or eased. Corners of signs shall have a minimum radius of ⅛ inch (3.2 mm). See Section 1117B.5.1, Item 1 for additional signage requirements applicable to sanitary facilities.	Which Std.provides greater access **depends** on circumstances.	The ANSI Sign Committee wrote this requirement in an attempt to clear up the misunderstanding about where the 3 inches were to be measured, and to provide a more measurable standard that would accommodate most people of average size who needed to get very close to the wall in order to visually read a door identificaiton sign. The CBC requires geometric symbol signs on the corridor side of all sanitary facility doors, whether they swing in or out but requires "rounded, chamfered or eased" edges and rounded corners as though they are intended to be read as tactile signs. If they are considered tactile signs, they would violate the ADA requirement for the 18" by 18" clear floor space free of the swing of the door.	Add the stricter ADA language, determine and specify if the gener-specific symbol signs are tactile or not and coordinate that decision with the final requirement.
1537	**703.4.2 EXCEPTION:** Signs with *tactile characters* shall be permitted on the push side of doors with closers and without hold-open devices.			2010 CBC **does not address** 2010 ADA req.	Thie exception is particularly useful for hotels, motels and apartment buildings. It can also be used in older buildings when there is a space problem on the walls.	Add the exception to Title 24.
1538	**703.5 Visual Characters.** Visual *characters* shall comply with 703.5.		**1117B.5.1.2. Directional and informational signs.** When signs direct to or give information about permanent rooms and functional spaces of a building or site, they shall comply with Sections 1117B.5.2, 1117B.5.3 and 1117B.5.4.	Which Std.provides greater access **depends** on circumstances.	Most of the requirements for visual characters are the same as the 2010 ADA standards, but the requirements for character and stroke width are slightly more stringent in Title 24, and there are added requirements for intercharacter and interline spacing in 2010 ADA. 2010 ADA scoping for these signs is at 216.3.	
1539	**703.5 EXCEPTION:** Where visual *characters* comply with 703.2 and are accompanied by Braille complying with 703.3, they shall not be required to comply with 703.5.2 through 703.5.9.			2010 CBC **does not address** 2010 ADA req.	Thie exception is particularly useful for hotels, motels and apartment buildings. It can also be used in older buildings when there is a space problem on the walls.	Add the **(ADA)** exception to Title 24.
1540	**703.5.1 Finish and Contrast.** *Characters* and their background shall have a non-glare finish. …		**1117B.5.2 Finish and contrast.** Characters, symbols and their background shall have a nonglare finish. …	2010 CBC is **equivalent** to 2010 ADA.	A maximum Gloss Meter reading of 19 (as per original ADAAG Appendix) should be added, so that plan checkers and inspectors will have something to go by. There are too many glossy signs being installed.	Consider adding a requirement for a maximum Gloss Meter reading of 19.
1541	**703.5.1 Finish and Contrast.** ... *Characters* shall contrast with their background with either light *characters* on a dark background or dark *characters* on a light background.		**1117B.5.2 Finish and contrast.** ... Characters and symbols shall contrast with their background, either light on a dark background or dark on a light background.	2010 CBC is **equivalent** to 2010 ADA.	Since Title 24 does refer to the 70 percent minimum contrast rule for the Cleaner Air Symbol, as well as for detectable warning surfaces, it should be included in the sign section, along with a minimum LRV for the lighter of the two colors.	

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1542	**Advisory 703.5.1 Finish and Contrast.** Signs are more legible for persons with low vision when characters contrast as much as possible with their background. Additional factors affecting the ease with which the text can be distinguished from its background include shadows cast by lighting sources, surface glare, and the uniformity of the text and its background colors and textures.			NA	Advisory notes would be a very good additon to the California standards. Originally, the Checklists fulfilled that role, but then it was decided to remove all interpretations and "best practices," so they became much less useful.	Consider reinstating explanatory notes and "best practices," well-labeled as such, to the Checklists.
1543	**703.5.2 Case.** *Characters* shall be uppercase or lowercase or a combination of both.		**1117B.5.4** .... Characters on signs required to be accessible by Section 1117B.5.1, Items 2 and 3 ... Lowercase characters are permitted. …	2010 CBC is **equivalent** to 2010 ADA.	Title 24 should be reorganized so that individual requirements are listed separately, rather than clustered under titles that are not descriptive.	
1544	**703.5.3 Style.** *Characters* shall be conventional in form. …			2010 CBC **does not address** 2010 ADA req.		
1545	**703.5.3 Style.** ...*Characters* shall not be italic, oblique, script, highly decorative, or of other unusual forms.			2010 CBC **does not address** 2010 ADA req.		
1546	**703.5.4 Character Proportions.** *Characters* shall be selected from fonts where the width of the uppercase letter “O” is 55 percent minimum and 110 percent maximum of the height of the uppercase letter “I”.		**1117B.5.3 Proportions.** Characters on signs shall be selected from fonts that have a width-to-height ratio of between 3:5 (60 percent) and 1:1 (100 percent) measured by the width of the uppercase letter “O” and height of the uppercase letter “I”, …	Which Std.provides greater access **depends** on circumstances.	I believe that the increase to a maximum width of 110 percent for the "O" provides greater access, but the decrease of the minimum width to 55 percent provides less access for persons with vision impairments.	Increase maximum width to 110 percent, but retain minimum width at 60 percent. Make it cear that the characters to be measured are to be from the selected font.
1547	**703.5.5 Character Height.** Minimum *character* height shall comply with Table 703.5.5. …		1117B.5.4 Character height. Characters on signs required to be accessible by Section 1117B.5.1, Items 2 and 3 shall be sized according to the following table. …	2010 CBC is **equivalent** to 2010 ADA.	Obviously, changes must be made to requirements for evacuation plans. Also, directories are not exempt in Title 24, so provisions need to be made for them. I would recommend exempting only certain size requirements, but retaining requirements for non-glare and high contrast finishes and surfaces. The 5/8 inch minimum character height would be appropriate for small directories, but would not be usable for very large directories or evacuation plans.	Make some changes in Title 19 and Title 24 to accommodate the minimum 5/8 inch high character size for visual signs that direct and inform about the facility such as evacuation plans.
1548	**703.5.5 Character Height.** ... Viewing distance shall be measured as the horizontal distance between the character and an obstruction preventing further approach towards the sign. …		1117B.5.4 Character height. ... Viewing distance shall be measured as the horizontal distance between the character and an obstruction preventing further approach towards the sign.	2010 CBC is **equivalent** to 2010 ADA.	New standards will need to be written for evacuation plans in order for them to comply with this standard and still be usable, especially by persons with vision and cognitive disabilities.	
1549	**703.5.5 Character Height.** ... *Character* height shall be based on the uppercase letter “I”.		**1117B.5.4 Character height.** ... The minimum height is measured using an uppercase letter “I”. …	2010 CBC is **equivalent** to 2010 ADA.		The text should read ". . . An uppercase letter "I" from the chosen font."
1549.1			**Visual Character Height**			
1549.2			**Height to Finish Floor or Ground From Baseline of Character**		**Minimum Character Height**	
1549.3			*40 inches (1015 mm) to less than or equal to 70 inches (1780 mm)*		5/8 inch (16 mm)	
1549.4					5/8 inch (16 mm), plus 1/8 inch (3.2 mm) per foot (305 mm) of viewing distance above 72 inches (1830 mm)	
1549.5			*Greater than 70 inches (1780 mm) to less than or equal to 120 inches (3050 mm)*		2 inches (51 mm)	
1549.6					2 inches (51 mm) plus 1/8 inch (3.2 mm) per ft (305 mm) of viewing distance above 180 inches (4570 mm)	
1549.7			*Greater than 120 inches (3050 mm)*		3 inches (75 mm)	
1549.8					3 inches (75 mm) plus 1/8 inch (3.2 mm) per ft (305 mm) of viewing distance above 21 feets (6400 mm)	

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1550	**703.5.6 Height From Finish Floor or Ground.** Visual *characters* shall be 40 inches (1015 mm) minimum above the finish floor or ground.			2010 CBC **does not address** 2010 ADA req.	The 40 inch rule is implicit because it is included in the table, but that does not make clear an absolute regulation not to post signs lower than 40 inches above the floor.	Add the minimum distance from the floor for visual signs.
1551	**703.5.6 EXCEPTION:** Visual *characters* indicating elevator car controls shall not be required to comply with 703.5.6.			2010 CBC **does not address** 2010 ADA req.		Add the exception for elevator cars to the standard.
1552	**703.5.7 Stroke Thickness.** Stroke thickness of the uppercase letter "I" shall be 10 percent minimum and 30 percent maximum of the height of the character.		**1117B.5.3 Proportions.** Characters on signs shall be selected from fonts that have a ... stroke width-to-height ratio of between 1:5 (20 percent) and 1:10 (10 percent) measured by the width and height of the uppercase letter "I".	Which Std.provides greater access **depends** on circumstances.	The ANSI text is clearer in the description of how the font should be chosen. Although much of the time, the very bold characters may be more visible for persons with low vision, it will depend on the height and the openiness of the character and the font.	Expamd the allowed stroke width of visual characters to 30 percent of height. Consider allowing 30 percent character width only for characters that have a minimum height.
1553	**703.5.8 Character Spacing.** *Character* spacing shall be measured between the two closest points of adjacent *characters* , excluding word spaces. Spacing between individual *characters* shall be 10 percent minimum and 35 percent maximum of *character* height.			2010 CBC **does not address** 2010 ADA req.	It is vital to add a requirement for intercharacter spacing.	Add spacing requirements to the standard. Provide a figure showing how the spacing is measured.
1554	**703.5.9 Line Spacing.** Spacing between the baselines of separate lines of *characters* within a message shall be 135 percent minimum and 170 percent maximum of the *character* height.			2010 CBC **does not address** 2010 ADA req.		Add line spacing requiremetns to the standard.
1555	**703.6 Pictograms.** *Pictograms* shall comply with 703.6.		**1117B.5.5 ... pictorial symbol signs**. When ... pictorial symbols (pictograms) are used on such signs, they shall conform to the following requirements:	2010 CBC is **equivalent** to 2010 ADA.	Title 24 is written so that it should be clear that the only pictograms that must comply with the specific rules for field size, are those that are included on room identification signs. However, the fact that the ISA and other Symbols of Accessibility are, indeed, pictographic symbols, muddies the waters.	Suggest adding an exception for the Symbols of Accessibility and the Cleaner Air Symbol to the section on pictograms.
1556	**703.6.1 Pictogram Field.** *Pictograms* shall have a field height of 6 inches (150 mm) minimum. …		**1117B.5.5.3. Pictorial symbol signs (pictograms).** Pictorial symbol signs (pictograms) shall be accompanied by the verbal description placed directly below the pictogram. The outside dimension of the pictogram field shall be a minimum of 6 inches (152 mm) in height.	2010 CBC is **equivalent** to 2010 ADA.	There is still confusion about the difference between the field of the pictogram and the pictogram figure. A diagram might help.	
1557	**703.6.1 Pictogram Field.** ... *Characters* and Braille shall not be located in the *pictogram* field.			2010 CBC **does not address** 2010 ADA req.	There is an assumption that there is a clear field of 6 inches high, except for the pictogram figure, but Title 24 does not spell it out.	Add the ANSI or federal standard to Title 24.
1558	**703.6.2 Finish and Contrast.** *Pictograms* and their field shall have a non-glare finish. …		**1117B.5.2 Finish and contrast.** Characters, symbols and their background shall have a nonglare finish. …	2010 CBC is **equivalent** to 2010 ADA.	Even though the Access Board makes a distinction between pictograms and Symbols of Accessibility, pictograms are symbols, so contrast and glare is covered in Title 24 by the general regulation.	Add the non-glare requirement directly to the section on pictograms. Specify the gloss meter reading.
1559	**703.6.2 Finish and Contrast.** ... *Pictograms* shall contrast with their field with either a light pictogram on a dark field or a dark *pictogram* on a light field.		**1117B.5.2 Finish and contrast.** ... Characters and symbols shall contrast with their background, either light on a dark background or dark on a light background.	2010 CBC is **equivalent** to 2010 ADA.	The 70 percent minimum should be added to give a marker to designers and inspectors.	Add the 70 percent minimum requirement, with the corrected formula.
1559.1	**703.6.2 Finish and Contrast.** .... *Pictograms* shall contrast with their field with either a light pictogram on a dark field or a dark *pictogram* on a light field.			2010 CBC **does not address** 2010 ADA req.	There is an assumption that there is a clear field of 6 inches high, except for the pictogram figure, but Title 24 does not spell it out.	Add the ANSI or **(ADA)** federal standard to Title 24.

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1560	**Advisory 703.6.2 Finish and Contrast.** Signs are more legible for persons with low vision when characters contrast as much as possible with their background. Additional factors affecting the ease with which the text can be distinguished from its background include shadows cast by lighting sources, surface glare, and the uniformity of the text and background colors and textures.			2010 CBC provides **less access** than 2010 ADA.	If a specific contrast requirement is not added, at the least, an advisory note should be added to Title 24.	
1561	**703.6.3 Text Descriptors.** *Pictograms* shall have text descriptors located directly below the *pictogram* field. Text descriptors shall comply with 703.2, 703.3 and 703.4.		**1117B.5.5.3. Pictorial symbol signs (pictograms).** Pictorial symbol signs (pictograms) shall be accompanied by the verbal description placed directly below the pictogram. …	2010 CBC is **equivalent** to 2010 ADA.	The section on pictogrrams has been very confusing, both because the Symbols of Accessibility happen to be pictograms, but also because there is not a clear statement that the reqirements for field size and desriptive text only apply to pictogramsused to designate rooms and spaces. Consequently, you see terms such as "Accessible" added to the International Symbol of Accessibility.	CBC should be reworded so that it is much more clear that braille and raised character descriptors are only required for pictograms used to designate rooms and spaces.
1562	**703.7 Symbols of Accessibility.** Symbols of *accessibility* shall comply with 703.7.			2010 CBC is **equivalent** to 2010 ADA.		
1563	**703.7.1 Finish and Contrast.** Symbols of *accessibility* and their background shall have a non-glare finish. …		**1117B.5.2 Finish and contrast.** ... symbols and their background shall have a nonglare finish. …	2010 CBC is **equivalent** to 2010 ADA.		
1564	**703.7.1 Finish and Contrast. ...** Symbols of *accessibility* shall contrast with their background with either a light symbol on a dark background or a dark symbol on a light background.		**1117B.5.2 Finish and contrast.** ... symbols shall contrast with their background, either light on a dark background or dark on a light background.	2010 CBC is **equivalent** to 2010 ADA.		
1565	**Advisory 703.7.1 Finish and Contrast.** Signs are more legible for persons with low vision when characters contrast as much as possible with their background. Additional factors affecting the ease with which the text can be distinguished from its background include shadows cast by lighting sources, surface glare, and the uniformity of the text and background colors and textures.			2010 CBC provides **less access** than 2010 ADA.	The advisory text might possibly prompt some designers to do a better job of choosing contrasting materials for signs.	Add the 70 percent minimumreqjirement, preferably with a minimum LRV for the lighter color.If no formula can be added, write a very clear advisory.
1566	**703.7.2 Symbols.**					
1567	**703.7.2.1 International Symbol of Accessibility.** The International Symbol of *Accessibility* shall comply with Figure 703.7.2.1.		**1117B.5.8.1 International Symbol of Accessibility**. The International Symbol of Accessibility shall be the standard used to identify facilities that are accessible to and usable by physically disabled persons as set forth in these building standards and as specifically required in this section. See Figure 11B-6.	2010 CBC is **equivalent** to 2010 ADA.	I suggest adding some sort of reference word to show that there is additional scoping for the ISA, since inspectors are interpreting this to mean that every accessible feature requires an ISA.	Either clarify the scoping for the ISA, or move all scoping out of the technical chapter.
1567			**1117B.5.8.1. EXCEPTION**: Signs need not be provided for facilities within an adaptable dwelling unit, or within an accessible patient or guest room.	2010 CBC is **equivalent** to 2010 ADA.		
1567			**1117B.5.8.1.1. Color of symbol**. The symbol specified above shall consist of a white figure on a blue background. The blue shall be equal to Color No. 15090 in Federal Standard 595B.	2010 CBC provides **greater access** than 2010 ADA.		
1567			**1117B.5.8.1.1. EXCEPTION:** The appropriate enforcement agency may approve other colors to complement decor or unique design. The symbol contrast shall be light on dark or dark on light.	2010 CBC is **equivalent** to 2010 ADA.	One would think that the word "décor" would apply only to interior spaces, rather than to parking lots and exterior pathways. California might consider permiting color variations only for interior signs, and not for parking or exterior wayfinding signs.	
1567			**1117B.5.8.1.2 Entrance signs.** Entrances to buildings and facilities that are accessible to and usable by persons with disabilities shall be identified with a minimum of one International Symbol of Accessibility and with additional directional signs, utilizing the symbol, at junctions where the accessible route of travel diverges from the regular circulation path, to be visible to persons along approaching circulation paths. ...	2010 CBC provides **greater access** than 2010 ADA.	Title 24 requires the use of the ISA at every building entrance, even when they are all accessible. The ADA only requires them when not all entrances are accessible. Title 24 also provides for much greater access for persons with mobility impairments on exterior pathways. The ADA does not require any exterior wayfinding assistance, other than from inaccessible entrances to accessible ones.	

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1568			**1117B.5.8.1.2 Entrance signs.** ... In existing buildings and facilities, entrances which are not accessible shall have directional signage complying with Section 1117B.5.1, Items 2 and 3, which indicates the location of and route to the nearest accessible entrance.	2010 CBC is **equivalent** to 2010 ADA.		
1568			**1117B.5.8.1.2. EXCEPTION:**			
1568			**1117B.5.8.1.2.1.** An International Symbol of Accessibility is not required at entrances to individual rooms, suites, offices, sales or rental establishments, or other such spaces when all entrances to the building or facility are accessible and persons entering the building or facility have passed through one or more entrances with signage complying with this section.	2010 CBC provides **greater access** than 2010 ADA.	The ADA does not rtequire the use of the ISA when all entrances are accessible, and actually intends that the ISA be used only on exterior building entrances, so California's code is slightly more demanding, in asking for at least one main entry to be marked with the ISA.	
1568			**1117B.5.8.1.2.2**. An International Symbol of Accessibility is not required at entrances to machinery spaces frequented only by service personnel for maintenance, repair, or occasional monitoring of equipment; for example, elevator pits or elevator penthouses; mechanical, electrical or communications equipment rooms; piping or equipment catwalks; electric substations and transformer vaults; and highway and tunnel utility facilities.	2010 CBC is **equivalent** to 2010 ADA.	I am calling this equivalent because the ADA states that this type of space is not required to be accessible. Therefore, they would not require the ISA at their entrances.	
1568			**1117B.5.8.1.3 Information posted.** Buildings that provide specific sanitary facilities and/or elevators for public use that conform to these building standards shall have this information posted in the building lobby, preferably as part of the building directory. The information shall be accompanied by the International Symbol of Accessibility. ...	2010 CBC provides **greater access** than 2010 ADA.	This standard was originally included only for remodeled buildings. An error caused it to apply to all buildings. This section of the standard should be revised to apply only to remodeled buildings, as was originally intended.	
1567.10			**1117B.5.8.1.3 Information posted. ...** Inaccessible sanitary facilities shall have directional signage complying with 1117B.5.1, Items 2 and 3, to indicate the location of the nearest accessible sanitary facility.	2010 CBC is **equivalent** to 2010 ADA.		
1568	**703.7.2.2 International Symbol of TTY.** The International Symbol of *TTY* shall comply with Figure 703.7.2.2.		**1117B.5.8.2 International TTY symbol.** Where the international TTY symbol is required, it shall comply with Figure 11B-14A.	2010 CBC is **equivalent** to 2010 ADA.		
1568.1			**1117B.5.10 Signs for text telephones.** Whenever signs shall refer to text telephones for people who are deaf or hard of hearing, the term “TTY” shall be used; the term “TDD” shall not be used.	NA	This was added to the code (in an awkward location, because the term "TTY" was considered offensive by persons who use ASL. It could probably be removed now, especially since video phones are more in use than text telephones.	This can probably be dropped from the code, especially since the text telephone is being rapidly replaced with video phones. If it is retained, it needs to be moved to relate to this section of the code.
1569	**703.7.2.3 Volume Control Telephones.** Telephones with a volume control shall be identified by a *pictogram* of a telephone handset with radiating sound waves on a square field such as shown in Figure 703.7.2.3.		**1117B.5.8.3 Volume control telephones.** Where telephones with volume controls are required to be identified, the identification symbol shall be a telephone handset with radiating sound waves, such as shown in Figure 11B-14B.	2010 CBC is **equivalent** to 2010 ADA.	The small symbols included on the phones are adequate since all public phones now have the volume controls.	
1570	**703.7.2.4 Assistive Listening Systems.** *Assistive listening systems* shall be identified by the International Symbol of Access for Hearing Loss complying with Figure 703.7.2.4.		**1117B.5.8.4 Assistive listening systems**. Where assistive listening systems are required to be identified by the International Symbol of Access for Hearing Loss, it shall comply with Figure 11B-14C.	2010 CBC is **equivalent** to 2010 ADA.	This is the one Symbol that should be followed exactly, since it is recognized in that form by the deaf community. The bar through the ear is not derogatory and is not analogous to the "Not" symbol such as in the "No Smoking" pictogram.	

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1570.1			**1117B.5.9 Traffic-control devices.** Pole-supported pedestrian traffic-control buttons shall be identified with color coding consisting of a textured horizontal yellow band 2 inches (51 mm) in width encircling the pole, and a 1-inch-wide (25 mm) dark border band above and below this yellow band. Color coding should be placed immediately above the control button. Control buttons shall be located no higher than 48 inches (1219 mm) above the surface adjacent to the pole.	2010 CBC provides **greater access** than 2010 ADA.	Although this is not a sign, it is included in this section since it is a type of color symbol for people with vision impairments.	
1570.2			**1117B.5.11 Cleaner air symbol**. Strictly for publicly funded facilities or any facilities leased or rented by state of California, not concessionaires. This symbol shall be the standard used to identify a room, facility and paths of travel that are accessible to and usable by people who are adversely impacted by airborne chemicals or particulate(s) and/or the use of electrical fixtures and/or devices. When used, the symbol shall comply with Figure 11B-40.	2010 CBC provides **greater access** than 2010 ADA.	California recognizes people disabled with environmental illnesses with the voluntary provision of "Cleaner Air" rooms and spaces in publicly funded buildings. The Symbol was designed and donated with no copyright strictly for this use. It should not be used for other purposes, such as for "No Smoking" areas. The copyright applies for any other use.	
1570.3			**1117B.5.11.1 Color and size of symbol.** The symbol shall be used when the following minimum conditions are met. The symbol, which shall include the text “Cleaner Air” as shown, shall be displayed either as a negative or positive image within a square that is a minimum of 6 inches on each side. The symbol may be shown in black and white or in color. When color is used, it shall be Federal Blue (Color No. 15090 Federal Standard 595B) on white, or white on Federal Blue. There shall be at least a 70-percent color contrast between the background of the sign from the surface that it is mounted on.	2010 CBC provides **greater access** than 2010 ADA.	Note that there is a requirement for a 70 percent dark/light contrast in the code. This should set a precedent for adding the requirement to other sign requirements. The formula was not included because it is flawed, unless a specific minimum LRV is rquired for the lighter color.	
1570.4			**1117B.5.11.2 Conditions of use**. Use of the cleaner air symbol is voluntary. The cleaner air symbol shall be permitted for use to identify a path of travel, and a room or a facility when the following is met	2010 CBC provides **greater access** than 2010 ADA.		
1570.5			**1117B.5.11.2.1 thru 4 and 6**		Not applicable to signs.	
1570.6			**1117B.5.11.2.5.** Signage shall be posted requesting occupants or users not to smoke or wear perfumes, colognes or scented personal care products. Fragranced products shall not be used in the designated cleaner-air room, facility or path of travel.	2010 CBC provides **greater access** than 2010 ADA.	The standard should include a reference to the requirements for informational signs.	
1570.7			**1117B.5.11.3** Removal of symbol. If the path of travel, room and/or facility identified by the cleaner air symbol should temporarily or permanently cease to meet the minimum conditions as set forth above, the cleaner air symbol shall be removed and shall not be replaced until the minimum conditions are again met.	2010 CBC provides **greater access** than 2010 ADA.		
1570.8			**1133B.2.3.2 Powered Doors.**			
1570.9			**a. Powered doors shall comply with Section 1133B.2.3.2.**		These standards were added because accessible doors were often very hard to spot, with poorly placed identification.	Retain all requirements for power door signage

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1570.10			c. Powered doors shall be controlled on both the interior and exterior sides of the doors by sensing devices, push plates, vertical actuation bars or other similar operating devices complying with Section 1117B.6. At each location where push plates are provided there shall be two push plates;. . . . Each push plate shall be a minimum of 4 inches (102 mm) diameter or a minimum of 4 inches by 4 inches (102 mm by 102 mm) square and shall display the International Symbol of Accessibility complying with Section 1117B.5.8.1.	2010 CBC provides **greater access** than 2010 ADA.		.
1570.11			At each location where vertical actuation bars are provided. . . .The operable portion of each vertical actuation bar shall be a minimum of 2 inches (51 mm) wide and shall display the International Symbol of Accessibility complying with Section 1117B.5.8.1.	2010 CBC provides **greater access** than 2010 ADA.		
1570.12			d. Signage identifying the accessible entrance required by Section 1127B.3 shall be placed on, or immediately adjacent to, each powered door. Signage shall be provided in compliance with BHMA A156.10 or BHMA 156.19, as applicable.	2010 CBC provides **greater access** than 2010 ADA.		
1570.13			e. In addition to the requirements of Item d, where a powered door is provided in buildings or facilities containing assembly occupancies of 300 or more, a sign displaying the International Symbol of Accessibility measuring 6 inches by 6 inches (152 mm by 152 mm), complying with Section 1117B.5.8.1, shall be provided above the door on both the interior and exterior sides of each powered door.	2010 CBC provides **greater access** than 2010 ADA.		
1570.14 1570.32					California should adopt the standards for Variable Message Signs. Neither the federal government nor California have recognized audible signage within their technical specifications, although many "Talking Signs" are installed in California, mostly in the City of San Francisco. The major drawback is that they require each person using the signs to carry a receiver.	
1571	**704 Telephones**		**1117B.2 Telephones.**	NA		
1572	**704.1 General.** Public telephones shall comply with 704.		**1117B.2.1 General.** If public pay telephones, public closed-circuit telephones or other public telephones are provided, they shall comply with this section …	NA		
1573	**704.2 Wheelchair Accessible Telephones.** Wheelchair *accessible* telephones shall comply with 704.2.		**1117B.2.1 General.** If public pay telephones, public closed-circuit telephones or other public telephones are provided, they shall comply with this section …	Which Std.provides greater access **depends** on circumstances.	Both standards require public telephones to comply with the referenced sections. 704.2 does not include sections that speak to telephones for hearing impaired persons and text telephones as 1117B.2 does, but scoping sections 217.3 and 217.4 indicate when the technical requirements that correspond to these elements apply.	See below

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1574	**704.2.1 Clear Floor or Ground Space.** A clear floor or ground space complying with 305 shall be provided. …		**1117B.2.2 Clear floor or ground space.** A clear floor or ground space at least 30 inches by 48 inches (762 mm by 1219 mm) that allows either a forward or parallel approach by a person using a wheelchair shall be provided at telephones. **1117B.2.3 Size and approach.** The minimum clear floor or ground space required to accommodate a single, stationary wheelchair and occupant is 30 inches by 48 inches (762 mm by 1219 mm). The minimum clear floor or ground space for wheelchairs may be positioned for forward or parallel approach to an object. Clear floor or ground space for wheelchairs may be part of the knee space required under some objects. See Figure 11B-5A. **1117B.2.4 Relationship of maneuvering clearances to wheelchair spaces**. One full unobstructed side of the clear floor or ground space for a wheelchair shall adjoin another wheelchair clear floor space. If a clear floor space is located in an alcove or otherwise confined on all or part of three sides, additional maneuvering clearances shall be provided. See Figure 11B-5A. **1117B.2.5 Floor surfaces of wheelchair spaces.** Floor surfaces of wheelchair spaces shall conform to Section 1124B. ...	Which Std.provides greater access **depends** on circumstances.	1) The minimum knee space configuration noted in 1117B.2.3 is relative; it is dependent on the knee space requirements of specific elements, whereas 306 (which is referenced in 305) defines it clearly, and applies it ubiquitously. Under tables, for instance, the CBC would allow the clear floor space (considered to extend under the table) to be reduced to no less than 27" high, but under lavatories, it could be reduced to as little as 9" high for a maximum depth of 6" (for toe space). The ADA allows the clear floor space height to be reduced per the toe space requirements under all elements. 2) Changes in level are not allowed by 2010 ADA in telephone CLFS; 1124B allows them. 3) 2010 ADA limits the slope of the floor or ground surface to 1:48; the CBC does not specifically limit the floor or ground slope except with respect to 2% maximum cross slope (1133B.7.1.3), 5% maximum slope in the direction of travel (1133B.7.3), and 8.33% maximum slope for ramps (1133B.5.3). 4) CBC 1117B.2.4 only requires the telephone CLFS to adjoin another CLFS (rather than an accessible route). As such, the CBC would be less restrictive when that CLFS creates an alcove approach.	1a) Adopt the ADA language for knee/toe space as it pertains to the extension of the clear floor space under objects. 1b) Leave the CBC language as it is (which currently provides greater access). 2) Add language to 1117B.2 that prohibits changes in level from occuring within the required clear floor or ground space. 3) Add language to 1117B.2 that clarifies that the required clear floor or ground space may slope no greater than 2% (= 1:50) or 2.08% (= 1:48 = 1/4"/ft).
1575	**704.2.1 Clear Floor or Ground Space.** ... The clear floor or ground space shall not be obstructed by bases, enclosures, or seats.		**1117B.2.5 Floor surfaces of wheelchair spaces.** .... Bases, enclosures and fixed seats shall not impede approaches to telephones by people who use wheelchairs.	2010 CBC is **equivalent** to 2010 ADA.	The concern has been expressed that the 1117B.2.5 phrase "by people who use wheelchairs" might limit applicability of this section. 704.2.1 only applies to wheelchair accessible telephones, and 1117B.2.5 is specifically titled "Floor surfaces of wheelchair spaces". The language in question is redundant, and could, perhaps, be cleaner, but it does not result in a difference in the levels of access provided.	1) Adopt the 704.2.1 language. 2) Leave 1117B.2.7 #4 as it is.
1576	**Advisory 704.2.1 Clear Floor or Ground Space.** ... clear floor and ground space ... must comply with the provisions for protruding objects. (See Section 307).		**1114B.1.2 Accessible route of travel.** When a ... portion of a building, is required to be accessible ..., an accessible route of travel complying with Sections ... 1133B.8.6 shall be provided to all portions of the building,... **1117B.2.7 #4 Protruding telephone enclosures.** Where telephone enclosures protrude into walks, halls, corridors or aisles, they shall also comply with Section 1133B.8.6.	2010 CBC is **equivalent** to 2010 ADA.		
1577	**704.2.1.1 Parallel Approach.** Where a parallel approach is provided, the distance from the edge of the telephone enclosure to the face of the telephone unit shall be 10 inches (255 mm) maximum.		**1117B.2.7 #1. Side reach possible**. Where a parallel approach is provided at a telephone within an enclosure, the enclosure and counter may extend beyond the face of the telephone a maximum of 10 inches (254 mm). ... See Figure 11B-4.	2010 CBC is **equivalent** to 2010 ADA.		
1578	**704.2.1.2 Forward Approach.** Where a forward approach is provided, the distance from the front edge of a counter within the telephone enclosure to the face of the telephone unit shall be 20 inches (510 mm) maximum.		**1117B.2.7 #3. Forward reach required.** Where a front approach is provided at a telephone within an enclosure, the counter may extend beyond the face of the telephone a maximum of 20 inches (508 mm) into the required clear floor or ground space and the enclosure may extend beyond the face of the telephone a maximum of 24 inches (610 mm). If an additional 6 inches (152 mm) in width of clear floor space is provided, creating a clear floor space of 36 inches by 48 inches (914 mm by 1219 mm), the enclosure may extend more than 24 inches (610 mm) beyond the face of the telephone. See Figure 11B-4.	2010 CBC provides **greater access** than 2010 ADA.	The CBC language recognizes that the enclosure may be deeper than the shelf, and it ensures that, when the enclosure depth is > 24" measured to the face of the telephone, additional clear width is required. Although ADA Figure 704.2.1.2 shows an enclosure depth equal to that of the shelf, the text of 704.2.1.2 does not limit the depth of the enclosure, and it does not require greater width when the enclosure depth exceeds 24".	

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1579	**704.2.2 Operable Parts.** *Operable parts* shall comply with 309. …		**1117B.2.6 Mounting height.** The highest operable part of the telephone shall be within the reach ranges specified in Sections 1118B.5 and 1118B.6. Telephones mounted diagonally in a corner that require wheelchair users to reach diagonally shall have the highest operable part no higher than 54 inches (1372 mm) above the floor. See Figure 11B-4. **1118B.5 Forward reach.** **1118B.5.1 Unobstructed.** Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1219 mm) maximum and the low forward reach shall be 15 inches (381 mm) minimum above the finish floor or ground. See Figure 11B-5C (a). **1118B.5.2 Obstructed high reach.** Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1219 mm) maximum where the reach depth is 20 inches (508 mm) maximum. Where the reach depth exceeds 20 inches (508 mm), the high forward reach shall be 44 inches (1118 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. See Figure 11B-5C (b) and (c). **1118B.6 Side reach.** **1118B.6.1 Unobstructed.** Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1219 mm) maximum and the low side reach shall be 15 inches (381 mm) minimum above the finish floor or ground. See Figure 11B-5D (a). **Exception:** An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (254 mm) maximum. **1118B.6.2 Obstructed high reach.** Where a clear floor or ground space allows a parallel approach to an element and the high side reach is over an obstruction, the height of the obstruction shall be 34 inches (864 mm) maximum and the	2010 CBC provides **less access** than 2010 ADA.	The CBC reach ranges have been recently modified; they are in agreement with the 2010 ADA Standards. The 2010 ADA Standards, however, speak of maximum and minimum heights of reaches required to access or operate an element, whereas 1117B.2.6 speaks of mounting heights. The latter, it can be argued, allows an operable part to be mounted at the maximum allowed reach range, even though one might have to reach above the maximum (or below the minimum) allowed height in order to perform the operation (see the coin slots and coin return mechanisms in Figure 11B-4, for instance). Since the ADA language is not focused on mounting heights, but on the actual height of the reach required, the ADA language could be considered to provide greater access. (Note that the language of 1118B.5 and 1118B.6 do not speak of mounting heights, but of reach ranges.) 2) The standards are in agreement with respect to operation.	1) Eliminate language that refers to mounting heights, and adopt language that focuses on the required reach to access and/or operate an element. 2) No action required.
1580	**704.2.2 Operable Parts.** ... Telephones shall have push-button controls where such service is available.		**1117B.2.10 Controls.** Telephones shall have push-button controls where service for such equipment is available.	2010 CBC is **equivalent** to 2010 ADA.		

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1581	**704.2.3 Telephone Directories.** Telephone directories, where provided, shall be located in accordance with 309.		**1117B.2.12 Telephone books.** If telephone books are provided, they shall be located in a position that complies with the reach ranges in Sections 1118B.5 and 1118B.6. **1118B.5 Forward reach.** **1118B.5.1 Unobstructed.** Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1219 mm) maximum and the low forward reach shall be 15 inches (381 mm) minimum above the finish floor or ground. See Figure 11B-5C (a). 1118B.5.2 Obstructed high reach. Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1219 mm) maximum where the reach depth is 20 inches (508 mm) maximum. Where the reach depth exceeds 20 inches (508 mm), the high forward reach shall be 44 inches (1118 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. See Figure 11B-5C (b) and (c). **1118B.6 Side reach.** **1118B.6.1 Unobstructed.** Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1219 mm) maximum and the low side reach shall be 15 inches (381 mm) minimum above the finish floor or ground. See Figure 11B-5D (a). Exception: An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (254 mm) maximum. **1118B.6.2 Obstructed high reach.** Where a clear floor or ground space allows a parallel approach to an element and the high side reach is over an obstruction, the height of the obstruction shall be 34 inches (864 mm) maximum and the depth of the obstruction shall be 24 inches (610 mm) maximum. The high side reach shall be 48 inches (1219 mm) maximum for a reach depth of 10 inches (254 mm) maximum. Where the reach depth exceeds 10 inches (254	2010 CBC is **equivalent** to 2010 ADA.		
1582	**704.2.4 Cord Length.** The cord from the telephone to the handset shall be 29 inches (735 mm) long minimum.		**1117B.2.11 Cord length.** The cord from the telephone to the handset shall be at least 29 inches (737 mm) long.	2010 CBC is **equivalent** to 2010 ADA.		
1583	**704.3 Volume Control Telephones.** Public telephones required to have volume controls shall be equipped with a receive volume control that provides a gain adjustable up to 20 dB minimum. …		**1117B.2.8 Telephone equipment for hearing impaired persons.** ... All telephones required to be accessible shall be equipped with a volume control. ... Such telephones shall be capable of a minimum of 12 dBA and a maximum of 18 dBA above normal. If an automatic reset is provided, 18 dBA may be exceeded. ...	2010 CBC provides **less access** than 2010 ADA.	Required volume levels per the CBC appear to be relative to whatever "*normal*" is, whereas, the ADA required volume levels do not.	
1584	**704.3 Volume Control Telephones.** ... For incremental volume control, provide at least one intermediate step of 12 dB of gain minimum. …		**1117B.2.8 Telephone equipment for hearing impaired persons.** ... All telephones required to be accessible shall be equipped with a volume control. ... Such telephones shall be capable of a minimum of 12 dBA and a maximum of 18 dBA above normal. If an automatic reset is provided, 18 dBA may be exceeded. ...	2010 CBC provides **less access** than 2010 ADA.	Regardless of the decibel numbers, the ADA Stds include a provision for incremental volume control, which is not specifically required by the CBC.	1) Modify the CBC to require incremental volume control. Indicate that it must provide at least one intermediate step of 12 dB of gain minimum.
1585	**704.3 Volume Control Telephones.** …		**1117B.2.8 Telephone equipment for hearing impaired persons.** Telephones shall be equipped with a receiver that generates a magnetic field in the area of the receiver cap. ... Public telephones with volume control shall be hearing aid compatible and shall be identified by a sign containing a depiction of a telephone handset with radiating sound waves.	2010 CBC provides **greater access** than 2010 ADA.	No equivalent language requiring hearing aid compatibility in 2010 ADA Stds. The language "generates a magnetic field in the area of the receiver cap" is unnecessarily loose.	

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1586	**704.3 Volume Control Telephones.** ... An automatic reset shall be provided.		**1117B.2.8 Telephone equipment for hearing impaired persons.** ... If an automatic reset is provided, 18 dBA may be exceeded. …	2010 CBC provides **less access** than 2010 ADA.	ADA requires automatic reset for volume control, CBC does not.	1) Modify the CBC to require automatic reset of the volume control.
1587	**Advisory 704.3 Volume Control Telephones.** Amplifiers on pay phones are located in the base or the handset or are built into the telephone. Most are operated by pressing a button or key. If the microphone in the handset is not being used, a mute button that temporarily turns off the microphone can also reduce the amount of background noise which the person hears in the earpiece. If a volume adjustment is provided that allows the user to set the level anywhere from the base volume to the upper requirement of 20 dB, there is no need to specify a lower limit. If a stepped volume control is provided, one of the intermediate levels must provide 12 dB of gain. Consider compatibility issues when matching an amplified handset with a phone or phone system. Amplified handsets that can be switched with pay telephone handsets are available. Portable and in-line amplifiers can be used with some phones but are not practical at most public phones covered by these requirements.		**1117B.2.8 Telephone equipment for hearing impaired persons.** …	NA	The advisory comments are not reflected in the CBC language.	
1588	**704.4 TTYs.** *TTY*s required at a public pay telephone shall be permanently affixed within, or adjacent to, the telephone enclosure. Where an acoustic coupler is used, the telephone cord shall be sufficiently long to allow connection of the *TTY* and the telephone receiver.		**1117B.2.9.2 General.** Text telephones shall comply with the following requirements: **1117B.2.9.2 #1.** Text telephones used with a pay telephone shall be permanently affixed within or adjacent to the telephone enclosure. If an acoustic coupler is used, the telephone cord shall be sufficiently long to allow connection of the text telephone and the telephone receiver.	2010 CBC provides **greater access** than 2010 ADA.	Although the technical requirements of both standards are equivalent, 704.4, as it states, only applies to required TTYs. 1117B.2.9. contains no similar limiting language, so it applieas to all TTYs provided, whether they are required or not.	
1589	**Advisory 704.4 TTYs.** Ensure that sufficient electrical service is available where *TTY*s are to be installed.		**1117B.2.9.2 General.** Text telephones shall comply with the following requirements: 1117B.2.9.2 **#2.** Where a bank of telephones in the interior of a building consists of three or more public pay telephones, at least one public pay telephone in each such bank shall be equipped with ... an electrical outlet within or adjacent to the telephone enclosure. ...	2010 CBC provides **greater access** than 2010 ADA.	Advisory 704.4 reminds one that power must be provided wherever TTys are to be installed. 1117B.2.9.2 requires power at specified locations regardless of whether or not a TTY is installed. Given that a installed TTY must have power, the CBC requires power at telephones that have a TTY and, when the conditions specified in this section exist, at others that may not.	
1590	**704.4.1 Height.** When in use, the touch surface of *TTY* keypads shall be 34 inches (865 mm) minimum above the finish floor.			2010 CBC **does not address** 2010 ADA req.		
1591	**704.4.1 EXCEPTION:** Where seats are provided, *TTY*s shall not be required to comply with 704.4.1.			2010 CBC is **equivalent** to 2010 ADA.	The CBC does not have a requirement that corresponds to 704.4.1. Logically, therefore, when the requirements of 704.4.1 do not apply per the exception, the CBC provides an equivalent level of access.	
1592	**Advisory 704.4.1 Height.** A telephone with a TTY installed underneath cannot also be a wheelchair accessible telephone because the required 34 inches (865 mm) minimum keypad height can causes the highest operable part of the telephone, usually the coin slot, to exceed the maximum permitted side and forward reach ranges. (See Section 308).			NA	Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b)	
1593	**Advisory 704.4.1 Height Exception.** While seats are not required at TTYs, reading and typing at a TTY is more suited to sitting than standing. Facilities that often provide seats at TTY's include, but are not limited to, airports and other passenger terminals or stations, courts, art galleries, and convention centers.			NA	Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b)	

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1594	**704.5 TTY Shelf.** Public pay telephones required to accommodate portable *TTY*s shall be equipped with a shelf and an electrical outlet within or adjacent to the telephone enclosure. The telephone handset shall be capable of being placed flush on the surface of the shelf. The shelf shall be capable of accommodating a *TTY* and shall have 6 inches (150 mm) minimum vertical clearance above the area where the *TTY* is to be placed.		**1117B.2.9.2 General.** Text telephones shall comply with the following requirements: **1117B.2.9.2 #2.** Where a bank of telephones in the interior of a building consists of three or more public pay telephones, at least one public pay telephone in each such bank shall be equipped with a shelf and an electrical outlet within or adjacent to the telephone enclosure. The telephone handset shall be capable of being placed flush on the surface of the shelf. The shelf shall be capable of accommodating a text telephone and shall have 6 inches (152 mm) minimum vertical clearance in the area where the text telephone is to be placed.	Which Std.provides greater access **depends** on circumstances.	Although the technical requirements of both standards are equivalent, 704.5, as it states, only applies to required portable TTYs. 1117B.2.9.2 #2, as it states, applies in limited and completely different circumstances, having nothing to do with whether or not the TTY is required and/or portable.	
1595	**704.5 TTY Shelf.** …		**1117B.2.9.2 General.** Text telephones shall comply with the following requirements: **1117B.2.9.2 #3.** Equivalent facilitation may be substituted for the requirements of this section. For example, a portable text telephone may be made available in a hotel at a registration desk if it is available on a 24-hour basis for use with nearby public pay phones. In this instance, at least one pay phone shall comply with Item 2 above. In addition, if an acoustic coupler is used, the telephone handset cord shall be sufficiently long to allow connection of the text telephone and the telephone receiver. Directional signage shall comply with Section 1117B.5.1 Items 2 and 3.	2010 CBC provides **less access** than 2010 ADA.	2010 ADA does not allow for "Equivalent Facilitation."	
1596	**705 Detectable Warnings**		**1127B.5.7. Detectable warnings.** ...	2010 CBC is **equivalent** to 2010 ADA.	The 2010 ADA Stds. no longer requires detectable warnings for curb ramps or where walking surfaces adjoin a vehicular way and are not separated by a curb (inside the property lines). The proposed Public Rights of Way Guidelines do require them in the PROW.	No change required.
1597	**705.1 General.** *Detectable warnings* … shall comply with 705.		**1127B.5.7. Detectable warnings.** ... Detectable warnings shall ... consist of raised truncated domes ... Figure 11B-23A. …	2010 CBC **does not address** 2010 ADA req.	2010 ADA Stds. Section 705.1 refers to the individual design requirements contained in the subsections. The CBC description for detectable warnings is contained under Section 1127B Exterior Routes of Travel, Section 1127B.5 Curb Ramps. Section 1127B.5.7 technically only applies to detectable warnings at curb ramps, so the scoping is different.	1) If the CBC format is followed, provide a separate self-contained section that includes the requirements for detectable warnings, regardless of where they are required. 2) If the 2010 ADA Stds. format is followed, incorporate Section 705.1 verbatim.
1598	**705.1 General.** *Detectable warnings* shall consist of a surface of truncated domes …		**1127B.5.7. Detectable warnings.** ... Detectable warnings shall ... consist of raised truncated domes w... Figure 11B-23A. …	2010 CBC **does not address** 2010 ADA req.	2010 CBC uses the 1991 ADA Stds. language of "raised truncated domes"	1) If the CBC format is followed, provide a separate self-contained section that includes the requirements for detectable warnings, regardless of where they are required. 2) Adopt 2010 2010 ADA Stds. language of "a surface of truncated domes." 3) If the 2010 ADA Stds. format is followed, incorporate Section 705.1 verbatim.

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1598			**SECTION 1102B DEFINITIONS DETECTABLE WARNING** is a standardized surface or feature built into or applied to walking surfaces or other elements to warn visually impaired persons of hazards in the path of travel. Only approved DSA-AC detectable warning products and directional surfaces shall be installed as provided in the California Code of Regulations (CCR). Title 24, Part 1, Articles 2, 3 and 4. Refer to CCR Title 24, Part 12, Chapter 12-11A and B, for building and facility access specifications for product approval for detectable warning products and directional surfaces. Detectable warning products and directional surfaces installed after January 1, 2001, shall be evaluated by an independent entity, selected by the Department of General Services, Division of the State Architect-Access Compliance, for all occupancies, including transportation and other outdoor environments, except that when products and surfaces are for use in residential housing evaluation shall be in consultation with the Department of Housing and Community Development. See Government Code Section 4460.	2010 CBC is **equivalent** to 2010 ADA.	1) 2010 ADA Stds. contains a definition for detectable warnings in Section 106.5: Detectable Warning. A standardized surface feature built in or applied to walking surfaces or other elements to warn of hazards on a circulation path. 2) DSA-AC has never evaluated or approved any detectable warning products.	No change required unless deleting the "Only approved DSA-AC detectable warning products" language.
1599	**705.1.1 Dome Size.** Truncated domes in a *detectable warning* surface shall have a base diameter of 0.9 inch (23 mm) minimum and 1.4 inches (36 mm) maximum, ... and a height of 0.2 inch (5.1 mm).		**1127B.5.7. Detectable warnings.** .... Detectable warnings shall... consist of raised truncated domes with a diameter of nominal 0.9 inch (22.9 mm) at the base... a height of nominal 0.2 inch (5.08 mm) ...Figure 11B-23A. …	2010 CBC **does not address** 2010 ADA req.	2010 ADA Stds. requires truncated dome base diameter to be 0.9 inch minimum and 1.4 inches maximum. CBC requires the base diameter to be 0.9 inches nominal and does not provide a maximum diameter. 2010 ADA Stds. requires the dome height to be 0.2 inches but does not include the word "nominal" as does the CBC.	1) If the CBC format is followed, adopt 2010 ADA Stds. requirements for base diameter between 0.9 inches and 1.4 inches and the height to be 0.2 inches. Eliminate the word "nominal" from all dimensional requirements. Adopt 2010 ADA Stds. requirements for dome base diameter and height but maintain the use of the word "nominal" in each requirement. 2) If the 2010 ADA Stds. format is followed, incorporate Section 705.1.1 verbatim.
1600	**705.1.1 Dome Size.** Truncated domes in a *detectable warning* surface shall have ... a top diameter of 50 percent of the base diameter minimum to 65 percent of the base diameter maximum, …		**1127B.5.7. Detectable warnings.** ... Detectable warnings shall ... consist of raised truncated domes with a diameter of ... 0.45 inch (11.4 mm) at the top, ... Figure 11B-23A. …	2010 CBC **does not address** 2010 ADA req.	2010 ADA Stds. requires the top diameter to be between 50 percent and 65 percent of the base diameter, which means the top diameter can be between .45 inches and .585 inches. CBC is therefore more restrictive in that it only allows a specific dimension instead of a range as does the 2010 ADA Stds.. The range would permit flexibility in manufacturing tolerances for different p/roducts	1) If the CBC format is followed, adopt 2010 ADA Stds. requirements for top diameter be between 50 percent and 65 percent of the base diameter (.45 inch - .585 inch). 2) If the 2010 ADA Stds. format is followed, incorporate Section 705.1.1 verbatim.
1601	**705.1.2 Dome Spacing.** Truncated domes in a *detectable warning* surface shall have a center-to-center spacing of 1.6 inches (41 mm) minimum and 2.4 inches (61 mm) maximum, …		**1127B.5.7. Detectable warnings.** ... Detectable warnings shall ... consist of raised truncated domes with a ... a center-to-center spacing of nominal 2.35 inches (59.7 mm) ... Figure 11B-23A. …	2010 CBC **does not address** 2010 ADA req.	2010 ADA Stds. requires the center-to-center dome spacing to be between 1.6 inches minimum and 2.4 inches maximum. CBC is therefore more restrictive in that it only allows a specific dimension instead of a range as does the 2010 ADA Stds.. The specific dimension specified by the CBC falls within the range allowed by the 2010 ADA Stds.. However, the CBC uses the word "nominal" which conceivably could permit an actual spacing beyond the 2.4 inch maximum allowed by the 2010 ADA Stds..	1) If the CBC format is followed, adopt 2010 ADA Stds. requirement for allowable range of center-to-center dome spacing of 1.6 inches minimum and 2.4 inches maximum. 2) If the CBC format is followed, maintain 2010 CBC requirement of 2.35 center-to-center dome spacing and eliminate the word "nominal", which would fall within the range allowed by 2010 ADA Stds.. 3) If the 2010 ADA Stds. format is followed, incorporate Section 705.1.2 verbatim.
1602	**705.1.2 Dome Spacing.** Truncated domes in a *detectable warning* surface shall have ... a base-to-base spacing of 0.65 inch (17 mm) minimum, measured between the most adjacent domes on a square grid.		**1127B.5.7. Detectable warnings.** ... Detectable warnings shall ... consist of raised truncated domes with a ... a center-to-center spacing of nominal 2.35 inches (59.7 mm) ... Figure 11B-23A. …	2010 CBC is **equivalent** to 2010 ADA.	2010 ADA Stds. includes a requirement for the base-to-base spacing of the domes to be .65 inches minimum. CBC does not include a similar requirement, but since the CBC requires the center-to-center dome spacing to be 2.35 inches "nominal" and the based diameter to be 0.9 inches "nominal", the inferred base-to-base dimension is 1.45 inches nominal. This appears to be equivalent to the 2010 ADA Stds. as a 1.45 inch nominal dimension should exceed the .65 inch actual minimum dimension per the 2010 ADA Stds..	1) If the CBC format is followed, adopt 2010 ADA Stds. requirement for the minimum base-to-base dome dimension of .65 inches minimum. 2) If the CBC format is followed, maintain 2010 CBC requirement of 2.35 center-to-center dome spacing and the base diameter of 0.9 inches and eliminate the word "nominal" from both requirements, which would fall within the range allowed by 2010 ADA Stds.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1603	**705.1.3 Contrast.** *Detectable warning* surfaces shall contrast visually with adjacent walking surfaces either light-on-dark, or dark-on-light.		**1127B.5.7. Detectable warnings.** ... Figure 11B-23A. ... The detectable warning shall contrast visually with adjoining surfaces, either light-on-dark or dark-on-light. …	2010 CBC provides **greater access** than 2010 ADA.	2010 ADA Stds. requires contrast with adjacent "walking" sufaces only. 2010 CBC requires contrast with all adjoining surfaces.	1) If the CBC format is followed, adopt 2010 ADA Stds. language that detectable warnings contrast with "adjacent walking surfaces." 2) If the CBC format is followed, maintain current CBC language that detectable warnings contrast with "adjoining surfaces." 3) If the 2010 ADA Stds. format is followed, incorporate Section 705.1.3 verbatim.
1604	**705.2 Platform Edges.** *Detectable warning* surfaces at platform boarding edges shall be 24 inches (610 mm) wide and shall extend the full length of the public use areas of the platform.		1121B.3 Fixed facilities and stations. 1121B.3.1 ... 8. Platform edges bordering a drop-off and not protected by platform screens or guards shall have a detectable warning. Such detectable warnings shall ... run the full length of the platform drop-off. (a) Detectable warnings at transit boarding platforms. Transit boarding platforms shall have a detectable warning texture extending the full length of the loading area. This detectable warning texture shall have the following features. Width 24 to 36 inches (610 mm to 914 mm) placed at the edge of the drop-off or safe area. Durable, slip-resistant material having a surface texture composed of raised, truncated domes with a diameter of nominal 0.9 inch (22.9 mm) at the base tapering to 0.45 inch (11.4 mm) at the top, a height of nominal 0.2 inch (5.08 mm), and a center-to-center spacing of nominal 2.35 inches (59.7 mm) in compliance with Figure 11B-23A. “Nominal” as used here shall be in accordance with California State Referenced Standards Code Sections 12-11A and B-102. The detectable warning shall contrast visually with adjoining surfaces, either light on dark or dark on light. The material used to provide contrast shall be an integral part of the walking surface. Warning surfaces shall differ from adjoining walking surfaces in resiliency or sound-on-cane contact. This surface shall be reserved for warning. Color yellow conforming to Federal Color No. 33538, as shown in Table IV of Standard No. 595B. Where the color value contrast between the yellow warning and the main walking surface is less than 70 percent, a 1 inch-wide (25 mm) black strip shall separate the yellow warning from the main walking surface. Contrast shall be determined by: Contrast = [(B1-B2)/B1] x 100 percent where B1 = light reflectance value (LRV) of the lighter area and	2010 CBC **does not address** 2010 ADA req.	2010 ADA Stds. uses the term "platform boarding edges" whereas CBC uses "platform edges bordering a drop-off and not protected by platform screens or guards", which is similar to the 1991 ADAAG text. 2010 ADA Stds. also requires that the detectable warning surface shall extend the full length of the "public use areas" of the platform, whereas the CBC requires the detectable warnings to run the full length of the "platform drop-off." The assumption is made that a "drop-off" does not occur where there are platform screens or guards, so therefore there is no "boarding edge" at those locations. CBC would appear to provide a greater level of accessibility in that the detectable warnings are required the full lenght of the platform drop-off, not just the "public areas" of the platform. It is conceivable that a drop-off could occur in an area that is not considered public use, but a person with a visual impairment would not be aware that they were outside of the public use area. CBC provides a greater level of access than the 2010 ADA Stds. in that the width of the detectable warnings must be 24 inches minimum to 36 inches maximum and 2010 ADA Stds. requires an exact 24 inch wide surface. A person with visual impairments is more likely to detect a surface that is between 24-36 inches in width as opposed to exactly 24 inches in width. CBC requires detectable warnings at transit boarding platforms to be yellow conforming to Federal Color No. 33538, whereas 2010 ADA Stds. does not specify a particular color for any locations.	1) If the CBC format is followed, adopt 2010 ADA Stds. language that detectable warnings extend the full length of the public use areas of the platform and that the width of the detectable warnings be 24 inches wide. 2) If the CBC format is followed, adopt 2010 ADA Stds. language that detectable warnings extend the full length of the public use areas of the platform and that the width of the detectable warnings be 24 - 36 inches wide. 3) If the CBC format is followed, maintain CBC text for yellow color at transit boarding platforms only to maintain consistency with existing boarding platforms; consistency of warnings is of great importance to individuals with visual impairments, especially those who are partially sighted. The Federal Yellow Color No. 33538 conforms to 2010 ADA Stds. 705.1.3 for contrast.

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1604.1			1121B.2 Bus stops and terminals. 1121B.2.1 New construction. Where provided, bus stop pads shall have a firm, stable surface with a minimum clear length of 96 inches (2438 mm) (measured from the curb or vehicle roadway edge) and a minimum clear width of 60 inches (1524 mm) (measured parallel to the vehicle roadway) to the maximum extent allowed by legal or site constraints. Bus stop pads shall connect to streets, sidewalks or pedestrian paths as part of an accessible route complying with Section 1114B.1.2. Newly constructed bus stop pads must provide a square curb surface between the pad and road or other detectable warning in accordance with Section 1133B.8.5. Bus stop pads shall be at same slope as roadway in the direction parallel to roadway, and maximum one unit vertical in 50 units horizontal (2-percent slope) perpendicular to roadway. Where provided, bus stop shelters shall be installed so as to permit a wheelchair user to enter the shelter from the public way and access a clear floor area of 30 inches by 48 inches (762 mm by 1219 mm) complying with Section 1118B.4, completely within the shelter. Such shelters shall be connected by an accessible route to the boarding area. Where provided, all bus route identification signs shall comply with Section 1117B.5.1, Item 2. Only approved DSA-AC detectable warning products and directional surfaces shall be installed as provided in the California Code of Regulations (CCR), Title 24, Part 1, Articles 2, 3 and 4. Refer to CCR Title 24, Part 12, Chapters 12-11A and B, for building and facility access specifications for product approval for detectable warning products and directional surfaces.	2010 CBC provides **greater access** than 2010 ADA.	2010 ADA Stds. does not contain requirements for detectable warnings at bus stops and shelters. Bus stops and shelters typically occur within the Public Right-of-Way and the USDOJ is expected to adopt requirements for the Public Right-of-Way in the future. 2010 ADA Stds. also lacks any text regarding product testing and approval of detectable warnings.	No change required.
1604.2			Detectable warning products and directional surfaces installed after January 1, 2001, shall be evaluated by an independent entity, selected by the Department of General **1121B.3.1.8(b) Detectable directional texture at boarding platforms.** At transit boarding platforms, the pedestrian access shall be identified with a detectable directional texture. This detectable directional texture shall comply with Figure 11B-23B and shall be 0.1 inch (2.54 mm) in height that tapers off to 0.04 inch (1.02 mm), with bars raised 0.2 inch (5.08 mm) from the surface. The raised bars shall be 1.3 inches (33.02 mm) wide and 3 inches (76 mm) from center-to-center of each bar. This surface shall differ from adjoining walking surfaces in resiliency or sound-on-cane contact. The color of the directional texture shall comply with Section 1121B.3.1, Item 8(a). This surface will be placed directly behind the yellow detectable warning texture specified in Section 1121B.3.1, Item 8(a), aligning with all doors of the transit vehicles where passengers will embark. The width of the directional texture shall be equal to the width of the transit vehicle's door opening. The depth of the texture shall not be less than 36 inches (914 mm).	2010 CBC provides **greater access** than 2010 ADA.	2010 ADA Stds. does not contain requirements for detectable directional texture at boarding platforms. Boarding platforms typically occur within the Public Right-of-Way and the USDOJ is expected to adopt requirements for the Public Right-of-Way in the future. 2010 ADA Stds. also lacks any text regarding product testing and approval of detectable warnings.	No change required.

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1604.3			**1133B.8 Hazards. 1133B.8.3 Detectable warnings at transit boarding platforms.** See Section 1121B.3.1, Item 8(a).	2010 CBC is **equivalent** to 2010 ADA.	2010 ADA Stds. refers to the requirement for detectable warnings at hazards in Section 106.5 Defined Terms: Detectable Warning. A standardized surface feature built in or applied to walking surfaces or other elements to warn of hazards on a circulation path.	No change required.
1604.4			**1133B.8 Hazards. 1133B.8.4 Detectable directional texture at boarding platforms.** See Section 1121B.3.1, Item 8(b).	2010 CBC provides **greater access** than 2010 ADA.	2010 ADA Stds. does contain any requirements for detectable directional texture at boarding platforms.	No change required.
1604.5			**1133B.8 Hazards. 1133B.8.5 Detectable warnings at hazardous vehicular areas.** If a walk crosses or adjoins a vehicular way, and the walking surfaces are not separated by curbs, railings or other elements between the pedestrian areas and vehicular areas, the boundary between the areas shall be defined by a continuous detectable warning which is 36 inches (914 mm) wide, complying with Section 1121B.3.1 Item 8(a). Only approved DSA-AC detectable warning products and directional surfaces shall be installed as provided in the California Code of Regulations (CCR), Title 24, Part 1, Articles 2, 3 and 4. Refer to CCR Title 24, Part 12, Chapter 12-11A and B, for building and facility access specifications for product approval for detectable warning products and directional surfaces. Detectable warning products and directional surfaces installed after January 1, 2001, shall be evaluated by an independent entity, selected by the Department of General Services, Division of the State Architect-Access Compliance, for all occupancies, including transportation and other outdoor environments, except that when products and surfaces are for use in residential housing evaluation shall be in consultation with the Department of Housing and Community Development. See Government Code Section 4460.	2010 CBC provides **greater access** than 2010 ADA.	Hazardous vehicular areas are not defined by CBC or by the old ADA Stds so there have been great difficulties and confusion with enforcement. Truncated dome detectable warnings are well-documented trip hazards and should not be overused due to the injuries they cause. 2010 ADA Stds. no longer includes scoping text for when detectable warnings are required, including at curb ramps, other than Section 705.2 Platform Edges. 1991 ADAAG 4.29.5 contained similar text to CBC 1133B.8.5 but the 2010 ADA Stds. lacks any such requirement.	1) Maintain requirements of CBC 1133B.8.5 2) Eliminate requirements of CBC 1133B.8.5 3. If USDOJ adopts requirements in the future for detectable warnings at hazardous vehicular areas within the Public Right-of-Way, incorporate similar requirements into the CBC for the Public Right-of-Way.
1604.6			**1133B.8.7 Detectable warnings at reflecting pools.** The edges of reflecting pools shall be protected by railings, walls, warning curbs or detectable warnings complying with Section 1121B.3.1, Item 8(a).	2010 CBC provides **greater access** than 2010 ADA.	2010 ADA Stds. no longer includes scoping text for detectable warnings at reflecting pools. 1991 ADAAG 4.29.6 contained similar text to CBC 1133B.8.7 but the 2010 ADA Stds. lacks any such requirement. Among other reasons, cane users can detect the edges of most reflecting pools so the requirement was dropped.	1) Maintain requirements of CBC 1133B.8.7 2) Eliminate requirements of CBC 1133B.8.7.
1605	**706 Assistive Listening Systems**		N/A	NA	2010 CBC does not have a stand alone heading for ALS.	N/A
1606	**706.1 General.** *Assistive listening systems* required in *assembly areas* shall comply with 706.		**1104B.2** **Assistive-listening systems in assembly areas.** Assembly areas, conference and meeting rooms shall provide assistive-listening systems for persons with hearing impairments as provided in this section.	2010 CBC provides **greater access** than 2010 ADA.	CBC 1104B.2 adresses conference and meeting rooms, while ADA Stds. do not specifically define conference and meeting rooms as assembly areas.	1. 2010 CBC should delete reference to conference and meeting rooms to be consistent with ADA Stds. or 2. 2010 CBC should retain specific requirement for ALS in conference and meeting rooms. Consider defining a conference or meeting room for ease of interpretation.

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1607	**Advisory 706.1 General.** Assistive listening systems are generally categorized by their mode of transmission. There are hard-wired systems and three types of wireless systems: induction loop, infrared, and FM radio transmission. Each has different advantages and disadvantages that can help determine which system is best for a given application. For example, an FM system may be better than an infrared system in some open-air assemblies since infrared signals are less effective in sunlight. On the other hand, an infrared system is typically a better choice than an FM system where confidential transmission is important because it will be contained within a given space. ...		**1104B.2 #2** **Types of listening systems.** Types of assistive-listening systems include, but are not limited to, audio-induction loops, radio frequency systems (AM or FM) and infrared transmission.	2010 CBC is **equivalent** to 2010 ADA.	ADA Stds. Advisory gives design advice relative to the different systems, which is not appropriate for a building code.	1. 2010 CBC should delete 1104B.2 #2 since it is superfluous. or 2. Incorporate into new CBC definition of assistive listening systems, if so adopted.
1608	**Advisory 706.1 General.** ... The technical standards for assistive listening systems describe minimum performance levels for volume, interference, and distortion. Sound pressure levels (SPL), expressed in decibels, measure output sound volume. Signal-to-noise ratio (SNR or S/N), also expressed in decibels, represents the relationship between the loudness of a desired sound (the signal) and the background noise in a space or piece of equipment. The higher the SNR, the more intelligible the signal. The peak clipping level limits the distortion in signal output produced when high-volume sound waves are manipulated to serve assistive listening devices. Selecting or specifying an effective assistive listening system for a large or complex venue requires assistance from a professional sound engineer. The Access Board has published technical assistance on assistive listening devices and systems.		N/A	2010 CBC **does not address** 2010 ADA req.	Performance levels of equipment are not addressed in 2010 CBC.	2010 CBC should adopt requirements for equipment performance noted below.
1609	**706.2 Receiver Jacks.** Receivers required for use with an *assistive listening system* shall include a ⅛ inch (3.2 mm) standard mono jack.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not have any requirements for type of receiver jack.	2010 CBC should adopt ADA Stds. requirements for receiver jacks.
1610	**706.3 Receiver Hearing-Aid Compatibility.** Receivers required to be hearing-aid compatible shall interface with telecoils in hearing aids through the provision of neck loops.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not have any requirements for hearing aid compatibility.	2010 CBC should adopt ADA Stds. requirements for hearing aid compatibility.
1611	**Advisory 706.3 Receiver Hearing-Aid Compatibility.** Neck loops and headsets that can be worn as neck loops are compatible with hearing aids. Receivers that are not compatible include ear buds, which may require removal of hearing aids, earphones, and headsets that must be worn over the ear, which can create disruptive interference in the transmission and can be uncomfortable for people wearing hearing aids.		N/A	2010 CBC **does not address** 2010 ADA req.	ADA Stds. Advisory has useful information to clarify what makes a receiver hearing aid compatible.	2010 CBC should Incorporate claifiying definition of what is a hearing aid compatible receiver, consistent with ADA Stds. Advisory.
1612	**706.4 Sound Pressure Level.** *Assistive listening systems* shall be capable of providing a sound pressure level of 110 dB minimum and 118 dB maximum with a dynamic range on the volume control of 50 dB.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not have any requirements for sound pressure level.	2010 CBC should adopt ADA Stds. requirements for sound pressure level.
1613	**706.5 Signal-to-Noise Ratio.** The signal-to-noise ratio for internally generated noise in assistive *listening systems* shall be 18 dB minimum.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not have any requirements for signal-to-noise ratio.	2010 CBC should adopt ADA Stds. requirements for signal-to-noise ratio.
1614	**706.6 Peak Clipping Level.** Peak clipping shall not exceed 18 dB of clipping relative to the peaks of speech.		N/A	2010 CBC **does not address** 2010 ADA req.	2010 CBC does not have any requirements for peak clipping level.	2010 CBC should adopt ADA Stds. requirements for peak clipping level.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1615	**707 Automatic Teller Machines and Fare Machines**		**1117B.7 Automated teller machines and point of sale machines.** **1117B.7.1 General.** Where ATMs, self-service fare vending, collection, or adjustment machines and point-of-sale devices are provided for the public they shall comply with Section 1117B.7. **Exceptions:** ... 3. Card reading devices located on fuel pump islands at gasoline service stations and motor-vehicle fuel facilities shall comply with the requirements of Chapter 11C.	2010 CBC provides **greater access** than 2010 ADA.	707 covers ATMs and fare machines; 1117B.7 covers these devices, as well as point-of-sale machines. Card reading devices on fuel pump islands at gas stations are excluded in 1117B.7.1, but they are covered in Chapter 11C. Advisory 707 clarifies that ITMs other than ATMs are not covered (by 707). Because the CBC provides standards for devices not covered by the ADA (point-of-sale machiines and card reading devices on fuel pump stations), it provides greater access.	
1616	**Advisory 707 Automatic Teller Machines and Fare Machines.** Interactive transaction machines (ITMs), other than ATMs, are not covered by Section 707. However, for entities covered by the ADA, the Department of Justice regulations that implement the ADA provide additional guidance regarding the relationship between these requirements and elements that are not directly addressed by these requirements. Federal procurement law requires that ITMs purchased by the Federal government comply with standards issued by the Access Board under Section 508 of the Rehabilitation Act of 1973, as amended. This law covers a variety of products, including computer hardware and software, websites, phone systems, fax machines, copiers, and similar technologies. For more information on Section 508 consult the Access Board's website at www.access-board.gov.		1117B.7.1 General. Where ATMs, self-service fare vending, collection, or adjustment machines and point-of-sale devices are provided for the public they shall comply with Section 1117B.7. **Exceptions:** ... 3. Card reading devices located on fuel pump islands at gasoline service stations and motor-vehicle fuel facilities shall comply with the requirements of Chapter 11C. **1121B Transportation Facilities** **1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **1121B.3.1 #7** Automatic fare vending, collection and adjustment (for example, add-fare) systems shall comply with Section 1117B.7. ...	2010 CBC provides **greater access** than 2010 ADA.	707 covers ATMs and fare machines; 1117B.7 covers these devices as well as point-of-sale machines. Card reading devices on fuel pump islands at gas stations are excluded in 1117B.7.1, but they are covered in Chapter 11C. Advisory 707 clarifies that ITMs other than ATMs are not covered (by 707). Because the CBC provides standards for devices not covered by the ADA (point-of-sale machiines and card reading devices on fuel pump stations), it provides greater access.	
1617	**707.1 General.** Automatic teller machines and fare machines shall comply with 707.		**1117B.7.1 General.** Where ATMs, self-service fare vending, collection, or adjustment machines and point-of-sale devices are provided for the public they shall comply with Section 1117B.7. **1114B.1.2 Accessible route of travel.** ... At least one accessible route shall connect accessible building or facility entrances with all accessible spaces and elements ... within the building or facility. ... **1121B Transportation Facilities** **1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** **1121B.3.1 #7.** Automatic fare vending, collection and adjustment (for example, add-fare) systems ... shall be located on an accessible route complying with Section 1114B.1.2. ...	2010 CBC is **equivalent** to 2010 ADA.	Similar to 206.2.4, 1114B.1.2 calls for all accessible elements to be located on an accessible route.	

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1618	**Advisory 707.1 General.** If farecards have one tactually distinctive corner they can be inserted with greater accuracy. Token collection devices that are designed to accommodate tokens which are perforated can allow a person to distinguish more readily between tokens and common coins. Place accessible gates and fare vending machines in close proximity to other accessible elements when feasible so the facility is easier to use.			NA	There is no comparable language in the CBC regarding farecards, tokens, or token collection devices. Advisory notes are not used in the CBC. Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b)	
1618.1			**1121B Transportation Facilities** **1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** **1121B.3.1 #1.** Elements such as ramps, elevators or other circulation devices, fare vending or other ticketing areas, and fare collection areas shall be placed to minimize the distance which wheelchair users and other persons who cannot negotiate steps may have to travel compared to the general public. The circulation paths, each including an accessible entrance and an accessible route, for persons with disabilities shall, to the maximum extent practicable, coincide with the circulation path for the general public. ...	2010 CBC provides **greater access** than 2010 ADA.	The ADA language applies to all facilities that might contain fare vending machines, but it is written as an advisory. CBC 1121B only applies to transportation facilities, but it contains an enforcable mandate. As such the CBC is stricter, and it provides greater access.	
1619	**707.2 Clear Floor or Ground Space.** A clear floor or ground *space* complying with 305 shall be provided.		**1117B.7.1.1** Where ATMs or fare machines are provided, they shall be provided in accordance with Section 1117B.7.1.1 for each type provided. **1117B.7.1.1.1 One ATM.** Where one ATM or fare machine is provided at a location, it shall comply with Sections 1117B.7.2 ... **1117B.7.1.1.2 Two ATMs.** Where two ATMs or fare machines are provided at a location, one shall comply with Sections 1117B.7.2 ... and one shall comply with Sections 1117B.6 Items 2 and ..., 1117B.7.2, ... **1117B.7.1.1.3 Three or more ATMs.** Where three or more ATMs or fare machines are provided at a location, at least 50 percent shall comply with Sections 1117B.7.2 ... and the rest shall comply with Sections 1117B.6 Items 2 and ..., 1117B.7.2, ... **1117B.7.1.3** ... Where point-of-sale devices are provided at accessible check stands, sales or service counters, they shall also comply with Sections 1117B.7.2, ... **1117B.7.2 Clear Floor or Ground Space.** A clear floor or ground space complying with Section 1118B.4 shall be provided. **...** **1117B.6 Controls and operating mechanisms.** **1117B.6 #2. Clear floor space.** Clear floor space complying with Section 1118B.4 that allows a forward or parallel approach by a person using a wheelchair shall be provided at controls, dispensers, receptacles and other operable equipment. **1121B Transportation Facilities** **1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **1121B.3.1 #7** Automatic fare vending, collection and adjustment (for example, add-fare) systems shall comply with Section 1117B.7. ... Accessible fare collection devices shall have a minimum	Which Std.provides greater access **depends** on circumstances.	Both standards require a clear floor space of similar nature be provided at ATMs except where there are differences between 305 and 1118B.4: 1) The minimum knee space configuration noted in 1118B.4 is relative; it is dependent on the knee space requirements of specific elements, whereas 306 (which is referenced in 305) defines it clearly, and applies it ubiquitously. Under tables, for instance, the CBC would allow the clear floor space (considered to extend under the table) to be reduced to no less than 27" high, but under lavatories, it could be reduced to as little as 9" high for a maximum depth of 6" (for toe space). The ADA allows the clear floor space height to be reduced per the toe space requirements under all elements. 2) Changes in level are not allowed by the 2010 ADA within the required CLFS; CBC 1124B (referenced in 1118B.4 #3) does not prohibit them. 3) 2010 ADA limits the slope of the floor or ground surface to 1:48; **The ADA will allow the 1:48 slope to occur in any directionn.**the CBC does not specifically limit the floor or ground slope except with respect to 2% maximum cross slope (1133B.7.1.3), 5% maximum slope in the direction of travel (1133B.7.3), and 8.33% maximum slope for ramps (1133B.5.3). 4) The portion of 1121B.3.1 #7 regarding minimum clear opening widths at accessible fare collection devices is very similar to 403.5.1. If the depth of the opening (requiring pass-through) exceeds 24", Figure 11B-10 (referenced in 1114B.1.2) provides a requirement equivalent to 403.5.1.	1a) Adopt the ADA language for knee/toe space as it pertains to the extension of the clear floor space under objects. 1b) Leave the CBC language as it is (which currently provides greater access). 2a) Add language to 1118B.4 that prohibits changes in level from occuring within the required clear floor or ground space. 2b) Do not add language to 1118B.4 that prohibits changes in level from occuring within the required clear floor or ground space. Such language could have significant consequences: for instance, an otherwise conmpliant carpet transition strip would create a noncompliant condition if located within the required clear floor space of an element. **This could put CBC at odds with ADA.** 3) Add language to 1118B.4 that clarifies that the required clear floor or ground space may slope no greater than 2% (= 1:50) or 2.08% (= 1:48 = 1/4"/ft). 4) No action required. Although there is no language in the ADA standards that is directly parallel to 1121B.3.1 #7, both standards require the same clear widths when pass-through is required.

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1620	**707.2 EXCEPTION:** Clear floor or ground *space* shall not be required at drive-up only automatic teller machines and fare machines.		**1117B.7.2 Clear Floor or Ground Space.** A clear floor or ground space complying with Section 1118B.4 shall be provided. **Exception:** Clear floor or ground space shall not be required at drive-up only ATMs, fare machines and point-of-sale devices.	2010 CBC is **equivalent** to 2010 ADA.	The issue under consideration on this line is limited to clear floor or ground space at drive-up only ATMs, which both standards exclude. The fact that one standard's requirements for clear floor space are more stringent than the others is irrelevant in this context, since the net result is that no clear floor space requirements apply.	
1621	**707.2 EXCEPTION:** Clear floor or ground *space* shall not be required at drive-up only automatic teller machines and fare machines.		**1117B.7.2 Clear Floor or Ground Space.** A clear floor or ground space complying with Section 1118B.4 shall be provided. **Exception:** Clear floor or ground space shall not be required at drive-up only ATMs, fare machines and point-of-sale devices.	2010 CBC is **equivalent** to 2010 ADA.	The issue under consideration on this line is limited to clear floor or ground space at drive-up only fare machines, which both standards exclude. The fact that the CBC also excludes the clear floor space requirements at drive-up-only point-of-sale machines is immaterial because the ADA states no requirements for them to begin with. Additionally, the fact that one standard's requirements for clear floor space are more stringent than the others is irrelevant in this context, since the net result is that no clear floor space requirements apply.	
1622	**707.3 Operable Parts.** *Operable parts* shall comply with 309. …		**1117B.7.3 Operable Parts.** Operable parts shall comply with Section 1117B.6. **...** **1117B.6 Controls and operating mechanisms.** **1. General.** Controls and operating mechanisms in accessible spaces, along accessible routes or as parts of accessible elements (for example, light switches and dispenser controls) and those required to be accessible by Section 1.9.1 shall comply with the requirements of this section. **2. Clear floor space.** Clear floor space complying with Section 1118B.4 that allows a forward or parallel approach by a person using a wheelchair shall be provided at controls, dispensers, receptacles and other operable equipment. **3. Height.** The highest operable part of all controls, dispensers, receptacles and other operable equipment shall be placed within at least one of the reach ranges specified in Sections 1118B.5 and 1118B.6. **...**. **4. Operation.** Controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 pounds (22.2 N) of force. **...**	2010 CBC is **equivalent** to 2010 ADA.	707.3 refers to 309, and 1117B.7.3 refers to 1117B.6. Both of the referenced sections include requirements for clear floor space, which is dealt with above. As such, the evaluation of this line does not consider the differences in the standards' requirements for clear floor space. Regarding height, the proposed changes to the 2010 CBC mirror the 2010 ADA requirements, and the two standards have been in agreement with regard to requirements for operation of controls. As such, with respect to height and operation of controls, the standards are equivalent. As discussed above, 1117B includes point-of-sale machines; 707 does not. One might conclude, therefore ,that the CBC is stricter, and that it provides greater access. But this does not logically follow. The fact that point-of-sale machines are not specifically mentioned in 707 does not mean that they are exempt from complying with the most basic requirements for operable parts. As such, since the requirements themselves are equivalent, it follows that the standards are equivalent with respect to this issue.	
1623	**707.3 Operable Parts.** *Operable parts* shall comply with 309. …		**1117B.7.3 Operable Parts.** Operable parts shall comply with Section 1117B.6. **…**	2010 CBC is **equivalent** to 2010 ADA.	707.3 refers to 309, and 1117B.7.3 refers to 1117B.6. Both of the referenced sections include requirements for clear floor space, which is dealt with above. As such, the evaluation of this line does not consider the differences in the standards' requirements for clear floor space. Regarding height, the proposed changes to the 2010 CBC mirror the 2010 ADA requirements, and the two standards have been in agreement with regard to requirements for operation of controls. As such, with respect to height and operation of controls, the standards are equivalent.	

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1624	**707.3 Operable Parts.** …		**1117B.7.3 Operable Parts.** Operable parts shall comply with Section 1117B.6. **…**	2010 CBC is **equivalent** to 2010 ADA.	707.3 refers to 309, and 1117B.7.3 refers to 1117B.6. Both of the referenced sections include requirements for clear floor space, which is dealt with above. As such, the evaluation of this line does not consider the differences in the standards' requirements for clear floor space. Regarding height, the proposed changes to the 2010 CBC mirror the 2010 ADA requirements, and the two standards have been in agreement with regard to requirements for operation of controls. As such, with respect to height and operation of controls, the standards are equivalent. The 1991 ADA exception is not included in the 2010 CBC.	
1625	**707.3 Operable Parts.** ... Unless a clear or correct key is provided, each *operable part* shall be able to be differentiated by sound or touch, without activation.		**1117B.7.3 Operable Parts.** Operable parts shall comply with Section 1117B.6. **...** **1117B.7.3.1** Unless a clear or correct key is provided, each operable part shall be able to be differentiated by sound or touch, without activation. **1117B.7.1.3** Where point-of-sale devices are provided, all devices at each location shall comply with Sections ... 1117B.7.3.1, ... Where a point-of-sale system is changed or modified to include a video touch screen or any other non-tactile keypad, all changed or modified point-of-sale devices at each location shall comply with Sections ... 1117B.7.3.1, ... Where point-of-sale devices are provided at accessible check stands, sales or service counters, they shall also comply with Sections ... 1117B.7.3 ...	2010 CBC provides **greater access** than 2010 ADA.	The text of the standards is the same, however 1117B.3.1 also applies to point-of-sale machines; 707.3 does not. This is not a basic requirement that could be said to apply to all devices required to be accessible. As such the CBC is stricter, and therefore it provides greater access.	
1626	**707.3 EXCEPTION:** Drive-up only automatic teller machines and fare machines shall not be required to comply with 309.2 and 309.3.		**1117B.7.3 Operable Parts.** Operable parts shall comply with Section 1117B.6. **Exception:** Drive-up only ATMs, fare machines and point-of-sale devices shall not be required to comply with Section 1117B.6 Items 2 and 3. **...**	2010 CBC is **equivalent** to 2010 ADA.	The text of the standards is the same, however 1117B.7.3 also applies to point-of-sale machines; 707.3 does not. But the fact that the CBC also excludes the operable parts requirements at drive-up-only point-of-sale machines is immaterial because the ADA states no requirements for them to begin with.	

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1627	**707.4 Privacy.** Automatic teller machines shall provide the opportunity for the same degree of privacy of input and output available to all individuals.		**1117B.7.4 Privacy.** Machines and devices shall provide the opportunity for the same degree of privacy of input and output available to all individuals. **1117B.7.1.1** Where ATMs or fare machines are provided, they shall be provided in accordance with Section 1117B.7.1.1 for each type provided. **1117B.7.1.1.1 One ATM.** Where one ATM or fare machine is provided at a location, it shall comply with Sections 1117B.7.2 through 1117B.7.8. **1117B.7.1.1.2 Two ATMs.** Where two ATMs or fare machines are provided at a location, one shall comply with Sections 1117B.7.2 through 1117B.7.8 and one shall comply with Sections ... 1117B.7.4, ... **1117B.7.1.1.3 Three or more ATMs.** Where three or more ATMs or fare machines are provided at a location, at least 50 percent shall comply with Sections 1117B.7.2 through 1117B.7.8 and the rest shall comply with Sections ... 1117B.7.4, ... **1117B.7.1.3** Where point-of-sale devices are provided, all devices at each location shall comply with Sections ... 1117B.7.9. Where a point-of-sale system is changed or modified to include a video touch screen or any other non-tactile keypad, all changed or modified point-of-sale devices at each location shall comply with Sections ... 1117B.7.9. Where point-of-sale devices are provided at accessible check stands, sales or service counters, they shall also comply with Sections ... 1117B.7.4. **1117B.7.9 Point-of-sale devices.** Point-of-sale systems that include a video touch screen or any other non-tactile keypad shall be equipped with either of the following: **1117B.7.9.1** A tactilely discernible numerical keypad similar to a telephone keypad containing a raised dot with a dot base diameter between 1.5 mm and 1.6 mm and a height between 0.6 mm and 0.9 mm on the number 5 key that enables a visually impaired person to enter his or her own personal identification number or any other personal	2010 CBC provides **greater access** than 2010 ADA.	The text of the standards is very similar, except that 707.4 only applies the requirement to ATMs; 1117B.7.4 applies it to fare vending, collection, or adjustment machines and to point-of-sale machines. 1117B.9 provides detailed requirements for point-of-sale machines that are not included in the 2010 ADA Standards. As such the CBC provides greater access.	
1628	**Advisory 707.4 Privacy.** In addition to people who are blind or visually impaired, people with limited reach who use wheelchairs or have short stature, who cannot effectively block the ATM screen with their bodies, may prefer to use speech output. Speech output users can benefit from an option to render the visible screen blank, thereby affording them greater personal security and privacy.			NA	There is no comparable language in the CBC regarding this advisory. Advisory notes are not used in the CBC. Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b)	

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1629	**707.5 Speech Output.** Machines shall be speech enabled. Operating instructions and orientation, visible transaction prompts, user input verification, error messages, and all displayed information for full use shall be *accessible* to and independently usable by individuals with vision impairments. Speech shall be delivered through a mechanism that is readily available to all users, including but not limited to, an industry standard connector or a telephone handset. Speech shall be recorded or digitized human, or synthesized.		**1117B.7.5 Speech Output.** Machines shall be speech enabled. Operating instructions and orientation, visible transaction prompts, user input verification, error messages, and all displayed information for full use shall be accessible to and independently usable by individuals with vision impairments. Speech shall be delivered through a mechanism that is readily available to all users, including but not limited to, an industry standard connector or a telephone handset. Speech shall be recorded or digitized human, or synthesized. **1117B.7.1.1** Where ATMs or fare machines are provided, they shall be provided in accordance with Section 1117B.7.1.1 for each type provided. **1117B.7.1.1.1 One ATM.** Where one ATM or fare machine is provided at a location, it shall comply with Sections 1117B.7.2 through 1117B.7.8. **1117B.7.1.1.2 Two ATMs.** Where two ATMs or fare machines are provided at a location, one shall comply with Sections 1117B.7.2 through 1117B.7.8 and one shall comply with Sections ..., 1117B.7.5, ... **1117B.7.1.1.3 Three or more ATMs.** Where three or more ATMs or fare machines are provided at a location, at least 50 percent shall comply with Sections 1117B.7.2 through 1117B.7.8 and the rest shall comply with Sections ... 1117B.7.5, ...	2010 CBC is **equivalent** to 2010 ADA.		
1630	**707.5 EXCEPTIONS:** 1. Audible tones shall be permitted instead of speech for visible output that is not displayed for security purposes, including but not limited to, asterisks representing personal identification numbers. 2. Advertisements and other similar information shall not be required to be audible unless they convey information that can be used in the transaction being conducted. 3. Where speech synthesis cannot be supported, dynamic alphabetic output shall not be required to be audible.		**1117B.7.5 Speech Output.** ... **Exceptions:** **1.** Audible tones shall be permitted instead of speech for visible output that is not displayed for security purposes, including but not limited to, asterisks representing personal identification numbers. **2.** Advertisements and other similar information shall not be required to be audible unless they convey information that can be used in the transaction being conducted. **3.** Where speech synthesis cannot be supported, dynamic alphabetic output shall not be required to be audible.	2010 CBC is **equivalent** to 2010 ADA.		
1631	**Advisory 707.5 Speech Output.** If an ATM provides additional functions such as dispensing coupons, selling theater tickets, or providing copies of monthly statements, all such functions must be available to customers using speech output. To avoid confusion at the ATM, the method of initiating the speech mode should be easily discoverable and should not require specialized training. For example, if a telephone handset is provided, lifting the handset can initiate the speech mode.			NA	There is no comparable language in the CBC regarding this advisory. Advisory notes are not used in the CBC. Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b)	
1632	**707.5.1 User Control.** Speech shall be capable of being repeated or interrupted. Volume control shall be provided for the speech function.		**1117B.7.5.1 User Control.** Speech shall be capable of being repeated or interrupted. Volume control shall be provided for the speech function.	2010 CBC is **equivalent** to 2010 ADA.		
1633	**707.5.1 EXCEPTION:** Speech output for any single function shall be permitted to be automatically interrupted when a transaction is selected.		**1117B.7.5.1 User Control.** ... **Exception:** Speech output for any single function shall be permitted to be automatically interrupted when a transaction is selected.	2010 CBC is **equivalent** to 2010 ADA.		
1634	**707.5.2 Receipts.** Where receipts are provided, speech output devices shall provide audible balance inquiry information, error messages, and all other information on the printed receipt necessary to complete or verify the transaction.		**1117B.7.5.2 Receipts.** Where receipts are provided, speech output devices shall provide audible balance inquiry information, error messages, and all other information on the printed receipt necessary to complete or verify the transaction.	2010 CBC is **equivalent** to 2010 ADA.		

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1635	**707.5.2 EXCEPTIONS:** 1. Machine location, date and time of transaction, customer account number, and the machine identifier shall not be required to be audible. 2. Information on printed receipts that duplicates information available on-screen shall not be required to be presented in the form of an audible receipt. 3. Printed copies of bank statements and checks shall not be required to be audible.		**1117B.7.5.2 Receipts.** ... **Exceptions:** **1.** Machine location, date and time of transaction, customer account number, and the machine identifier shall not be required to be audible. **2.** Information on printed receipts that duplicates information available on-screen shall not be required to be presented in the form of an audible receipt. **3.** Printed copies of bank statements and checks shall not be required to be audible.	2010 CBC is **equivalent** to 2010 ADA.		
1636	**707.6 Input.** Input devices shall comply with 707.6.		**1117B.7.6 Input.** Input devices shall comply with Section 1117B.7.6. **1117B.7.1.1** Where ATMs or fare machines are provided, they shall be provided in accordance with Section 1117B.7.1.1 for each type provided. **1117B.7.1.1.1 One ATM.** Where one ATM or fare machine is provided at a location, it shall comply with Sections 1117B.7.2 through 1117B.7.8. **1117B.7.1.1.2 Two ATMs.** Where two ATMs or fare machines are provided at a location, one shall comply with Sections 1117B.7.2 through 1117B.7.8 and one shall comply with Sections ... 1117B.7.6, ... **1117B.7.1.1.3 Three or more ATMs.** Where three or more ATMs or fare machines are provided at a location, at least 50 percent shall comply with Sections 1117B.7.2 through 1117B.7.8 and the rest shall comply with Sections ... 1117B.7.6, ...	2010 CBC is **equivalent** to 2010 ADA.		

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1637	**707.6.1 Input Controls.** At least one *tactilely* discernible input control shall be provided for each function. Where provided, key surfaces not on active areas of display screens, shall be raised above surrounding surfaces. Where membrane keys are the only method of input, each shall be *tactilely* discernable from surrounding surfaces and adjacent keys.		**1117B.7.6.1 Input Controls.** At least one tactilely discernible input control shall be provided for each function. Where provided, key surfaces not on active areas of display screens, shall be raised above surrounding surfaces. Where membrane keys are the only method of input, each shall be tactilely discernable from surrounding surfaces and adjacent keys. **1117B.7.1.3** Where point-of-sale devices are provided, all devices at each location shall comply with Sections ... 1117B.7.9. Where a point-of-sale system is changed or modified to include a video touch screen or any other non-tactile keypad, all changed or modified point-of-sale devices at each location shall comply with Sections ... 1117B.7.9. ... **1117B.7.9 Point-of-sale devices.** Point-of-sale systems that include a video touch screen or any other non-tactile keypad shall be equipped with either of the following: **1117B.7.9.1** A tactilely discernible numerical keypad similar to a telephone keypad containing a raised dot with a dot base diameter between 1.5 mm and 1.6 mm and a height between 0.6 mm and 0.9 mm on the number 5 key that enables a visually impaired person to enter his or her own personal identification number or any other personal information necessary to process the transaction ... **1117B.7.9.2** Other technology, such as a radio frequency identification device, fingerprint biometrics, or some other mechanism that enables a visually impaired person to access the video touch screen device with his or her personal identifier and to process his or her transaction ... Where a video screen overlay is provided it shall be equipped with a tactilely discernible numerical keypad complying with Section 1117B.7.9.1.	2010 CBC provides **greater access** than 2010 ADA.	The text of the 707.6.1 and 1117B.7.6 is the same, but 1117B.7.1.3 and 1117B.7.9 provide detailed requirements for point-of-sale machines that are not included in the 2010 ADA Standards. As such the CBC provides greater access.	
1638	**707.6.2 Numeric Keys.** Numeric keys shall be arranged in a 12-key ascending or descending telephone keypad layout. The number five key shall be *tactilely* distinct from the other keys.		**1117B.7.6.2 Numeric Keys.** Numeric keys shall be arranged in a 12-key ascending or descending telephone keypad layout. The number five key shall be tactilely distinct from the other keys. See Figure 11B-41.	2010 CBC is **equivalent** to 2010 ADA.		
1639	**Advisory 707.6.2 Numeric Keys.** Telephone keypads and computer keyboards differ in one significant feature, ascending versus descending numerical order. Both types of keypads are acceptable, provided the computer-style keypad is organized similarly to the number pad located at the right on most computer keyboards, and does not resemble the line of numbers located above the computer keys.			NA	There is no comparable language in the CBC regarding this advisory. Advisory notes are not used in the CBC. Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b)	
1640	**707.6.3 Function Keys.** Function keys shall comply with 707.6.3.		**1117B.7.6.3 Function Keys.** Function keys shall comply with Section 1117B.7.6.3.	2010 CBC is **equivalent** to 2010 ADA.		
1641	**707.6.3.1 Contrast.** Function keys shall contrast visually from background surfaces. *Characters* and symbols on key surfaces shall contrast visually from key surfaces. Visual contrast shall be either light-on-dark or dark-on-light.		**1117B.7.6.3.1 Contrast**. Function keys shall contrast visually from background surfaces. Characters and symbols on key surfaces shall contrast visually from key surfaces. Visual contrast shall be either light-on-dark or dark-on-light.	2010 CBC is **equivalent** to 2010 ADA.		
1642	**707.6.3.1 EXCEPTION:** *Tactile* symbols required by 707.6.3.2 shall not be required to comply with 707.6.3.1.		**1117B.7.6.3.1 Contrast.** ... **Exception:** Tactile symbols required by Section 1117B.7.6.3.2 shall not be required to comply with Section 1117B.7.6.3.1.	2010 CBC is **equivalent** to 2010 ADA.		

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1643	**707.6.3.2 Tactile Symbols.** Function key surfaces shall have *tactile* symbols as follows: Enter or Proceed key: raised circle; Clear or Correct key: raised left arrow; Cancel key: raised letter ex; Add Value key: raised plus sign; Decrease Value key: raised minus sign.		**1117B.7.6.3.2 Tactile Symbols.** Function key surfaces shall have tactile symbols as follows: Enter or Proceed key: raised circle; Clear or Correct key: raised left arrow; Cancel key: raised letter ex; Add Value key: raised plus sign; Decrease Value key: raised minus sign.	2010 CBC is **equivalent** to 2010 ADA.		
1644	**707.7 Display Screen.** The display screen shall comply with 707.7.		**1117B.7.7 Display Screen.** The display screen shall comply with Section 1117B.7.7. **1117B.7.1.1** Where ATMs or fare machines are provided, they shall be provided in accordance with Section 1117B.7.1.1 for each type provided. **1117B.7.1.1.1 One ATM.** Where one ATM or fare machine is provided at a location, it shall comply with Sections 1117B.7.2 through 1117B.7.8. **1117B.7.1.1.2 Two ATMs.** Where two ATMs or fare machines are provided at a location, one shall comply with Sections 1117B.7.2 through 1117B.7.8 and one shall comply with Sections ... 1117B.7.7.2 ... **1117B.7.1.1.3 Three or more ATMs.** Where three or more ATMs or fare machines are provided at a location, at least 50 percent shall comply with Sections 1117B.7.2 through 1117B.7.8 and the rest shall comply with Sections ... 1117B.7.7.2 .... **1117B.7.1.3** Where point-of-sale devices are provided, all devices at each location shall comply with Sections ... 1117B.7.7.2, ... Where a point-of-sale system is changed or modified to include a video touch screen or any other non-tactile keypad, all changed or modified point-of-sale devices at each location shall comply with Sections ... 1117B.7.7.2, ...	2010 CBC is **equivalent** to 2010 ADA.		
1644.1			**1117B.7.7 Display Screen.** The display screen shall comply with Section 1117B.7.7. ... **1117B.7.1.3** Where point-of-sale devices are provided, all devices at each location shall comply with Sections 1117B.6 Item 4, 1117B.7.3.1, 1117B.7.7.2, and 1117B.7.9. Where a point-of-sale system is changed or modified to include a video touch screen or any other non-tactile keypad, all changed or modified point-of-sale devices at each location shall comply with Sections 1117B.6 Item 4, 1117B.7.3.1, 1117B.7.7.2, and 1117B.7.9. Where point-of-sale devices are provided at accessible check stands, sales or service counters, they shall also comply with Sections 1117B.7.2, 1117B.7.3 and 1117B.7.4.	2010 CBC provides **greater access** than 2010 ADA.	Point of Sale devices are not specifically covered by the 2010 ADA Stds.	
1645	**707.7 EXCEPTION:** Drive-up only automatic teller machines and fare machines shall not be required to comply with 707.7.1.		**1117B.7.7 Display Screen.** ... **Exception:** Drive-up only automatic teller machines and fare machines shall not be required to comply with Section 1117B.7.7.1.	2010 CBC is **equivalent** to 2010 ADA.		

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1646	**707.7.1 Visibility.** The display screen shall be visible from a point located 40 inches (1015 mm) above the center of the clear floor *space* in front of the machine.		**1117B.7.7.1 Visibility.** The display screen shall be visible from a point located 40 inches (1016 mm) above the center of the clear floor space in front of the machine. **1117B.7.7.1.1 Vertically mounted display screen.** Where display screens are mounted vertically or no more than 30 degrees tipped away from the viewer, the center line of the display screen and other display devices shall be no more than 52 inches (1321 mm) above the floor or ground surface. **1117B.7.7.1.2 Angle-mounted display screen.** Where display screens are mounted between 30 degrees and 60 degrees tipped away from the viewer, the center line of the display screen and other display devices shall be no more than 44 inches (1118 mm) above the floor or ground surface. **1117B.7.7.1.3 Horizontally mounted display screen.** Where display screens are mounted no less than 60 degrees and no more than 90 degrees (horizontal) tipped away from the viewer, the center line of the display screen and other display devices shall be no more than 34 inches (864 mm) above the floor or ground surface.	2010 CBC provides **greater access** than 2010 ADA.	The text of 707.7.1 and 1117B.7.7.1 is the same, however the subsections of the latter enhance it by taking into consideration the tilt of the display screen. As such, the CBC provides greater access.	
1647	**707.7.2 Characters.** *Characters* displayed on the screen shall be in a sans serif font. *Characters* shall be 3/16 inch (4.8 mm) high minimum based on the uppercase letter "I". *Characters* shall contrast with their background with either light *characters* on a dark background or dark *characters* on a light background.		**1117B.7.7.2 Characters.** Characters displayed on the screen shall be in a sans serif font. Characters shall be 3/16 inch (4.8 mm) high minimum based on the uppercase letter "I". Characters shall contrast with their background with either light characters on a dark background or dark characters on a light background. **1117B.7.1.3** Where point-of-sale devices are provided, all devices at each location shall comply with Sections ... 1117B.7.7.2, ... Where a point-of-sale system is changed or modified to include a video touch screen or any other non-tactile keypad, all changed or modified point-of-sale devices at each location shall comply with Sections ... 1117B.7.7.2, ...	2010 CBC provides **greater access** than 2010 ADA.	The text of the standards is the same, however 1117B.7.7.2 also applies to point-of-sale machines; 707.7.2 does not. As such the CBC is stricter, and therefore it provides greater access.	
1648	**707.8 Braille Instructions.** Braille instructions for initiating the speech mode shall be provided. …		**1117B.7.8 Braille Instructions.** Braille instructions for initiating the speech mode shall be provided. ... **1117B.7.1.1** Where ATMs or fare machines are provided, they shall be provided in accordance with Section 1117B.7.1.1 for each type provided. **1117B.7.1.1.1 One ATM.** Where one ATM or fare machine is provided at a location, it shall comply with Sections 1117B.7.2 through 1117B.7.8. **1117B.7.1.1.2 Two ATMs.** Where two ATMs or fare machines are provided at a location, one shall comply with Sections 1117B.7.2 through 1117B.7.8 and one shall comply with Sections ... 1117B.7.8. **1117B.7.1.1.3 Three or more ATMs.** Where three or more ATMs or fare machines are provided at a location, at least 50 percent shall comply with Sections 1117B.7.2 through 1117B.7.8 and the rest shall comply with Sections ...1117B.7.8.	2010 CBC is **equivalent** to 2010 ADA.		
1649	**707.8 Braille Instructions.** ... Braille shall comply with 703.3.		**1117B.7.8 Braille Instructions.** ... Braille shall comply with Section 1117B.5.6.	2010 CBC is **equivalent** to 2010 ADA.		
1650	**708 Two-Way Communication Systems**		There is no equivalent heading in the CBC	NA		

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1651	**708.1 General.** Two-way communication systems shall comply with 708.		There is no equivalent heading in the CBC	NA		
1652	**Advisory 708.1 General.** Devices that do not require handsets are easier to use by people who have a limited reach.		Advisory only not part of regulation	NA		
1653	**708.2 Audible and Visual Indicators.** The system shall provide both audible and visual signals.		**1007.8.1 System requirements**. .... The two-way communication system shall include both audible and visible signals.	2010 CBC is **equivalent** to 2010 ADA.		
1654	**Advisory 708.2 Audible and Visual Indicators.** A light can be used to indicate visually that assistance is on the way. Signs indicating the meaning of visual signals should be provided.		Advisory only not part of regulation	NA		
1655	**708.3 Handsets.** Handset cords, if provided, shall be 29 inches (735 mm) long minimum.		**1116B.1.8 Car inside**. ... ... the handset cord shall be a minimum of 2 feet 5 inches in length. ...	2010 CBC is **equivalent** to 2010 ADA.	The ADA has a general statement regarding handset cord length. The CBC only references handset cord length with regards to elevators.	
1656	**708.4 Residential Dwelling Unit Communication Systems.** Communications systems between a *residential dwelling unit* and a *site* , *building* , or floor *entrance* shall comply with 708.4.		There is no equivalent regulation in the CBC	2010 CBC provides **less access** than 2010 ADA.		Include this regulation in the CBC
1657	**708.4.1 Common Use or Public Use System Interface.** The *common use* or *public use* system interface shall include the capability of supporting voice and TTY communication with the *residential dwelling unit* interface.		There is no equivalent regulation in the CBC	2010 CBC provides **less access** than 2010 ADA.		Include this regulation in the CBC
1658	**708.4.2 Residential Dwelling Unit Interface.** The *residential dwelling unit* system interface shall include a telephone jack capable of supporting voice and *TTY* communication with the *common use* or *public use* system interface.		There is no equivalent regulation in the CBC	2010 CBC provides **less access** than 2010 ADA.		Include this regulation in the CBC
1659	**CHAPTER 8: SPECIAL ROOMS, SPACES, AND ELEMENTS**		`	NA	Header	
1660	**801 General**		There is no equivalent heading in the CBC	NA	Header	
1661	**801.1 Scope.** The provisions of Chapter 8 shall apply where required by Chapter 2 or where referenced by a requirement in this document.		There is no equivalent text in the CBC	NA	CBC is not structured like the 2010 ADA Standards with scoping chapters and technical chapters so no similar language is required to clarify what is covered.	Develop scoping and technical chapters for CBC. Then a paragraph like this will be required.
1662	**Advisory 801.1 Scope.** Facilities covered by these requirements are also subject to the requirements of the other chapters. For example, 806 addresses guest rooms in transient lodging facilities while 902 contains the technical specifications for dining surfaces. If a transient lodging facility contains a restaurant, the restaurant must comply with requirements in other chapters such as those applicable to certain dining surfaces.		There is no equivalent text in the CBC	NA	CBC mixes scoping and technical requirements with overlapping and inconsistent language for what should be essentially the same requirements scattered throughout.	Follow the "say it once and say it right" approach adopted by the ADA Standards and all model building codes for greater consistency. Then a paragraph like this would be helpful.
1663	**802 Wheelchair Spaces, Companion Seats, and Designated Aisle Seats**		There is no equivalent heading in the CBC	NA		
1664	**802.1 Wheelchair Spaces.** Wheelchair *spaces* shall comply with 802.1.		There is no equivalent heading in the CBC	NA	This language is only necessary as a formality of code writing.	This type of language should be included if an ADA-like structure is adopted.
1665	**802.1 Wheelchair Spaces.** *Wheelchair spaces* shall comply with 802.1.		There is no equivalent heading in the CBC	NA	This language is only necessary as a formality of code writing.	This type of language needs to be included if an ADA-like structure is adopted for CBC.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1666	**802.1.1 Floor or Ground Surface.** The floor or ground surface of *wheelchair spaces* shall comply with 302. Changes in level are not permitted.		**1104B.3.4 #2 [Auditoriums+]** The ground or floor at spaces shall be level and shall comply with Section 1124B. **1104B.4.1 [Stadiums+] Spectator seating.** Spectator seating shall comply with Section 1104B.3. **1104B.6.2.1 [Sanctuary]** Wheelchair seating spaces in these areas shall conform to the requirements in Section 1104B.3.1. **1105B.3.5 #4.** Courtroom areas, including the judge's chambers and bench, counsel tables, jury box, witness stand and public seating area shall be made accessible. **1124B.1 General.** Ground and floor surfaces along accessible routes and in accessible rooms and spaces, including floors, walks, ramps, stairs and curb ramps, shall be stable, firm, slip resistant and shall comply with this section. **1124B.2 Changes in level.** Changes in level up to ¼ inch (6.4 mm) may be vertical and without edge treatment [see Figure 11B-5E(c)]. Changes in level between ¼ inch (6.4 mm) and ½ inch (12.7 mm) shall be beveled with a slope no greater than one unit vertical in 2 units horizontal (50-percent slope) [see Figure 11B-5E(d)]. Changes in level greater than ½ inch (12.7 mm) shall be accomplished by means of a curb ramp, ramp, elevator or platform lift that complies with Sections 1127B.5, 1133B.5, 1116B.1 or 1116B.2, respectively. **1124B.3 Carpet.** If carpet or carpet tile is used on a ground or floor surface, then it shall be securely attached; have a firm cushion, pad or backing or no cushion or pad; and have a level loop, textured loop, level-cut pile or level-cut/uncut pile texture. The maximum pile height shall be ½ inch (12.7 mm). See Figure 11B-7E(b). Exposed edges of carpet shall be fastened to floor surfaces and have trim along the entire length of the exposed edge. Carpet edge trim shall comply with Section 1124B.2. **1124B.4 Gratings.** If gratings are located in walking surfaces, then they shall have spaces no greater than ½ inch (12.7 mm) wide in one direction (see Figure 11B-7E). If gratings have elongated openings, then they shall be placed so that the long dimension is perpendicular to the	Which Std.provides greater access **depends** on circumstances.	Equivalency of changes in level that are allowed by 302 is based on ADA Advisory at 304.2. Wheelchair seating in courtrooms " shall be made accessible" but there is no section reference to say exactly what that requires.	Adopt a single place in the CBC that covers how to make floor or ground surfaces at wheelchair spaces accessible and referring back to that section at every location it is needed. **Allowing level changes within clear floor and ground space may put the CBC at odds with ADA.**
1667	**802.1.1 EXCEPTION:** Slopes not steeper than 1:48 shall be permitted.		**1124B.2 Changes in level.** Changes in level up to ¼ inch (6.4 mm) may be vertical and without edge treatment [see Figure 11B-5E(c)]. Changes in level between ¼ inch (6.4 mm) and ½ inch (12.7 mm) shall be beveled with a slope no greater than one unit vertical in 2 units horizontal (50-percent slope) [see Figure 11B-5E(d)]. Changes in level greater than ½ inch (12.7 mm) shall be accomplished by means of a curb ramp, ramp, elevator or platform lift that complies with Sections 1127B.5, 1133B.5, 1116B.1 or 1116B.2, respectively.	Which Std.provides greater access **depends** on circumstances.	CBC is generally stricter because it does not specifically allow shallow-sloped changes in level, however, because the courtroom seating accessibility requirements are not stated, they could be interpreted differently. Some slope is needed at all exterior wheelchair seating spaces to prevent ponding and subsequent icing in freezing weather.	Adopt a single place in the CBC that defines acceptable sloping surfaces at wheelchair spaces and referring back to that section at every location it is needed. **ADA would ow a Max slope of 1:48**
1668	**802.1.2 Width.** A single *wheelchair space* shall be 36 inches (915 mm) wide minimum. Where two adjacent *wheelchair spaces* are provided, each *wheelchair space* shall be 33 inches (840 mm) wide minimum.		**1104B.3.6 Size of wheelchair location.** Each wheelchair location shall provide minimum clear floor or ground space as shown in Figure 11B-15, ... **1104B.4.1 [Stadiums+] Spectator seating.** Spectator seating shall comply with Section 1104B.3. **1104B.6.2.1 [Sanctuary]** Wheelchair seating spaces in these areas shall conform to the requirements in Section 1104B.3.1.	2010 CBC provides **less access** than 2010 ADA.	The size of a single wheelchair space is not specified in CBC although they are being used throughout the state, especially in existing facilities where they are placed on an aisle where one wheelchair space cannot cross another. The single ADA space is wider than either of the two adjacent spaces in CBC.	Adopt the ADA size requirement for single wheelchair spaces. It might also be advisable to state, somewhere, if there is any minimum number or percentage of wheelchair spaces in new facilities that would have to be paired instead of allowing all single spaces.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1669	**802.1.3 Depth.** Where a *wheelchair space* can be entered from the front or rear, the *wheelchair space* shall be 48 inches (1220 mm) deep minimum. Where a *wheelchair space* can be entered only from the side, the *wheelchair space* shall be 60 inches (1525 mm) deep minimum.		**1104B.3.6 Size of wheelchair location.** Each wheelchair location shall provide minimum clear floor or ground space as shown in Figure 11B-15, ... **1104B.4.1 [Stadiums+] Spectator seating.** Spectator seating shall comply with Section 1104B.3. **1104B.6.2.1 [Sanctuary]** Wheelchair seating spaces in these areas shall conform to the requirements in Section 1104B.3.1.	2010 CBC is **equivalent** to 2010 ADA.	CBC relies on two figures with their labels to convey the depth requirement but it is the same as the ADA.	Create a written description of the requirement instead of relying on figures.
1670	**802.1.4 Approach.** *Wheelchair spaces* shall adjoin *accessible* routes. *Accessible* routes shall not overlap *wheelchair spaces*.		**1104B.3.6 ... wheelchair location.** Each wheelchair location shall provide minimum clear floor or ground space as shown in Figure 11B-15, and shall adjoin an egress aisle on at least one side. **1104B.4.1 [Stadiums+] Spectator seating.** Spectator seating shall comply with Section 1104B.3. **1104B.6.2.1 [Sanctuary]** Wheelchair seating spaces in these areas shall conform to the requirements in Section 1104B.3.1.	2010 CBC is **equivalent** to 2010 ADA.	CBC relies on two figures with their labels to convey the requirement that accessible routes/egress aisles serve each wheelchair space without overlapping but it is the same requirement as the ADA.	Create a written description of the requirement instead of relying on figures.
1671	**Advisory 802.1.4 Approach.** Because accessible routes serving wheelchair spaces are not permitted to overlap the clear floor space at wheelchair spaces, access to any wheelchair space cannot be through another wheelchair space.		NA	NA		Consider adding the Advisory note.
1672	**802.1.5 Overlap.** *Wheelchair spaces* shall not overlap *circulation paths*.		**1118B.4 Clear floor or ground space for wheelchairs. 1118B.4 #2 Relationship of maneuvering clearances to wheelchair spaces.** One full unobstructed side of the clear floor or ground space for a wheelchair shall adjoin or overlap an accessible route or adjoin another wheelchair clear floor space. If a clear floor space is located in an alcove or otherwise confined on all or a part of three sides, additional maneuvering clearances shall be provided as shown in Figure 11B-5A(b).	2010 CBC provides **less access** than 2010 ADA.	Although the question of overlapping of circulation paths and wheelchair spaces is not answered in the assembly seating section of CBC, this section does have language about overlapping and it allows it. This is either less restrictive or misleading.	Add language prohibiting the overlapping.
1673	**Advisory 802.1.5 Overlap.** The term “circulation paths” used in Section 802.1.5 means aisle width required by applicable building or life safety codes for the specific assembly occupancy. Where the circulation path provided is wider than the required aisle width, the wheelchair space may intrude into that portion of the circulation path that is provided in excess of the required aisle width.		NA	**NA**		Consider adding this very helpful Advisory note.
1674	**802.2 Lines of Sight.** Lines of sight to the screen, performance area, or playing field for spectators in *wheelchair spaces* shall comply with 802.2.		**1104B.3.5 Placement of wheelchair locations**. Wheelchair areas ... shall be arranged so as to provide persons with disabilities... lines of sight comparable to those for members of the general public. ... **Exceptions:** **1.** Accessible viewing positions where seating capacity is less than 300 may be clustered for bleachers, balconies and other areas having sight lines that require slopes of greater than one unit vertical in 20 units horizontal (5-percent slope). Equivalent accessible viewing positions may be located on levels having accessible egress.	2010 CBC provides **less access** than 2010 ADA.	The CBC requirement for comparable lines of sight is a performance specification. In my experience, it does not typically result in equivalent lines of sight for people with disabilities that the more prescriptive approach taken by the 2010 ADA Standards achieves. And it certainly does not guarantee the same lines of sight.	Adopt the ADA language for lines of sight.
1675	**802.2.1 Lines of Sight Over Seated Spectators.** Where spectators are expected to remain seated during events, spectators in *wheelchair spaces* shall be afforded lines of sight complying with 802.2.1.		**1104B.3.5 Placement of wheelchair locations**. Wheelchair areas ... shall be arranged so as to provide persons with disabilities ... lines of sight comparable to those for members of the general public.	2010 CBC provides **less access** than 2010 ADA.	The CBC requirement for comparable lines of sight is a performance specification. It does not guarantee the same lines of sight.	Adopt the ADA language for lines of sight. Also, anthropometric dimensions need to be given for wheelchair user eye locations in relation to the wheelchair seating spaces and for other spectators (both seated and standing) to allow designers to properly calculate these lines of sight.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1676	**802.2.1.1 Lines of Sight Over Heads.** Where spectators are provided lines of sight over the heads of spectators seated in the first row in front of their seats, spectators seated in *wheelchair spaces* shall be afforded lines of sight over the heads of seated spectators in the first row in front of *wheelchair spaces*.		**1104B.3.5 Placement of wheelchair locations**. Wheelchair areas ... shall be arranged so as to provide persons with disabilities ... lines of sight comparable to those for members of the general public.	2010 CBC provides **less access** than 2010 ADA.	The CBC requirement for comparable lines of sight is a performance specification. It does not guarantee the same lines of sight.	Adopt the ADA language for lines of sight.
1677	**802.2.1.2 Lines of Sight Between Heads.** Where spectators are provided lines of sight over the shoulders and between the heads of spectators seated in the first row in front of their seats, spectators seated in *wheelchair spaces* shall be afforded lines of sight over the shoulders and between the heads of seated spectators in the first row in front of *wheelchair spaces*.		**1104B.3.5 Placement of wheelchair locations**. Wheelchair areas ... shall be arranged so as to provide persons with disabilities ... lines of sight comparable to those for members of the general public.	2010 CBC provides **less access** than 2010 ADA.	The CBC requirement for comparable lines of sight is a performance specification. It does not guarantee the same lines of sight.	Adopt the ADA language for lines of sight.
1678	**802.2.2 Lines of Sight Over Standing Spectators.** Where spectators are expected to stand during events, spectators in *wheelchair spaces* shall be afforded lines of sight complying with 802.2.2.		**1104B.3.5 Placement of wheelchair locations**. Wheelchair areas ... shall be arranged so as to provide persons with disabilities ... lines of sight comparable to those for members of the general public.	2010 CBC provides **less access** than 2010 ADA.	The CBC requirement for comparable lines of sight is a performance specification. It does not guarantee the same lines of sight.	Adopt the ADA language for lines of sight. Also, anthropometric dimensions need to be given for wheelchair user eye locations in relation to the wheelchair seating spaces and for other spectators (both seated and standing) to allow designers to properly calculate these lines of sight.
1679	**802.2.2.1 Lines of Sight Over Heads.** Where standing spectators are provided lines of sight over the heads of spectators standing in the first row in front of their seats, spectators seated in *wheelchair spaces* shall be afforded lines of sight over the heads of standing spectators in the first row in front of *wheelchair spaces*.		**1104B.3.5 Placement of wheelchair locations**. Wheelchair areas ... shall be arranged so as to provide persons with disabilities ... lines of sight comparable to those for members of the general public.	2010 CBC provides **less access** than 2010 ADA.	The CBC requirement for comparable lines of sight is a performance specification. It does not guarantee the same lines of sight.	Adopt the ADA language for lines of sight.
1680	**802.2.2.2 Lines of Sight Between Heads.** Where standing spectators are provided lines of sight over the shoulders and between the heads of spectators standing in the first row in front of their seats, spectators seated in *wheelchair spaces* shall be afforded lines of sight over the shoulders and between the heads of standing spectators in the first row in front of *wheelchair spaces*.		**1104B.3.5 Placement of wheelchair locations**. Wheelchair areas ... shall be arranged so as to provide persons with disabilities ...lines of sight comparable to those for members of the general public.	2010 CBC provides **less access** than 2010 ADA.	The CBC requirement for comparable lines of sight is a performance specification. It does not guarantee the same lines of sight.	Adopt the ADA language for lines of sight.
1681	**802.3 Companion Seats.** Companion seats shall comply with 802.3.		**1104B.3.5 Placement of wheelchair locations**. ... At least one companion fixed seat shall be provided next to each wheelchair seating area. ... **Exceptions:** **1**... **2**. ... Each accessible seating area shall have provisions for companion seating ...	2010 CBC provides **less access** than 2010 ADA.	Although companion seats are required by CBC, there are no specific requirements for them, except that they be fixed. (See also comments on 802.3.2.)	Adopt ADA language for companion seats.
1682	**802.3.1 Alignment.** In row seating, companion seats shall be located to provide shoulder alignment with adjacent *wheelchair spaces*. The shoulder alignment point of the *wheelchair space* shall be measured 36 inches (915 mm) from the front of the wheelchair space. The floor surface of the companion seat shall be at the same elevation as the floor surface of the *wheelchair space*.		There is no CBC language related to shoulder alignment or floor surface heights of companion(s) and the wheelchair space.	2010 CBC provides **less access** than 2010 ADA.	Under CBC, wheelchair users' eyes will typically end up about 6" to 12" in front of their companions in fixed seats. This problem is compounded by the fact that many wheelchair users have more difficulty turning their heads backwards to talk to their companions than would others without mobility disabilities in the same situation.	Adopt ADA language for shoulder alignment and floor surface heights of companion(s) and the wheelchair space.
1683	**802.3.1 Alignment.** ...		NA	**NA**	NA	NA
1684	**802.3.2 Type.** Companion seats shall be equivalent in size, quality, comfort, and amenities to the seating in the immediate area. Companion seats shall be permitted to be movable.		There is no CBC language related to companion seat equivalency in size, quality, comfort, and amenities to the seating in the immediate area. …	2010 CBC provides **less access** than 2010 ADA.	Without this requirement, venues often provide simple metal folding chairs for companions when other seats in the area have wider, padded chairs with armrests and cupholders. These amenities can make a lot of difference in comfort, especially during long duration events.	Adopt ADA language for companion seat types.
1685	**802.3.2 Type.** Companion seats shall be equivalent in size, quality, comfort, and amenities to the seating in the immediate area. Companion seats shall be permitted to be movable.		… CBC requires companion seats to be fixed.	2010 CBC provides **less access** than 2010 ADA.	2010 ADA Standards dropped the fixed requirement for companion seats so that more flexibility could be provided when appropriate in wheelchair seating areas. While a movable seat might occasionally go missing, movable seats can offer more options for comfortable alignment with the performing area and companions and more options for groups of wheelchair users, larger wheelchairs and scooters, and extra companions.	Adopt ADA language to allow for movable companion seats.

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1686	**802.4 Designated Aisle Seats.** Designated aisle seats shall comply with 802.4.		**1104B.3.9 Designated aisle seats.** In addition to the wheelchair spaces required, 5 percent, but not less than one, of all fixed seats, shall be designated aisle seats with no armrests on the aisle side, or with removable or folding armrests on the aisle side. The designated aisle seats shall be those located closest to accessible routes. Each such seat shall be identified by a sign or marker with the International Symbol of Accessibility (see Figure 11B-6). Signage notifying patrons of the availability of such seats shall be posted at the ticket office. Signs and markers shall comply with Section 1117B.5.1 items 2 and 3, as applicable.	Which Std.provides greater access **depends** on circumstances.	CBC puts scoping and all requirements for these seats into one section. This section was recently changed to bring the CBC into equivalency with section 221.4 of the 2010 ADA Standards but the typographical error, "5%... of all fixed seats", makes it so much more stringent that it is often impossible to achieve. (See also 221.4.)	Adopt ADA language to correct the typo error which is analyzed in 221.4.
1687	**802.4.1 Armrests.** Where armrests are provided on the seating in the immediate area, folding or retractable armrests shall be provided on the aisle side of the seat.		(See 221.4.)	NA	(See 221.4.)	(See 221.4.)
1688	**802.4.1 Armrests.** Where armrests are provided on the seating in the immediate area, folding or retractable armrests shall be provided on the aisle side of the seat.		**1104B.3.9 Designated aisle seats.** ...designated aisle seats with no armrests on the aisle side, or with removable or folding armrests on the aisle side. …	2010 CBC provides **less access** than 2010 ADA.	Removable armrests are no longer allowed by the ADA. Now they must be folding or retractable. This assures that the armrests will not be removed and lost or permanently stored and therefore unavailable for people with disabilities who would like to use them like other people nearby.	Adopt ADA language.
1689	**802.4.2 Identification.** Each designated aisle seat shall be identified by a sign or marker.		**1104B.3.9 Designated aisle seats.** ... Each such seat shall be identified by a sign or marker with the International Symbol of Accessibility (see Figure 11B-6). Signage notifying patrons of the availability of such seats shall be posted at the ticket office. Signs and markers shall comply with Section 1117B.5.1 items 2 and 3, as applicable.	2010 CBC provides **greater access** than 2010 ADA.	The 2010 ADA dropped the requirement for signage at the box office which CBC retains. CBC designates the ISA on the aisle seat while the ADA simply says it "shall be identified by a "sign or marker."	
1690	**Advisory 802.4.2 Identification.** Seats with folding or retractable armrests are intended for use by individuals who have difficulty walking. Consider identifying such seats with signs that contrast (light-on-dark or dark-on-light) and that are also photo luminescent.		NA	**NA**		Consider adding the Advisory note.
1691	**803 Dressing, Fitting, and Locker Rooms**		***1117B.8 Fitting and dressing rooms.*** …	2010 CBC **does not address** 2010 ADA req.	CBC does not include locker rooms statement of rooms for male and female is redundant since it states for each gender as examples of type	Expand section to include locker rooms 2. Delete phrase '..for male and female customer,"
1692	**803.1 General.** Dressing, fitting, and locker rooms shall comply with 803.		***1117B.8 Fitting and dressing rooms***	2010 CBC **does not address** 2010 ADA req.	CBC does not include locker rooms	Expand section to include locker rooms
1693	**Advisory 803.1 General.** Partitions and doors should be designed to ensure people using accessible dressing and fitting rooms privacy equivalent to that afforded other users of the facility. Section 903.5 requires dressing room bench seats to be installed so that they are at the same height as a typical wheelchair seat, 17 inches (430 mm) to 19 inches (485 mm). However, wheelchair seats can be lower than dressing room benches for people of short stature or children using wheelchairs.		**NA**	NA		
1694	**803.2 Turning Space.** Turning *space* complying with 304 shall be provided within the room.		***1117B.8 Fitting and dressing rooms.*** ... . The minimum clear space within the room shall be 60 inches (1524 mm) in width and length. No door shall encroach into the required space.	2010 CBC provides **greater access** than 2010 ADA.	ADA allows a turning space of a 60" diameter or a 60" 'T'-shape - CBC seems to require it to be square. If the bench is 48" wide and a 36" clr flr space is required at the end, the dressing room is 7' wide by 5' deep clr of the bench which allows more than 30" x 48" beyond the door swing if it opens inwards	Adopt ADA language and criteria 2. Adopt ADA language but allow the door to infringe on the maneuvering space by 12" max. **ADA requires a 30" x 48" WC footprint beyond the swing of the door, then a 60" turning space.** 3. Adopt ADA language with 60" square amendment.

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1695	**803.3 Door Swing.** Doors shall not swing into the room unless a clear floor or ground *space* complying with 305.3 is provided beyond the arc of the door swing.		**1117B.8 Fitting and dressing rooms.** ... Entry doors shall conform to the requirements of Section 1133B.2 ... *The minimum clear space within the room shall be 60 inches (1524 mm) in width and length. No door shall encroach into the required space*	2010 CBC provides **greater access** than 2010 ADA.	ADA allows for a 30"x48" clr flr space beyond the door swing rather than a 60" x 60" beyond the door swing - CBC could necessitate a door opening outwards requiring more space or an extra large dressing room If the bench is 48" wide and a 36" clr flr space is required at the end, the dressing room is 7' wide by 5' deep clr of the bench which allows more than 30" x 48" beyond the door swing if it opens inwards	Adopt ADA language and criteria 2. Adopt ADA language but allow the door to infringe on the maneuvering space by 12" max. **ADA requires a 30" x 48" WC footprint beyond the swing of the door, then a 60" turning space.** 3. Adopt ADA language with 60" squar
1696	**803.3 Door Swing.** …		NA	NA		
1697	**803.3 Door Swing.** Doors shall not swing into the room unless a clear floor or ground *space* complying with 305.3 is provided beyond the arc of the door swing.		***1117B.8 Fitting and dressing rooms*** . ... *Entry doors shall conform to the requirements of Section 1133B.2* ... ... *The minimum clear space within the room shall be 60 inches (1524 mm) in width and length. No door shall encroach into the required space*	2010 CBC provides **greater access** than 2010 ADA.	ADA allows for a 30"x48" clr flr space beyond the door swing rather than a 60" x 60" beyond the door swing - CBC could necessitate a door opening outwards requiring more space or an extra large dressing room If the bench is 48" wide and a 36" clr flr space is required at the end, the dressing room is 7' wide by 5' deep clr of the bench which allows more than 30" x 48" beyond the door swing if it opens inwards	Adopt ADA language and criteria 2. Specify CBC sections 1133B.2.2 and 1133B.2.4 with an exception that Gates greater than 10" AFF can meet ADA requirements of swinging into the maneuvering space if there is 30" x 48" beyond
1698	**803.4 Benches.** A bench complying with 903 shall be provided within the room.		**1117B.8 Fitting and dressing rooms.** .... *Every accessible dressing room shall have a 24-inch by 48-inch (610 mm by 1219 mm) bench fixed to the wall along the longer dimension. The bench shall be mounted 17 to 19 inches (432 to 483 mm) above the finish floor. Clear floor space shall be provided alongside the bench to allow a person using a wheelchair to make a parallel transfer onto the bench. The structural strength of the bench and attachments shall comply with Section 1115B.7.2. Where installed in conjunction with showers, swimming pools or other wet locations, water shall not accumulate upon the surface of the bench and the bench shall have a slip-resistant surface.* ...	Which Std.provides greater access **depends** on circumstances.	Information about the bench should be pulled out and entered into a separate section The size of the bench - 2010 CBC provides more access than 2010 ADA; the seat back wall provides - ADA provides more options than the 2010 CBC; the remaining parameters are equivalent	Create new section for fixed benches for changing of clothes and adopt ADA language including the ability to use the wall instead of a seat back Adopt previous comment with revision about bench size to be 48" long 3. Adopt previous comments with revision about bench size to be 20" to 24" deep
1699	**803.4 Benches.** A bench complying with 903 shall be provided within the room.		NA	NA		
1700	**803.5 Coat Hooks and Shelves.** Coat hooks provided within the room shall be located within one of the reach ranges specified in 308. Shelves shall be 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor or ground.		***1117B.8 Fitting and dressing rooms.*** ... ... *Clothing hooks shall be located not greater than 48 inches (1219 mm) from the floor.* …	Which Std.provides greater access **depends** on circumstances.	ADA requires a coat hook to be within reach range - if the coat hook is above the bench or another seat it can only be 46" max AFF since ADA stipulates within reach range CBC does not address shelf ht except in a medicine cabinet	Revise to ADA language Keep language of 48" max but also do not allow coat hooks to be above the bench or other seating inside the room Create new section on shelving at 40" min to 48" max AFF Add - if clothing hooks or clothing rails exist to 4th paragraph

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1700			**1117B.8 Fitting and dressing rooms.** ... ... *The bottom of* ***mirrors*** *provided for use by persons with disabilities shall not be greater than 20 inches (508 mm) from the floor. Mirrors to be used by persons with disabilities shall be full length, measuring at least 18 inches (457 mm) wide by 54 inches (1372 mm) high, and shall be mounted in a position affording a view to a person on the bench as well as to a person in a standing position.* ... *The minimum clear space within the room shall be 60 inches (1524 mm) in width and length. No door shall encroach into the required space.*	Which Std.provides greater access **depends** on circumstances.	ADA does not specifically address mirrors in fitting/changing rooms except 213.3.5. 'Where mirrors are provided, at least one shall comply with 603.3' - 603.3 requires the bottom reflecting edge at 35" max AFF - CBC provides more access; top of the reflecting surface ADA suggests 74" - CBC it could possibly be only 54" AFF so ADA suggests more restrictive; ADA does not specify width & CBC states 18" min wide so CBC is more restrictive than ADA	1.Use ADA 35" max AFF and 74" min AFF to top and bottom of reflecting surface Use 20" Max AFF to bottom of reflecting surface and 74" min AFF to top of reflecting surface 3. Add 18" min wide for reflecting surface to either of the above options
1701	**804 Kitchens and Kitchenettes**		***1117B.3 Kitchens. See Section 1133A.*** ***SECTION 1133A KITCHENS***	2010 CBC provides **less access** than 2010 ADA.	"Kitchenette" not defined in 2010 ADA or the 2010 CBC. The term "kitchenette" is not used in Section 1133A of the 2010 CBC. "Kitchenette" is used only in Section 1111B.4.4 of the 2010 CBC, along with "wet bars units and similar amenities", and references the requirements of Section 1133A of the 2010 CBC.	1. Recommend using 2010 ADA's "Kitchens and Kitchenettes".
1702	**804.1 General.** Kitchens and kitchenettes shall comply with 804.		***1117B.3 Kitchens.*** *See Section 1133A.* ***...***	NA		1. Recommend including definitions of the terms "kitchens" (cooktop or conventional range/oven, refrigerator, and sink); "kitchenettes" (on one side only, with microwave, refrigerator, and sink, but not a cooktop or conventional range); and a wet bar (on one side only and provides a sink and an undercounter refrigerator). 2. Specify the requirements for each: Kitchens and kitchenettes as provided in 1133A; Wet bars, with parallel approach to the sink as provided in ADA 606.2 Exception 1.

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1702	**NA**		***1133A.1 General.*** *Kitchens shall be on an accessible route and shall comply with this section.*	2010 CBC provides **greater access** than 2010 ADA.	This section of the 2010 ADA does not mention the requirement for the kitchen to be on an accessible route. **ADA 201.1 requires all areas within new or altered buildings and facilities to comply. ADA 206.2.4 requires at least route to connect the entrance to tall accessible spaces and elements..** **1114B.1.2 Accessible route of travel.** When a building, or portion of a building, is required to be accessible or adaptable, an accessible route of travel complying with Sections 1102B, 1114B, 1124B, 1133B.3, 1133B.5, 1133B.7 and 1133B.8.6 shall be provided to all portions of the building, to accessible building entrances and between the building and the public way. All walks, halls, corridors, aisles, skywalks, tunnels, and other spaces that are part of an accessible route shall comply with the applicable provisions of this code. Except within an individual dwelling unit, an accessible route of travel shall not pass through kitchens, storage rooms, restrooms, closets or other spaces used for similar purposes. In residential occupancies, the following sections apply: **ADA 809.2.1 Location.** At least one accessible route shall connect all spaces and elements which are a part of the residential dwelling unit. Where only one accessible route is provided, it shall not pass through bathrooms, closets, or similar spaces. (Note: I am assuming the accessible route can pass through a "pass-through" kitchen.) **CBC 1119A.1 General.** When a building or portion of a building is required to be accessible or adaptable, an accessible route shall be provided to all portions of the building, accessible building entrances and to covered multifamily dwelling units. The accessible route shall, to the maximum extent feasible, coincide with the route for the general public and other building residents. Accessible routes shall not pass through kitchens, storage rooms, restrooms, closets or other spaces used for similar purposes except within an individual dwelling unit.	1. Chapter 11B should reference additional requirements for kitchens beyond a simple reference to Chapter 11A, such as a reference to 1114B.1.2 indicating that the accessible route shall not pass through kitchens.
1703	**804.2 Clearance.** Where a pass through kitchen is provided, clearances shall comply with 804.2.1. Where a U-shaped kitchen is provided, clearances shall comply with 804.2.2.		***1133A.2.1 Clear width.*** ... ***1133A.2.1 #1*** *U-shaped kitchens, designed with parallel approach at a range or cooktop located at the base of the U, shall have a minimum clear width of at least 60 inches (1524 mm). (See Figure 11A-10A).* ***1133A.2.1 #2*** *U-shaped kitchens, designed with a cooktop or sink located at the base of the U which provides a 30-inch-wide (762 mm) knee space to a height of 27 inches (686 mm) above the floor to allow for a forward approach, shall have a clear width of at least 48 inches (1219 mm). (See Figure 11A-10A).* ***1133A.2.1 #3*** *All other kitchen designs shall provide a minimum clear width of at least 48 inches (1219 mm). (See Figure 11A-10A).*	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC does not limit kitchen types with the all-inclusive "all other kitchen designs".	1. Recommend keeping terminology of "all other kitchen designs".
1704	**804.2 EXCEPTION:** Spaces that do not provide a cook top or conventional range shall not be required to comply with 804.2.			2010 CBC **does not address** 2010 ADA req.	The 2010 CBC does not differentiate as to whether the kitchen does not contain a cooktop or conventional range. The minimum clear width remains 48" which exceeds the 40" requirement in the 2010 ADA 804.2.	1. Recommend retaining a minimum clear width of 48" for all kitchens between counters. 2. If defined separately, specify a minimum clearance of 48" in front of kitchenettes and wet bars.

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1705	**Advisory 804.2 Clearance.** Clearances are measured from the furthest projecting face of all opposing base cabinets, counter tops, appliances, or walls, excluding hardware.		***1133A.2.1 Clear width.*** *Kitchens shall have a minimum clear width measured between any cabinet, countertop or the face of any appliance (excluding handles and controls) that projects into the kitchen and the opposing cabinet, countertop, appliance or wall as follows:* ***...***	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC defines the clear width within the body of the text. 2010 ADA defines the clear width with an advisory note.	
1706	**804.2.1 Pass Through Kitchen.** In pass through kitchens where counters, appliances or cabinets are on two opposing sides, or where counters, appliances or cabinets are opposite a parallel wall, clearance between all opposing base cabinets, counter tops, appliances, or walls within kitchen work areas shall be 40 inches (1015 mm) minimum. Pass through kitchens shall have two entries.		**See below**	**See below**	**See below**	**See below**
1707	**804.2.1 Pass Through Kitchen.** In pass through kitchens where counters, appliances or cabinets are on two opposing sides, or where counters, appliances or cabinets are opposite a parallel wall, clearance between all opposing base cabinets, counter tops, appliances, or walls within kitchen work areas shall be 40 inches (1015 mm) minimum. Pass through kitchens shall have two entries.		***1133A.2.1 #3*** *All other kitchen designs shall provide a minimum clear width of at least 48 inches (1219 mm). (See Figure 11A-10A).*	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC does not define a "pass through" kitchen, but instead uses "all other kitchen designs". The 2010 ADA's use of "pass through kitchens" implies that an accessible route can pass through a kitchen. There are sections in both documents do not allow an accessible route to pass through the kitchen, except in a residential dwelling unit.	1. Recommend retaining the use of "all other kitchen designs" because it is more inclusive.
1708	**804.2.2 U-Shaped.** In U-shaped kitchens enclosed on three contiguous sides, clearance between all opposing base cabinets, counter tops, appliances, or walls within kitchen work areas shall be 60 inches (1525 mm) minimum.		***1133A.2.1 #1*** *U-shaped kitchens, designed with parallel approach at a range or cooktop located at the base of the U, shall have a minimum clear width of at least 60 inches (1524 mm). (See Figure 11A-10A).* ***1133A.2.1 #2*** *U-shaped kitchens, designed with a cooktop or sink located at the base of the U which provides a 30-inch-wide (762 mm) knee space to a height of 27 inches (686 mm) above the floor to allow for a forward approach, shall have a clear width of at least 48 inches (1219 mm). (See Figure 11A-10A).*	2010 CBC provides **less access** than 2010 ADA.	2010 ADA provides greater access because it allows a complete turning radius of 60" in all U-shaped kitchens.	1. Recommend 2010 ADA's use of 60" in all U-shaped kitchen designs.
1709	**804.3 Kitchen Work Surface.** In *residential dwelling units* required to comply with 809, at least one 30 inches (760 mm) wide minimum section of counter shall provide a kitchen work surface that complies with 804.3.		***1133A.4 Countertops.*** *Kitchen countertops shall comply with this section and shall be provided with the following (see Section 1133A.4.1 for repositionable countertop requirements)* *...* *1133A.4 #2 A minimum linear length of 30 inches (762 mm) of countertop shall be provided for a work surface.* *...* *1133A.4 Exception: Two 15-inch (381 mm) minimum width breadboards may be provided in lieu of the required 30 inches (762 mm) of countertop work surface.*	2010 CBC provides **less access** than 2010 ADA.	This requirement applies only to "residential dwelling units" in the 2010 ADA, and does not provide for the use of breadboards in lieu of the required 30" countertop work surface.	1. Recommend deleting the exception in the 2010 CBC that allows the use of breadboards for a 30" work surface. 2. Recommend including the provision that the height of the kitchen counters, except for the 30" section of work surface and the 30" section for the sink, do not have a maximum height requirement. Too many jurisdictions are under the impression that all counters in accessible/adaptable units must be at a 34" maximum height.
1710	**804.3.1 Clear Floor or Ground Space.** A clear floor *space* complying with 305 positioned for a forward approach shall be provided. The clear floor or ground *space* shall be centered on the kitchen work surface and shall provide knee and toe clearance complying with 306.		***1133A.4.1 #2*** *Base cabinets directly under the kitchen sink and work surface shall be removable to provide clearance for a wheelchair.*	2010 CBC provides **less access** than 2010 ADA.	The referenced 2010 CBC section for the work surface falls under the requirements of repositionable countertops, which only applies to 5% of the covered multifamily dwellings, a number less stringent than the 2010 ADA requirement for 5% of units. The requirement for the knee and toe clearance does not otherwise apply to the 30" work surface area and it is assumed in the 2010 CBC that a parallel approach is acceptable for the 30" work surface area.	1. Recommend including the knee and toe clearance to the 30" work surface area in all residential dwelling unit kitchens.

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1711	**804.3.1 EXCEPTION:** Cabinetry shall be permitted under the kitchen work surface provided that all of the following conditions are met: (a) the cabinetry can be removed without removal or replacement of the kitchen work surface; (b) the finish floor extends under the cabinetry; and (c) the walls behind and surrounding the cabinetry are finished.		***1133A.3 Removable base cabinets.*** *Base cabinets directly under the kitchen sink counter area, including toeboard and shelving, shall be removable without the use of specialized tools or specialized knowledge in order to provide clearance for a wheelchair. The finish floor beneath the kitchen sink counter area shall be extended to the wall.*	Which Std.provides greater access **depends** on circumstances.	The provision for removable base cabinets exists only at the kitchen sink area in the 2010 CBC. There is no provision for the removable base cabinet at the 30" work surface area, except under Seciton 1133A.4.1 Repsitionable Countertops, which applies to only 5% of the covered multifamily dwellings, a number less stringent than the 2010 ADA's requirement for 5% of units. The ADA requires the cabinetry to be removed without removal or replacement of the kitchen work surface, where the 2010 CBC requires the base cabinetry to be removable "without the use of specialized tools or specialized knowledge" (makes no mention of the removal of the kitchen work surface). The 2010 ADA requires the finish floor to extend under the cabinetry (no specified length), while the 2010 ADA requires the finish floor to be extended to the wall. The ADA standard requires the walls behind and surrounding the cabinetry to be finished, where the 2010 CBC does not require the walls to be finished.	1. Recommend including the knee and toe clearance to the 30" work surface area in all kitchens with the following cabinetry provisions: (a) the cabinetry can be removed without removal or replacement of the kitchen work surface; (b) he finish floor beneath the kitchen sink counter area shall be extended to the wall; (c) the walls behind and surrounding the cabinetry are finished. 2. The term "without the use of specialized tools or specialized knowledge" is too vague.
1712	**804.3.2 Height.** The kitchen work surface shall be 34 inches (865 mm) maximum above the finish floor or ground.			2010 CBC provides **less access** than 2010 ADA.	The maximum height of the 30" section of kitchen work surface in residential dwelling units is not specified in the 2010 CBC. The referenced 2010 CBC section for the height of the work surface falls under the requirements of repositionable countertops (1133A.4.1 #2), which only applies to 5% of the covered multifamily dwellings, a number less stringent than the 2010 ADA.	1. Specify the maximum height of the 30" work surface in residential dwelling units at 34".
1713	**804.3.2 EXCEPTION:** A counter that is adjustable to provide a kitchen work surface at variable heights, 29 inches (735 mm) minimum and 36 inches (915 mm) maximum, shall be permitted.		***1133A.4.1 Repositionable countertops.*** *Repositionable countertops shall be provided in a minimum of 5 percent of the covered multifamily dwelling units. Repositionable countertops shall comply with the following:* ***1133A.4.1 #1.*** *The kitchen sink and work surface space required by Section 1133A.4 shall be designed to enable repositioning to a minimum height of 28 inches (711 mm)* ***...*** ***1133A.4.1, Exc.1*** *Stone, cultured stone and tiled countertops may be used without meeting the repositioning requirements.* ***...***	Which Std.provides greater access **depends** on circumstances.	There is no provision for the maximum height in the 2010 CBC, and the 2010 CBC has a lower minimum height of 28" in contrast to the 2010 ADA's height of 29". The 2010 ADA does not make exceptions for stone, cultured stone, and tiled countertops.	1. Retain the minimum height of 28" for the repositionable counter. 2. Remove the exception for stone, cultured stone, and tiled countertops.
1714	**804.3.3 Exposed Surfaces.** There shall be no sharp or abrasive surfaces under the work surface counters.			2010 CBC **does not address** 2010 ADA req.	The provision for no sharp or abrasive surfaces under counters applies only to sinks in the 2010 CBC. See CBC Section 1117B.9.2.	1. Include this requirement in the 2010 CBC.
1714.1	**28 CFR 36.406(e)(1)** (1) Kitchens within housing units containing accessible sleeping rooms with mobility features (including suites and clustered sleeping rooms) or on floors containing accessible sleeping rooms with mobility features shall provide turning spaces that comply with section 809.2.2 of the 2010 Standards and kitchen work surfaces that comply with section 804.3 of the 2010 Standards.					

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1715	**804.4 Sinks.** Sinks shall comply with 606.		***1133A.2.2.*** *A clear floor space at least 30 inches (762 mm) by 48 inches (1219 mm) that allows either a parallel or forward approach shall be provided at the kitchen sink ...* ***1133A.2.3.*** *The centerline of the 30-inch (762 mm) by 48-inch (1219 mm) clear floor space provided for parallel or forward approach shall be aligned with the centerline of ... fixture. (See Figure 11A-10A).* ***1133A.4.1.*** *A minimum linear length of 30 inches (762 mm) of countertop shall be provided for the kitchen sink installation.* ***1133A.4.3.*** *The sink and work surface may be a single integral unit a minimum of 60 inches (1524 mm) in length, or be separate components.* ***1117B.9*** *Accessible sinks. Sinks required to be accessible shall comply with this subsection.* ***1117B.9.1.*** *A clear floor space at least 30 inches by 48 inches (762 mm by 1219 mm) complying with Section 1118B.4 shall be provided in front of a sink to allow forward approach. The clear floor space shall be on an accessible route and shall extend a maximum of 19 inches (485 mm) underneath the sink (see Figure 11B-1D).* ***1117B.9.2.*** *Each accessible sink shall be a maximum of 6½ inches (165 mm) deep. Sinks shall be mounted with the counter or rim no higher than 34 inches (865 mm) above the finish floor. Knee clearance that is at least 27 inches (685 mm) high, 30 inches (762 mm) wide and 19 inches (485 mm) deep shall be provided underneath sinks. Hot water and drain pipes exposed under sinks shall be insulated or otherwise configured so as to protect against contact. There shall be no sharp or abrasive surfaces under sinks.* ***1117B.9.3.*** *Faucet controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be not greater than 5 lbf (22.2 N). Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs. Self-closing valves are allowed if the faucet remains open for at least 10 seconds*	NA	The requirements for sinks in the 2010 CBC falls in different sections: 1133A for Kitchens and 1117B.9 for Accessible Sinks in public facilities/commercial facilities.	1. *Chapter 11B Kitchens* should reference *Section 1117B.9* to illustrate the requirements for accessible sinks in public facitilites/commercial facilties.
1716	**804.5 Storage.** At least 50 percent of shelf space in storage *facilities* shall comply with 811.		***1133A.5 Lower shelving.*** *Lower shelving and/or drawer space shall be provided in the kitchen at a height of no more than 48 inches (1219 mm) above the floor.*	2010 CBC provides **less access** than 2010 ADA.	2010 ADA specifies a certain amount of shelf space that is required to comply (50%). The 2010 CBC does not specify a required percentage of shelving required to be accessible.	1. Recommend specifying the 50% of shelf and/or drawer space shall be provided at a height of no more than 48" above the floor.
1717	**804.6 Appliances.** Where provided, kitchen appliances shall comply with 804.6.			Which Std.provides greater access **depends** on circumstances.	2010 CBC makes reference to accessibility of appliances in Section 1133A.2 Clear floor space, but not other requirements covered by 804.6 as described below.	1. Recommend including a separate section for each appliance as in the 2010 ADA.

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1718	**804.6.1 Clear Floor or Ground Space.** A clear floor or ground *space* complying with 305 shall be provided at each kitchen appliance. Clear floor or ground *spaces* shall be permitted to overlap.		***1133A.2 Clear floor space.*** *Clear floor space at kitchens shall comply with the following:* ***1133A.2.1.*** *A clear floor space at least 30 inches (762 mm) by 48 inches (1219 mm) that allows a parallel approach by a person in a wheelchair shall be provided at the range or cooktop* ***1133A.2.2.*** *A clear floor space at least 30 inches (762 mm) by 48 inches (1219 mm) that allows either a parallel or forward approach shall be provided at ... all other fixtures or appliances including the oven, dishwasher, refrigerator/freezer and trash compactor* ***1133A.2.3.*** *The centerline of the 30-inch (762 mm) by 48-inch (1219 mm) clear floor space provided for parallel or forward approach shall be aligned with the centerline of the appliance ... (See Figure 11A-10A).*	Which Std.provides greater access **depends** on circumstances.	The 2010 CBC makes no mention of overlap of clear floor spaces, but it does not prohibit overlap. The 2010 CBC is more stringent in that the clear floor space is required to be aligned with the centerline of the appliance or fixture. (ADA Section 305 does not mention clear space to be aligned with the centerline of the appliance or fixture.)	1. ADA Language does not specify which appliances are covered by "each kitchen appliance." Recommend clarifying in CBC but be careful not to be less inclusive than DOJ's interpretation of the ADA's language.
1719	**804.6.2 Operable Parts.** All appliance controls shall comply with 309.			2010 CBC **does not address** 2010 ADA req.	2010 CBC addresses appliance controls in Section 1136A,2 Exception for dwelling unit kitchens. This exception does not make appliance controls comply with the reach ranges specified in ADA Section 804.6.2	1. Recommend including the requirements for ADA Section 804.6.2 in the 2010 CBC.
1719			***1133A.6 Kitchen sink faucet controls.*** *Faucet controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist.* *The force required to activate controls shall be no greater than 5 pound force (22.2N). Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs. Self-closing valves are allowed if the faucet remains open for at least 10 seconds*	2010 CBC is **equivalent** to 2010 ADA.	2010 ADA addresses this requirement in the ADA Section 606 Sinks by reference to ADA Section 309 Operable Parts.	
1720	**804.6.2 EXCEPTIONS: 1.** Appliance doors and door latching devices shall not be required to comply with 309.4. **2.** Bottom-hinged appliance doors, when in the open position, shall not be required to comply with 309.3.			2010 CBC **does not address** 2010 ADA req.		1. Recommend including the exception along with Section 804.6.2.
1721	**804.6.3 Dishwasher.** Clear floor or ground *space* shall be positioned adjacent to the dishwasher door. The dishwasher door, in the open position, shall not obstruct the clear floor or ground *space* for the dishwasher or the sink.		**1133A.2.2.** A clear floor space at least 30 inches (762 mm) by 48 inches (1219 mm) that allows either a parallel or forward approach shall be provided at the ..., dishwasher, ... **1133A.2.3.** The centerline of the 30-inch (762 mm) by 48-inch (1219 mm) clear floor space provided for parallel or forward approach shall be aligned with the centerline of the appliance ... (See Figure 11A-10A).	2010 CBC provides **less access** than 2010 ADA.	While the 2010 CBC requires a clear floor space to the dishwasher, it does not specify clearances for the dishwasher door in the open position.	1. Recommend including the requirement as specified in 804.6.3.
1722	**804.6.4 Range or Cooktop.** Where a forward approach is provided, the clear floor or ground *space* shall provide knee and toe clearance complying with 306. Where knee and toe space is provided, the underside of the range or cooktop shall be insulated or otherwise configured to prevent burns, abrasions, or electrical shock. The location of controls shall not require reaching across burners.		**1133A.2.1.** A clear floor space at least 30 inches (762 mm) by 48 inches (1219 mm) that allows a parallel approach by a person in a wheelchair shall be provided at the range or cooktop. **1133A.2.3.** The centerline of the 30-inch (762 mm) by 48-inch (1219 mm) clear floor space provided for parallel or forward approach shall be aligned with the centerline of the appliance ... (See Figure 11A-10A).	2010 CBC provides **less access** than 2010 ADA.	The 2010 ADA permits a forward or parallel approach to a range or cooktop. The 2010 CBC permits only a parallel approach. The 2010 ADA provides more access in that a forward approach requires additional measures (See ADA Section 804.6.4).	1. Recommend including the provisions for a forward approach to the range or cooktop as specified in ADA 804.6.4.
1723	**804.6.5 Oven.** Ovens shall comply with 804.6.5.			NA		1. Recommend including ADA Section 804.6.5 in the 2010 CBC.

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1724	**804.6.5.1 Side-Hinged Door Ovens.** Side-hinged door ovens shall have the work surface required by 804.3 positioned adjacent to the latch side of the oven door.			2010 CBC **does not address** 2010 ADA req.	With this provision, the 2010 ADA states that the required 30" work surface be located adjacent to the oven. The 2010 CBC does not make a distinction as to the location of the 30" work surface in the kitchen. There is merit and greater accessibility in requiring a minimum section of counter space adjacent to the oven, so that an individual does not have to carry a hot plate for a considerable distance.	1. Recommend that if the required 30" section of work surface is located adjacent to the oven only one 30" work surface is required. If the required 30" section of work surface is not located adjacent to the oven, then an additional section of counter space adjacent to the oven (minimum 24" width) shall be provided.
1725	**804.6.5.2 Bottom-Hinged Door Ovens.** Bottom-hinged door ovens shall have the work surface required by 804.3 positioned adjacent to one side of the door			2010 CBC **does not address** 2010 ADA req.	With this provision, the 2010 ADA states that the required 30" work surface be located adjacent to the oven. The 2010 CBC does not make a distinction as to the location of the 30" work surface in the kitchen. There is merit and greater accessibility in requiring a minimum section of counter space adjacent to the oven, so that an individual does not have to carry a hot plate for a considerable distance	1. Recommend that if the required 30" section of work surface is located adjacent to the oven only one 30" work surface is required. If the required 30" section of work surface is not located adjacent to the oven, then an additional section of counter space adjacent to the oven (minimum 24" width) shall be provided.
1726	**804.6.5.3 Controls.** Ovens shall have controls on front panels.			2010 CBC **does not address** 2010 ADA req.	2010 CBC addresses appliance controls in *Section 1136A.2 Exception* for dwelling unit kitchens. This exception does not make appliance controls comply with the reach ranges specified in ADA Section 804.6.2. Requiring oven controls on front panels provides greater accessibility so that an individual does not have to reach over the cooktop in an cooktop/oven combination unit.	1. Recommend including the requirement for ovens to have controls on front panels.
1727	**804.6.6 Refrigerator/Freezer.** Combination refrigerators and freezers shall have at least 50 percent of the freezer *space* 54 inches (1370 mm) maximum above the finish floor or ground. The clear floor or ground *space* shall be positioned for a parallel approach to the *space* dedicated to a refrigerator/freezer with the centerline of the clear floor or ground *space* offset 24 inches (610 mm) maximum from the centerline of the dedicated *space* .		**1133A.2.2.** A clear floor space at least 30 inches (762 mm) by 48 inches (1219 mm) that allows either a parallel or forward approach shall be provided at the ... refrigerator/freezer ... **1133A.2.3.** The centerline of the 30-inch (762 mm) by 48-inch (1219 mm) clear floor space provided for parallel or forward approach shall be aligned with the centerline of the appliance ... (See Figure 11A-10A).	Which Std.provides greater access **depends** on circumstances.	The 2010 CBC does not specify the location height or minimum percentage of freezer space from the finish floor. The 2010 CBC specifies the clear floor space to be on the centerline of the refrigerator, while the 2010 ADA specifies a 24" offset for the clear floor space. The CBC allows a forward approach to the appliance which the ADA does not.	1. Recommend including the offset for the clear floor space requirements in the 2010 CBC.
1727.1			**1133A.2.2.** A clear floor space at least 30 inches (762 mm) by 48 inches (1219 mm) that allows either a parallel or forward approach shall be provided at ... all other fixtures or appliances... and trash compactor **1133A.2.3.** The centerline of the 30-inch (762 mm) by 48-inch (1219 mm) clear floor space provided for parallel or forward approach shall be aligned with the centerline of the appliance or fixture. (See Figure 11A-10A).	Which Std.provides greater access **depends** on circumstances.	The 2010 CBC includes more appliance types ("all other" and "trash compactor") than the 2010 ADA. However, which types of appliances are actually included under CBC is not clear.	1. Recommend clarifying what "all other appliances" means (is it limited to those listed or does it include, for example, coffee makers, microwave ovens, garbage disposals, blenders, etc.) and splitting the CBC requirements into separate ones for each type of appliance and adopting the ADA language where applicable.
1728	**805 Medical Care and Long-Term Care Facilities**		There is no equivalent heading in the CBC	NA		
1729	**805.1 General.** Medical care *facility* and long-term care *facility* patient or resident sleeping rooms required to provide mobility features shall comply with 805.		**1109B.3 Patient bedrooms and toilet rooms.** Patient bedrooms and associated toilet facilities shall be made accessible as follows:	2010 CBC is **equivalent** to 2010 ADA.		
1730	**805.1 General.** Medical care *facility* and long-term care *facility* patient or resident sleeping rooms required to provide mobility features shall comply with 805.		**1109B.3 Patient bedrooms and toilet rooms.** Patient bedrooms and associated toilet facilities shall be made accessible as follows:	2010 CBC is **equivalent** to 2010 ADA.		
1731	**805.2 Turning Space.** Turning *space* complying with 304 shall be provided within the room.		**1109B.4 Patient bedroom areas.** Accessible patient bedrooms shall comply with the following requirements: 1109B.4 #1. Each bedroom shall have a turning space measuring 60 inches (1524 mm) clear in diameter, or that is a T-shaped space complying with Figure 11B-12. In rooms with two beds, it is preferable that this space be located between beds. ...	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC prefers that turning space be provided between beds in rooms where two beds are provided	

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1732	**805.3 Clear Floor or Ground Space.** ...		**1109B.4 Patient bedroom areas.** Accessible patient bedrooms shall comply with the following requirements: ... 1109B.4 #3. Each bedroom shall have an accessible door that complies with Section 1133B.2.	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC does not allow the exception regarding latch side maneuvering clearance at the entry doors to hospital patient rooms as found in 404.2.4.clearance beyond the latch side of the door.	
1733	**805.3 Clear Floor or Ground Space.** A clear floor *space* complying with 305 shall be provided on each side of the bed. The clear floor *space* shall be positioned for parallel approach to the side of the bed.		**1109B.4 Patient bedroom areas**. Accessible patient bedrooms shall comply with the following requirements: ... 1109B.4 #2. Each bedroom shall have a minimum clear floor space of 36 inches (914 mm) along each side of the bed, and shall provide an accessible route to each side of the bed. ...	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC requires more space (36") along each side of the bed than 2010 ADA, which requires only a single clear floor space at 30" wide unless it is an alcove situation, which would call for 36" of width.	
1734	**805.4 Toilet and Bathing Rooms.** Toilet and bathing rooms that are provided as part of a patient or resident sleeping room shall comply with 603. Where provided, no fewer than one water closet, one lavatory, and one bathtub or shower shall comply with the applicable requirements of 603 through 610.		1109B.5 Patient toilet rooms and bathing facilities. Patient toilet rooms and bathing facilities required to be accessible shall comply with Section 1115B.	2010 CBC is **equivalent** to 2010 ADA.		
1734.1			1109B.6 Diagnostic and treatment areas. Diagnostic and treatment areas and, where applicable, at least one dressing room, sanitary facility, etc., for each unit or suite shall be made accessible.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC specifies that diagnostic and treatment areas be accessible. 2010 ADA covers these requirements in scoping sections 201, 213, 222, 223, etc.	
1734.2			1109B.7 Waiting areas, offices and sanitary facilities. Waiting areas, offices and sanitary facilities serving them shall be made accessible as covered in other portions of these standards.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC specifies that waiting areas, offices, and sanitary facilities be accessible. 2010 ADA covers these requirements in scoping sections 201, 213, etc.	
1734.3			1109B.8 Offices and suites. In buildings that house offices and suites of physicians, dentists, etc., all such offices or suites shall be made accessible, subject to other provisions of these regulations.	2010 CBC is **equivalent** to 2010 ADA.	2010 CBC specifies that offices and suites be accessible. 2010 ADA covers these requirements in scoping sections 201, 213, etc.	
1735	**806 Transient Lodging Guest Rooms**		There is no equivalent heading in the CBC	NA		
1736	**806 Transient Lodging Guest Rooms**		There is no equivalent heading in the CBC	NA		
1737	**806 Transient Lodging Guest Rooms** **106.5 Transient Lodging.** ... Transient lodging does not include ... private buildings or facilities that contain not more than five rooms for rent or hire and that are actually occupied by the proprietor as the residence of such proprietor. (See also 36.104, 36.406(c), 36.406(e), and 35.151(f).)		**1111B.4 Hotels, motels, inns, dormitories, resorts, homeless shelters, halfway houses, transient group homes and similar places of transient lodging.** Hotels, motels, inns, dormitories, resorts, homeless shelters, halfway houses, transient group homes and similar places of transient lodging shall provide access for persons with disabilities in accordance with the provisions of the accessibility requirements of this California Building Code, except as herein provided. Facilities with multibed rooms or spaces shall comply with Sections 1111B.4.2 and 1111B.4.3.	Which Std.provides greater access **depends** on circumstances.	Where the 2010 CBC defines what **is** considered transient lodging, the 2010 ADA specifies what **is not** considered transient lodging. [See additional requirements for places of lodging at 28 CFR 36.406(c), p. 28. and for housing at a place of education at 28 CFR 35.151(f), p. 11, and 28 CFR 36.406(e), p. 29.]	1. Recommend keeping the 2010 CBC section that specifies what transient lodging is, as opposed to what it does not include. **Since there has been considerable confusion about what is and is not covered, why not include both the ADA version and the CBC version.**
1738	**806. Transient Lodging Guest Rooms**		The CBC heading is embedded in the technical specification section. (See row 1737 above.)	NA	NA	NA
1738			Occupancies which are not homeless shelters but are being altered to provide shelter accommodations shall meet the requirements of this section.	2010 CBC provides **greater access** than 2010 ADA.	ADA does not address occupancies which are altered to provide shelter accommodations. **The ADA covers transit lodging and shelters that do not provide long term care. Most shelters would be covered by the ADA.**	
1738			***1111B.4.1 Available range of accommodations*** . *Accessible guest rooms or suites shall be dispersed among the various classes of sleeping accommodations to provide a range of options applicable to room sizes, costs, amenities provided and the number of beds provided.*	2010 CBC is **equivalent** to 2010 ADA.	2010 ADA states dispersion requirements in Section 224.5 Dispersion.	

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1739	**806.1 General.** *Transient lodging* guest rooms shall comply with 806. Guest rooms required to provide mobility features shall comply with 806.2. Guest rooms required to provide communication features shall comply with 806.3.		**1111B.4.2 Guest rooms and suites.** Places of transient lodging shall incorporate the accessibility requirements of this code as modified by this chapter in at least one guest room or dormitory room together with their sanitary facilities as required in Table 11B-3. All accessible sleeping rooms or suites required by Table 11B-3 shall comply with the requirements of Section 1111B.4.5 for hearing impaired guests.	Which Std.provides greater access **depends** on circumstances.	Analysis of the number of guest rooms can be found in the Scoping section of the 2010 ADA under Section 224.	
1740	**806.2 Guest Rooms with Mobility Features.** Guest rooms required to provide mobility features shall comply with 806.2.		**1111B.4.2.1 Spaces.** Where provided as part of an accessible unit, sleeping room or suite, the following spaces shall be accessible and shall be on an accessible route complying with Section 1114B.1.2: **...**	2010 CBC is **equivalent** to 2010 ADA.		
1741	**Advisory 806.2 Guest Rooms.** The requirements in Section 806.2 do not include requirements that are common to all accessible spaces. For example, closets in guest rooms must comply with the applicable provisions for storage specified in scoping.		**1111B.4.7 Storage areas**. Fixed or built-in storage facilities located within accessible sleeping rooms or suites required by Table 11B-3 shall be accessible in the number and dimensions provided in Section 1125B. …	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC provides the requirement for accessible storage areas in the body of the text.	
1742	**806.2.1 Living and Dining Areas.** Living and dining areas shall be *accessible* .		1111B.4.2.1 Spaces. Where provided as part of an accessible unit, sleeping room or suite, the following spaces shall be accessible and shall be on an accessible route complying with Section 1114B.1.2: 1111B.4.2.1 #1. The living area; 1111B.4.2.1 #2. The dining area; ...	2010 CBC is **equivalent** to 2010 ADA.		
1743	**806.2.2 Exterior Spaces.** Exterior spaces, including patios, terraces and balconies, that serve the guest room shall be *accessible* .		See line 1744 below.	NA	See line 1744 below.	
1744	**806.2.2 Exterior Spaces.** Exterior spaces, including patios, terraces and balconies, that serve the guest room shall be accessible.		**1111B.4.2.1 Spaces.** Where provided as part of an accessible unit, sleeping room or suite, the following spaces shall be accessible and shall be on an accessible route complying with Section 1114B.1.2: ... **1111B.4.2.1 #4** Patios, terraces or balconies; ...	2010 CBC is **equivalent** to 2010 ADA.		
1745	**806.2.3 Sleeping Areas.** At least one sleeping area shall provide a clear floor *space* complying with 305 on both sides of a bed. The clear floor *space* shall be positioned for parallel approach to the side of the bed.		1111B.4.2.1 Spaces. Where provided as part of an accessible unit, sleeping room or suite, the following spaces shall be accessible and shall be on an accessible route complying with Section 1114B.1.2: ... 1111B.4.2.1 #3 At least one sleeping area; ... **1111B.4.3 Access to beds.** Accessible sleeping rooms shall have a 36-inch (914 mm) clear width maneuvering space located along both sides of a bed, except that where two beds are provided, this requirement can be met by providing a 36-inch-wide (914 mm) maneuvering space located between the beds. In addition, there shall be a clear space under the bed for the use of a personal lift device. The clear space shall be on a long side of the bed adjacent to an accessible aisle. The clear space shall extend horizontally to points not more than 12 inches (305 mm) from each end of the bed, vertically not less than 7 inches (178 mm), and not less than 30 inches (762 mm) deep.	2010 CBC provides **greater access** than 2010 ADA.	2010 ADA does not have provision for the requirement of a clear space under the bed for a personal lift device.	

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1746	**806.2.3 EXCEPTION:** Where a single clear floor *space* complying with 305 positioned for parallel approach is provided between two beds, a clear floor or ground *space* shall not be required on both sides of a bed.		**1111B.4.3 Access to beds.** Accessible sleeping rooms shall have a 36-inch (914 mm) clear width maneuvering space located along both sides of a bed, except that where two beds are provided, this requirement can be met by providing a 36-inch-wide (914 mm) maneuvering space located between the beds. ...	2010 CBC is **equivalent** to 2010 ADA.		
1747	**806.2.4 Toilet and Bathing Facilities.** At least one bathroom that is provided as part of a guest room shall comply with 603. No fewer than one water closet, one lavatory, and one bathtub or shower shall comply with applicable requirements of 603 through 610. In addition, required roll-in shower compartments shall comply with 608.2.2 or 608.2.3. Toilet and bathing fixtures required to comply with 603 through 610 shall be permitted to be located in more than one toilet or bathing area, provided that travel between fixtures does not require travel between other parts of the guest room.		**1111B.4.2.1 Spaces.** Where provided as part of an accessible unit, sleeping room or suite, the following spaces shall be accessible and shall be on an accessible route complying with Section 1114B.1.2: **...** **1111B.4.2.1 #5** Where full bathrooms are provided, at least one full bathroom (that is, one with a water closet, a lavatory and a bathtub or shower); **1111B.4.2.1 #6** Where only half baths are provided, at least one half bath; **...** **1111B.4.6 Bathrooms in hotels, motels, inns, dormitories, resorts, homeless shelters, halfway houses, transient group homes and similar places of transient lodging.** Required accessible bathrooms for places of transient lodging shall comply with the following provisions: **1111B.4.6 #1. Doors**. Doors to accessible bathrooms shall comply with Section 1133B.2. Doors shall not swing into the floor space required for any fixture. **1111B.4.6 #2. Clear floor space.** All fixtures and controls shall be on an accessible route. There must be within the bathroom a clear floor space measuring 30 inches by 60 inches (762 mm by 1524 mm). The clear floor spaces at fixtures and controls, the accessible route and the turning space may overlap. **1111B.4.6 #3. Water closets.** If a toilet compartment is provided, it shall comply with Section 1115B.3.1 or 1115B.3.2; its water closet shall comply with Section 1115B.4.1 of this code. **1111B.4.6 #4. Lavatory and mirrors.** If a lavatory and/or mirror is provided, they shall comply with Sections 1115B.4.3 and 1115B.8.1, as applicable. **1111B.4.6 #5. Controls and dispensers.** If controls, dispensers, receptacles or other types of equipment are provided, then at least one of each shall be on an accessible route and shall comply with Section 1117B.6, Controls and Operating Mechanisms. **1111B.4.6 #6. Bathing and toilet facilities.** If toilet facilities or bathing facilities are provided in a common area, they shall comply with Section 1111B.4.6, as modified for hotel, motel and dormitory accommodations.	Which Std.provides greater access **depends** on circumstances.	The 2010 CBC does not define that the accessible water closet, lavatory, and bathtub or shower can be provided in separate, if adjacent areas. The 2010 ADA permits the lavatory to be in a separate, if adjacent areas. 2010 ADA does not make provisions for adaptability for the remainder of the dormitory rooms that are not required to be fully accessible as does the 2010 CBC in Section 111B.4.6 #7. The 2010 ADA requires a turnaround space within the bathroom, while the 2010 CBC requires a clear floor space 30'x60". Analysis of applicable requirements of ADA Sections 603-610 to CBC Section 1115B requirements are made in those respective sections of this comparative analysis.	1. Recommend including the flexibility for fixtures to be in separate, adjacent areas as stated in the 2010 ADA. 2. Recommend including the turnaround space within the bathroom.
1747			**1111B.4.6 #7. Toilet facilities.** Toilet facilities shall comply with Section **1111B.4.6,** as modified for hotel, motel and dormitory accommodations. Hotel and motel bathrooms beyond those specified in Section 1111B.4 shall provide the following features: **1111B.4.6 #7.1.** All bathroom fixtures shall be in a location that allows a person using a wheelchair measuring 30 inches by 48 inches (762 mm by 1219 mm) to touch the wheelchair to any lavatory, urinal, water closet, tub, sauna, shower stall and any other similar sanitary installation, if provided. **1111B.4.6 #7.2.** All bathroom entrance doors shall have a clear opening width of 32 inches (813 mm) and shall be either sliding doors or shall be hung to swing in the direction of egress from the bathroom.	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC provides greater access because <u>all</u> bathrooms, beyond the minimum amount required to meet 111B.4, accessible, have additional access provisions beyond door access. The 2010 ADA provides requirements for doors into and within all other rooms and suites that are not considered accessible rooms in the scoping requirements, Section 206.5.3 and 224.1.2. The 2010 ADA provides requirements in Section 806 for doors and doorways designed to allow passage into and within all sleeping rooms, suites, or other covered units, in the Advisory 806.2 Guest Rooms, and in the direction of which areas are to be accessible per Section 806.	

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1748	**806.2.4.1 Vanity Counter Top Space.** If vanity counter top *space* is provided in non-accessible guest toilet or bathing rooms, comparable vanity counter top space, in terms of size and proximity to the lavatory, shall also be provided in *accessible* guest toilet or bathing rooms.		CBC has no comparable language.	2010 CBC provides **less access** than 2010 ADA.	2010 CBC makes no provision for the comparable amount of vanity counter space of accessible guest toilet or bathing rooms to non-accessible guest toilet or bathing rooms.	1. Recommend including the equitable vanity countertop requirement.
1749	**Advisory 806.2.4.1 Vanity Counter Top Space.** This provision is intended to ensure that accessible guest rooms are provided with comparable vanity counter top space.		CBC has no comparable language.	2010 CBC provides **less access** than 2010 ADA.		If advisories are added to CBC and this requirement is adopted, recommend adding this Advisory.
1750	**806.2.5 Kitchens and Kitchenettes.** Kitchens and kitchenettes shall comply with 804.		1111B.4.4 Kitchens, kitchenettes or wet bar facilities. When accommodations are provided with kitchens, kitchenettes, wet bar units or similar amenities, they shall be accessible and meet the requirements of Section 1133A. Kitchens shall be provided per the number required to be accessible in conformance with Table 11B-3.	2010 CBC provides **less access** than 2010 ADA.	The 2010 ADA addresses the wet bar in guest rooms, by an exception in 606.2. It allows a parallel approach to wet bars. The requirements for the kitchen or wet bar sink in the 2010 ADA requires the height to be at 34". The requirements in the 2010 CBC does not specify a minimum height requirement for the kitchen or wet bar sink. The repositionable sink and work surface height applies only to residential dwelling units and not to transient lodging.	1. Recommend specifying the minimum 34" height for a kitchen or wet bar sink in transient lodging facilities.
1750			**1111B.4.2.1 Spaces.** Where provided as part of an accessible unit, sleeping room or suite, the following spaces shall be accessible and shall be on an accessible route complying with Section 1114B.1.2: **...** **1111B.4.2.1 #7** Carports, garages or parking spaces.	2010 CBC provides **greater access** than 2010 ADA.	2010 ADA does not make provision for accessibility of carports, garages, or parking spaces in Section 806 Transient Lodging Guest Rooms. **ADA section 208 provides the scoping requirements for parking spaces**	
1751	**806.2.6 Turning Space.** Turning *space* complying with 304 shall be provided within the guest room.		**1111B.4.2.2 Accessible route.** Guest rooms and suites shall be on an accessible route complying with Section 1114B.1.2. An accessible route shall also connect all accessible spaces and elements, including telephones, within the unit, sleeping room or suite.	2010 CBC provides **less access** than 2010 ADA.	The accessible route requirement within guest rooms and suites implies a turning space.	1. Recommend specifying a turning space within the guest room.
1751			**1111B.4.2.3 Doors.** **1111B.4.2.3.1** Doors into and within covered rooms and suites. Doors and doorways designed to allow passage into and within all sleeping rooms, suites or other covered units shall comply with Section 1133B.2. **1111B.4.2.3.2** Doors into and within all other rooms and suites. Doors and doorways designed to allow passage into and within all other sleeping rooms and suites shall comply with Section 1133B.2.2.		The 2010 ADA provides requirements for doors into and within all other rooms and suites that are not considered accessible rooms in the scoping requirements, Section 206.5.3 and 224.1.2. This section also expressly states that shower and sauna doors need not comply. The 2010 ADA provides requirements in Section 806 for doors and doorways designed to allow passage into and within all sleeping rooms, suites, or other covered units, in the Advisory 806.2 Guest Rooms, and in the direction of which areas are to be accessible per Section 806.	1. Recommend including the provision that states that shower and sauna doors need not comply in those units that are not required to be accessible.
1752	**806.3 Guest Rooms with Communication Features.** Guest rooms required to provide communication features shall comply with 806.3.		There is no equivalent heading in the CBC	NA		
1753	**806.3 Guest Rooms with Communication Features.** Guest rooms required to provide communication features shall comply with 806.3.		**1111B.4.5** Visible alarms, notification devices and telephones for persons with hearing impairments. In addition to those accessible sleeping rooms and suites required by Section 1111B.4.2, additional sleeping rooms and suites shall be provided with the following features as required by Table 11B-4 as follows: ...	2010 CBC is **equivalent** to 2010 ADA.		

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1754	**Advisory 806.3 Guest Rooms with Communication Features.** In guest rooms required to have accessible communication features, consider ensuring compatibility with adaptive equipment used by people with hearing impairments. To ensure communication within the facility, as well as on commercial lines, provide telephone interface jacks that are compatible with both digital and analog signal use. If an audio headphone jack is provided on a speaker phone, a cutoff switch can be included in the jack so that insertion of the jack cuts off the speaker. If a telephone-like handset is used, the external speakers can be turned off when the handset is removed from the cradle. For headset or external amplification system compatibility, a standard subminiature jack installed in the telephone will provide the most flexibility.			2010 CBC **does not address** 2010 ADA req.	ADA Advisory 806.3 clarifies what communication features can enhance accessibilty or provide a better use experience.	1. Consider implementing these enhancement features into communication systems.
1755	**806.3.1 Alarms.** Where emergency warning systems are provided, alarms complying with 702 shall be provided.		... **1111B.4.5.1 Visible alarms.** Visible alarms shall be provided and shall comply with NFPA 72 and Chapter 9, Section 907.5.2.3. ...	2010 CBC provides **greater access** than 2010 ADA.	2010 CBC Section 907.5.2.3.3 states that transient lodging facilities shall be provided with a visible alarm notification appliance, activated by both the in-room smoke alarm and the building fire alarm system. Unless by reference to the requirements of NFPA 72, 2010 ADA does not state that the visible alarms shall be activated by both the in-room smoke alarm and the building fire alarm system.	
1756	**806.3.2 Notification Devices.** Visible notification devices shall be provided to alert room occupants of incoming telephone calls and a door knock or bell. Notification devices shall not be connected to visible alarm signal appliances. Telephones shall have volume controls compatible with the telephone system and shall comply with 704.3. Telephones shall be served by an electrical outlet complying with 309 located within 48 inches (1220 mm) of the telephone to facilitate the use of a *TTY*.		**1111B.4.5 ...** notification devices ... for persons with hearing impairments. In addition to those accessible sleeping rooms and suites required by Section 1111B.4.2, additional sleeping rooms and suites shall be provided with the following features as required by Table 11B-4 as follows: **...** **1111B.4.5.2** Visual notification devices. Visual notification devices shall also be provided in units, sleeping rooms and suites to alert room occupants of incoming telephone calls and a door knock or bell. Notification devices shall not be connected to visible alarm signal appliances. **1111B.4.5.3 Telephones.** Permanently installed telephones shall have volume controls complying with Section 1117B.2.8; an accessible electrical outlet within 48 inches (1219 mm) of a telephone connection shall be provided to facilitate the use of a text telephone.	2010 CBC is **equivalent** to 2010 ADA.		
1756.1			**1111B.4.8 Dormitory rooms.** Dormitory rooms beyond those specified herein shall comply with the adaptability requirements of Section 1111B.5. **1111B.5** Buildings and complexes containing publicly funded dwelling units. **1111B.5.1 General.** Buildings and complexes containing publicly funded dwelling units shall be accessible as required by Chapter 11A, Housing Accessibility, except that scoping requirements for covered multifamily dwellings include one or more publicly funded dwelling units, and are required to comply with Division IV - Accessibility for Existing Buildings, beginning with Section 1134B.	2010 CBC is **equivalent** to 2010 ADA.	2010 ADA does not expressly use the term "dormitory", but in ADA Title II Standards, 28 CFR part 35.151 New Construction and Alterations (f), and in ADA Title III Subpart D of 28 CFR Part 36, a clarification is made that "guest rooms" can be used interchangeably with "sleeping rooms". If a dormitory is at a housing of a place of education, the requirements in kitchens of kitchen work surfaces applies (Section 804.3). In the 2010 CBC, dormitory rooms beyond the specified amount are required to be adaptable as required in 2010 CBC Chapter 11A, which includes the repositionable counter requirements (1133A.4.1). The 2010 CBC states that in "publicly funded housing" that the required number of accessible units specified in Table 11B-3 and 11B-4 must be included in the "covered multi-family dwellings". **The ADA does not limit accessible dorms to"publicly funded housing"** For analysis of publicly funded dwelling units see Section 809 Residential Dwelling Units in this comparative analysis.	

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1756.2			**1111B.4.2.4 Alterations in existing facilities.** When guest rooms are being altered in an existing facility, or portion thereof, subject to the requirements of this section, at least one guest room or suite that complies with the accessibility requirements of this code as modified by this chapter shall be provided for each 25 guest rooms, or fraction thereof, of rooms being altered until the number of such rooms provided equals the number required to be accessible in Table 11B-3. In addition, at least one guest room or suite that complies with the requirements of Section 1111B.4.5 shall be provided for each 25 guest rooms, or fraction thereof, of rooms being altered until the number of such rooms equals the number required to be accessible in Table 11B-4.	2010 CBC is **equivalent** to 2010 ADA.	The scoping requirements of 2010 ADA Section 224.1.1 Alterations, states: Where guest rooms are altered or added, the requirements of 224 shall apply only to the guest rooms being altered or added until the number of guest rooms complies with the minimum number required for new construction.	
1757	**807 Holding Cells and Housing Cells**		NA	2010 CBC **does not address** 2010 ADA req.	2010 CBC has no equivalent passage to "Holding Cells and Housing Cells". Section 1109B Accessibility for Group I Occupancies is the most comparable occupancy classification for long term holding and housing cells but Section 1105B Group B Occupancies is also comparable for jails and other short term holding cells. CBC contains definitions for cells in Section 408.	1) If the CBC format is followed, add a section to the CBC to either 1105B or 1109B indicating the requirements for Holding Cells and Housing Cells and refer from one to the other, depending upon Occupancy classification. 2) If the 2010 ADA Stds. format is followed, incorporate Section 807 verbatim.
1758	**807.1 General.** Holding cells and housing cells shall comply with 807.		NA	2010 CBC **does not address** 2010 ADA req.	2010 CBC has no equivalent passage to "Holding Cells and Housing Cells shall comply with Section 807". Section 1109B Accessibility for Group I Occupancies is the most comparable occupancy classification for long term holding and housing cells but Section 1105B Group B Occupancies is also comparable for jails and other short term holding cells.	1) If the CBC format is followed, add a section to the CBC to either 1105B or 1109B indicating that Holding Cells and Housing Cells shall comply with the requirements of that section and refer from one to the other, depending upon Occupancy classification. 2) If the 2010 ADA Stds. format is followed, incorporate Section 807.1 verbatim.
1759	**807.2 Cells with Mobility Features.** Cells required to provide mobility features shall comply with 807.2.		NA	2010 CBC **does not address** 2010 ADA req.	2010 CBC has no equivalent passage to "Cells required to provide mobility features shall comply with Section 807.2". Section 1109B Accessibility for Group I Occupancies is the most comparable occupancy classification for long term holding and housing cells but Section 1105B Group B Occupancies is also comparable for jails and other short term holding cells.	1) If the CBC format is followed, add a section to the CBC to either 1105B or 1109B indicating that cells required to provide mobility features shall comply with the requirements of that section and refer from one to the other, depending upon Occupancy classification. 2) If the 2010 ADA Stds. format is followed, incorporate Section 807.2 verbatim.
1760	**807.2.1 Turning Space.** Turning *space* complying with 304 shall be provided within the cell.		NA	2010 CBC **does not address** 2010 ADA req.	2010 CBC has no equivalent passage to "Turning space complying with 304 shall be provided within the cell". Section 1115B.3.2.1 is the most comparable CBC section regarding a circular or T-shaped turning space.	1) If the CBC format is followed, add a section to the CBC to either 1105B or 1109B indicating that cells required to provide mobility features shall comply with the requirements for wheelchair clearance per CBC 1115B.3.2.1. 2) If the 2010 ADA Stds. format is followed, incorporate Section 807.2.1 verbatim.
1761	**807.2.2 Benches.** Where benches are provided, at least one bench shall comply with 903.		NA	2010 CBC **does not address** 2010 ADA req.	2010 CBC has no equivalent passage to "Where benches are provided, at least one bench shall comply with 903". Section 1117B.8 is the most comparable CBC section regarding accessible benches. CBC requires accessible benches to measure exactly 24" x 48" and 2010 ADA Stds. requires 20" x 42" minimum and 24" maximum depth. CBC and 2010 ADA Stds. have similar requirements for structural strength and bench height. CBC requires clear wheelchair transfer space alongside the bench to allow for a parallel transfer and 2010 ADA Stds. requires the clear space parallel to the short axis of the bench at the end of the bench.	1) If the CBC format is followed, add a section to the CBC to either 1105B or 1109B indicating that when benches are provided in cells they shall comply with the requirements for benches per CBC 1117B.8. 2) If the 2010 ADA Stds. format is followed, incorporate Section 807.2.2 verbatim. 3) Since the bench dimensions per CBC do not conflict with 2010 ADA Stds., maintain the CBC bench dimensions.

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1762	**807.2.3 Beds.** Where beds are provided, clear floor *space* complying with 305 shall be provided on at least one side of the bed. The clear floor *space* shall be positioned for parallel approach to the side of the bed.		NA	2010 CBC **does not address** 2010 ADA req.	2010 CBC has no equivalent passage to "Where beds are provided, clear floor space complying with 305 shall be provided on at least one side of the bed. The clear floor space shall be positioned for parallel approach to the side of the bed.". Section 1111B.4.3 is the most comparable CBC section regarding clear space on the side of a bed, except the requirement is for a 36" clear space on both sides of a bed. 2010 ADA Stds. also has language indicating that "the clear floor space shall be positioned for parallel approach to the side of the bed." This language appears redundant since a 36" wide clear floor space would permit a parallel approach to the side of the bed.	1) If the CBC format is followed, add a section to the CBC to either 1105B or 1109B indicating that when beds are provided in cells they shall comply with the requirements for clearance on at least one side of the bed per CBC 1111B.4.3. 2) If the 2010 ADA Stds. format is followed, incorporate Section 807.2.3 verbatim.
1763	**807.2.4 Toilet and Bathing Facilities.** Toilet *facilities* or bathing *facilities* that are provided as part of a cell shall comply with 603. Where provided, no fewer than one water closet, one lavatory, and one bathtub or shower shall comply with the applicable requirements of 603 through 610.		NA	2010 CBC **does not address** 2010 ADA req.	2010 CBC has no equivalent passage to "Toilet facilities or bathing facilities that are provided as part of a cell shall comply with 603. Where provided, no fewer than one water closet, one lavatory, and one bathtub or shower shall comply with the applicable requirements of 603 through 610.". Section 1115B.3.2.1 is the most comparable CBC section regarding a circular or T-shaped turning space, but the CBC allows the door swing to encroach 12" on this space whereas 2010 ADA Stds. allows the door to encroach on the turning space when the room is for individual use/single occupant. Since cells rarely have swinging doors, this language appears moot. Section 1115B.3.1.4 is the most comparable CBC section regarding accessible water closet compartments (2010 ADA Stds. 604), 1115B.4.3 is the most comparable regarding grab bars (2010 ADA Stds. 604.5 & 609), 1115B.8.3 & 1115B.8.4 are the most comparable regarding dispensers (2010 ADA Stds. 604.7), CBC 1115B.4.2 Urinals = 2010 ADA Stds. 605, CBC 1115B.4.3 Lavatories = 2010 ADA Stds. 606, 1115B.4.5 Bathtubs = 2010 ADA Stds. 607 & 610, 1115B.4.4 Showers = 2010 ADA Stds. 608. There are numerous differences between the CBC and 2010 ADA Stds. requirements.	1) If the CBC format is followed, add a section to the CBC to either 1105B or 1109B indicating that when toilet and bathing facilities are provided as part of a cell they shall comply with the requirements for turning space per CBC 1111B.3.2.1 and mirrors per CBC 1115B.8.1.1. Also add a section to the CBC to either 1105B or 1109B indicating that where toilet and bathing facilities are provided they shall comply with all the requirements of CBC 1115B (with significant editing). If the 2010 ADA Stds. format is followed, incorporate Section 807.2.4 verbatim.
1764	**Advisory 807.2.4 Toilet and Bathing Facilities.** In holding cells, housing cells, or rooms required to be accessible, these requirements do not require a separate toilet room.		NA	2010 CBC **does not address** 2010 ADA req.		
1765	**807.3 Cells with Communication Features.** Cells required to provide communication features shall comply with 807.3.		NA	2010 CBC **does not address** 2010 ADA req.	2010 CBC has no equivalent passage to "Cells required to provide communication features shall comply with 807.3". CBC Section 907.5.2.3 is the most comparable CBC section regarding visual fire alarms and CBC Section 1117B.2 is the most comparable section regarding telephones.	1) If the CBC format is followed, add a section to the CBC to either 1105B or 1109B indicating that cells required to provide communication features shall comply with CBC 907.5.2.3 and 1117B.2. 2) If the 2010 ADA Stds. format is followed, incorporate Section 807.3 verbatim.
1766	**807.3.1 Alarms.** Where audible emergency alarm systems are provided to serve the occupants of cells, visible alarms complying with 702 shall be provided.		NA	2010 CBC **does not address** 2010 ADA req.	2010 CBC has no equivalent passage to "Where audible emergency alarm systems are provided to serve the occupants of cells, visible alarms complying with 702 shall be provided". CBC Sections 907.5.2.3.1 and 1114B.2.2 are the most comparable CBC sections regarding visible alarms for Institutional occupancies. The 2010 ADA Stds. references to NFPA 72 requirements are more specific than CBC, including edition dates and device dB rating.	1) If the CBC format is followed, add a section to the CBC to either 1105B or 1109B indicating that where audible emergency alarm systems are provided to serve the occupants of cells, visible alarms shall be provided in compliance with the requirements of CBC 907.5.2.3.1 and 1114B.2.2. 2) If the 2010 ADA Stds. format is followed, incorporate Section 807.2.3 verbatim.
1767	**807.3.1 EXCEPTION:** Visible alarms shall not be required where inmates or detainees are not allowed independent means of egress.		NA	2010 CBC **does not address** 2010 ADA req.	2010 CBC has no equivalent passage to "Visible alarms shall not be required where inmates or detainees are not allowed independent means of egress.". This is a typical condition in CDCR facilities. CBC requirements for Group I-3 Occupancies are contained in Section 408.14.3.2 but do not include an exception similar to 2010 ADA Stds. (what about the Fire Code?).	1) If the CBC format is followed, add a section to the CBC to either 1105B or 1109B indicating that visible alarms are not required where inmates or detainees are not allowed independent means of egress. 2) If the 2010 ADA Stds. format is followed, incorporate Section 807.3.1 verbatim.

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1768	**807.3.2 Telephones.** Telephones, where provided within cells, shall have volume controls complying with 704.3.		NA	2010 CBC **does not address** 2010 ADA req.	2010 CBC has no equivalent passage to "Telephones, where provided within cells, shall have volume controls complying with 704.3.". CBC Section 1117B.2.8 is the most comparable section regarding telephone equipment for hearing impaired persons.	1) If the CBC format is followed, add a section to the CBC to either 1105B or 1109B indicating that when telephones are provided within cells they shall comply with the requirements for volume control per CBC 1117B.2.8. 2) If the 2010 ADA Stds. format is followed, incorporate Section 807.3.2 verbatim.
1769	**808 Courtrooms**		There is no equivalent heading in the CBC	NA		
1770	**808.1 General.** Courtrooms shall comply with 808.		There is no equivalent heading in the CBC	NA		
1771	**808.2 Turning Space.** Where provided, areas that are raised or depressed and accessed by *ramps* or platform lifts with entry *ramps* shall provide unobstructed turning *space* complying with 304.		**1105B.3.5 Police department, law enforcement, fire department facilities and courtrooms**. Areas to be made accessible include the following: ... 4. Courtroom areas, including the judge's chambers and bench, counsel tables, jury box, witness stand and public seating area shall be made accessible.	2010 CBC provides **less access** than 2010 ADA.	The CBC is not clear that turning space is required at raised areas, especially those areas that may be considered "Employee Work Areas". CBC Definition: **ACCESSIBLE** is approachable and usable by persons with disabilities in compliance with this code.	1.) revise CBC to specifically require all areas that are required to be accessible include turning space.
1772	**808.3 Clear Floor Space.** Each jury box and witness stand shall have, within its defined area, clear floor *space* complying with 305.		**1105B.3.5 Police department, law enforcement, fire department facilities and courtrooms**. Areas to be made accessible include the following: ... 4. Courtroom areas, including the judge's chambers and bench, counsel tables, jury box, witness stand and public seating area shall be made accessible.	2010 CBC provides **less access** than 2010 ADA.	The CBC is not clear that clear floor space is required, especially those areas that may be considered "Employee Work Areas". CBC Definition: **ACCESSIBLE** is approachable and usable by persons with disabilities in compliance with this code.	1.) Revise CBC to specifically require all areas that are required to be accessible include clear floor space.
1773	**808.3 EXCEPTION:** In *alterations* , *wheelchair spaces* are not required to be located within the defined area of raised jury boxes or witness stands and shall be permitted to be located outside these *spaces* where *ramp* or platform lift access poses a hazard by restricting or projecting into a means of egress required by the appropriate *administrative authority* .		There is no equivalent exception in the CBC	2010 CBC is **equivalent** to 2010 ADA.	Although not specifically stated, this exception is implied in **1134B**, in the definition of **Accessible Route of Travel**, and in **1104B.3.9 Life safety.** ACCESSIBLE ROUTE OF TRAVEL is a continuous unobstructed path connecting all accessible elements and spaces in an accessible building or facility that can be negotiated by a person with a disability using a wheelchair and that is also safe for and usable by persons with other disabilities, and that is consistent with the definition of —Path of travelll in this section. Interior accessible routes may include corridors, floors, ramps, elevators, lifts and clear floor space at fixtures. Exterior accessible routes may include parking access aisles, curb ramps, crosswalks at vehicular ways, walks, sidewalks, ramps, and lifts. An accessible route does not include stairs, steps, or escalators. **1104B.3.9 Life safety. In determining ...**	
1774	**808.4 Judges' Benches and Courtroom Stations.** Judges' benches, clerks' stations, bailiffs' stations, deputy clerks' stations, court reporters' stations and litigants' and counsel stations shall comply with 902.		**1105B.3.5 Police department, law enforcement, fire department facilities and courtrooms**. Areas to be made accessible include the following: ... 4. Courtroom areas, including the judge's chambers and bench, counsel tables, jury box, witness stand and public seating area shall be made accessible.	2010 CBC provides **less access** than 2010 ADA.	The CBC is does not specify that the tables and counters used by Judges , clerks, bailiffs, deputy clerks, and court reporters are required to be accessible, especially those areas that may be considered "Employee Work Areas". CBC Definition: **ACCESSIBLE** is approachable and usable by persons with disabilities in compliance with this code.	1.) Revise CBC to specifically require all areas that are required to be accessible include including tables and counters used by Judges , clerks, bailiffs, deputy clerks, and court reporters.
1775	**809 Residential Dwelling Units**		**1111B.5 Buildings and complexes containing publicly funded dwelling units.** **1111B.5.1 General.** Buildings and complexes containing publicly funded dwelling units shall be accessible as required by Chapter 11A, Housing Accessibility, …	NA	The requirements for residential dwelling units fall in Division IV of Chapter 11A, Housing Accessibility, of the 2010 CBC. These sections are 1128A through 1136A.	

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1776	**809.1 General.** *Residential dwelling units* shall comply with 809. *Residential dwelling units* required to provide mobility features shall comply with 809.2 through 809.4. *Residential dwelling units* required to provide communication features shall comply with 809.5.		**SECTION 1128A** **COVERED DWELLING UNITS** **1128A.1 General.** Covered multifamily dwelling units shall be adaptable and accessible into and throughout the dwelling unit as provided in this division.	Which Std.provides greater access **depends** on circumstances.	2010 ADA requires residential dwelling units to be accessible. **The ADA limits the accessibility requirements for residential dwelling units to those facilities with residential dwelling units for sale to individual owners by "public enities"** **(35.151(k)** By 1111B.5 reference to Chapter 11A, the 2010 CBC requires dwelling units to be adaptable and accessible. Analysis of which document provides greater access depends on the specific provision.	
1777	**809.2 Accessible Routes.** *Accessible* routes complying with Chapter 4 shall be provided within *residential dwelling units* in accordance with 809.2.		**SECTION 1130A ACCESSIBLE ROUTE WITHIN COVERED MULTIFAMILY DWELLING UNITS** **1130A.1 General.** An accessible route shall be provided through all rooms and spaces of the dwelling unit. The accessible route shall pass through the primary entry door, and shall connect with all additional exterior doors, required clear floor spaces at kitchen appliances and bathroom fixtures. For the purpose of this section, “accessible routes” may include hallways, corridors and ramps. **...** **1130A.2 Width.** The accessible route into and throughout covered multifamily dwelling units shall be at least 36 inches (914 mm) wide.	2010 CBC is **equivalent** to 2010 ADA.	By reference to 2010 ADA Chapter 4, a provision is made for the minimum width of 36" for the accessible route.	
1778	**809.2 EXCEPTION:** *Accessible* routes shall not be required to or within unfinished attics or unfinished basements.		**...** **1130A.1, Exc.** An accessible route is not required from the interior of the unit into a basement or garage, except as provided in Section 1105A.1. ...	2010 CBC provides **less access** than 2010 ADA.	2010 ADA specifies that accessible routes are not required to unfinished attics or basements. By unfinished, the 2010 ADA does not consider these areas to be habitable spaces. 2010 CBC only specifies that tan accessible route is not required to a basement and makes no mention of an attic, nor does it address whether it is finished or unfinished. 2010 CBC states that access to the garage is required if it is an accessory structure to the dwelling unit by 1105A..1, however access is not required from the interior of the unit directly to the garage. The garage can be accessed from exiting the unit and then entering the garage.	1. Recommend the inclusion of the terminology "unfinished attics or unfinished basements".
1779	**809.2.1 Location.** At least one *accessible* route shall connect all *spaces* and *elements* which are a part of the *residential dwelling unit*. Where only one accessible route is provided, it shall not pass through bathrooms, closets, or similar *spaces*.		**1130A.1 General.** An accessible route shall be provided through all rooms and spaces of the dwelling unit. The accessible route shall pass through the primary entry door, and shall connect with all additional exterior doors, required clear floor spaces at kitchen appliances and bathroom fixtures. For the purpose of this section, “accessible routes” may include hallways, corridors and ramps. **...**	2010 CBC provides **less access** than 2010 ADA.	The 2010 CBC allows the accessible route to pass through kitchens, storage rooms, restrooms, closets, or other spaces used for similar purposes in an individual dwelling unit, but makes no distinction if this is acceptable if it is the only accesible route provided.	1. Recommend including the 2010 ADA provision, "where only one accessible route is provided, it shall not pass through bathrooms, closets, or similar spaces."
1780	**809.2.2 Turning Space.** All rooms served by an *accessible* route shall provide a turning *space* complying with 304.			2010 CBC **does not address** 2010 ADA req.	The 2010 CBC makes provisions for maneuvering clearances at doors and for clear floor spaces at fixtures in bathrooms, fixtures in kitchens, and appliances in kitchens, but does not make a requirement that all rooms within the dwelling unit served by an accessible route shall provide a turning space.	1. Recommend the inclusion that all rooms served by an accessible route shall provide a turning space.

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1780.1	**28 CFR 36.406(e)(1)** (1) Kitchens within housing units containing accessible sleeping rooms with mobility features (including suites and clustered sleeping rooms) or on floors containing accessible sleeping rooms with mobility features shall provide turning spaces that comply with section 809.2.2 of the 2010 Standards and kitchen work surfaces that comply with section 804.3 of the 2010 Standards					
1780.2	**28 CFT 36.406(e)(2)** (2) Multi-bedroom housing units containing accessible sleeping rooms with mobility features shall have an accessible route throughout the unit in accordance with section 809.2 of the 2010 Standards.					
1781	**809.2.2 EXCEPTION:** Turning *space* shall not be required in exterior *spaces* 30 inches (760 mm) maximum in depth or width.			NA	2010 CBC does not address the requirement, because it does not address the turning space requirement.	1. Recommend the inclusion of this exception.
1782	**Advisory 809.2.2 Turning Space.** It is generally acceptable to use required clearances to provide wheelchair turning space. For example, in kitchens, 804.3.1 requires at least one work surface with clear floor space complying with 306 to be centered beneath. If designers elect to provide clear floor space that is at least 36 inches (915 mm) wide, as opposed to the required 30 inches (760 mm) wide, that clearance can be part of a T-turn, thereby maximizing efficient use of the kitchen area. However, the overlap of turning space must be limited to one segment of the T-turn so that back-up maneuvering is not restricted. It would, therefore, be unacceptable to use both the clearances under the work surface and the sink as part of a T-turn. See Section 304.3.2 regarding T-turns.			NA	It is logical to provide for turning space to overlap with fixture and/or appliance clear floor space. This advisory, however, stipulates a clarification on how combining the two floor clearances can provide for less accessibilty.	1. Recommend that the required turning space can overlap with required fixture clearances. 2. Recommend stipulating limits on the combination of floor clearances so that accessibility can be maintained.
1783	**809.3 Kitchen.** Where a kitchen is provided, it shall comply with 804.		***SECTION 1133A KITCHENS*** ***1133A.1 General.*** *Kitchens shall be on an accessible route and shall comply with this section.*	2010 CBC is **equivalent** to 2010 ADA.	The requirement for an accessible kitchen is provided in both the 2010 ADA and the 2010 CBC. For a comparative analysis of kitchen requirements, refer to Section 804.	

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1784	**809.4 Toilet Facilities and Bathing Facilities.** At least one bathroom shall comply with 603. No fewer than one of each type of fixture provided shall comply with applicable requirements of 603 through 610. Toilet and bathing fixtures required to comply with 603 through 610 shall be located in the same toilet and bathing area, such that travel between fixtures does not require travel between other parts of the *residential dwelling unit* .		***SECTION 1134A*** ***BATHING AND TOILET FACILITIES*** **1134A.1 General.** All bathrooms, bathing and toilet facilities within covered multifamily dwelling units shall comply with this section. **1134A.2** Number of complying bathrooms. Bathrooms shall be designed to comply with one of the following options: **1134A.2 Option 1.** All bathrooms within the dwelling unit shall be designed to comply with the following: **1134A.2 Option 1 #1.** Toilet, bathing and shower facilities shall comply with Section 1134A.4. **1134A.2 Option 1 #2.** Bathtubs shall comply with Section 1134A.5. **1134A.2 Option 1 #3.** Showers shall comply with Section 1134A.6. **1134A.2 Option 1 #4.** Water closets shall comply with Section 1134A.7. **1134A.2 Option 1 #5.** Lavatories, vanities, mirrors and towel fixtures shall comply with Section 1134A.8. **1134A.2 Option 1 #6.** Bathrooms shall be provided with an accessible route into and through the bathroom. **1134A.2 Option 1 #7.** If a door is provided, it shall comply with the requirements of Section 1132A.5. **1134A.2 Option 1 #8.** A minimum 18-inch (457 mm) clear maneuvering space shall be provided on the swing side of the door at the strike edge of the door. **1134A.2 Option 1 #9.** Switches, outlets and controls shall comply with Section 1142A. **1134A.2 Option 1 #10.** Reinforced walls to allow for the future installation of grab bars around the toilet, tub and shower shall comply with Sections 1134A.5 for bathtubs, 1134A.6 for showers and 1134A.7 for water closets. Grab bars shall comply with Section 1127A.4. **1134A.2 Option 2.** Only one bathroom within the dwelling unit shall be designed to comply with the following: **1134A.2 Option 2 #1.** Toilet, bathing and shower facilities shall comply with Section 1134A.4.	Which Std.provides greater access **depends** on circumstances.	2010 ADA references the requirements for bathrooms to Section 603 which in this documents is compared to the requirements for Chapter 11B. However, the 2010 CBC covers bathing and toilet facilities for dwelling units by 1111B.5 reference to Chapter 11A. Therefore the review of this section is a comparative analysis of 2010 ADA Chapter 6 to 2010 CBC Chapter 1134A. For a more concise review, only those requirements that differ will be listed. Analysis of which document provides greater access depends on the specific provision. The 2010 ADA states that no fewer than one of each type of fixture provided shall be accessible. This can be interpreted that if both a shower and bathtub are provided, even in separate bathrooms, then both must be made accessible. This can also be interpreted that if an accessible shower and an accessible bathtub are in separate bathrooms, then both bathrooms are required to have the accessible features expressed in ADA Sections 603-610. In the 2010 CBC Option 1 is equivalent to the ADA requirements. Option 2, however, is less restrictive. If the first bathroom contains the required accessible fixtures and an accesible bathtub, and the second bathroom contains only the accessible shower, then only an accessible route, accessible clearances at the door, switches, outlets, and controls, and wall reinforcement for the toilet and shower are required. The remainder of the fixtures in the second bathroom are not required to have accessible clearances or features.	1. The 2010 ADA consolidates the toilet and bathing facilities requirements in Chapter 6. In the areas that define a specific use, reference is made to Chapter 6, and then exceptions are made in the section that defines the specific use. The 2010 CBC stipulates the bathroom requirements for housing (Chapter 11A) and for public accommodations (Chapter 11B) in two separate sections. If possible, the CBC should follow a similar format to the ADA and provide one section for the accessibility of toilet and bathing facilities, and then make exceptions to the requirements in the section that defines the specific use. 2. Recommendation to include all the pertinent accessible features required for bathing and toilet facilities in both bathrooms if a tub is provided in one bathroom and a shower is provided in another.
1784			**1134A.4 Sufficient maneuvering space.** Bathing and toilet facilities required to be adaptable shall provide sufficient maneuvering space for a person using a wheelchair or other mobility aid to enter and close the door, use the fixtures, reopen the door and exit. Where the door swings into the bathroom or powder room, there shall be a clear maneuvering space outside the swing of the door of at least 30 inches by 48 inches (762 mm by 1219 mm) within the room. The clear maneuvering space shall allow the user to position a wheelchair or other mobility aid clear of the path of the door as it is closed and to permit use of fixtures. Doors may swing into the required clear space at any fixture when a clear maneuvering space is provided outside the swing arc of the door so it can be closed. Maneuvering spaces may include any knee space or toe space available below bathroom fixtures.	2010 CBC provides **less access** than 2010 ADA.	Section 603 of the 2010 ADA requires a full 60" diameter turning space or a T-shaped turning space within the bathroom. The 2010 CBC requires only a 30" x 48" clear maneuvering space.	1. Recommend including the 2010 ADA provision for a full 60" diameter turning space or a T-shaped turning space within the bathroom.

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1784			**1134A.5 Bathtubs.** Bathtubs required to be accessible shall comply with this section. **1134A.5 #1. Floor Space.** There shall be a minimum clear floor space 48 inches parallel by 30 inches perpendicular (1219 mm by 762 mm) to the side of a bathtub or bathtub-shower combination (measured from the foot or drain end of the bathtub) to provide for the maneuvering of a wheelchair and transfer to and from the bathing facilities. The area under a lavatory may be included in the clear floor space provided the knee and toe space comply with Section 1134A.8. Cabinets under lavatories and toilets shall not encroach into the clear floor space. **1134A.5 #2. Reinforced Walls for Grab Bars.** A bathtub installed without surrounding walls shall provide reinforced areas for the installation of floor-mounted grab bars. Where a bathtub is installed with surrounding walls, grab bar reinforcement shall be located on each end of the bathtub, 32 inches to 38 inches (813 mm to 965 mm) above the floor, extending a minimum of 24 inches (610 mm) from the front edge of the bathtub toward the back wall of the bathtub. The grab bar reinforcement shall be a minimum of 6 inches (152.4 mm) nominal in height. (See Figure 11A-9G). Grab bar reinforcement shall be installed on the back wall of the bathtub a maximum of 6 inches (152.4 mm) above the bathtub rim extending upward to at least 38 inches (965 mm) above the floor. Grab bar backing shall be installed horizontally to permit the installation of a 48-inch (1219 mm) grab bar with each end a maximum of 6 inches (152.4 mm) from the end walls of the bathtub. The grab bar reinforcement shall be a minimum of 6 inches (152.4 mm) nominal in height. **1134A.5 #3. Bathtub Controls.** Faucet controls and operation mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 pound-force (22.2 N). Lever operated, push type and electronically controlled mechanisms are examples of	Which Std.provides greater access **depends** on circumstances.	Floor Space: The 2010 ADA provides more access because it requires a 30" wide clearance the full width of the tub. If a permanent seat is provided, the clearance is required to extend an additional 12" at the head end of the tub. Clear floor space can extend under lavatory only if the lavatory is located at the control end of the tub. Reinforced Walls for Grab Bars: The 2010 CBC makes a provision for floor mounted grab bars where a tub does not have surrounding walls. The 2010 ADA requires the tub to have surrounding walls so that grab bars can be installed. While the location for the grab bars are equivalent, the 2010 ADA stipulates the location for the grab bars and the 2010 CBC stipulates the location for the grab bar reinforcement. Both documents require the reinforcement for grab bars to be installed, but the actual installation of grab bars is optional. Bathtub Controls: The 2010 ADA provides more access because it specifies the location of the controls on an end wall. Controls shall be between the bathtub rim and grab bar, and between the open side of the bathtub and the centerline of the width of the bathtub. Both documents are equivalent in the requirements of the type of control and the force to operate controls. Shower Unit: The 2010 ADA provides more access because a shower spray unit is required. Bathtub Enclosures: Each document requires different provisions for access. The 2010 CBC requires hinged doors to open outward and the glass to be shatter resistant. The 2010 ADA requires that enclosures for bathtubs shall not obstruct controls, faucets, shower and spray units or obstruct transfer from wheelchairs onto bathtub seats or into bathtubs. Enclosures on bathtubs shall not have tracks installed on the rim of the open face of the bathtub. Tub Seats: A permanent or removable in-tub seat is required to be provided per the 2010 ADA. Tub Seats are not addressed in 2010 CBC Section 1134A.5.	1. Recommend the clearance of floor space as specified in the 2010 ADA. 2. Recommend requiring the installation of surrounding walls for an accessible tub since the location of required floor mounted grab bars is not specified. Recommend specifying the location of grab bars as required in the 2010 ADA. Retain the provision for required installation of reinforcement, but the optional installation of grab bars. 3. Recommend specifying the location of the controls as required by the 2010 ADA. 4. Recommend the installation of a shower spray unit as required by the 2010 ADA. 5. Recommend retaining the 2010 CBC provisions for the bathtub enclosure with the addition of the 2010 ADA requirements for the location of enclosure components.

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1784			**1134A.6 Showers.** Showers required to be accessible shall comply with this section. **1134A.6 #1. Size.** When one or more shower stalls are provided within the same dwelling unit, at least one shower stall shall comply with one of the following requirements. **1134A.6 #1-1.1.** The shower stall shall measure at least one shower stall shall measure at least 42 inches wide by 48 inches deep (1067 mm by 1219 mm) with an entrance opening of at least 36 inches (914 mm) or: **1134A.6 #1-1.2.** The shower stall shall measure at least 30 inches deep by 60 inches wide (762 mm) by 1524 mm) with an entrance opening of a least 60 inches (1524 mm). A water closet may project a maximum of 12 inches (305 mm) into the opening provided that a minimum of 36 inches (914 mm) clear space is maintained between the water closet and the shower wall as illustrated in Figure 11A-9L or: **1134A.6 #1-1.3**. Other shower stall configurations shall measure at least 36 inches deep by 60 inches wide (914 mm) by 1524 mm) with an entrance opening of at least 36 inches (914 mm) when a wall is installed on the opening side. **1134A.6 #2. Slope.** The maximum slope of the shower floor shall be ½ inch (12.7 mm) per foot in any direction and shall slope toward the rear to drain. The floor surfaces shall be of Carborundum or grit-faced tile or of material providing equivalent slip resistance. **1134A.6 #3. Floor Space.** A clear maneuvering space at least 30 inches in width by 48 inches in length (762 mm by 1219 mm) shall be located outside the shower, flush and parallel to the control wall. **1134A.6 #4. Reinforced Walls for Grab Bars.** Grab bar reinforcement shall be installed continuous in the walls of showers 32 inches to 38 inches (813 mm to 965 mm) above the floor. The grab bar reinforcement shall be a minimum of 6 inches (152.4 mm) nominal in height. Glass-walled shower stalls shall provide reinforcement for installation of floor-mounted or ceiling-mounted grab bars. **1134A.6 #5. Thresholds.** When a threshold is used, it	Which Std.provides greater access **depends** on circumstances.	Shower Size: The 2010 ADA "transfer type" shower, with dimensions that are 36"x36" is not permissible with the 2010 CBC. The 2010 CBC 42"x48" "roll-in" shower is not labelled as a "roll-in" shower by the 2010 ADA, but provides greater access as a "transfer type" shower than the "transfer type" shower specified in the 2010 ADA. **The ADA would not recognize a 42" x 48" shower as either a transfer or roll-in shower.** The 30"x60" "roll-in" shower specified in 1134A.6 #1-1.2 is equivalent to the 2010 ADA's "standard roll-in" shower, however, the 2010 ADA permits a lavatory projection into the clear floor space requirements and the 2010 CBC permits a water closet projection into the clear floor space requirements. The 30"x60" "roll-in" shower specified in 1134A.6 #1-1.3 is equivalent to the 2010 ADA's "alternate roll-in" shower. **The ADA alternate roll-in shower must be 36" deep x 60" wide and configured as showen in Fig. 608.2.3** Slope: The 2010 CBC provides requirements for the slope of shower floors that is greater than 2%, but the 2010 ADA dloes not require level areas to exceed a 2%. Floor Space: In the 2010 ADA , clear floor space outside the shower depends on the shower type. In the 2010 CBC the clear floor space is stipulated at 30"x48" outside the shower, flush and parallel to the control wall. Reinforced Walls for Grab Bars: The 2010 CBC makes a provision for floor or ceiling mounted grab bars where a shower has glass walls. The 2010 ADA requires the shower to have surrounding walls so that grab bars can be installed. While the location for the grab bars are equivalent, the 2010 ADA stipulates the location for the grab bars and the 2010 CBC stipulates the location for the grab bar reinforcement. Both documents require the reinforcement for grab bars to be installed, but the actual installation of grab bars is optional. Thresholds: Thresholds in the 2010 ADA are more restrictive in that they cannot exceed 1/2" and depending on the shower type, require a beveled entry with 1/4" maximum vertical and 1/4" bevelled 1:2. Shower Controls: The 2010 ADA provides more access because it specifies the location of the controls depending on the type of shower. Both documents are equivalent in the	1. Recommend not including the 2010 ADA "transfer type" shower, and keeping the 3 shower sizes required by the 2010 CBC. **See column "T" comments regarding shower size**. Recommend permitting a lavatory projection into the clear floor space requirements of the shower specified in 1134A.6 #1-1.2 instead of a water closet projection into the clear floor space requirements, since the lavatory has clear floor space that extends underneath the lavatory and the water closet does not. This clearance is required for access to controls. 2. Recommend requiring the slope of shower floors to the 2010 ADA recommendation of 2%. 3. Recommend retaining the requirement for the clear floor space outside the shower as provided in the 2010 CBC. 4. Recommend requiring the installation of surrounding walls for an accessible shower since the location of required floor and/or ceiling mounted grab bars is not specified. Recommend specifying the location of grab bars as required in the 2010 ADA. Retain the provision for required installation of reinforcement, but the optional installation of grab bars. 5. Recommend including the ADA requirement on thresholds in that they cannot exceed 1/2" and depending on the shower type, require a beveled entry with 1/4" maximum vertical and 1/4" bevelled 1:2. 6. Recommend specifying the location of the controls per shower type as required by the 2010 ADA. 7. Recommend the installation of a shower spray unit as required by the 2010 ADA. 8. Recommend retaining the 2010 CBC provisions for the shower enclosure with the addition of the 2010 ADA requirements for the location of enclosure components. 9. Recommend the requirement that reinforcement has be installed in walls so as to permit the installation of seats in transfer-type shower compartments.

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1784			**1134A.7 Water closets.** Water closets in bathrooms or powder rooms required to be accessible shall comply with this section. **1134A.7 #1. Floor Space.** The minimum floor space provided at a water closet shall be 48 inches (1219 mm) in clear width. The clear floor space shall extend past the front edge of the water closet at least 36 inches (914 mm). See Figure 11A-9M. ***1134A.7 Exc.:*** *The 48-inch (1219 mm) minimum clear width may be reduced to 36 inches (914 mm) for lavatories, cabinets, wing walls, or privacy walls located immediately adjacent to a water closet which extend no more than 24 inches (610 mm) in depth.* Water closets shall be located within bathrooms in a manner that permits a grab bar to be installed on one side of the fixture. In locations where water closets are adjacent to walls vanities, lavatories or bathtubs, the centerline of the fixture shall be a minimum of 18 inches (457 mm) from the obstacle. **1134A.7 #2. Reinforced Walls for Grab Bars.** Where the water closet is not placed adjacent to a side wall, the bathroom shall have provisions for installation of floor-mounted, foldaway or similar alternative grab bars. Where the water closet is placed adjacent to a side wall, reinforcement shall be installed on both sides or one side and the back. If reinforcement is installed at the back, it shall be installed between 32 inches (813 mm) and 38 inches (965 mm) above the floor. The grab bar reinforcement shall be a minimum of 6 inches (152.4 mm) nominal in height. The backing shall be a minimum of 40 inches (1016 mm) in length. Reinforcement installed at the side of the water closet shall be installed 32 inches to 38 inches (813mmto 965 mm) above the floor. The reinforcement shall be installed a maximum of 12 inches (305 mm) from the rear wall and shall extend a minimum of 26 inches (660 mm) in front of the water closet. The grab bar reinforcement shall be a minimum of 6 inches (152.4 mm) nominal in height. **1134A.7 #3. Seat Height.** The minimum height of water	2010 CBC provides **less access** than 2010 ADA.	Floor Space: The 2010 ADA provides more access because it requires a clear floor space that is 56" from the rear wall and 60" from a side wall. Even with the exception in ADA 604.3.2, that permits a lavatory complying on the rear wall 18" minimum from the water closet centerline where the clearance at the water closet is 66" minimum measured perpendicular from the rear wall. Reinforced Walls for Grab Bars: The 2010 CBC makes a provision for the grab bars to be installed at a minimum on one side of the fixture. The 2010 ADA requires the grab bars to be installed on the rear and one side of the fixture. The 2010 ADA stipulates the location for the grab bars and the 2010 CBC stipulates the location for the grab bar reinforcement. Both documents require the reinforcement for grab bars to be installed, but the actual installation of grab bars is optional. The ADA makes no provision for floor mounted grab bars where there is no side wall. The 2010 ADA stipulates a 36" long minimum grab bar at the rear that extends from the centerline of the water closet 12" minimum on one side and 24" minimum on the other side. The 2010 ADA stipulates that the side wall grab bar shall be 42" long minimum, located 12" maximum from the rear wall and extending 54" minimum from the rear wall. Seat Height: The 2010 ADA stipulates a seat height range of 15" -19" above the floor. Water Closet Controls: The 2010 CBC stipulates control location and force. The 2010 ADA stipulates force and control type. Toilet Paper Dispenser: The 2010 ADA makes requirements for the toilet dispenser location to be 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser. The outlet of the dispenser shall be 15" minimum and 48" inches maximum above the finish floor and shall not be located behind grab bars. Dispensers shall not be of a type that controls delivery or that does not allow continuous paper flow. The 2010 CBC does not stipulate requirements for the location of the toilet dispenser in dwelling units.	1. Recommend providing the clear floor space requirements as specified in the 2010 ADA. 2. Recommend the requirement that grab bars should be installed on the rear and one side of the fixture, and remove the requirement for floor mounted grab bars. Grab bar lengths should be stipulated as provided in the 2010 ADA. The requirement to provide grab bar reinforcement in lieu of grab bar installation should remain. 3. Recommend the seat height range as provided in the 2010 ADA. 4. Recommend requirements for the location and force of the water closet controls as stipulated in the 2010 CBC with the addition of the requirements for control type of the ADA. 5. Recommend including the requirements for the location of the toilet paper dispenser as per the 2010 ADA.

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1785			**1134A.8 Lavatories, vanities, mirrors and towel fixtures.** Bathrooms or powder rooms required to be accessible shall have at least one accessible lavatory. Where mirrors and towel fixtures are provided, at least one of each shall be accessible. **1134A.8 #1. Location.** Vanities and lavatories shall be installed with the centerline of the fixture a minimum of 18 inches (457 mm) horizontally from an adjoining wall or fixture to allow for forward approach. When parallel approach is provided, lavatories shall be installed with the centerline of the fixture a minimum of 24 inches (610 mm) horizontally from an adjoining wall or fixture. The top of the fixture rim shall be a maximum of 34 inches (864 mm) above the finished floor. **1134A.8 #2. Floor Space.** A clear maneuvering space at least 30 inches by 48 inches (762 mm by 1219 mm) shall be provided at lavatories and shall be centered on the lavatory. **1134A.8 #3. Cabinets.** Cabinets under lavatories are acceptable-provided the bathroom has space to allow a parallel approach by a person in a wheelchair and the lavatory cabinets are designed with adaptable knee and toe space. **1134A.8 #4. Knee and Toe Space.** Knee and toe space shall be provided as follows: **1134A.8 #4-4.1.** The knee space shall be at least 30 inches (762 mm) wide and 8 inches (203.2 mm) deep. **1134A.8 #4-4.2.** The knee space shall be at least 29 inches (737 mm) high at the front face and reducing to not less than 27 inches (686 mm) at a point 8 inches (203.2 mm) back from the front edge. **1134A.8 #4-4.3.** The knee and toe space required in this section shall be provided by one of the following: **1134A.8 #4-4.3.1.** The space beneath the lavatory shall be left clear and unobstructed; **1134A.8 #4-4.3.2.** Any cabinet beneath the lavatory shall be removable without the use of specialized knowledge or specialized tools; or **1134A.8 #4-4.3.3.** Doors to the cabinet beneath the lavatory	2010 CBC provides **less access** than 2010 ADA.	Location: The 2010 ADA Section 606 does not allow a parallel approach to the lavatory sink. 34" height and 18" centerline of fixture from an adjoining wall are equivalent to the 2010 CBC. Floor Space: The 2010 CBC floor space requirements at the lavatory are equivalent to the 2010 ADA requirements. Cabinets: A parallel approach to the lavatory sink is not permitted in the 2010 ADA. Cabinets are permitted in the 2010 ADA as long as they can removed without removal or replacement of the lavatory fixture. The 2010 CBC designation of the removal of cabinets "without specialized knowledge or specialized tools" is too vague. Removal of doors to the cabinet is acceptable in both documents as long as clear space requirements are met. Knee and Toe Space: Knee space of 30" wide and 8" deep is equivalent in both documents. Knee space in the 2010 ADA is a consistent 27" from the front edge of the lavatory to a point 8" back from the front edge. The toe space is equivalent in both documents. Finished Floor: Equivalent in both documents. Plumbing Protection: Equivalent in both documents. Lavatory and Faucet Controls: Equivalent in both documents. Mirrors and Towel Fixtures: The maximum 40" height for the bottom edge of mirrors is equivalent in both documents. The 2010 ADA stipulates an additional requirement that mirrors not located over a lavatory or countertop shall have a maximum 35" height requirement above the finish floor. Towel fixtures have a maximum 40" height requirement in both documents.	1. Eliminate the provision for a parallel approach in the 2010 CBC. 2. Eliminate the provision in the 2010 CBC that states that cabinets shall be removable "without specialized knowledge or specialized tools" and replace it with the provision that cabinets shall be removeable without removal or replacement of the lavatory fixture as is stated in the 2010 ADA. 3. Include the provision for the continuous 27" high clearance of the lavatory as provided in the 2010 ADA instead of the tapered clearance of 29" to 27" from the front of the lavatory fixture to a point 8" from the front edge. 4. Include the provision for the lower 35" maximum height of the bottom edge of the mirror if the mirror is not mounted over a lavatory or countertop as provided in the 2010 ADA.
1785	**Advisory 809.4 Toilet Facilities and Bathing Facilities.** In an effort to promote space efficiency, vanity counter top space in accessible residential dwelling units is often omitted. This omission does not promote equal access or equal enjoyment of the unit. Where comparable units have vanity counter tops, accessible units should also have vanity counter tops located as close as possible to the lavatory for convenient access to toiletries.			2010 CBC **does not address** 2010 ADA req.	The advisory increases access because it provides for equal enjoyment.	1. Recommend inclusion of this provision in the 2010 CBC.
1786	**809.5 Residential Dwelling Units with Communication Features.** *Residential dwelling units* required to provide communication features shall comply with 809.5.					
1787	**809.5.1 Building Fire Alarm System.** Where a *building* fire alarm system is provided, the system wiring shall be extended to a point within the *residential dwelling unit* in the vicinity of the *residential dwelling unit* smoke detection system.		**1114B.2.2 Alarms/emergency warning systems/accessibility.** If emergency warning systems are provided, they shall include both audible alarms and visible alarms complying with NFPA 72 and Chapter 9, Sections 907.5.2.1 and 907.5.2.3.	2010 CBC **does not address** 2010 ADA req.	While both documents reference NFPA 72, the 2010 ADA clarifies further the alarm requirement in requiring that the system wiring shall be extended to a point within the residential dwelling unit in the vicinity of the residential dwelling unit smoke detection system.	1. Recommend including the 2010 ADA requirement that when a building fire alarm system is provided, the system wiring shall be extended to a point within the residential dwelling unit in the vicinity of the residential dwelling unit smoke detection system.
1788	**809.5.1.1 Alarm Appliances.** Where alarm appliances are provided within a *residential dwelling unit* as part of the *building* fire alarm system, they shall comply with 702.		**1114B.2.2 Alarms/emergency warning systems/accessibility.** If emergency warning systems are provided, they shall include both audible alarms and visible alarms complying with NFPA 72 and Chapter 9, Sections 907.5.2.1 and 907.5.2.3.	2010 CBC **does not address** 2010 ADA req.	While both documents reference NFPA 72, the 2010 ADA clarifies further the requirement for alarm appliances that are provided within a residential dwelling unit as part of the building fire alarm system.	1. Recommend including the requirement that where alarm appliances are provided within a residential dwelling unit as part of the building fire alarm system, they shall comply with 702.

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1789	**809.5.1.2 Activation.** All visible alarm appliances provided within the *residential dwelling unit* for *building* fire alarm notification shall be activated upon activation of the *building* fire alarm in the portion of the *building* containing the *residential dwelling unit* .		**1114B.2.2 Alarms/emergency warning systems/accessibility.** If emergency warning systems are provided, they shall include both audible alarms and visible alarms complying with NFPA 72 and Chapter 9, Sections 907.5.2.1 and 907.5.2.3. **1111B.4.5.1 Visible alarms.** Visible alarms shall be provided and shall comply with NFPA 72 and Chapter 9, Section 907.5.2.3.	2010 CBC **does not address** 2010 ADA req.	While both documents reference NFPA 72, the 2010 ADA clarifies further the requirement all visible alarm appliances provided within the residential dwelling unit for building fire alarm notification shall be activated upon activation of the building fire alarm in the portion of the building containing the residential dwelling unit.	1. Recommend including the requirement that all visible alarm appliances provided within the residential dwelling unit for building fire alarm notification shall be activated upon activation of the building fire alarm in the portion of the building containing the residential dwelling unit.
1790	**809.5.2 Residential Dwelling Unit Smoke Detection System.** *Residential dwelling unit* smoke detection systems shall comply with NFPA 72 (1999 or 2002 edition) (incorporated by reference, see “Referenced Standards” in Chapter 1).					
1791	**809.5.2.1 Activation.** All visible alarm appliances provided within the *residential dwelling unit* for smoke detection notification shall be activated upon smoke detection.		**1114B.2.2 Alarms/emergency warning systems/accessibility.** If emergency warning systems are provided, they shall include both audible alarms and visible alarms complying with NFPA 72 and Chapter 9, Sections 907.5.2.1 and 907.5.2.3. **1111B.4.5.1 Visible alarms.** Visible alarms shall be provided and shall comply with NFPA 72 and Chapter 9, Section 907.5.2.3.	2010 CBC **does not address** 2010 ADA req.	While both documents reference NFPA 72, the 2010 ADA clarifies further the requirement that all visible alarm appliances provided within the residential dwelling unit for smoke detection notification shall be activated upon smoke detection.	1. Recommend including the requirement that all visible alarm appliances provided within the residential dwelling unit for smoke detection notification shall be activated upon smoke detection.
1792	**809.5.3 Interconnection.** The same visible alarm appliances shall be permitted to provide notification of *residential dwelling unit* smoke detection and *building* fire alarm activation.		**1114B.2.2 Alarms/emergency warning systems/accessibility.** If emergency warning systems are provided, they shall include both audible alarms and visible alarms complying with NFPA 72 and Chapter 9, Sections 907.5.2.1 and 907.5.2.3. **1111B.4.5.1 Visible alarms.** Visible alarms shall be provided and shall comply with NFPA 72 and Chapter 9, Section 907.5.2.3.	2010 CBC **does not address** 2010 ADA req.	While both documents reference NFPA 72, the 2010 ADA clarifies further the requirement all visible alarm appliances provided within the residential dwelling unit for building fire alarm notification shall be activated upon activation of the building fire alarm in the portion of the building containing the residential dwelling unit.	1. Recommend including the requirement that all visible alarm appliances provided within the residential dwelling unit for building fire alarm notification shall be activated upon activation of the building fire alarm in the portion of the building containing the residential dwelling unit.
1793	**809.5.4 Prohibited Use.** Visible alarm appliances used to indicate *residential dwelling unit* smoke detection or *building* fire alarm activation shall not be used for any other purpose within the *residential dwelling unit* .		**1114B.2.2 Alarms/emergency warning systems/accessibility.** If emergency warning systems are provided, they shall include both audible alarms and visible alarms complying with NFPA 72 and Chapter 9, Sections 907.5.2.1 and 907.5.2.3. **1111B.4.5.1 Visible alarms.** Visible alarms shall be provided and shall comply with NFPA 72 and Chapter 9, Section 907.5.2.3. **1111B.4.5.2 Visual notification devices.** Visual notification devices shall also be provided in units, sleeping rooms and suites to alert room occupants of incoming telephone calls and a door knock or bell. Notification devices shall not be connected to visible alarm signal appliances.	2010 CBC is **equivalent** to 2010 ADA.		
1794	**809.5.5 Residential Dwelling Unit Primary Entrance.** Communication features shall be provided at the *residential dwelling unit* primary *entrance* complying with 809.5.5.		**1111B.4.5 Visible alarms, notification devices and telephones for persons with hearing impairments.** In addition to those accessible sleeping rooms and suites required by Section 1111B.4.2, additional sleeping rooms and suites shall be provided with the following features as required by Table 11B-4. **...**	2010 CBC is **equivalent** to 2010 ADA.		

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1795	**809.5.5.1 Notification.** A hard-wired electric doorbell shall be provided. A button or switch shall be provided outside the *residential dwelling unit* primary *entrance*. Activation of the button or switch shall initiate an audible tone and visible signal within the *residential dwelling unit*. Where visible doorbell signals are located in sleeping areas, they shall have controls to deactivate the signal.		**1111B.4.5.2 Visual notification devices.** Visual notification devices shall also be provided in units, sleeping rooms and suites to alert room occupants of incoming telephone calls and a door knock or bell. Notification devices shall not be connected to visible alarm signal appliances.	2010 CBC provides **less access** than 2010 ADA.	While both documents provide for a visual notification of when a door bell is rung, the 2010 ADA has additional requirements that provide for a hard-wired electric doorbell and a button or switch outside the residential dwelling unit primary entrance. The 2010 ADA requires that activation of the button or switch shall initiate an audible tone and visible signal within the residential dwelling unit. The 2010 CBC does not mandate an audible tone. The 2010 ADA also makes an additional requirement that where visible doorbell signals are located in sleeping areas, they shall have controls to deactivate the signal.	1. Recommend including the provisions that provide for a hard-wired electric doorbell and a button or switch outside the residential dwelling unit primary entrance. 2. Recommend including the provision that requires that activation of the button or switch to initiate an audible tone and visible signal within the residential dwelling unit. 3. Recommend including the requirement that where visible doorbell signals are located in sleeping areas, they shall have controls to deactivate the signal.
1796	**809.5.5.2 Identification.** A means for visually identifying a visitor without opening the *residential dwelling unit* entry door shall be provided and shall allow for a minimum 180 degree range of view.			2010 CBC **does not address** 2010 ADA req.	The 2010 CBC does not require the use of peepholes in the entry door.	Recommend including the requirement for a means for visually identifying a visitor without opening the residential dwelling unit entry door. The device shall allow for a minimum 180 degree range of view.
1797	**Advisory 809.5.5.2 Identification.** In doors, peepholes that include prisms clarify the image and should offer a wide-angle view of the hallway or exterior for both standing persons and wheelchair users. Such peepholes can be placed at a standard height and permit a view from several feet from the door.			2010 CBC **does not address** 2010 ADA req.	The 2010 CBC does not require the use of peepholes in the entry door.	1. Recommend including the requirement for a peephole that includes prisms to clarify the image and offer a wide-angle view of the hallway or exterior for both standing persons and wheelchair users. Such peepholes can be placed at a standard height and permit a view from several feet from the door.
1798	**809.5.6 Site, Building, or Floor Entrance.** Where a system, including a closed-circuit system, permitting voice communication between a visitor and the occupant of the *residential dwelling unit* is provided, the system shall comply with 708.4.			2010 CBC **does not address** 2010 ADA req.	The 2010 ADA makes the following provisions for Residential Dwelling Unit Communication Systems in Section 708.4: Communications systems between a residential dwelling unit and a site, building, or floor entrance shall comply with 708.4. 708.4.1 Common Use or Public Use System Interface. The common use or public use system interface shall include the capability of supporting voice and TTY communication with the residential dwelling unit interface. 708.4.2 Residential Dwelling Unit Interface. The residential dwelling unit system interface shall include a telephone jack capable of supporting voice and TTY communication with the common use or public use system interface.	1. Recommend including the 2010 ADA requirements for residential dwelling units communication systems as provided in Section 708.4.
1799	**810 Transportation Facilities**		**SECTION 1121B TRANSPORTATION FACILITIES**	2010 CBC is **equivalent** to 2010 ADA.		
1800	**810.1 General.** Transportation *facilities* shall comply with 810.		**1121B.1 General.** Every station, bus stop, bus stop pad, terminal, building or other transportation facility shall incorporate the accessibility requirements of this code as modified by this chapter. …	2010 CBC is **equivalent** to 2010 ADA.	The text of 1121B.1 comes from and is an expansion of 1991 ADA Stds 10.1, which has been determined to be equivalent to 810.1 by others. The language within 1121B.1 pertaining to the elevator exemption can be found in §36.401(d)(2)(ii).	
1800	**810.1 General.** Transportation *facilities* shall comply with 810.		**1121B.1 General.** Every station, bus stop, bus stop pad, terminal, building or other transportation facility shall incorporate the accessibility requirements of this code as modified by this chapter. ... In such a facility, any area housing passenger services, including boarding and debarking, loading and unloading, baggage claim, dining facilities, and other common areas open to the public must be on an accessible route from an accessible entrance.	2010 CBC is **equivalent** to 2010 ADA.	Text similar to that shown here can be found in §36.401 (d)(2)(ii).	
1801	**810.2 Bus Boarding and Alighting Areas.** Bus boarding and alighting areas shall comply with 810.2.		**1121B.2.1 New construction.** Where provided, bus stop pads shall ... **1121B.2.2 Bus stop siting and alterations.** **1.** Bus stop sites shall be chosen such that the areas where lifts or …	2010 CBC provides **less access** than 2010 ADA.	"Where provided" in 1121B.2.1 indicates that "bus stop pads" are not required at all bus stops. 810.2 on the other hand indicates, since every bus stop involves/includes boarding and alighting areas, that compliant bus boarding and alighting areas shall be provided every bus stop.	Eliminate the phrase "Where provided" from the text.

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1802	**Advisory 810.2 Bus Boarding and Alighting Areas.** At bus stops where a shelter is provided, the bus stop pad can be located either within or outside of the shelter.			NA	There is no comparable language in the CBC regarding this advisory. Advisory notes are not used in the CBC. Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b)	
1803	**810.2.1 Surface.** Bus stop boarding and alighting areas shall have a firm, stable surface.		**1121B.2.1 New construction.** ... bus stop pads shall have a firm, stable surface ... **1121B.2.2 Bus stop siting and alterations.** **1.** Bus stop sites shall be chosen such that the areas where lifts or ramps are to be deployed comply with Section 1121B.2.1. **...**	2010 CBC is **equivalent** to 2010 ADA.		
1804	**810.2.2 Dimensions.** Bus stop boarding and alighting areas shall provide a clear length of 96 inches (2440 mm) minimum, measured perpendicular to the curb or vehicle roadway edge, and a clear width of 60 inches (1525 mm) minimum, measured parallel to the vehicle roadway.	***ETA Editor's Note*** The Department of Transportation in Appendix F of 36 CFR Part 1191 has modified 810.2.2 as follows: 810.2.2 Dimensions. Bus boarding and alighting areas shall provide a clear length of 96 inches (2440 mm), measured perpendicular to the curb or vehicle roadway edge, and a clear width of 60 inches (1525 mm), measured parallel to the vehicle roadway. Public entities shall ensure that the construction of bus boarding and alighting areas comply with 810.2.2, to the extent the construction specifications are within their control.	**1121B.2.1 New construction.** ...bus stop pads shall have ... a minimum clear length of 96 inches (2438 mm) (measured from the curb or vehicle roadway edge) and a minimum clear width of 60 inches (1524 mm) (measured parallel to the vehicle roadway) to the maximum extent allowed by legal or site constraints. ... **1121B.2.2 Bus stop siting and alterations.** **1.** Bus stop sites shall be chosen such that the areas where lifts or ramps are to be deployed comply with Section 1121B.2.1. **...**	2010 CBC provides **less access** than 2010 ADA.	11121B.2.1 contains the mitigating phrase, "to the maximum extent allowed by legal or site constraints". Similar language can be found in 209.2.3, which states "On-street bus stops shall comply with 810.2 to the maximum extent practicable." The latter allows noncompliance only at on-street bus stops. While one might argue that all bus stops are "on-street", and that the former says essentially the same thing, in actuality they are not, and it does not. 1121B.2.1 would allow for a failure to comply at an on-site bus stop, for example. 1121B.2.1, therefore is less restrictive, and provides less access than 810.2.2 (and 209.2.3).	1) Modify the text of 1121B.2.1 to state something along the lines of: "On-street bus stops shall comply with 1121B.2.1 (paragraphs 1 and 2) to the maximum extent practicable" 2) Note the *ETA Editor's Note* in column M. Consider modifying the text to reflect the language used therein: "Public entities shall ensure that the construction of bus boarding and alighting areas comply with 1121B.2.1 (paragraphs 1 and 2), to the extent the construction specifications are within their control."
1805	**810.2.3 Connection.** Bus stop boarding and alighting areas shall be connected to streets, sidewalks, or pedestrian paths by an *accessible* route complying with 402.		**1121B.2.1 New construction.** .... Bus stop pads shall connect to streets, sidewalks or pedestrian paths as part of an accessible route complying with Section 1114B.1.2. ... **1121B.2.2 Bus stop siting and alterations.** **1.** Bus stop sites shall be chosen such that the areas where lifts or ramps are to be deployed comply with Section 1121B.2.1. **...**	2010 CBC provides **greater access** than 2010 ADA.	The text of the standards is essentially the same with respect to the notion that bus stop pads shall be connected in an accessible fashion to sidewalks, etc. There is a difference in the requirements of the referenced standards, however. 402 references 403, which calls for cross slopes no steeper than 1:48 (2.08%, 1/4" per foot). 1114B.1.2 references 1133B.7(.1.3), which calls for cross slopes no steeper than 1:50 (2%). One could argue that the CBC language is more restrictive, and therefore provides greater access, but the difference in the two standards is quite minor. The ADA requirement recognizes that elements are commonly constructed in terms of inches, not percentages, and it allows for cross slopes of up to 1/4" per foot. While it is perhaps less restrictive, 1:48 recognizes and allows for common construction industry practice without significantly impacting accessibility.	1) Maintain the current language of 1133B.7.1.3, which calls for maximum cross slopes of 1:50 **1:48 is the industry standard**. 2) Modify 1133B.7.1.3 to agree with 403.3 by calling for maximum cross slopes of 1:48.

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1805	**810.2.3 Connection.** Bus stop boarding and alighting areas shall be connected to streets, sidewalks, or pedestrian paths by an *accessible* route complying with 402.		**1121B.2.1 New construction.** ... Newly constructed bus stop pads must provide a square curb surface between the pad and road or other detectable warning in accordance with Section 1133B.8.5. ... Only approved DSA-AC detectable warning products and directional surfaces shall be installed as provided in the California Code of Regulations (CCR), Title 24, Part 1, Articles 2, 3 and 4. Refer to CCR Title 24, Part 12, Chapters 12-11A and B, for building and facility access specifications for product approval for detectable warning products and directional surfaces. Detectable warning products and directional surfaces installed after January 1, 2001, shall be evaluated by an independent entity, selected by the Department of General Services, Division of the State Architect—Access Compliance, for all occupancies, including transportation and other outdoor environments, except that when products and surfaces are for use in residential housing, evaluation shall be in consultation with the Department of Housing and Community Development. See Government Code Section 4460.	2010 CBC provides **greater access** than 2010 ADA.	2010 ADA Standards require detectable warnings at rail platforms (810.5.2), but there is no stated requirement to provide them at bus stop pads. In fact 810.5.2 is the only section, and rail platforms are the only location where the 2010 ADA Standards require detectable warnings. 1121B.1.2 calls for square curb surface between the bus stop pad and the road as an alternative to detectable warnings. There is no similar language in 810.2. While detectable warnings may assist persons with visual impairments, it is generally accepted that they can create problems for individuals with mobility impairments. Whether or not detectable warnings provide greater access depends at least as much on one's disability as it does on the specific locations where they may be installed. Likewise, a curb may benefit some while creating a barrier for others.	1) Maintain the current language of 1121B.2.1 regarding square curbs and detectable warnings at road edges. 2) Remove the portion of 1121B.2.1 pertaining to square curbs and detectable warnings at road edges.
1806	**810.2.4 Slope.** Parallel to the roadway, the slope of the bus stop boarding and alighting area shall be the same as the roadway, to the maximum extent practicable. Perpendicular to the roadway, the slope of the bus stop boarding and alighting area shall not be steeper than 1:48.		**1121B.2.1 New construction.** ... Bus stop pads shall be at same slope as roadway in the direction parallel to roadway, and maximum one unit vertical in 50 units horizontal (2-percent slope) perpendicular to roadway. ... **1121B.2.2 Bus stop siting and alterations.** **1.** Bus stop sites shall be chosen such that the areas where lifts or ramps are to be deployed comply with Section 1121B.2.1. **...**	2010 CBC provides **greater access** than 2010 ADA.	The text of the standards is essentially the same, except that 810.2.4 calls for cross slopes no steeper than 1:48 (2.08%, 1/4" per foot), and 1121B.2.1 calls for cross slopes no steeper than 1:50 (2%). One could argue that the CBC language is more restrictive, and therefore provides greater access, but the difference in the two standards is quite minor. The ADA requirement recognizes that elements are commonly constructed in terms of inches, not percentages, and it allows for cross slopes of up to 1/4" per foot. While it is perhaps less restrictive, 1:48 recognizes and allows for common construction industry practice without significantly impacting accessibility.	1) Maintain the current language of 1121B.2.1, which calls for maximum cross slopes of 1:50. 2) Modify 1121B.2.1 to agree with 810.3 by calling for maximum cross slopes of 1:48.

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1807	**810.3 Bus Shelters.** Bus shelters shall provide a minimum clear floor or ground *space* complying with 305 entirely within the shelter. Bus shelters shall be connected by an *accessible* route complying with 402 to a boarding and alighting area complying with 810.2.		**1121B.2.1 New construction.** ... Where provided, bus stop shelters shall be installed so as to permit a wheelchair user to enter the shelter from the public way and access a clear floor area of 30 inches by 48 inches (762 mm by 1219 mm) complying with Section 1118B.4, completely within the shelter. ...	Which Std.provides greater access **depends** on circumstances.	Both standards require a clear floor space of similar nature be provided within the bus shelter except where there are differences between 305 and 1118B.4: 1) The minimum knee space configuration noted in 1118B.4 is relative; it is dependent on the knee space requirements of specific elements, whereas 306 (which is referenced in 305) defines it clearly, and applies it ubiquitously. Under tables, for instance, the CBC would allow the clear floor space (considered to extend under the table) to be reduced to no less than 27" high, but under lavatories, it could be reduced to as little as 9" high for a maximum depth of 6" (for toe space). The ADA allows the clear floor space height to be reduced per the toe space requirements under all elements. 2) Changes in level are not allowed by the 2010 ADA within the required CLFS; CBC 1124B (referenced in 1118B.4 #3) does not prohibit them. 3) 2010 ADA limits the slope of the floor or ground surface to 1:48; the CBC does not specifically limit the floor or ground slope except with respect to 2% maximum cross slope (1133B.7.1.3), 5% maximum slope in the direction of travel (1133B.7.3), and 8.33% maximum slope for ramps (1133B.5.3). Paragraph 3 of 1121B.2.1 begins with "Where provided...". 810.3 does not include similar scoping language, but 218.4 does. With respect to this issue, the standards are in agreement.	1a) Adopt the ADA language for knee/toe space as it pertains to the extension of the clear floor space under objects. 1b) Leave the CBC language as it is (which currently provides greater access). 2a) Add language to 1118B.4 that prohibits changes in level from occurring within the required clear floor or ground space. 2b) Do not add language to 1118B.4 that prohibits changes in level from occurring within the required clear floor or ground space. T**his could put the CBC at odds with the ADA.**Such language could have significant consequences: for instance, an otherwise compliant carpet transition strip would create a noncompliant condition if located within the required clear floor space of an element. 3) Add language to 1118B.4 that clarifies that the required clear floor or ground space may slope no greater than 2% (= 1:50) or 2.08% (= 1:48 = 1/4"/ft).
1807	**810.3 Bus Shelters.** Bus shelters shall provide a minimum clear floor or ground *space* complying with 305 entirely within the shelter. Bus shelters shall be connected by an *accessible* route complying with 402 to a boarding and alighting area complying with 810.2.		**1121B.2.1 New construction.** ... Where provided, bus stop shelters ... shall be connected by an accessible route to the boarding area. ... 1121B.2.2 Bus stop siting and alterations. 1. Bus stop sites shall be chosen such that the areas where lifts or ramps are to be deployed comply with Section 1121B.2.1. **...**	2010 CBC is **equivalent** to 2010 ADA.	Both standards are in agreement, except with respect to differences in referenced standards already mentioned above. Bottom line: both standards require bus shelters to be connected to the bus stop pads by accessible routes.	
1807	**810.4 Bus Signs.** Bus route identification signs shall comply with 703.5.1 through 703.5.4, and 703.5.7 and 703.5.8. In addition, to the maximum extent practicable, bus route identification signs shall comply with 703.5.5.		**1121B.2.1 New construction.** ... Where provided, all bus route identification signs shall comply with Section 1117B.5.1, Item 2. ... **1121B.2.2 Bus stop siting and alterations.** **...** **2.** When new bus route identification signs are installed or old signs are replaced, they shall comply with the requirements of Section 1121B.2.1.	Which Std.provides greater access **depends** on circumstances.	Both standards require bus route identification signs to comply with signage standards, but there are a few differences in those standards. 1) 703.5.4 calls for character proportion percentages of 55% and 110%; 1117B.5.3 calls for 60% and 100%. The CBC is stricter, but it isn't clear whether or not this provides greater access. 2) 703.5.7 calls for stroke thickness percentage range of 10% - 30%; 1117B.5.3 calls for a range of 10% - 20%. The CBC is stricter, but it isn't clear whether or not this provides greater access. 3) 703.5.8 prescribes standards for character spacing. There is no comparable language in the CBC.	1a) Maintain the character proportion percentages prescribed in 1117B.5.3. 1b) Adopt the 703.5.4 character proportion percentages. 2a) Maintain the stroke thickness percentages prescribed in 1117B.5.3. 2b) Adopt the 703.5.7 character proportion percentages. 3) Add language to 1117B.5 addressing character spacing.
1808	**810.4 Bus Signs.** Bus route identification signs shall comply with 703.5.1 through 703.5.4, and 703.5.7 and 703.5.8. In addition, to the maximum extent practicable, bus route identification signs shall comply with 703.5.5.		**1121B.2.1 New construction.** ... Where provided, all bus route identification signs shall comply with Section 1117B.5.1, Item 2. …	2010 CBC provides **greater access** than 2010 ADA.	1121B.2.1 does include language that allows characters on bus route identification signs to be shorter than the heights prescribed in 1117B.5.4 under any circumstances. 810.4 allows for character height to be reduced when it is not practicable to comply with 703.5.5.	

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1809	**810.4 Bus Signs.** Bus route identification signs shall comply with 703.5.1 through 703.5.4, and 703.5.7 and 703.5.8. In addition, to the maximum extent practicable, bus route identification signs shall comply with 703.5.5.		**1121B.2.1 New construction.** ... Where provided, all bus route identification signs shall comply with Section 1117B.5.1, Item 2. …	2010 CBC provides **greater access** than 2010 ADA.	1121B.2.1 does include language that allows characters on bus route identification signs to be shorter than the heights prescribed in 1117B.5.4 under any circumstances. 810.4 allows for character height to be reduced when it is not practicable to comply with 703.5.5.	
1810	**810.4 EXCEPTION:** Bus schedules, timetables and maps that are posted at the bus stop or bus bay shall not be required to comply.			2010 CBC **does not address** 2010 ADA req.	The Column S language isn't quite correct. It isn't that the CBC doesn't address this requirement; the CBC doesn't explicitly address this exception/exclusion. There is, however, no language in the CBC that calls for schedules, timetables, or maps to comply.	1) Add language to 1121B.2.1 that explicitly states the 810.4 exception. 2) Do not add the 801.4 Exception language to 1121B.2.1
1811	**810.5 Rail Platforms.** Rail platforms shall comply with 810.5.		**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable:	2010 CBC provides **greater access** than 2010 ADA.	1121B.3 appears to include more types of facilities than 810.5, which is limited to Rail Platforms. Granted, the majority of facilities included in the 1121B.3.1 list are rail-oriented, there is room for the inclusion of non-rail systems. As such, the CBC provides greater access.	
1811.1	**810.5 Rail Platforms.** Rail platforms shall comply with 810.5.		**1121B.3 Fixed facilities and stations.** **...** **1.** Elements such as ramps, elevators or other circulation devices, fare vending or other ticketing areas, and fare collection areas shall be placed to minimize the distance which wheelchair users and other persons who cannot negotiate steps may have to travel compared to the general public. ...Where a circulation path is different, signage complying with Section 1117B.5.1, Items 2 and 3, shall be provided to indicate direction to and identify the accessible entrance and accessible route. **...**	2010 CBC provides **greater access** than 2010 ADA.	There is no language in the 2010 ADA Standards that is comparable to the text illustrated. Fare vending is mentioned in 707, but in this regard, only as an advisory.	
1811.2	**810.5 Rail Platforms.** Rail platforms shall comply with 810.5.		**1121B.3 Fixed facilities and stations.** **...** The circulation paths, each including an accessible entrance and an accessible route, for persons with disabilities shall, to the maximum extent practicable, coincide with the circulation path for the general public. ... **2.** If different entrances to a station serve different transportation fixed routes or groups of fixed routes, entrances serving each group or route shall comply with Section 1133B.1. **...**	2010 CBC is **equivalent** to 2010 ADA.	206.3 contains language equivalent to that noted in 1121B.3.1 #1. 206.4.4. contains language equivalent to 1121B.3.1 #2.	
1811.3	**810.5 Rail Platforms.** Rail platforms shall comply with 810.5.		**1121B.4 Airports.** **1121B.4.1 New construction.** **1.** Elements such as ramps, elevators or other vertical circulation devices, ticketing areas, security checkpoints or passenger waiting areas shall be placed to provide equitable travel distances for wheelchair users and other persons who cannot negotiate steps compared to the route for the general public. **2.** The circulation paths, each including an accessible entrance and an accessible route, for persons with disabilities shall, to the maximum extent practicable, coincide with the circulation path for the general public. Where a circulation path is different, signage complying with Section 1117B.5.1, Items 2 and 3, shall be provided to indicate direction to and identify the accessible entrance and accessible route.	2010 CBC provides **greater access** than 2010 ADA.	1121B.4.1 #2 provides requirements for location of circulation devices and accessible routes in airports. 810 does not speak of airports. There is no similar requirement in the 2010 ADA Standards.	

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1811.4	**810.5 Rail Platforms.** Rail platforms shall comply with 810.5.		**1121B.3 Fixed facilities and stations.** **...** **10.** Stations shall not be designed or constructed so as to require persons with disabilities to board or alight from a vehicle at a location other than one used by the general public.	2010 CBC provides **greater access** than 2010 ADA.	There is no similar language in the 2010 ADA Standards.	
1811.5	**810.5 Rail Platforms.** Rail platforms shall comply with 810.5.		**1121B.3 Fixed facilities and stations.** **...** **11.** Illumination levels in the areas where signage is located shall be uniform and shall minimize glare on signs. Lighting along circulation routes shall be of a type and configuration to provide uniform illumination.	2010 CBC provides **greater access** than 2010 ADA.	There is no similar language in the 2010 ADA Standards.	
1811.6	**810.5 Rail Platforms.** Rail platforms shall comply with 810.5.		**1121B.3 Fixed facilities and stations.** **...** **19.** Where provided, baggage check-in and retrieval systems shall be on an accessible route complying with Section 1114B.1.2 and shall have space immediately adjacent complying with Section 1118B.	2010 CBC provides **greater access** than 2010 ADA.	There is no similar language in the 2010 ADA Standards.	
1811.7	**810.5 Rail Platforms.** Rail platforms shall comply with 810.5.		**1121B.4 Airports.** **1121B.4.1 New construction.** **5.** Where provided, baggage check-in and retrieval systems shall be on an accessible route complying with Section 1114B.1.2 and shall have space immediately adjacent complying with Section 1118B.	2010 CBC provides **greater access** than 2010 ADA.	1121B.4.1 #5 provides requires baggage check-in and retrieval areas to be on an accessible route. 810 does not speak of airports. There is no similar requirement in the 2010 ADA Standards. 1118B includes reach ranges but this language does not specify what must be reached.	Recommend clarifying the reference to 1118B.
1812	**810.5.1 Slope.** Rail platforms shall not exceed a slope of 1:48 in all directions.		**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **...** **3.** Direct connections to commercial, retail or residential facilities shall have an accessible route complying with Section 1114B.1.2 from the point of connection to boarding platforms and all transportation system elements used by the public. Any elements provided to facilitate future direct connections shall be on an accessible route connecting boarding platforms and all transportation system elements used by the public.	2010 CBC provides **greater access** than 2010 ADA.	There is a difference between the 810.5.1 stated maximum cross slope of 1:48 (2.08%, 1/4" per foot), and the 1133B.7.1.3 (referenced in 1114B.1.2) stated maximum cross slope of 1:50 (2%). One could argue that the CBC language is more restrictive, and therefore provides greater access, but the difference in the two standards is quite minor. The ADA requirement recognizes that elements are commonly constructed in terms of inches, not percentages, and it allows for cross slopes of up to 1/4" per foot. While it is perhaps less restrictive, 1:48 recognizes and allows for common construction industry practice without significantly impacting accessibility.	1) Maintain the current language of 1133B.7.1.3, which calls for maximum cross slopes of 1:50. 2) Modify 1133B.7.1.3 to agree with 810.5.1 by calling for maximum cross slopes of 1:48.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1813	**810.5.1 Slope.** Rail platforms shall not exceed a slope of 1:48 in all directions.		**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **...** **3.** Direct connections to commercial, retail or residential facilities shall have an accessible route complying with Section 1114B.1.2 from the point of connection to boarding platforms and all transportation system elements used by the public. Any elements provided to facilitate future direct connections shall be on an accessible route connecting boarding platforms and all transportation system elements used by the public.	2010 CBC provides **greater access** than 2010 ADA.	There is a difference between the 810.5.1 stated maximum cross slope of 1:48 (2.08%, 1/4" per foot), and the 1133B.7.1.3 (referenced in 1114B.1.2) stated maximum cross slope of 1:50 (2%). One could argue that the CBC language is more restrictive, and therefore provides greater access, but the difference in the two standards is quite minor. The ADA requirement recognizes that elements are commonly constructed in terms of inches, not percentages, and it allows for cross slopes of up to 1/4" per foot. While it is perhaps less restrictive, 1:48 recognizes and allows for common construction industry practice without significantly impacting accessibility.	1) Maintain the current language of 1133B.7.1.3, which calls for maximum cross slopes of 1:50. **1:48 is the industry standard.** 2) Modify 1133B.7.1.3 to agree with 810.5.1 by calling for maximum cross slopes of 1:48.
1814	**810.5.1 EXCEPTION:** Where platforms serve vehicles operating on existing track or track laid in existing roadway, the slope of the platform parallel to the track shall be permitted to be equal to the slope (grade) of the roadway or existing track.			2010 CBC provides **greater access** than 2010 ADA.	1121B.3.1 applies to new construction, so the requirements stated therein do not apply to existing rail platforms. But it is conceivable that a new platform could be built on or adjacent to existing track. There is no language in the 2010 CBC that offers an exception similar to 810.5.1.	
1815	**810.5.2 Detectable Warnings.** Platform boarding edges not protected by platform screens or guards shall have *detectable warnings* complying with 705 along the full length of the *public use* area of the platform.		**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **1121.3.1 #8.** Platform edges bordering a drop-off and not protected by platform screens or guards shall have a detectable warning. Such detectable warnings shall comply with the following provisions as applicable, and shall run the full length of the platform drop-off. **(a)** Detectable warnings at transit boarding platforms. Transit boarding platforms shall have a detectable warning texture extending the full length of the loading area. This detectable warning texture shall have the following features. Width 24 to 36 inches (610 mm to 914 mm) placed at the edge of the drop-off or safe area. Durable, slip-resistant material having a surface texture composed of raised, truncated domes with a diameter of nominal 0.9 inch (22.9 mm) at the base tapering to 0.45 inch (11.4 mm) at the top, a height of nominal 0.2 inch (5.08 mm), and a center-to-center spacing of nominal 2.35 inches (59.7 mm) in compliance with Figure 11B-23A. “Nominal” as used here shall be in accordance with California State Referenced Standards Code Sections 12-11A and B-102. The detectable warning shall contrast visually with adjoining surfaces, either light on dark or dark on light. The material used to provide contrast shall be an integral part of the walking surface. Warning surfaces shall differ from adjoining walking surfaces in resiliency or sound-on-cane contact. This surface shall be reserved for warning. Color yellow conforming to Federal Color No. 33538, as shown in Table IV of Standard No. 595B. Where the color value contrast between the yellow warning and the main walking surface is less than 70 percent, a 1 inch-wide (25 mm) black strip shall separate the yellow warning from the main walking surface. Contrast shall be determined by: Contrast = [(B1-B2)/B1] x 100 percent where	Which Std.provides greater access **depends** on circumstances.	The following differences exist between 705 (referenced in 810.5.2) and 1121B.3.1 #8 (a): 1) 705 calls for a width of 24"; 1121B.3.1 calls for a width of 24" - 34". 2) The requirements for dome size and spacing are more restrictive in 1121B.3.1. 3) 1121B.3.1 requires that the material used to provide contrast shall be an integral part of the walking surface. 705 does not contain a similar requirement. 4) 1121B.3.1 requires that the warning surface shall differ from adjoining walking surfaces in resiliency or sound-on-cane contact. 705 does not contain a similar requirement. 5) 1121B.3.1 includes very specific requirements for color. 705 does not contain similar requirements. 6) 1121B.3.1 contains requirements for the review and approval of detectable warning products. 705 does not contain a similar requirement. 1121B.3.1 is generally more restrictive than 705, but more restrictive does not necessarily equate with greater access. In addition, while detectable warnings may assist persons with visual impairments, it is generally accepted that they can create problems for individuals with mobility impairments. Whether or not detectable warnings provide greater access depends at least as much on one's disability as it does on the specific locations where they may be installed.	1) Modify all or part of the text of 1121B.3.1#8 (a) so that it agrees with 705. 2) Leave 1121B.3.1 #8 (a) as it is.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1815.1	**810.5.2 Detectable Warnings.** Platform boarding edges not protected by platform screens or guards shall have *detectable warnings* complying with 705 along the full length of the *public use* area of the platform.		**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **1121.3.1 #8.** Platform edges bordering a drop-off and not protected by platform screens or guards shall have a detectable warning. Such detectable warnings shall comply with the following provisions as applicable, and shall run the full length of the platform drop-off. **(b)** Detectable directional texture at boarding platforms. At transit boarding platforms, the pedestrian access shall be identified with a detectable directional texture. This detectable directional texture shall comply with Figure 11B-23B and shall be 0.1 inch (2.54 mm) in height that tapers off to 0.04 inch (1.02 mm), with bars raised 0.2 inch (5.08 mm) from the surface. The raised bars shall be 1.3 inches (33.02 mm) wide and 3 inches (76 mm) from center-to-center of each bar. This surface shall differ from adjoining walking surfaces in resiliency or sound-on-cane contact. The color of the directional texture shall comply with Section 1121B.3.1, Item 8(a). This surface will be placed directly behind the yellow detectable warning texture specified in Section 1121B.3.1, Item 8(a), aligning with all doors of the transit vehicles where passengers will embark. The width of the directional texture shall be equal to the width of the transit vehicle's door opening. The depth of the texture shall not be less than 36 inches (914 mm). Only approved DSA-AC detectable warning products and directional surfaces shall be installed as provided in the California Code of Regulations (CCR), Title 24, Part 1, Articles 2, 3 and 4. Refer to CCR Title 24, Part 12, Chapters 12-11A and B, for building and facility access specifications for product approval for detectable warning products and directional surfaces. Detectable warning products and directional surfaces installed after January 1, 2001, shall be evaluated by an independent entity, selected by the Department of General	2010 CBC provides **greater access** than 2010 ADA.	Neither 810.5.2 nor 705 contain a requirement for detectable directional texture at boarding platforms. While the effect and value of detectable warnings depends on ones disability, the provision of discernable directional elements within a line of detectable warnings to identify the locations of the pedestrian access does appear to benefit individuals with visual impairments. The provision of clear lines of passage between the raised rows also appears to benefit those with mobility impairments when compared to the standard detectable warning feature.	
1816	**810.5.3 Platform and Vehicle Floor Coordination.** Station platforms shall be positioned to coordinate with vehicles in accordance with the applicable requirements of 36 CFR Part 1192. Low-level platforms shall be 8 inches (205 mm) minimum above top of rail.	***UNDER REVIEW*** ***ACC Note:*** See comments in Column T. The Column N statement is not correct. The 2010 ADA Stds are more stringent here.	**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **1121.3.1 #9.** In stations covered by this section, rail-to-platform height in new stations shall be coordinated with the floor height of new vehicles so that the vertical difference, measured when the vehicle is at rest, is within plus or minus ⅝ inch (15.9 mm) under normal passenger load conditions. ... **Exceptions:** **1.** Existing vehicles operating in new stations may have a vertical difference with respect to the new platform within plus or minus 1½ inches (38 mm). **...**	2010 CBC provides **less access** than 2010 ADA.	810.5.3 references the applicable requirements of 36 CFR Part 1192.. With respect to the vertical difference, it agrees with 1121B.3.1, except in two cases: 1) A vertical difference of within +/- 5/8" is allowed at each of the listed station types, except for "other fixed guideway systems" where the allowed vertical difference is within +/- 1/2". 2) 810.5.3 does not speak of existing vehicles operating in new stations. As such, one may conclude that the requirements above apply regardless. In these cases the 2010 ADA Stds is stricter.	1) Modify 1121.3.1 to require a maximum vertical offset of +/- 1/2" at "other guideway systems". 2a) Remove Exception 1. 2b) Exception 1 recognizes the likely use of existing vehicles at new stations, and it makes reasonable allowances. Leave it in.

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1816.1	**810.5.3 Platform and Vehicle Floor Coordination.** Station platforms shall be positioned to coordinate with vehicles in accordance with the applicable requirements of 36 CFR Part 1192. Low-level platforms shall be 8 inches (205 mm) minimum above top of rail.	***UNDER REVIEW*** ***ACC Note:*** See comments in Column T. The Column N statement is not correct. The are equivalent here.	**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **1121.3.1 #9.** ... For rapid rail, light rail, commuter rail, high speed rail, and intercity rail systems in new stations, the horizontal gap, measured when the new vehicle is at rest, shall be no greater than 3 inches (76 mm). For slow moving automated guideway "people mover" transit systems, the horizontal gap in new stations shall be no greater than 1 inch (25 mm). **...** **2.** In light rail, commuter rail and intercity rail systems where it is not operationally or structurally feasible to meet the horizontal gap or vertical difference requirements, mini-high platforms, car-borne or platform-mounted lifts, ramps or bridge plates, or similar manually deployed devices, meeting the applicable requirements of 36 CFR Part 1192, or 49 CFR Part 38 shall suffice.	2010 CBC is **equivalent** to 2010 ADA.	810.5.3 references the applicable requirements of 36 CFR Part 1192.. With respect to the horizontal gap, it agrees with 1121B.3.1 in all stated cases. 1121.3.1 # 9 Exception allows for alternative methods in cases of operational or structural infeasibility as long as those methods comply with the applicable requirements of 36 CFR 1192, or 49 CFR Part 38. Alternative methods are permitted by the ADA as long as they provide equivalent facilitation, which this statement requires. In these cases the standards are equivalent.	
1817	**810.5.3 EXCEPTION:** Where vehicles are boarded from sidewalks or street-level, low-level platforms shall be permitted to be less than 8 inches (205 mm).	**ETA Editor's Note** The Department of Transportation in Appendix F of 36 CFR Part 1191 has modified 810.5.3 as follows: 810.5.3 Platform and Vehicle Floor Coordination. Station platforms shall be positioned to coordinate with vehicles in accordance with the applicable requirements of 36 CFR part 1192. Low-level platforms shall be 8 inches (205 mm) minimum above top of rail. In light rail, commuter rail, and intercity rail systems where it is not operationally or structurally feasible to meet the horizontal gap or vertical difference requirements of 36 CFR part 1192 or 49 CFR part 38, mini-high platforms, car-borne or platform-mounted lifts, ramps or bridge plates or similarly manually deployed devices, meeting the requirements of 49 CFR part 38, shall suffice. EXCEPTION: Where vehicles are boarded from sidewalks or street-level, low-level platforms shall be permitted to be less than 8 inches (205 mm).	**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **1121.3.1 #9.** In stations covered by this section, rail-to-platform height in new stations shall be coordinated with the floor height of new vehicles so that the vertical difference, measured when the vehicle is at rest, is within plus or minus ⅝ inch (15.9 mm) under normal passenger load conditions. For rapid rail, light rail, commuter rail, high speed rail, and intercity rail systems in new stations, the horizontal gap, measured when the new vehicle is at rest, shall be no greater than 3 inches (76 mm). For slow moving automated guideway "people mover" transit systems, the horizontal gap in new stations shall be no greater than 1 inch (25 mm). **Exceptions:** **1.** Existing vehicles operating in new stations may have a vertical difference with respect to the new platform within plus or minus 1½ inches (38 mm). **2.** In light rail, commuter rail and intercity rail systems where it is not operationally or structurally feasible to meet the horizontal gap or vertical difference requirements, mini-high platforms, car-borne or platform-mounted lifts, ramps or bridge plates, or similar manually deployed devices, meeting the applicable requirements of 36 CFR Part 1192, or 49 CFR Part 38 shall suffice.	Which Std.provides greater access **depends** on circumstances.	1121.3.1 #9 Exception 2 and the 36 CFR Appendix F modifications of 810.5.3 (see the Column M *ETA Editor's Note*) are essentially the same. 810.5.3 does not offfer any exceptions pertaining to existing vehicles in new stations as 1121.3.1 #9 Exception 1 does.	

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1818	**Advisory 810.5.3 Platform and Vehicle Floor Coordination.** The height and position of a platform must be coordinated with the floor of the vehicles it serves to minimize the vertical and horizontal gaps, in accordance with the ADA Accessibility Guidelines for Transportation Vehicles (36 CFR Part 1192). The vehicle guidelines, divided by bus, van, light rail, rapid rail, commuter rail, intercity rail, are available at www.access-board.gov. The preferred alignment is a high platform, level with the vehicle floor. In some cases, the vehicle guidelines permit use of a low platform in conjunction with a lift or ramp. Most such low platforms must have a minimum height of eight inches above the top of the rail. Some vehicles are designed to be boarded from a street or the sidewalk along the street and the exception permits such boarding areas to be less than eight inches high.			NA	There is no comparable language in the CBC regarding this advisory. Advisory notes are not used in the CBC. Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b)	
1819	**810.6 Rail Station Signs.** Rail station signs shall comply with 810.6.		**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **...** **5.** Stations covered by this section shall have identification signs complying with Section 1117B.5.1, Item 2. Signs shall be placed at frequent intervals and shall be clearly visible from within the vehicle on both sides when not obstructed by another train. When station identification signs are placed close to vehicle windows (that is, on the side opposite from boarding) each shall have the top of the highest letter or symbol below the top of the vehicle window and the bottom of the lowest letter or symbol above the horizontal mid-line of the vehicle window. **...**	2010 CBC provides **greater access** than 2010 ADA.	1121B.3 appears to include more types of facilities than 810.6, which is limited to Rail Platforms. Granted, the majority of facilities included in the 1121B.3.1 list are rail-oriented, there is room for the inclusion of non-rail systems. As such, the CBC provides greater access.	
1820	**810.6 EXCEPTION:** Signs shall not be required to comply with 810.6.1 and 810.6.2 where audible signs are remotely transmitted to hand-held receivers, or are user- or proximity-actuated.		**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **...**	2010 CBC provides **greater access** than 2010 ADA.	The 2010 CBC does not contain a similar exception. While the provision of audible signs recognized in 810.6 Exception could be beneficial, 810.6 does not require them, and 1121B.3.1 requires compliant signs regardless of whether or not audible signs are provided. As such, the CBC provides greater access.	
1821	**Advisory 810.6 Rail Station Signs Exception.** Emerging technologies such as an audible sign systems using infrared transmitters and receivers may provide greater accessibility in the transit environment than traditional Braille and raised letter signs. The transmitters are placed on or next to print signs and transmit their information to an infrared receiver that is held by a person. By scanning an area, the person will hear the sign. This means that signs can be placed well out of reach of Braille readers, even on parapet walls and on walls beyond barriers. Additionally, such signs can be used to provide wayfinding information that cannot be efficiently conveyed on Braille signs.			NA	There is no comparable language in the CBC regarding this advisory. Advisory notes are not used in the CBC. Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b)	

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1822	**810.6.1 Entrances.** Where signs identify a station or its *entrance* , at least one sign at each *entrance* shall comply with 703.2 and shall be placed in uniform locations to the maximum extent practicable. Where signs identify a station that has no defined *entrance* , at least one sign shall comply with 703.2 and shall be placed in a central location.		**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **4.** Where signs are provided at entrances to stations identifying the station or the entrance, or both, at least one sign at each entrance shall comply with Section 1117B.5.1, Item 1. Such signs shall be placed in uniform locations at entrances within the transit system. **Exception:** Where the station has no defined entrance, but signage is provided, the accessible signage shall be placed in a central location. **...**	2010 CBC provides **less access** than 2010 ADA.	The CBC language is the same as the 1991 ADA Standards language. Both are in agreement with 810.6.1 regarding the notion that raised letter and Braille signs are required. The specific requirements for those signs, however, differ in numerous and significant ways. As such, these comments focus only on the basic requirements for the provision of the signs. Where there are defined entrances, the requirements for tactile signs are essentially the same. 810.6.1 offers greater clarity, however, regarding locations where there is no defined entrance. One might assume that when 1121B.3.1 #4 Exception says "the accessible signage shall be placed..." that a tactile sign is required, but that is not explicitly stated. 810.6.1 clearly requires that at least one tactile sign shall be provided. As such, it provides greater access.	Adopt revised language incorporating the stricter requirements of both standards.
1823	**810.6.2 Routes and Destinations.** Lists of stations, routes and destinations served by the station which are located on boarding areas, platforms, or *mezzanines* shall comply with 703.5. At least one *tactile* sign identifying the specific station and complying with 703.2 shall be provided on each platform or boarding area. Signs covered by this requirement shall, to the maximum extent practicable, be placed in uniform locations within the system.		**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **...** **6.** Lists of stations, routes or destinations served by the station and located on boarding areas, platforms or mezzanines shall comply with Section 1117B.5.1, Item 2. A minimum of one sign identifying the specific station and complying with Section 1117B.5.1, Item 1, shall be provided on each platform or boarding area. All signs referenced in this paragraph shall be placed in uniform locations within the transit system.	2010 CBC is **equivalent** to 2010 ADA.	The language of the standards is essentially the same. The specific requirements of the referenced sections, however, differ in numerous and significant ways. As such, these comments focus only on the basic requirements for the provision of the signs. The last sentence of 810.6.2 recognizes that it may not be practicable to place signs in uniform locations, and thus allows for variation based on site conditions.	
1824	**810.6.2 EXCEPTION:** Where sign *space* is limited, *characters* shall not be required to exceed 3 inches (75 mm).			2010 CBC provides **greater access** than 2010 ADA.	The 2010 CBC does not contain a similar exception.	
1825	**Advisory 810.6.2 Routes and Destinations.** Route maps are not required to comply with the informational sign requirements in this document.			NA	There is no comparable language in the CBC regarding the subject of this advisory. Advisory notes are not used in the CBC. Advisory notes unless specifically stated otherwise explain or illustrate the rule. They do not establish enforceable requirements. See 35.151 (d) & 36.406 (b)	

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1826	**810.6.3 Station Names.** Stations covered by this section shall have identification signs complying with 703.5. Signs shall be clearly visible and within the sight lines of standing and sitting passengers from within the vehicle on both sides when not obstructed by another vehicle.		**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **...** **5.** Stations covered by this section shall have identification signs complying with Section 1117B.5.1, Item 2. Signs shall be placed at frequent intervals and shall be clearly visible from within the vehicle on both sides when not obstructed by another train. When station identification signs are placed close to vehicle windows (that is, on the side opposite from boarding) each shall have the top of the highest letter or symbol below the top of the vehicle window and the bottom of the lowest letter or symbol above the horizontal mid-line of the vehicle window. **...**	Which Std.provides greater access **depends** on circumstances.	The CBC language is the same as the 1991 ADA Standards language, and for the most part it is in agreement with the 810.6.3 The specific requirements of the referenced sections, however, differ in numerous and significant ways. As such, these comments focus only on the basic requirements for the provision of the signs. 1121B.3.1 #5 prescribes specific mounting heights for the signs in question, whereas 810.6.3 requires them to be mounted so that they are "clearly visible and within the sight lines of standing and sitting passengers...". Given that one cannot anticipate the configuration of every vehicle and every station, it is not possible to say whether or not the placement of the signs as prescribed by 1121B.3.1 #5 will create the result mandated by 810.6.3 1121B.3.1 #5 states that the signs in question "shall be placed at frequent intervals". An advisory to 810.6.3 speaks to sign placement intervals, but advisories do not establish enforceable requirements. As such, in this case, the CBC is provides greater access.	Adopt revised language incorporating the stricter requirements of both standards.
1827	**Advisory 810.6.3 Station Names.** It is also important to place signs at intervals in the station where passengers in the vehicle will be able to see a sign when the vehicle is either stopped at the station or about to come to a stop in the station. The number of signs necessary may be directly related to the size of the lettering displayed on the sign.		**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **...** **5.** Stations covered by this section shall have identification signs complying with Section 1117B.5.1, Item 2. Signs shall be placed at frequent intervals and shall be clearly visible from within the vehicle on both sides when not obstructed by another train. When station identification signs are placed close to vehicle windows (that is, on the side opposite from boarding) each shall have the top of the highest letter or symbol below the top of the vehicle window and the bottom of the lowest letter or symbol above the horizontal mid-line of the vehicle window. **...**	2010 CBC provides **greater access** than 2010 ADA.	The CBC language is the same as the 1991 ADA Standards language, and for the most part it is in agreement with the 810.6.3 The specific requirements of the referenced sections, however, differ in numerous and significant ways. As such, these comments focus only on the basic requirements for the provision of the signs. 1121B.3.1 #5 states that the signs in question "shall be placed at frequent intervals". An advisory to 810.6.3 speaks to sign placement intervals, but advisories do not establish enforceable requirements. As such the CBC is stricter and it provides greater access.	
1828	**810.7 Public Address Systems.** Where public address systems convey audible information to the public, the same or equivalent information shall be provided in a visual format.		**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **14.** Where public address systems are provided to convey information to the public in terminals, stations, or other fixed facilities, a means of conveying the same or equivalent information to persons with hearing loss or who are deaf shall be provided.	2010 CBC is **equivalent** to 2010 ADA.	The CBC language is the same as the 1991 ADA Standards language, and it is essentially the same as the 2010 ADA Standards.	

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1828.1	**810.7 Public Address Systems.** Where public address systems convey audible information to the public, the same or equivalent information shall be provided in a visual format.		**1121B.4 Airports.** **1121B.4.1 New construction.** **6.** Terminal information systems which broadcast information to the general public through a public address system shall provide a means to provide the same or equivalent information to persons with a hearing loss or who are deaf. Such methods may include, but are not limited to, visual paging systems using video monitors and computer technology. For persons with certain types of hearing loss such methods may include, but are not limited to, an assistive listening system complying with Section 1104B.2.	2010 CBC provides **greater access** than 2010 ADA.	1121B.4.1 #6 provides requirements for terminal information systems for persons with hearing loss or who are deaf in airports. 810 does not speak of airports. There is no similar requirement in the 2010 ADA Standards.	
1829	**810.8 Clocks.** Where clocks are provided for use by the public, the clock face shall be uncluttered so that its *elements* are clearly visible. Hands, numerals and digits shall contrast with the background either light-on-dark or dark-on-light. Where clocks are installed overhead, numerals and digits shall comply with 703.5.		**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **15.** Where clocks are provided for use by the general public, the clock face shall be uncluttered so that its elements are clearly visible. Hands, numerals, and/or digits shall contrast with the background either light-on-dark or dark-on-light. Where clocks are mounted overhead, numerals and/or digits shall comply with Section 1117B.5.4. ...	2010 CBC provides **less access** than 2010 ADA.	1121B.3.1 #15 utilizes the 1991 ADA Standards language. It calls for numerals and/or digits to comply with 1117B.5.4, which pertains to character height. 810.8 calls for numerals and digits to comply with 703.5, which, in addition to character height, contains requirements for finish and contrast, case, style, proportions, stroke thickness, character spacing, and line spacing.	1) Call numerals and/or digits on overhead clocks to comply with 1117B.5.2, 1117B.5.3, and 1117B.5.4. Modify those sections to agree with the corresponding 2010 ADA sections, and create additional sections to cover character style and spacing.
1829.1			**1121B.4 Airports.** **1121B.4.1 New construction.** **7.** Where clocks are provided for use by the general public the clock face shall be uncluttered so that its elements are clearly visible. Hands, numerals and/or digits shall contrast with their background either light-on-dark or dark-on-light. Where clocks are mounted overhead, numerals and/or digits shall comply with Section 1117B.5.4. ...	2010 CBC provides **greater access** than 2010 ADA.	1121B.4.1 #7 provides requirements for clocks in airports. 810 does not speak of airports. There is no similar requirement in the 2010 ADA Standards.	
1830	**810.8 Clocks.** Where clocks are provided for use by the public, the clock face shall be uncluttered so that its *elements* are clearly visible. Hands, numerals and digits shall contrast with the background either light-on-dark or dark-on-light. Where clocks are installed overhead, numerals and digits shall comply with 703.5.		**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **15.** Where clocks are provided for use by the general public, ... Clocks shall be placed in uniform locations throughout the facility and system. **1121B.4 Airports.** **1121B.4.1 New construction.** **7.** Where clocks are provided for use by the general public ... Clocks shall be placed in uniform locations throughout the facility.	2010 CBC provides **greater access** than 2010 ADA.	1121B.3.1 #15 utilizes the 1991 ADA Standards language, but the Visual Character Height chart referenced in 1117B.5.4 is the same as 703.5.5 of the 2010 ADA Standards. In this case, the standards are equivalent. 1121B.3.1 #15 states that "Clocks shall be placed in uniform locations throughout the facility and system." There is no similar requirement in the 2010 ADA Standards. 1121B.3.1 #15 is somewhat confusing, however. It begins by saying "Where clocks are provided...", and ends by requiring them throughout. Apparently clocks aren't required, but providing one results in a requirement for many. 1121B.4.1 #7 provides requirements for clocks in airports. There is no similar requirement in the 2010 ADA Standards.	

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1831	**810.9 Escalators.** Where provided, escalators shall comply with the sections 6.1.3.5.6 and 6.1.3.6.5 of ASME A17.1 (incorporated by reference, see "Referenced Standards" in Chapter 1) and shall have a clear width of 32 inches (815 mm) minimum.		**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **16.** Where provided in below-grade stations, escalators shall have a minimum clear width of 32 inches (813 mm). At the top and bottom of each escalator run, at least two contiguous treads shall be level beyond the comb plate before the risers begin to form. All escalator treads shall be marked by a strip of clearly contrasting color, 2 inches (51 mm) in width, placed parallel to and on the nose of each step. The strip shall be of a material that is at least as slip resistant as the remainder of the tread. The edge of the tread shall be apparent from both ascending and descending directions.	Which Std.provides greater access **depends** on circumstances.	1121B.3.1 #15 utilizes the 1991 ADA Standards language. There are a few differences between it and the 2010 ADA requirements: 1) 1121B.3.1 #15 applies only to escalators in below-grade stations. 810.9 is not so limited; it applies in all cases where escalators are provided. ASME A17.1 has not been reviewed, however 2010 ADA Stds Advisory 105.2.2 speaks of the relevant requirements. 2) 1121B.3.1 #15 requires the contrasting stair strip to be 2" wide. Per Advisory 105.2.2, ASME A17.1 calls for them to be 2" wide maximum. 3) 1121B.3.1 #15 requires the contrasting stair strip to be places parallel to and on the nose of each step. Per Advisory 105.2.2, ASME A17.1 calls for them along the nose (the advisory says "back"), and along the sides of the steps. 4) The advisory does not mention slip resistance of the contrast strips. 5) The Advisory does not mention whether or not edges of treads must be apparent from both ascending and descending directions.	1) Modify 1121B.3.1 #16 to include all escalators. 2) No action required. 3) Modify 1121B.3.1 #16 to call for contrast striping along the sides of the steps (in addition to along the nose of each step). 4) No action required. 5) No action required.
1832	**810.9 EXCEPTION:** Existing escalators in *key stations* shall not be required to comply with 810.9.		**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **16.** Where provided in below-grade stations, escalators shall have a minimum clear width of 32 inches (813 mm). At the top and bottom of each escalator run, at least two contiguous treads shall be level beyond the comb plate before the risers begin to form. All escalator treads shall be marked by a strip of clearly contrasting color, 2 inches (51 mm) in width, placed parallel to and on the nose of each step. The strip shall be of a material that is at least as slip resistant as the remainder of the tread. The edge of the tread shall be apparent from both ascending and descending directions.	2010 CBC is **equivalent** to 2010 ADA.	Although no exemption comparable to 810.9 is stated, 1121B.3.1 only applies to new construction. As such, the two standards are equivalent.	
1833	**810.10 Track Crossings.** Where a *circulation path* serving boarding platforms crosses tracks, it shall comply with 402.		**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **13.** Where it is necessary to cross tracks to reach boarding platforms, the route surface shall be level and flush with the rail top at the outer edge and between rails, ... Such crossings shall comply with Section 1133B.8.5. ...	Which Std.provides greater access **depends** on circumstances.	1121B.3.1 #13 utilizes the 1991 ADA Standards language. There are a couple of differences between it and the 2010 ADA requirements: 1) 1121B.3.1 #13 requires compliance with 1133B.8.5, which pertains to detectable warnings. 8.10.5 only calls for detectable warnings at rail platform boarding edges. As stated above, detectable warnings may provide greater access to individuals with visual impairments, but the also create problems for individuals with mobility impairments. Which standard provides greater access regarding this issue depends on the disability. 2) 810.10 requires crossings to comply with 402. 402 requires compliance with all applicable sections of Chapter 4, some of which are not in agreement with the 2010 CBC. As they are too numerous to compare here, suffice it to say that which standard provides greater access depends on the circumstances.	1a) Maintain the requirement for detectable warnings. 1b) Remove the requirement for detectable warnings. 2a) Adopt the relevant 2010 ADA Stds language. 2b) Modify 1121B.3.1 #13 to clarify that the route must comply with 1114B.1.2.

Initial Row Number	2010 ADA Stds, Title II & III Regulations	2010 ETA's Notes & DOJ's "Note to Readers"	2010 CBC Section	Comparison of 2010 ADA Stds to 2010 CBC	Analysis and Comments	1-3 Recommendation(s) to Eliminate Conflict &/or Bring 2010 CBC up to Minimum 2010 ADA Requirement
1834	**810.10 EXCEPTION:** Openings for wheel flanges shall be permitted to be 2½ inches (64 mm) maximum.		**1121B.3 Fixed facilities and stations.** **1121B.3.1 New construction.** New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (for example, automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable: **13.** Where it is necessary to cross tracks to reach boarding platforms, the route surface shall be level and flush with the rail top at the outer edge and between rails, except for a maximum 2½-inch (64 mm) gap on the inner edge of each rail to permit passage of wheel flanges. ... Where gap reduction is not practicable, an above-grade or below-grade accessible route shall be provided.	2010 CBC provides **greater access** than 2010 ADA.	1121B.3.1 #13 utilizes the 1991 ADA Standards language. There is one difference between the 810.10 Exception and 1121B.3.1 #13. Both 1121B.3.1 #13 and 810.10 Exception allow for a maximum 2 1/2" gap on the inner edge of each rail for the passage of wheel flanges, but the former requires that an above or below-grade accessible route be provided when complying with this requirement is not practicable. 810.10 does not contain a similar requirement.	1) No action required. 2) Adopt the 810.10 language.
1835	**811 Storage**		See section 1125B Storage	NA		
1836	**811.1 General.** Storage shall comply with 811.		See section 1125B Storage	NA		
1837	**811.2 Clear Floor or Ground Space.** A clear floor or ground *space* complying with 305 shall be provided.		**1118B.4 Clear floor or ground space for wheelchairs.** 1. Size and approach. The minimum clear floor or ground space required to accommodate a single, stationary wheelchair and occupant is 30 inches by 48 inches. The minimum clear floor or ground space for wheelchairs may be positioned for forward or parallel approach to an object. Clear floor or ground space for wheelchairs may be part of the knee space required under some objects. See Figure 11B-5A. 2. Relationship of maneuvering clearances to wheelchair spaces. One full unobstructed side of the clear floor or ground space for a wheelchair shall adjoin or overlap an accessible route or adjoin another wheelchair clear floor space. If a clear floor space is located in an alcove or otherwise confined on all or a part of three sides, additional maneuvering clearances shall be provided as shown in Figure 11B-5A (b). 3. Surfaces for wheelchair spaces. Clear floor or ground spaces for wheelchairs shall comply with Section 1124B. **1125B.2 Clear floor space**. A clear floor space at least 30 inches by 48 inches (762 mm by 1219 mm) complying with Section 1118B.4 that allows either a forward or parallel approach by a person using a wheelchair shall be provided at accessible storage facilities.	2009 CBC is **equivalent** to 2010 ADA.		

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1838	**811.3 Height.** Storage *elements* shall comply with at least one of the reach ranges specified in 308.		**1118B.5 Forward reach.** **1118B.5.1 Unobstructed.** Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1219 mm) maximum and the low forward reach shall be 15 inches minimum above the finish floor or ground. See Figure 11B-5C (a). **1118B.5.2 Obstructed high reach.** Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches maximum where the reach depth is 20 inches maximum. Where the reach depth exceeds 20 inches, the high forward reach shall be 44 inches maximum and the reach depth shall be 25 inches maximum. See Figure 11B-5C (b) and (c). **1125B.3 Height.** Accessible storage spaces, including closets with a clothes rod or shelf, shall be within at least one of the reach ranges specified in Sections 1118B.5 and 1118B.6.	2010 CBC is **equivalent** to 2010 ADA.		
1839	**811.3 Height.** Storage *elements* shall comply with at least one of the reach ranges specified in 308.		**1118B.6 Side reach.** **1118B.6.1 Unobstructed.** Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches maximum and the low side reach shall be 15 inches minimum above the finish floor or ground. See Figure 11B-5D (a). Exception: An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches maximum. **1118B.6.2 Obstructed high reach**. Where a clear floor or ground space allows a parallel approach to an element and the high side reach is over an obstruction, the height of the obstruction shall be 34 inches maximum and the depth of the obstruction shall be 24 inches maximum. The high side reach shall be 48 inches maximum for a reach depth of 10 inches maximum. Where the reach depth exceeds 10 inches, the high side reach shall be 46 inches maximum for a reach depth of 24 inches maximum. See Figure 11B-5D (b) and (c). Exception: The top of washing machines and clothes dryers shall be permitted to be 36 inches maximum above the finish floor. **1125B.3 Height.** Accessible storage spaces, including closets with a clothes rod or shelf, shall be within at least one of the reach ranges specified in Sections 1118B.5 and 1118B.6.	2010 CBC is **equivalent** to 2010 ADA.	The ADA includes an aditional exception in 308 which is in CBC **1104C** in the body of the text under item 3. and shown in figure 11C-1. 2. Operable parts of fuel dispensers shall be permitted to be 54 inches maximum measured from the surface of the vehicular way where fuel dispensers are installed on existing curbs.	
1840	**811.3 Height.** Storage *elements* shall comply with at least one of the reach ranges specified in 308.		See above	See above		

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1841	**811.3 Height.** Storage *elements* shall comply with at least one of the reach ranges specified in 308.		See above		See above	
1842	**811.4 Operable Parts.** *Operable parts* shall comply with 309.		**1125B.4 Hardware.** Hardware for accessible storage facilities shall comply with Section 1117B.6. Touch latches and U-shaped pulls are acceptable.	2010 CBC is **equivalent** to 2010 ADA.		
1843	**CHAPTER 9: BUILT-IN ELEMENTS**		There are no equivalent headings in CBC.	NA		Organize and create section titled Built-In Elements
1844	**901 General**		There are no equivalent headings in CBC.	NA	Many of these elements are spread out in the CBC but they are in specific building use sections - it would be helpful if they can be grouped outside a building use so if the element is used in another building use the requirements would be there for all types	Organize and create section titled Built-In Elements
1845	**901.1 Scope.** The provisions of Chapter 9 shall apply where required by Chapter 2 or where referenced by a requirement in this document.		NA	2010 CBC **does not address** 2010 ADA req.	Many of these elements are spread out in the CBC but they are in specific building use sections - it would be helpful if they can be grouped outside a building use so if the element is used in another building use the requirements would be there for all types	Organize and create section titled Built-In Elements
1846	**902 Dining Surfaces and Work Surfaces**		There are no equivalent headings in CBC.	NA	CBC does not have a specific section on dining and work surfaces but rather it is spread thru-out in sections 1104B.5, 1105B.2, 1106B.3, 1110B.1, 1120B, 1122B	1. Revise title to add work surfaces and create a separate section not under A or other occupancies
1847	**902.1 General.** Dining surfaces and work surfaces shall comply with 902.2 and 902.3.		***SECTION 1122B*** ***FIXED OR BUILT-IN SEATING, TABLES, AND COUNTERS*** ***...*** ***1122B.4 Height of work surfaces.*** *The tops of tables and counters shall be 28 inches to 34 inches (711 mm to 864 mm) from the floor or ground.* …	2010 CBC **does not address** 2010 ADA req.	CBC does not include Work Surfaces in its title	Under 1122B add description of dining surfaces to say - Dining surfaces include, but are not limited to, bars, tables, lunch counters, and booths Under 1122B add description of work surfaces to say - Examples of work surfaces include writing surfaces, study carrels, student laboratory stations, baby changing and other tables or fixtures for personal grooming, and coupon counters, as well as employee work stations if required.
1848	**902.1 EXCEPTION:** Dining surfaces and work surfaces for *children's use* shall be permitted to comply with 902.4.		NA	2010 CBC **does not address** 2010 ADA req.	CBC does not address the heights and approach for dining and work surfaces allowed by ADA	1. Adopt the ADA requirements for children for dining and work surface requirements
1849	**Advisory 902.1 General.** Dining surfaces include, but are not limited to, bars, tables, lunch counters, and booths. Examples of work surfaces include writing surfaces, study carrels, student laboratory stations, baby changing and other tables or fixtures for personal grooming, coupon counters, and where covered by the ABA scoping provisions, employee work stations.		NA	2010 CBC **does not address** 2010 ADA req.	CBC does not specifically address all of the items as listed in the ADA - it would be helpful if these were listed in one spot	Under 1122B add description of dining surfaces to say - Dining surfaces include, but are not limited to, bars, tables, lunch counters, and booths Under 1122B add description of work surfaces to say - Examples of work surfaces include writing surfaces, study carrels, student laboratory stations, baby changing and other tables or fixtures for personal grooming, and coupon counters, as well as employee work stations if required.

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1850	**902.2 Clear Floor or Ground Space.** A clear floor *space* complying with 305 positioned for a forward approach shall be provided. …		***SECTION 1118B*** ***SPACE ALLOWANCE AND REACH RANGES*** **...** ***1118B.4 Clear floor or ground space for wheelchairs.*** ***1. Size and approach.*** *The minimum clear floor or ground space required to accommodate a single, stationary wheelchair and occupant is 30 inches by 48 inches (762 mm by 1219 mm). The minimum clear floor or ground space for wheelchairs may be positioned for forward or parallel approach to an object. Clear floor or ground space for wheelchairs may be part of the knee space required under some objects. See Figure 11B-5A.* ***2. Relationship of maneuvering clearances to wheelchair spaces.*** *One full unobstructed side of the clear floor or ground space for a wheelchair shall adjoin or overlap an accessible route or adjoin another wheelchair clear floor space. If a clear floor space is located in an alcove or otherwise confined on all or a part of three sides, additional maneuvering clearances shall be provided as shown in Figure 11B-5A(b).* ***Surfaces for wheelchair spaces.*** *Clear floor or ground spaces for wheelchairs shall comply with Section 1124B Ground and Floor Surfaces.* ***SECTION 1122B*** ***FIXED OR BUILT-IN SEATING, TABLES, AND COUNTERS*** **...**	2010 CBC provides **greater access** than 2010 ADA.		
1851	**902.2 Clear Floor or Ground Space.** ... Knee and toe clearance complying with 306 shall be provided.		**SECTION 1122B** **FIXED OR BUILT-IN SEATING, TABLES, AND COUNTERS** **...** ***1122B.3 Knee clearance***. *If seating for persons in wheelchairs is provided at fixed tables or counters, knee spaces at least 27 inches (686 mm) high, 30 inches (762 mm) wide and 19 inches (483 mm) deep shall be provided (see Figure 11B-13).* ...	Which Std.provides greater access **depends** on circumstances.	CBC does not distinguish between knee and toe clearance and requires 19" deep clear; ADA allows for a depth of 17" to 25" under the table in the same profile used for a lavatory	Adopt the knee and toe clearance per ADA of 8" min deep at 27" ht clr AFF and 11" min deep at 9" AFF with an additional 6" min at 0" to 9" AFF beyond the knee clearance and enter it under Section 1118B.4 - reference section
1852	**902.3 Height.** The tops of dining surfaces and work surfaces shall be 28 inches (710 mm) minimum and 34 inches (865 mm) maximum above the finish floor or ground.		***SECTION 1122B*** ***FIXED OR BUILT-IN SEATING, TABLES, AND COUNTERS*** **...** ***1122B.4 Height of work surfaces.*** *The tops of tables and counters shall be 28 inches to 34 inches (711 mm to 864 mm) from the floor or ground.* …	2010 CBC is **equivalent** to 2010 ADA.		NA
1853	**902.4 Dining Surfaces and Work Surfaces for Children's Use.** *Accessible* dining surfaces and work surfaces for *children's use* shall comply with 902.4.		NA	2010 CBC **does not address** 2010 ADA req.	CBC does not address the heights and approach for dining and work surfaces allowed by ADA	1. Adopt the ADA requirements for children for dining and work surface requirements

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1854	**902.4 EXCEPTION:** Dining surfaces and work surfaces that are used primarily by children 5 years and younger shall not be required to comply with 902.4 where a clear floor or ground *space* complying with 305 positioned for a parallel approach is provided.		**NA**	2010 CBC **does not address** 2010 ADA req.	CBC does not address the heights and approach for dining and work surfaces allowed by ADA	1. Adopt the ADA requirements for children for dining and work surface requirements
1855	**902.4.1 Clear Floor or Ground Space.** A clear floor *space* complying with 305 positioned for forward approach shall be provided. Knee and toe clearance complying with 306 shall be provided, except that knee clearance 24 inches (610 mm) minimum above the finish floor or ground shall be permitted.		NA	2010 CBC **does not address** 2010 ADA req.	CBC does not address the heights and approach for dining and work surfaces allowed by ADA	1. Adopt the ADA requirements for children for dining and work surface requirements
1856	**902.4.2 Height.** The tops of tables and counters shall be 26 inches (660 mm) minimum and 30 inches (760 mm) maximum above the finish floor or ground.		NA	2010 CBC **does not address** 2010 ADA req.	CBC does not address the heights and approach for dining and work surfaces allowed by ADA	1. Adopt the ADA requirements for children for dining and work surface requirements
1857	**903 Benches**		NA	2010 CBC **does not address** 2010 ADA req.		Create a new section for benches under 1122B which can address fixed bench requirements for fitting rooms, dressing rooms, changing rooms, shower rooms, pools, locker rooms, etc and specify that these are requirements for clothes changing only and adopt ADA language and criteria.
1858	**903.1 General.** Benches shall comply with 903.		NA	2010 CBC **does not address** 2010 ADA req.		Create a new section for benches under 1122B which can address fixed bench requirements for fitting rooms, dressing rooms, changing rooms, shower rooms, pools, locker rooms, etc and specify that these are requirements for clothes changing only and adopt ADA language and criteria.
1859	**903.2 Clear Floor or Ground Space.** Clear floor or ground *space* complying with 305 shall be provided and shall be positioned at the end of the bench seat and parallel to the short axis of the bench.		***1117B.8 Fitting and dressing rooms. ...*** *Clear floor space shall be provided alongside the bench to allow a person using a wheelchair to make a parallel transfer onto the bench. …*	Which Std.provides greater access **depends** on circumstances.	This needs to be changed to make the 48" length of the clr flr space parallel to the short axis of the bench. This changer moves the CLFS from the front of the bench to the side. Also clarify that if there is a wall greater than 24" deep on that side then the clear floor space needs to increase from 30"x 48" to 36" x 48" since it is in an alcove per 1118B.4 Item 2	The clear floor space shall be positioned at the end of the bench seat and parallel to the short axis of the bench to comply with the ADA. The clear floor space shall be positioned at the end of the bench seat and parallel to the short axis of the bench and comply with 1118B.4
1860	**903.3 Size.** Benches shall have seats that are 42 inches (1065 mm) long minimum and 20 inches (510 mm) deep minimum and 24 inches (610 mm) deep maximum.		***1117B.8 Fitting and dressing rooms. ...*** *Every accessible dressing room shall have a 24-inch by 48-inch (610 mm by 1219 mm) bench …*	Which Std.provides greater access **depends** on circumstances.	ADA requires a 42" min long seat - CBC requires a 48" min long seat ADA requires a 20" min to 24" max depth seat from face of wall or seat back - CBC requires 24" which may not accommodate as many people	Adopt ADA language and criteria for bench seats Adopt ADA language and criteria for seats except state seat and seat back are 48" long min
1861	**903.4 Back Support.** The bench shall provide for back support or shall be affixed to a wall. Back support shall be 42 inches (1065 mm) long minimum and shall extend from a point 2 inches (51 mm) maximum above the seat surface to a point 18 inches (455 mm) minimum above the seat surface. Back support shall be 2½ inches (64 mm) maximum from the rear edge of the seat measured horizontally.		***1117B.8 Fitting and dressing rooms. ...*** *Every accessible dressing room shall have a ...bench fixed to the wall along the longer dimension. ...*	2010 CBC **does not address** 2010 ADA req.	CBC does not address the space between the bench and the back of 2.5" max horizontally and 2" max vertically CBC does not address using the wall OR a back support CBC does not address the 42" min length for the back support CBC does not address the min ht above the seat for the back support CBC states that a bench has to be affixed to the wall - this is not always possible in a locker room situation and the bench needs to be near the accessible lockers - ADA allows for a back instead	Create a new section for benches under 1122B which can address fixed bench requirements for fitting rooms, dressing rooms, changing rooms, shower rooms, pools, locker rooms, etc and specify that these are requirements for clothes changing only and adopt ADA language and criteria. Then adopt the ADA language on seat backs Allowing for a seat back OR affixed to the wall Adopt ADA language about back support with bench being affixed to the wall and add an exception for a seat back when in the middle of a space not backed to a wall (ie locker rooms)

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1862	**Advisory 903.4 Back Support.** To assist in transferring to the bench, consider providing grab bars on a wall adjacent to the bench, but not on the seat back. If provided, grab bars cannot obstruct transfer to the bench.		NA	2010 CBC **does not address** 2010 ADA req.	CBC does not address advisory of grab bars on side wall	Do not provide for grab bars Provide for grab bar on side wall adjacent to bench, not the back wall behind the bench
1863	**903.5 Height.** The top of the bench seat surface shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum above the finish floor or ground.		***1117B.8 Fitting and dressing rooms. ...*** *The bench shall be mounted 17 to 19 inches (432 to 483 mm) above the finish floor. ...*	2010 CBC is **equivalent** to 2010 ADA.	the location is confusing since this is in fitting and dressing rooms	Create a new section for benches under 1122B which can address fixed bench requirements for fitting rooms, dressing rooms, changing rooms, shower rooms, pools, locker rooms, etc and specify that these are requirements for clothes changing only
1864	**903.6 Structural Strength.** Allowable stresses shall not be exceeded for materials used when a vertical or horizontal force of 250 pounds (1112 N) is applied at any point on the seat, fastener, mounting device, or supporting structure.		**1117B.8 Fitting and dressing rooms. ...** ... The structural strength of the bench and attachments shall comply with Section 1115B.7.2. …	2010 CBC is **equivalent** to 2010 ADA.	the section on structural strength is confusing since it is located in the restroom section - might be better to add new section after 1117B.6 which address structural strength	Create a new section which references structural strength outside of the restroom section
1865	**903.7 Wet Locations.** Where installed in wet locations, the surface of the seat shall be slip resistant and shall not accumulate water.		***1117B.8 Fitting and dressing rooms. ...*** *... Where installed in conjunction with showers, swimming pools or other wet locations, water shall not accumulate upon the surface of the bench and the bench shall have a slip-resistant surface.* *...*	2010 CBC is **equivalent** to 2010 ADA.	the location is confusing since this is in fitting and dressing rooms	Create a new section for benches under 1122B which can address fixed bench requirements for fitting rooms, dressing rooms, changing rooms, shower rooms, pools etc and specify that these are requirements for clothes changing only
1866	**904 Check-Out Aisles and Sales and Service Counters**		***SECTION 1110B*** ***ACCESSIBILITY FOR GROUP M OCCUPANCIES*** …	Which Std.provides greater access **depends** on circumstances.	CBC does not dedicate a separate section to check-out aisles and counters - it is located in M occupancy types only	Rework counter section to have 3 sections with requirements for check-out stands/aisles, sales & service counter, and food service lines & tableware/condiment counters Rework counter section to have 4 sections with requirements for check-out stands/aisles, sales & service counter, food service line counters, and tableware/condiment counters 3. Rework counter section to have 5 sections - check-out stands/aisles, sales & service counter, food service line counters, tableware & condiment, and bar/eating counters
1867	**904.1 General.** Check-out aisles and sales and service counters shall comply with the applicable requirements of 904.		***SECTION 1110B*** ***ACCESSIBILITY FOR GROUP M OCCUPANCIES*** ***1110B.1 Sales.*** ***...*** ***1110B.1.2 Work areas.*** *...the customer side of sales or check-out stations shall be accessible. ...* ***1110B.1.3 Check stands.*** *...* *...heckout aisle ...* ***1133B.6 Aisles.*** ***1133B.6.1 General.*** *Every portion of every building in which are installed seats, tables, merchandise, equipment or similar materials shall be provided with aisles leading to an exit.* ***1133B.6.2 Width.*** *Every aisle shall not be less than 36 inches (914 mm) wide if serving only one side, and not less than 44 inches (1118 mm) wide if serving both sides. In addition, aisles shall comply with Figure 11B-5E(a) and (b) for circulation around obstructions.*	Which Std.provides greater access **depends** on circumstances.	CBC does not dedicate a separate section to check-out aisles and counters - it is located in M occupancy types and partially under 1122B CBC uses terminoology of check stands instead of differentiating counters between check writing and check out aisle counters	Rework counter section to have 3 sections with requirements for check-out stands/aisles, sales & service counter, and food service lines & tableware/condiment counters Rework counter section to have 4 sections with requirements for check-out stands/aisles, sales & service counter, food service line counters, and tableware/condiment counters 3. Rework counter section to have 5 sections - check-out stands/aisles, sales & service counter, food service line counters, tableware & condiment, and bar/eating counters

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1868	**904.2 Approach.** All portions of counters required to comply with 904 shall be located adjacent to a walking surface complying with 403.		***SECTION 1110B*** ***ACCESSIBILITY FOR GROUP M OCCUPANCIES*** ***...*** . ***1110B.1.3 Check stands.*** ... *Accessible check stands shall provide a minimum clear checkout aisle width of 36 inches ...* ***1133B.6 Aisles*** . ***1133B.6.1 General.*** *Every portion of every building in which are installed seats, tables, merchandise, equipment or similar materials shall be provided with aisles leading to an exit.* *1133B.6.2 Width. Every aisle shall not be less than 36 inches (914 mm) wide if serving only one side, and not less than 44 inches (1118 mm) wide if serving both sides. In addition, aisles shall comply with Figure 11B-5E(a) and (b) for circulation around obstructions.*	Which Std.provides greater access **depends** on circumstances.	CBC appears to conflict with itself - 1110B1.3 states the aisle is 36" min: 1133B.6 states 36" if single loaded and 44" if double loaded - it is confusing whether a typical check-out aisle in a grocery store which has magazines or candy on one side and the counter on the other if it is considered single or double loaded - clarify intent ADA 403 talks about walking surfaces which CBC does not for this area; ADA allows for a 36" wide aisles which can be reduced down to 32" for a 24" length; ADA talks about requirements for queues at a switchback where CBC does not align	1. Revise CBC section on aisles to align with ADA and have the section for check-out stand counters refer to the aisle section If checkout aisles only need to be 36" wide, create an exception under 1133B.3.6 in CBC 3. If check out aisles need to be 44" if there is product on one side and the aisle on the other, clarify in 1133B.3.6
1869	**904.2 Approach.** All portions of counters required to comply with 904 shall be located adjacent to a walking surface complying with 403.		***SECTION 1122B*** ***FIXED OR BUILT-IN SEATING, TABLES, AND COUNTERS*** ***...*** *An accessible route of travel complying with Section 1114B.1.2 shall lead to and through such fixed or built-in seating areas or tables.* ***...*** *...* ***1122B.5 Sales and service counters, teller windows, and information counters.*** *In department stores and miscellaneous retail stores where counters have cash registers and are provided for sales or distribution of goods or services to the public, ...located on an accessible route complying with Section 1114B.1.2.* *At ticketing counters, teller stations in a bank, registration counters in hotels and motels, box office ticket counters and other counters that may not have a cash register but at which goods or services are sold or distributed, ...* ***1106B.4 Library general use areas.*** ***...*** ***6. Check-out areas.*** *At least one lane at each check-out area shall be on an accessible route complying with Section 1114B.1.2, and shall have a portion of the counter which is at least 36 inches (914 mm) in length with a maximum height of 34 inches (864 mm) above the finish floor with a 36 inch (914 mm) wide aisle on the customer side. Any traffic control or book security gates or turnstiles shall comply with Section 1133B.2.3.4.*	Which Std.provides greater access **depends** on circumstances.	CBC only addresses counters with cash registers as being on a path of travel - counters with no cash register only addresses counter ht There is a separate section for check out aisles for E occupancy libraries	Revise to state generally - all counters and portions of counters that are required to be accessible to be on an accessible route 2. Add to counters that do not have a cash register -all counters and portions of counters that are required to be accessible to be on an accessible route

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1870	**904.2 Approach.** All portions of counters required to comply with 904 shall be located adjacent to a walking surface complying with 403.		***SECTION 1122B*** ***FIXED OR BUILT-IN SEATING, TABLES, AND COUNTERS*** ***...*** *An accessible route of travel complying with Section 1114B.1.2 shall lead to and through such fixed or built-in seating areas or tables.* ***...*** ***1122B.5 Sales and service counters, teller windows, and information counters*** *. I...located on an accessible route complying with Section 1114B.1.2.* *...* ***1106B.4 Library general use areas.*** ***...*** ***6. Check-out areas.*** *At least one lane at each check-out area shall be on an accessible route complying with Section 1114B.1.2, ...Any traffic control or book security gates or turnstiles shall comply with Section 1133B.2.3.4.*	Which Std.provides greater access **depends** on circumstances.	CBC only addresses counters with cash registers as being on a path of travel - counters with no cash register only addresses counter ht There is a separate section for check out aisles for E occupancy libraries	Revise to generally state - all counters and portions of counters that are required to be accessible to be on an accessible route 2. Add to counters that do not have a cash register -all counters and portions of counters that are required to be accessible to be on an accessible route
1871	**Advisory 904.2 Approach.** If a cash register is provided at the sales or service counter, locate the *accessible* counter close to the cash register so that a person using a wheelchair is visible to sales or service personnel and to minimize the reach for a person with a disability.		***SECTION 1122B*** ***FIXED OR BUILT-IN SEATING, TABLES, AND COUNTERS*** ***...*** ***1122B.5 Sales and service counters, teller windows, and information counters.*** *In department stores and miscellaneous retail stores where counters have cash registers and are provided for sales or distribution of goods or services to the public,... located on an accessible route complying with Section 1114B.1.2.* *...*	2010 CBC is **equivalent** to 2010 ADA.		
1872	**904.3 Check-Out Aisles.** Check-out aisles shall comply with 904.3.		***SECTION 1110B*** ***ACCESSIBILITY FOR GROUP M OCCUPANCIES*** ***...*** *Accessible check stands shall provide a minimum clear checkout aisle width of 36 inches …*	2010 CBC **does not address** 2010 ADA req.	CBC appears to conflict with itself - 1110B1.3 states the aisle is 36" min: 1133B.6 states 36" if single loaded and 44" if double loaded - it is confusing whether a typical check-out aisle in a grocery store which has magazines or candy on one side and the counter on the other if it is considered single or double loaded - clarify intent ADA 403 talks about walking surfaces which CBC does not for this area; ADA allows for a 36" wide aisles which can be reduced down to 32" for a 24" length; ADA talks about requirements for queues at a switchback where CBC does not align	Rework counter section to have 3 sections with requirements for check-out stands/aisles, sales & service counter, and food service lines & tableware/condiment counters Rework counter section to have 4 sections with requirements for check-out stands/aisles, sales & service counter, food service line counters, and tableware/condiment counters 3. Rework counter section to have 5 sections - check-out stands/aisles, sales & service counter, food service line counters, tableware & condiment, and bar/eating counters

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1873	**904.3.1 Aisle.** Aisles shall comply with 403.		***SECTION 1110B*** ***ACCESSIBILITY FOR GROUP M OCCUPANCIES*** ***...*** *Accessible check stands shall provide a minimum clear checkout aisle width of 36 inches (914 mm) ...* ***1106B.4 Library general use areas.*** ***...*** ***6. Check-out areas.*** *At least one lane at each check-out area shall be on an accessible route complying with Section 1114B.1.2, ...with a 36 inch (914 mm) wide aisle on the customer side. ...* ***1133B.6 Aisles.*** ***1133B.6.1 General.*** *Every portion of every building in which are installed seats, tables, merchandise, equipment or similar materials shall be provided with aisles leading to an exit.* ***1133B.6.2 Width.*** *Every aisle shall not be less than 36 inches (914 mm) wide if serving only one side, and not less than 44 inches (1118 mm) wide if serving both sides. In addition, aisles shall comply with Figure 11B-5E(a) and (b) for circulation around obstructions.*	Which Std.provides greater access **depends** on circumstances.	CBC appears to conflict with itself - 1110B1.3 states the aisle is 36" min: 1133B.6 states 36" if single loaded and 44" if double loaded - it is confusing whether a typical check-out aisle in a grocery store which has magazines or candy on one side and the counter on the other if it is considered single or double loaded - clarify intent ADA 403 talks about walking surfaces which CBC does not for this area; ADA allows for a 36" wide aisles which can be reduced down to 32" for a 24" length; ADA talks about requirements for queues at a switchback where CBC does not align	1. Revise CBC section on aisles to align with ADA and have the section for check-out stand counters refer to the aisle section If checkout aisles only need to be 36" wide, create an exception under 1133B.3.6 in CBC 3. If check out aisles need to be 44" if there is product on one side and the aisle on the other, clarify in 1133B.3.6
1874	**904.3.2 Counter.** The counter surface height shall be 38 inches (965 mm) maximum above the finish floor or ground. The top of the counter edge protection shall be 2 inches (51 mm) maximum above the top of the counter surface on the aisle side of the check-out counter.		***SECTION 1110B*** ***ACCESSIBILITY FOR GROUP M OCCUPANCIES*** ***...*** *Accessible check stands shall provide ... maximum adjoining counter height not exceeding 38 inches (965 mm) above the finish floor. The top of the counter lip shall not exceed 40 inches (1016 mm) above the finish floor.* *...* ***1106B.4 Library general use areas.*** ***...*** ***6. Check-out areas*** *. ...with a maximum height of 34 inches (864 mm) above the finish floor ...*	Which Std.provides greater access **depends** on circumstances.	CBC does not call out where the 2" max ht lip is located Heights for counter and lip are the same CBC addresses check-out aisles for libraries but having a 38" ht - the library aisle better aligns with the definition of sales and service counters	Add location of 2" max ht lip to be on the aisle side Change the terminology from library check-out aisles to library sales and service counters 3. Under check-out aisles write an Excep for library check out aisle heights
1875	**904.3.3 Check Writing Surfaces.** Where provided, check writing surfaces shall comply with 902.3.		***SECTION 1110B*** ***ACCESSIBILITY FOR GROUP M OCCUPANCIES*** ***...*** *Accessible check stands shall provide ... maximum adjoining counter height not exceeding 38 inches (965 mm) above the finish floor. The top of the counter lip shall not exceed 40 inches (1016 mm) above the finish floor.* *...*	2010 CBC **does not address** 2010 ADA req.	CBC does not address a lower portion for writing checks at the accessible check-out aisle of 28" min to 34 " max AFF where a check writing surface is provided	Add - where a check writing surface is provided at an accessible check-out stand the ht should be 28" min to 34" max AFF

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1876	**904.4 Sales and Service Counters.** Sales counters and service counters shall comply with 904.4.1 or 904.4.2. …		***SECTION 1122B*** ***FIXED OR BUILT-IN SEATING, TABLES, AND COUNTERS*** ***...*** *Exception: ...* ***1122B.4 Height of work surfaces.*** *T...* *Where a single counter contains more than one transaction station, such as (but not limited to) a bank counter with multiple teller windows or a retail sales counter with multiple cash register stations, at least 5 percent, but never less than one, of each type of station shall be located at a section of counter that is at least 36 inches (914 mm) long and no more than 28 to 34 inches (711 to 864 mm) high.* ***...*** *At ticketing counters, teller stations in a bank, registration counters in hotels and motels, box office ticket counters and other counters that may not have a cash register but at which goods or services are sold or distributed, a portion of the main counter which is a minimum of 36 inches (915 mm) in length shall be provided with a maximum height of 34 inches (864 mm).* ***...***	2010 CBC **does not address** 2010 ADA req.	CBC does not address types of counters in the same manner as ADA and it becomes cofusing	Rework counter section to have 3 sections with requirements for check-out stands/aisles, sales & service counter, and food service lines & tableware/condiment counters Rework counter section to have 4 sections with requirements for check-out stands/aisles, sales & service counter, food service line counters, and tableware/condiment counters 3. Rework counter section to have 5 sections - check-out stands/aisles, sales & service counter, food service line counters, tableware & condiment, and bar/eating counters
1877	**904.4 Sales and Service Counters.** ... The *accessible* portion of the counter top shall extend the same depth as the sales or service counter top.		***SECTION 1122B*** ***FIXED OR BUILT-IN SEATING, TABLES, AND COUNTERS*** ***...*** *Exception: ...* ***1122B.4 Height of work surfaces.*** *....* *Where a single counter contains more than one transaction station, such as (but not limited to) a bank counter with multiple teller windows or a retail sales counter with multiple cash register stations, at least 5 percent, but never less than one, of each type of station shall be located at a section of counter that is at least 36 inches (914 mm) long and no more than 28 to 34 inches (711 to 864 mm) high.* ***...*** *At ticketing counters, teller stations in a bank, registration counters in hotels and motels, box office ticket counters and other counters that may not have a cash register but at which goods or services are sold or distributed, a portion of the main counter which is a minimum of 36 inches (915 mm) in length shall be provided with a maximum height of 34 inches (864 mm).* ***...***	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA requirement of the accessible portion extending the full depth of the countertop
1878	**904.4 EXCEPTION:** In *alterations* , when the provision of a counter complying with 904.4 would result in a reduction of the number of existing counters at work stations or a reduction of the number of existing *mail boxes* , the counter shall be permitted to have a portion which is 24 inches (610 mm) long minimum complying with 904.4.1 provided that the required clear floor or ground *space* is centered on the *accessible* length of the counter.		NA	2010 CBC **does not address** 2010 ADA req.		Adopt the exception for existing counters from ADA

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1879	**904.4.1 Parallel Approach.** A portion of the counter surface that is 36 inches (915 mm) long minimum and 36 inches (915 mm) high maximum above the finish floor shall be provided. A clear floor or ground *space* complying with 305 shall be positioned for a parallel approach adjacent to the 36 inch (915 mm) minimum length of counter.		***SECTION 1122B*** ***FIXED OR BUILT-IN SEATING, TABLES, AND COUNTERS*** ***...*** ***1122B.3 Knee clearance.*** *If seating for persons in wheelchairs is provided at fixed tables or counters, knee spaces at least 27 inches (686 mm) high, 30 inches (762 mm) wide and 19 inches (483 mm) deep shall be provided (see Figure 11B-13).* *Exception: Knee clearance is not required at checkout counters or service counters.* ***...*** ***1122B.5 Sales and service counters, teller windows, and information counters.*** *I...portion of the counter which is at least 36 inches (915 mm) in length ...* *At ticketing counters, teller stations in a bank, registration counters in hotels and motels, box office ticket counters and other counters that may not have a cash register ... a portion of the main counter which is a minimum of 36 inches (915 mm) in length ...* ***...***	Which Std.provides greater access **depends** on circumstances.	ADA allows for a 36" max ht sales & service counter whereas CBC allows for 34" max AFF - since this is not a food service or tabletop service there is more flexibility if it is 36" max AFF for those who may have trouble bending	Revise sales and service counters to allow up to a 38" max ht AFF **The ADA limits the heigth of sales and service counters to 36" AFF**
1880	**904.4.1 EXCEPTION:** Where the provided counter surface is less than 36 inches (915 mm) long, the entire counter surface shall be 36 inches (915 mm) high maximum above the finish floor.		NA	2010 CBC **does not address** 2010 ADA req.		Adopt the Exception from ADA for counters that are less that 36" in length
1881	**904.4.2 Forward Approach.** A portion of the counter surface that is 30 inches (760 mm) long minimum and 36 inches (915 mm) high maximum shall be provided. Knee and toe *space* complying with 306 shall be provided under the counter. A clear floor or ground *space* complying with 305 shall be positioned for a forward approach to the counter.		***SECTION 1122B*** ***FIXED OR BUILT-IN SEATING, TABLES, AND COUNTERS*** *... ...* ***1122B.3 Knee clearance.*** *If seating for persons in wheelchairs is provided at fixed tables or counters, knee spaces at least 27 inches (686 mm) high, 30 inches (762 mm) wide and 19 inches (483 mm) deep shall be provided (see Figure 11B-13).* *Exception: Knee clearance is not required at checkout counters or service counters.* ***...*** . ***1122B.5 Sales and service counters, teller windows, and information counters.*** *... portion of the counter which is at least 36 inches (915 mm) in length ...* *At ticketing counters, teller stations in a bank, registration counters in hotels and motels, box office ticket counters and other counters that may not have a cash register ... a portion of the main counter which is a minimum of 36 inches (915 mm) in length ...*	2010 CBC provides **less access** than 2010 ADA.	CBC does not differentiate between forward reach & side reach other than stating that knee clearance is not required at checkout or service counters ADA allows for more flexibility by have a parallel and/or forward approach option - since a forward approach may have more accessibility for those who can not twist their body	Rework counter section to allow a forward approach of 30" wide with knee clearance below

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1882	**904.5 Food Service Lines.** Counters in food service lines shall comply with 904.5.		***1104B.5 Dining, banquet and bar facilities.*** ***...*** ... ***5. Food service aisles.*** …	2010 CBC provides **less access** than 2010 ADA.	Section 1122B is confusing as to whether it relates to food service lines or not	Rework counter section to have 3 sections with requirements for check-out stands/aisles, sales & service counter, and food service lines & tableware/condiment counters Rework counter section to have 4 sections with requirements for check-out stands/aisles, sales & service counter, food service line counters, and tableware/condiment counters 3. Rework counter section to have 5 sections - check-out stands/aisles, sales & service counter, food service line counters, tableware & condiment, and bar/eating counters
1883	**904.5.1 Self-Service Shelves and Dispensing Devices.** Self-service shelves and dispensing devices for tableware, dishware, condiments, food and beverages shall comply with 308.		***1104B.5 Dining, banquet and bar facilities.*** ***...*** ***6. Tableware and condiment areas.*** *Self-service tableware, dishware, condiments, food and beverage display shelves and dispensing devices shall comply with Sections 1118B and 1122B.4. See Figure 11B-17.* ***...*** ..	2010 CBC provides **less access** than 2010 ADA.	ADA refers to reach range; CBC refers to 1118B which refers to reach range & clr flr space, & Figure 11B-17 which has incorrect reach ranges 1122B refers to seating, tables, counters which states knee clearance is not necessary - confusing because it is mixing different types of functional counters	Rework counter section to have 3 sections with requirements for check-out stands/aisles, sales & service counter, and food service lines & tableware/condiment counters Rework counter section to have 4 sections with requirements for check-out stands/aisles, sales & service counter, food service line counters, and tableware/condiment counters 3. Rework counter section to have 5 sections - check-out stands/aisles, sales & service counter, food service line counters, tableware & condiment, and bar/eating counters
1884	**904.5.2 Tray Slides.** The tops of tray slides shall be 28 inches (710 mm) minimum and 34 inches (865 mm) maximum above the finish floor or ground.		***1104B.5 Dining, banquet and bar facilities.*** ***...*** ***5. Food service aisles.*** *... Tray slides shall be mounted no higher than 34 inches (864 mm) above the floor as shown in Figure 11B-16. I...* ***SECTION 1122B*** ***FIXED OR BUILT-IN SEATING, TABLES, AND COUNTERS*** ... ***1122B.4 Height of work surfaces*** . *The tops of tables and counters shall be 28 inches to 34 inches (711 mm to 864 mm) from the floor or ground.* ...	Which Std.provides greater access **depends** on circumstances.	ADA states 28" min ht - CBC has no min ht 4 ADA specifies the tops of the tray slides - CBC does not specify where measuring to CBC 1122B.4 states hs of counters but it is not specific to Food tray slides	1. Create section for Food Service Line & Condiment Counters and call out 28" min to 34" max AFF to the top of the tray slides
1885	**904.6 Security Glazing.** Where counters or teller windows have security glazing to separate personnel from the public, a method to facilitate voice communication shall be provided. Telephone handset devices, if provided, shall comply with 704.3.		NA	2010 CBC **does not address** 2010 ADA req.	Can add suggestions on the different methods per the ADA advisory 904.6	Create section on security glazing 1122B.5.1 and use the language in ADA
1886	**Advisory 904.6 Security Glazing.** Assistive listening devices complying with 706 can facilitate voice communication at counters or teller windows where there is security glazing which promotes distortion in audible information. Where assistive listening devices are installed, place signs complying with 703.7.2.4 to identify those facilities which are so equipped. Other voice communication methods include, but are not limited to, grilles, slats, talk-through baffles, intercoms, or telephone handset devices.		NA	2010 CBC **does not address** 2010 ADA req.	Can add suggestions on the different methods per the ADA advisory 904.6	Add Advisory Note to CBC
1887	**CHAPTER 10: RECREATION FACILITIES**					
1888	**1001 General**		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,

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1889	**1001.1 Scope.** The provisions of Chapter 10 shall apply where required by Chapter 2 or where referenced by a requirement in this document.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1890	**Advisory 1001.1 Scope.** Unless otherwise modified or specifically addressed in Chapter 10, all other ADAAG provisions apply to the design and construction of recreation facilities and elements. The provisions in Section 1001.1 apply wherever these elements are provided. For example, office buildings may contain a room with exercise equipment to which these sections would apply.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1891	**1002 Amusement Rides**		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1892	**1002.1 General.** *Amusement rides* shall comply with 1002.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1893	**1002.2 Accessible Routes.** *Accessible* routes serving *amusement rides* shall comply with Chapter 4.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1894	**1002.2 EXCEPTIONS: 1.** In load or unload areas and on *amusement rides*, where compliance with 405.2 is not structurally or operationally feasible, *ramp* slope shall be permitted to be 1:8 maximum. **2.** In load or unload areas and on *amusement rides*, handrails provided along walking surfaces complying with 403 and required on *ramps* complying with 405 shall not be required to comply with 505 where compliance is not structurally or operationally feasible.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1895	**Advisory 1002.2 Accessible Routes Exception 1.** Steeper slopes are permitted on accessible routes connecting the amusement ride in the load and unload position where it is “structurally or operationally infeasible.” In most cases, this will be limited to areas where the accessible route leads directly to the amusement ride and where there are space limitations on the ride, not the queue line. Where possible, the least possible slope should be used on the accessible route that serves the amusement ride.					
1896	**1002.3 Load and Unload Areas.** A turning *space* complying with ... 304.3 shall be provided in load and unload areas.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1897	**1002.3 Load and Unload Areas.** A turning *space* complying with 304.2 ... shall be provided in load and unload areas.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1898	**1002.4 Wheelchair Spaces in Amusement Rides.** *Wheelchair spaces* in *amusement rides* shall comply with 1002.4.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1899	**1002.4.1 Floor or Ground Surface.** The floor or ground surface of *wheelchair spaces* shall be stable and firm.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,

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1900	**1002.4.2 Slope.** The floor or ground surface of *wheelchair spaces* shall have a slope not steeper than 1:48 when in the load and unload position.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1901	**1002.4.3 Gaps.** Floors of *amusement rides* with *wheelchair spaces* and floors of load and unload areas shall be coordinated so that, when *amusement rides* are at rest in the load and unload position, the vertical difference between the floors shall be within plus or minus ⅝ inches (16 mm) and the horizontal gap shall be 3 inches (75 mm) maximum under normal passenger load conditions.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1902	**1002.4.3 EXCEPTION:** Where compliance is not operationally or structurally feasible, *ramps* , bridge plates, or similar devices complying with the applicable requirements of 36 CFR 1192.83(c) shall be provided.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1903	**Advisory 1002.4.3 Gaps Exception.** 36 CFR 1192.83(c) ADA Accessibility Guidelines for Transportation Vehicles - Light Rail Vehicles and Systems - Mobility Aid Accessibility is available at www.access-board.gov. It includes provisions for bridge plates and ramps that can be used at gaps between wheelchair spaces and floors of load and unload areas.					
1904	**1002.4.4 Clearances.** Clearances for *wheelchair spaces* shall comply with 1002.4.4.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1905	**1002.4.4 EXCEPTIONS: 1.** Where provided, securement devices shall be permitted to overlap required clearances. **2.** *Wheelchair spaces* shall be permitted to be mechanically or manually repositioned. **3.** *Wheelchair spaces* shall not be required to comply with 307.4.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1906	**Advisory 1002.4.4 Clearances Exception 3.** This exception for protruding objects applies to the ride devices, not to circulation areas or accessible routes in the queue lines or the load and unload areas.					
1907	**1002.4.4.1 Width and Length.** *Wheelchair spaces* shall provide a clear width of 30 inches (760 mm) minimum and a clear length of 48 inches (1220 mm) minimum measured to 9 inches (230 mm) minimum above the floor surface.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1908	**1002.4.4.2 Side Entry.** Where *wheelchair spaces* are entered only from the side, *amusement rides* shall be designed to permit sufficient maneuvering clearance for individuals using a wheelchair or mobility aid to enter and exit the ride.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1909	**Advisory 1002.4.4.2 Side Entry.** The amount of clear space needed within the ride, and the size and position of the opening are interrelated. A 32 inch (815 mm) clear opening will not provide sufficient width when entered through a turn into an amusement ride. Additional space for maneuvering and a wider door will be needed where a side opening is centered on the ride. For example, where a 42 inch (1065 mm) opening is provided, a minimum clear space of 60 inches (1525 mm) in length and 36 inches (915mm) in depth is needed to ensure adequate space for maneuvering.					
1910	**1002.4.4.3 Permitted Protrusions in Wheelchair Spaces.** Objects are permitted to protrude a distance of 6 inches (150 mm) maximum along the front of the *wheelchair space* , where located 9 inches (230 mm) minimum and 27 inches (685 mm) maximum above the floor or ground surface of the *wheelchair space* . Objects are permitted to protrude a distance of 25 inches (635 mm) maximum along the front of the *wheelchair space* , where located more than 27 inches (685 mm) above the floor or ground surface of the *wheelchair space* .		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,

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1911	**1002.4.5 Ride Entry.** Openings providing entry to *wheelchair spaces* on *amusement rides* shall be 32 inches (815 mm) minimum clear.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1912	**1002.4.6 Approach.** One side of the *wheelchair space* shall adjoin an *accessible* route when in the load and unload position.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1913	**1002.4.7 Companion Seats.** Where the interior width of the *amusement ride* is greater than 53 inches (1345 mm), seating is provided for more than one rider, and the wheelchair is not required to be centered within the *amusement ride* , a companion seat shall be provided for each *wheelchair space* .		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1914	**1002.4.7.1 Shoulder-to-Shoulder Seating.** Where an *amusement ride* provides shoulder-to-shoulder seating, companion seats shall be shoulder-to-shoulder with the adjacent *wheelchair space* .		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1915	**1002.4.7.1 EXCEPTION:** Where shoulder-to-shoulder companion seating is not operationally or structurally feasible, compliance with this requirement shall be required to the maximum extent practicable.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1916	**1002.5 Amusement Ride Seats Designed for Transfer.** *Amusement ride* seats designed for transfer shall comply with 1002.5 when positioned for loading and unloading.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1917	**Advisory 1002.5 Amusement Ride Seats Designed for Transfer.** The proximity of the clear floor or ground space next to an element and the height of the element one is transferring to are both critical for a safe and independent transfer. Providing additional clear floor or ground space both in front of and diagonal to the element will provide flexibility and will increase usability for a more diverse population of individuals with disabilities. Ride seats designed for transfer should involve only one transfer. Where possible, designers are encouraged to locate the ride seat no higher than 17 to 19 inches (430 to 485 mm) above the load and unload surface. Where greater distances are required for transfers, providing gripping surfaces, seat padding, and avoiding sharp objects in the path of transfer will facilitate the transfer.					
1918	**1002.5.1 Clear Floor or Ground Space.** A clear floor or ground *space* complying with 305 shall be provided in the load and unload area adjacent to the *amusement ride seats* designed for transfer.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1919	**1002.5.2 Transfer Height.** The height of *amusement ride seats* designed for transfer shall be 14 inches (355 mm) minimum and 24 inches (610 mm) maximum measured from the surface of the load and unload area.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1920	**1002.5.3 Transfer Entry.** Where openings are provided for transfer to *amusement ride seats* , the openings shall provide clearance for transfer from a wheelchair or mobility aid to the *amusement ride seat* .		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1921	**1002.5.4 Wheelchair Storage Space.** Wheelchair storage spaces complying with 305 shall be provided in or adjacent to unload areas for each required *amusement ride seat* designed for transfer and shall not overlap any required means of egress or *accessible* route.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,

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1922	**1002.6 Transfer Devices for Use with Amusement Rides.** *Transfer devices* for use with *amusement rides* shall comply with 1002.6 when positioned for loading and unloading.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1923	**Advisory 1002.6 Transfer Devices for Use with Amusement Rides.** Transfer devices for use with amusement rides should permit individuals to make independent transfers to and from their wheelchairs or mobility devices. There are a variety of transfer devices available that could be adapted to provide access onto an amusement ride. Examples of devices that may provide for transfers include, but are not limited to, transfer systems, lifts, mechanized seats, and custom designed systems. Operators and designers have flexibility in developing designs that will facilitate individuals to transfer onto amusement rides. These systems or devices should be designed to be reliable and sturdy. Designs that limit the number of transfers required from a wheelchair or mobility device to the ride seat are encouraged. When using a transfer device to access an amusement ride, the least number of transfers and the shortest distance is most usable. Where possible, designers are encouraged to locate the transfer device seat no higher than 17 to 19 inches (430 to 485 mm) above the load and unload surface. Where greater distances are required for transfers, providing gripping surfaces, seat padding, and avoiding sharp objects in the path of transfer will facilitate the transfer. Where a series of transfers are required to reach the amusement ride seat, each vertical transfer should not exceed 8 inches (205 mm).					
1924	**1002.6.1 Clear Floor or Ground Space.** A clear floor or ground *space* complying with 305 shall be provided in the load and unload area adjacent to the *transfer device*.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1925	**1002.6.2 Transfer Height.** The height of *transfer device* seats shall be 14 inches (355 mm) minimum and 24 inches (610 mm) maximum measured from the load and unload surface.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1926	**1002.6.3 Wheelchair Storage Space.** Wheelchair storage *spaces* complying with 305 shall be provided in or adjacent to unload areas for each required *transfer device* and shall not overlap any required means of egress or *accessible* route.		There is no equivelent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1927	**1003 Recreational Boating Facilities**		**1132B.2 Parks and recreational areas.** ... **1132B.2#4. Boat docks.** …	2010 CBC is **equivalent** to 2010 ADA.	CBC 1132B.2 heading is "parks and recreational areas". 2010 ADA Stds. uses the term "boat slip" whereas CBC uses "boat docks", but the intent is equivalent.	1. If the CBC version is adopted, add a section for Recreational Boating Facilities. 2. Adopt the 2010 ADA Stds. version verbatim.
1928	**1003.1 General.** Recreational boating *facilities* shall comply with 1003.		**1132B.2 Parks and recreational areas.** The following parks and recreational areas shall comply with these regulations.**1132B.2#4. Boat docks.** Boat docks, fishing piers, etc., shall be accessible.	2010 CBC **does not address** 2010 ADA req.	CBC 1132B.2.4 requires Boat Docks to be accessible and is under the Section 1132B.2 heading "parks and recreational areas" 2010 ADA Stds. uses the term "boat slip" whereas CBC uses "boat docks", but the intent is equivalent. CBC requires boat docks to be accessible but does not provide additional of different requirements than those found elsewhere so it is assumed that the other requirements of Chapter 11B apply to boat docks.	The CA State Parks Accessibility Guidelines 2009 Edition is the most comparable document to the 2010 ADA Stds. requirements for recreational boating facilities. These guidelines are not enforceable as law. Section 6 is titled "Boating" and is the most comparable section to 2010 ADA Stds. Section 1003.

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1929	**1003.2 Accessible Routes.** *Accessible* routes serving recreational boating *facilities*, including *gangways* and floating piers, shall comply with Chapter 4 except as modified by the exceptions in 1003.2.		**1127B.1 General.** Site development and grading shall be designed to provide access to all entrances and exterior ground floor exits, and access to normal paths of travel, and where necessary to provide access, shall incorporate pedestrian ramps, curb ramps, etc. Access shall be provided within the boundary of the site from public transportation stops, accessible parking spaces, passenger loading zones if provided, and public streets or sidewalks. When more than one building or facility is located on a site, accessible routes of travel complying with Section 1114B.1.2 shall be provided between buildings and accessible site facilities, accessible elements, and accessible spaces that are on the same site. . **Exceptions: 1.** Where the enforcing agency determines that compliance with these regulations would create an unreasonable hardship because of topography, natural barriers, etc., an exception may be granted when equivalent facilitation is provided through the use of other methods and materials.	2010 CBC **does not address** 2010 ADA req.	1. CBC does not provide the exceptions listed in Section 1003.2.1. 2. CBC 1127B.1 Exception 1 appears to allow the enforcing agency to grant exceptions to full compliance where unreasonable hardship is created due to "topography and natural barriers" and when equivalent facilitation is provided. A gangway serving a boat slip with fluctuating tidal levels might be considered a "natural barrier".	1. Incorporate the 2010 ADA Stds. definitions, requirements and exceptions. 2. Use the CA State Parks Accessibility Guidelines.
1930	**1003.2.1 Boat Slips.** *Accessible* routes serving *boat slips* shall be permitted to use the exceptions in 1003.2.1.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	Gangways serving boat slips are subject to fluctuating tidal levels which can	1. Incorporate the 2010 ADA Stds. definitions, requirements and exceptions. 2. Use the CA State Parks Accessibility Guidelines.
1931	**1003.2.1 EXCEPTIONS: 1.** Where an existing *gangway* or series of *gangways* is replaced or *altered,* an increase in the length of the *gangway* shall not be required to comply with 1003.2 unless required by 202.4. **2.** *Gangways* shall not be required to comply with the maximum rise specified in 405.6. **3.** Where the total length of a *gangway* or series of *gangways* serving as part of a required *accessible* route is 80 feet (24 m) minimum, *gangways* shall not be required to comply with 405.2. **4.** Where *facilities* contain fewer than 25 *boat slips* and the total length of the *gangway* or series of *gangways* serving as part of a required *accessible* route is 30 feet (9145 mm) minimum, *gangways* shall not be required to comply with 405.2. **5.** Where *gangways* connect to *transition plates,* landings specified by 405.7 shall not be required. **6.** Where *gangways* and *transition plates* connect and are required to have handrails, handrail extensions shall not be required. Where handrail extensions are provided on *gangways* or *transition plates*, the handrail extensions shall not be required to be parallel with the ground or floor surface. **7.** The *cross slope* specified in 403.3 and 405.3 for *gangways*, *transition plates*, and floating piers that are part of *accessible* routes shall be measured in the static position. **8.** Changes in level complying with 303.3 and 303.4 shall be permitted on the surfaces of *gangways* and *boat launch ramps*.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	1. The CA State Parks Accessibility Guidelines include equivalent exceptions for 2010 ADA Stds. exceptions 3, 4, 5 & 6 but not for exceptions 1, 2, 7 & 8. 2. CA State Parks Accessibility Guidelines Section 6.III.A requires gangways (regardless of length) to have slopes no greater than 8.33%, which is a virtually impossible condition to comply with when dealing with tidal fluctuations.	1. Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1932	**Advisory 1003.2.1 Boat Slips Exception 3.** The following example shows how exception 3 would be applied: A gangway is provided to a floating pier which is required to be on an accessible route. The vertical distance is 10 feet (3050 mm) between the elevation where the gangway departs the landside connection and the elevation of the pier surface at the lowest water level. Exception 3 permits the gangway to be 80 feet (24 m) long. Another design solution would be to have two 40 foot (12 m) plus continuous gangways joined together at a float, where the float (as the water level falls) will stop dropping at an elevation five feet below the landside connection. The length of transition plates would not be included in determining if the gangway(s) meet the requirements of the exception.	NA	NA	NA	NA	NA

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1933	**1003.2.2 Boarding Piers at Boat Launch Ramps.** *Accessible* routes serving *boarding piers* at *boat launch ramps* shall be permitted to use the exceptions in 1003.2.2.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	1. The CA State Parks Accessibility Guidelines include equivalent exceptions for 2010 ADA Stds. exceptions 5 & 6 but not for exceptions 1, 2, 7 & 8. 2. CA State Parks Accessibility Guidelines Section 6.III.A requires gangways (regardless of length) to have slopes no greater than 8.33%, which is a virtually impossible condition to comply with when dealing with tidal fluctuations.	1. Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1934	**1003.2.2 EXCEPTIONS: 1.** *Accessible* routes serving floating *boarding piers* shall be permitted to use Exceptions 1, 2, 5, 6, 7 and 8 in 1003.2.1. **2.** Where the total length of the *gangway* or series of *gangways* serving as part of a required *accessible* route is 30 feet (9145 mm) minimum, *gangways* shall not be required to comply with 405.2. **3.** Where the *accessible* route serving a floating *boarding pier* or skid pier is located within a *boat launch ramp*, the portion of the *accessible* route located within the *boat launch ramp* shall not be required to comply with 405.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	1. The CA State Parks Accessibility Guidelines include equivalent exceptions for 2010 ADA Stds. exceptions 5 & 6 but not for exceptions 1, 2, 7 & 8. 2. CA State Parks Accessibility Guidelines Section 6.III.A requires gangways (regardless of length) to have slopes no greater than 8.33%, which is a virtually impossible condition to comply with when dealing with tidal fluctuations.	1. Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1935	**1003.3 Clearances.** Clearances at *boat slips* and on *boarding piers* at *boat launch ramps* shall comply with 1003.3.		**1133B.7 Walks and Sidewalks. 1133B.7.1 Continuous surface.** Walks and sidewalks subject to these regulations... shall be a minimum of 48 inches (1219 mm) in width. If a walk or sidewalk has less than 60 inch (1525 mm) clear width, then passing spaces at least 60 inches by 60 inches (1525 mm by 1525 mm) shall be located at reasonable intervals not to exceed 200 feet (61 m). A T-intersection is an acceptable passing place. **Exception:** When, because of right-of-way restrictions, natural barriers or other existing conditions, the enforcing agency determines that compliance with the 48-inch (1219 mm) clear sidewalk width would create an unreasonable hardship, the clear width may be reduced to 36 inches (914 mm).	2010 CBC provides **less access** than 2010 ADA.	Since CBC does not have a section for boat slips or boarding piers at boat launch ramps Section 1133B.7 is the most comparable section.	1. Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1936	**Advisory 1003.3 Clearances.** Although the minimum width of the clear pier space is 60 inches (1525 mm), it is recommended that piers be wider than 60 inches (1525 mm) to improve the safety for persons with disabilities, particularly on floating piers.		NA	NA	NA	NA
1937	**1003.3.1 Boat Slip Clearance.** *Boat slips* shall provide clear pier space 60 inches (1525 mm) wide minimum and at least as long as the *boat slips*. Each 10 feet (3050 mm) maximum of linear pier edge serving *boat slips* shall contain at least one continuous clear opening 60 inches (1525 mm) wide minimum.		**1133B.7 Walks and Sidewalks. 1133B.7.1 Continuous surface.** Walks and sidewalks subject to these regulations ... shall be a minimum of 48 inches (1219 mm) in width. If a walk or sidewalk has less than 60 inch (1525 mm) clear width, then passing spaces at least 60 inches by 60 inches (1525 mm by 1525 mm) shall be located at reasonable intervals not to exceed 200 feet (61 m). A T-intersection is an acceptable passing place. **Exception:** When, because of right-of-way restrictions, natural barriers or other existing conditions, the enforcing agency determines that compliance with the 48-inch (1219 mm) clear sidewalk width would create an unreasonable hardship, the clear width may be reduced to 36 inches (914 mm).	2010 CBC **does not address** 2010 ADA req.	1. CBC 1133B.7.1 requires 48 inch minimum width at walks and sidewalks but is not ruly comparable to the 2010 ADA Stds. requirement for clear width at boat slips (60 inch minimum). 2. CA State Parks Accessibility Guidelines Section 6.IV.E requires boat slips/docks to have a clear pier width of 60" minimum and as long as the slip plus for every 120 inches of linear length the boarding pier/dock shall have a clear opening of 60".	1. Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.

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1938	**1003.3.1 EXCEPTIONS: 1.** Clear pier *space* shall be permitted to be 36 inches (915 mm) wide minimum for a length of 24 inches (610 mm) maximum, provided that multiple 36 inch (915 mm) wide segments are separated by segments that are 60 inches (1525 mm) wide minimum and 60 inches (1525 mm) long minimum. **...**		**1133B.7 Walks and Sidewalks. 1133B.7.1 Continuous surface.** Walks and sidewalks subject to these regulations ... shall be a minimum of 48 inches (1219 mm) in width. If a walk or sidewalk has less than 60 inch (1525 mm) clear width, then passing spaces at least 60 inches by 60 inches (1525 mm by 1525 mm) shall be located at reasonable intervals not to exceed 200 feet (61 m). A T-intersection is an acceptable passing place. **Exception:** When, because of right-of-way restrictions, natural barriers or other existing conditions, the enforcing agency determines that compliance with the 48-inch (1219 mm) clear sidewalk width would create an unreasonable hardship, the clear width may be reduced to 36 inches (914 mm).	2010 CBC **does not address** 2010 ADA req.	1. CA State Parks Accessibility Guidelines Section 6.IV.E.1 requires boat slips/docs to have a clear pier width of 60" minimum and as long as the slip plus for every 120 inches of linear length the boarding pier/dock shall have a clear opening of 60", with 3 exceptions, one of which is: Width of clear pier space may be 36" wide for a length of 24" as long as multiple 36" segments are separated by segments 60" x 60" x 60" clear.	1. Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1939	**1003.3.1 EXCEPTIONS: ...** **2.** Edge protection shall be permitted at the continuous clear openings, provided that it is 4 inches (100 mm) high maximum and 2 inches (51 mm) wide maximum. **3.** In existing piers, clear pier space shall be permitted to be located perpendicular to the boat slip and shall extend the width of the boat slip, where the facility has at least one boat slip complying with 1003.3, and further compliance with 1003.3 would result in a reduction in the number of boat slips available or result in a reduction of the widths of existing slips		**1133B.8 Hazards. 1133B.8.1 Warning curbs.** Abrupt changes in level, except between a walk or sidewalk and an adjacent street or driveway, exceeding 4 inches (102 mm) in a vertical dimension, such as at planters or fountains located in or adjacent to walks, sidewalks or other pedestrian ways, shall be identified by curbs projecting at least 6 inches (152 mm) in height above the walk or sidewalk surface to warn the blind of a potential drop off. ...	2010 CBC **does not address** 2010 ADA req.	1. CA State Parks Accessibility Guidelines Section 6.IV.E.1 requires boat slips/docks to have a clear pier width of 60" minimum and as long as the slip plus for every 120 inches of linear length the boarding pier/dock shall have a clear opening of 60", with 3 exceptions, one of which is: Width of clear pier space may be 36" wide for a length of 24" as long as multiple 36" segments are separated by segments 60" x 60" x 60" clear. 2. CBC 1133B.8.6 is similar to 2010 ADA Stds. 1003.3.1 Exception 2 but requires a minimum 6 inch high curb instead of a 4 inch maximum height, which is intended to protect the blind. CBC does not specify a maximum width. The 2010 ADA Stds. edge protection would protect both the blind as well as wheelchair users.	1. Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1940	**Advisory 1003.3.1 Boat Slip Clearance Exception 3.** Where the conditions in exception 3 are satisfied, existing facilities are only required to have one accessible boat slip with a pier clearance which runs the length of the slip. All other accessible slips are allowed to have the required pier clearance at the head of the slip. Under this exception, at piers with perpendicular boat slips, the width of most “finger piers” will remain unchanged. However, where mooring systems for floating piers are replaced as part of pier alteration projects, an opportunity may exist for increasing accessibility. Piers may be reconfigured to allow an increase in the number of wider finger piers, and serve as accessible boat slips.		NA	NA	NA	NA
1941	**1003.3.2 Boarding Pier Clearances.** *Boarding piers* at *boat launch ramps* shall provide clear pier *space* 60 inches (1525 mm) wide minimum and shall extend the full length of the *boarding pier*. Every 10 feet (3050 mm) maximum of linear pier edge shall contain at least one continuous clear opening 60 inches (1525 mm) wide minimum.		**1133B.7 Walks and Sidewalks. 1133B.7.1 Continuous surface.** Walks and sidewalks subject to these regulations... shall be a minimum of 48 inches (1219 mm) in width. If a walk or sidewalk has less than 60 inch (1525 mm) clear width, then passing spaces at least 60 inches by 60 inches (1525 mm by 1525 mm) shall be located at reasonable intervals not to exceed 200 feet (61 m). A T-intersection is an acceptable passing place. **Exception:** When, because of right-of-way restrictions, natural barriers or other existing conditions, the enforcing agency determines that compliance with the 48-inch (1219 mm) clear sidewalk width would create an unreasonable hardship, the clear width may be reduced to 36 inches (914 mm).	2010 CBC **does not address** 2010 ADA req.	1. CBC 1133B.7.1 requires 48 inch minimum width at walks and sidewalks but is not ruly comparable to the 2010 ADA Stds. requirement for clear width at boat piers (60 inch minimum), extending the full lenght of the boarding pier. 1133B.7.1 also does not require that every 10 feet maximum of linear pier edge shall contain at least one continuous clear opening 60 inches wide minimum. 2. CA State Parks Accessibility Guidelines Section 6.IV.E requires boarding piers to have a clear pier width of 60" minimum and as long as the slip plus for every 120 inches of linear length the boarding pier/dock shall have a clear opening of 60".	1. Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.

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1942	**1003.3.2 EXCEPTIONS: 1.** The clear pier *space* shall be permitted to be 36 inches (915 mm) wide minimum for a length of 24 inches (610 mm) maximum provided that multiple 36 inch (915 mm) wide segments are separated by segments that are 60 inches (1525 mm) wide minimum and 60 inches (1525 mm) long minimum. **...**		**1133B.7 Walks and Sidewalks. 1133B.7.1 Continuous surface.** Walks and sidewalks subject to these regulations ... shall be a minimum of 48 inches (1219 mm) in width. If a walk or sidewalk has less than 60 inch (1525 mm) clear width, then passing spaces at least 60 inches by 60 inches (1525 mm by 1525 mm) shall be located at reasonable intervals not to exceed 200 feet (61 m). A T-intersection is an acceptable passing place. **Exception:** When, because of right-of-way restrictions, natural barriers or other existing conditions, the enforcing agency determines that compliance with the 48-inch (1219 mm) clear sidewalk width would create an unreasonable hardship, the clear width may be reduced to 36 inches (914 mm).	2010 CBC **does not address** 2010 ADA req.	1. CA State Parks Accessibility Guidelines Section 6.IV.E.1 requires boarding piers to have a clear pier width of 60" minimum and as long as the slip plus for every 120 inches of linear length the boarding pier/dock shall have a clear opening of 60", with 3 exceptions, one of which is: Width of clear pier space may be 36" wide for a length of 24" as long as multiple 36" segments are separated by segments 60" x 60" x 60" clear.	1. Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1943	**1003.3.2 EXCEPTIONS: ...** **2.** Edge protection shall be permitted at the continuous clear openings provided that it is 4 inches (100 mm) high maximum and 2 inches (51 mm) wide maximum.		**1133B.8 Hazards. 1133B.8.1 Warning curbs.** Abrupt changes in level, except between a walk or sidewalk and an adjacent street or driveway, exceeding 4 inches (102 mm) in a vertical dimension, such as at planters or fountains located in or adjacent to walks, sidewalks or other pedestrian ways, shall be identified by curbs projecting at least 6 inches (152 mm) in height above the walk or sidewalk surface to warn the blind of a potential drop off. ...	2010 CBC **does not address** 2010 ADA req.	1. CA State Parks Accessibility Guidelines Section 6.IV.E.1 requires boarding piers to have a clear pier width of 60" minimum and as long as the pier plus for every 120 inches of linear length the boarding pier/dock shall have a clear opening of 60", with 3 exceptions, one of which is: Width of clear pier space may be 36" wide for a length of 24" as long as multiple 36" segments are separated by segments 60" x 60" x 60" clear. 2. CBC 1133B.8.6 is similar to 2010 ADA Stds. 1003.3.1 Exception 2 but requires a minimum 6 inch high curb instead of a 4 inch maximum height, which is intended to protect the blind. CBC does not specify a maximum width. The 2010 ADA Stds. edge protection would protect both the blind as well as wheelchair users.	1. Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1944	**Advisory 1003.3.2 Boarding Pier Clearances.** These requirements do not establish a minimum length for accessible boarding piers at boat launch ramps. The accessible boarding pier should have a length at least equal to that of other boarding piers provided at the facility. If no other boarding pier is provided, the pier would have a length equal to what would have been provided if no access requirements applied. The entire length of accessible boarding piers would be required to comply with the same technical provisions that apply to accessible boat slips. For example, at a launch ramp, if a 20 foot (6100 mm) long accessible boarding pier is provided, the entire 20 feet (6100 mm) must comply with the pier clearance requirements in 1003.3. Likewise, if a 60 foot (18 m) long accessible boarding pier is provided, the pier clearance requirements in 1003.3 would apply to the entire 60 feet (18 m). The following example applies to a boat launch ramp boarding pier: A chain of floats is provided on a launch ramp to be used as a boarding pier which is required to be accessible by 1003.3.2. At high water, the entire chain is floating and a transition plate connects the first float to the surface of the launch ramp. As the water level decreases, segments of the chain end up resting on the launch ramp surface, matching the slope of the launch ramp.		NA	NA	NA	NA
1945	**1004 Exercise Machines and Equipment**		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1946	**1004.1 Clear Floor Space.** Exercise machines and equipment shall have a clear floor *space* complying with 305 positioned for transfer or for use by an individual seated in a wheelchair. Clear floor or ground *spaces* required at exercise machines and equipment shall be permitted to overlap.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,

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1947	**Advisory 1004.1 Clear Floor Space.** One clear floor or ground space is permitted to be shared between two pieces of exercise equipment. To optimize space use, designers should carefully consider layout options such as connecting ends of the row and center aisle spaces. The position of the clear floor space may vary greatly depending on the use of the equipment or machine. For example, to provide access to a shoulder press machine, clear floor space next to the seat would be appropriate to allow for transfer. Clear floor space for a bench press machine designed for use by an individual seated in a wheelchair, however, will most likely be centered on the operating mechanisms.					
1948	**1005 Fishing Piers and Platforms**		**1132B.2 Parks and recreational areas.** … **1132B.2#4. Boat docks.** …		CBC 1132B.2 heading is "parks and recreational areas". 2010 ADA Stds. uses the term "boat slip" whereas CBC uses "boat docks", but the intent is equivalent.	1. If the CBC version is adopted, add a section for Recreational Boating Facilities. 2. Adopt the 2010 ADA Stds. version verbatim.
1949	**1005.1 Accessible Routes.** *Accessible* routes serving fishing piers and platforms, including *gangways* and floating piers, shall comply with Chapter 4.		**… 1132B.2#4. Boat docks.** ..., fishing piers, etc., shall be accessible.	2010 CBC is **equivalent** to 2010 ADA.	CBC 1132B.2.4 requires Boat Docks to be accessible and is under the Section 1132B.2 heading "parks and recreational areas" 2010 ADA Stds. uses the term "boat slip" whereas CBC uses "boat docks", but the intent is equivalent. CBC requires boat docks to be accessible but does not provide additional or different requirements than those found elsewhere so it is assumed that the other requirements of Chapter 11B apply to boat docks.	The CA State Parks Accessibility Guidelines 2009 Edition is the most comparable document to the 2010 ADA Stds. requirements for recreational boating facilities. These guidelines are not enforceable as law. Section 6 is titled "Boating" and is the most comparable section to 2010 ADA Stds. Section 1005.
1950	**1005.1 EXCEPTIONS: 1.** *Accessible* routes serving floating fishing piers and platforms shall be permitted to use Exceptions 1, 2, 5, 6, 7 and 8 in 1003.2.1. **2.** Where the total length of the *gangway* or series of *gangways* serving as part of a required *accessible* route is 30 feet (9145 mm) minimum, *gangways* shall not be required to comply with 405.2.		CBC does not have an equivalent section.		1. The CA State Parks Accessibility Guidelines include equivalent exceptions for 2010 ADA Stds. exceptions 5 & 6 but not for exceptions 1, 2, 7 & 8 in 2010 ADA Stds. 1003.2.1. 2. CA State Parks Accessibility Guidelines Section 6.III.A requires gangways (regardless of length) to have slopes no greater than 8.33%, which is a virtually impossible condition to comply with when dealing with tidal fluctuations.	1. Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1951	**1005.2 Railings.** Where provided, railings, guards, or handrails shall comply with 1005.2.		**SECTION 1013 GUARDS 1013.1 Where required.** Guards shall be located along open-sided walking surfaces, including mezzanines, equipment platforms, stairs, ramps and landings that are located more than 30 inches (762 mm) measured vertically to the floor or grade below at any point within 36 inches (914 mm) horizontally to the edge of the open side. Guards shall be adequate in strength and attachment in accordance with Section 1607.7. Exception: Guards are not required for the following locations: 1. On the loading side of loading docks or piers.	2010 CBC **does not address** 2010 ADA req.	Railings at fishing piers are primarily intended for safety similar to the CBC requirement for guards. However, 2010 ADA Stds. recognizes that railings at piers must be treated differently to allow wheelchair users to fish. Since CBC requires guards to be 42 inches high that would interfere with a wheelchair user's ability to fish. CBC includes an exception for guards on the loading side of docks or piers, which would typically not occur at a fishing pier.	1. Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1952	**1005.2.1 Height.** At least 25 percent of the railings, guards, or handrails shall be 34 inches (865 mm) maximum above the ground or deck surface.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	The 34 inch maximum height permits wheelchair users to fish while providing an acceptable level of safety to the CBC requirement for guards.	1. Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1953	**1005.2.1 EXCEPTION:** Where a guard complying with sections 1003.2.12.1 and 1003.2.12.2 of the International Building Code (2000 edition) or sections 1012.2 and 1012.3 of the International Building Code (2003 edition) (incorporated by reference, see “Referenced Standards” in Chapter 1) is provided, the guard shall not be required to comply with 1005.2.1.		CBC does not have an equivalent excepttion.	2010 CBC **does not address** 2010 ADA req.	CBC is not included in the 2010 ADA Stds. Chapter 1 Reference Standards as is the IBC.	1. Incorporate the 2010 ADA Stds. definitions, requirements and exceptions. Reference the CBC instead of the IBC if incorporated in the Reference Standards.
1954	**1005.2.1.1 Dispersion.** Railings, guards, or handrails required to comply with 1005.2.1 shall be dispersed throughout the fishing pier or platform.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	The dispersion of lower railing height locations is intended to provide a variety of conditions for people with disabilities to fish so as to not be discriminatory.	1. Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1955	**Advisory 1005.2.1.1 Dispersion.** Portions of the railings that are lowered to provide fishing opportunities for persons with disabilities must be located in a variety of locations on the fishing pier or platform to give people a variety of locations to fish. Different fishing locations may provide varying water depths, shade (at certain times of the day), vegetation, and proximity to the shoreline or bank.		NA	NA	NA	NA

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1956	**1005.3 Edge Protection.** Where railings, guards, or handrails complying with 1005.2 are provided, edge protection complying with 1005.3.1 or 1005.3.2 shall be provided.		**1133B.8 Hazards. 1133B.8.1 Warning curbs.** Abrupt changes in level, except between a walk or sidewalk and an adjacent street or driveway, exceeding 4 inches (102 mm) in a vertical dimension, such as at planters or fountains located in or adjacent to walks, sidewalks or other pedestrian ways, shall be identified by curbs projecting at least 6 inches (152 mm) in height above the walk or sidewalk surface to warn the blind of a potential drop off. When a guard or handrail is provided, no curb is required when a guide rail is provided centered 3 inches (76 mm) plus or minus 1 inch (25 mm) above the surface of the walk or sidewalk, the walk is 5 percent or less gradient or no adjacent hazard exists.	2010 CBC **does not address** 2010 ADA req.	1. 2010 ADA Stds. requires edge protection "where railings, guards or handrails…are provided" whereas CBC requires "warning curbs" where dropoffs exceeding 4 inches occur at walks and sidewalks. 2. The CBC requirement is intended to protect the blind whereas the 2010 ADA Stds. edge protection would protect both the blind as well as wheelchair users. 3. The CBC requirement is intended to apply only at walks and sidewalk adjacent to a street or driveway, which is a different condition than along the edge of a fishing pier.	1. Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1957	**Advisory 1005.3 Edge Protection.** Edge protection is required only where railings, guards, or handrails are provided on a fishing pier or platform. Edge protection will prevent wheelchairs or other mobility devices from slipping off the fishing pier or platform. Extending the deck of the fishing pier or platform 12 inches (305 mm) where the 34 inch (865 mm) high railing is provided is an alternative design, permitting individuals using wheelchairs or other mobility devices to pull into a clear space and move beyond the face of the railing. In such a design, curbs or barriers are not required.		NA	NA	NA	NA
1958	**1005.3.1 Curb or Barrier.** Curbs or barriers shall extend 2 inches (51 mm) minimum above the surface of the fishing pier or platform.		**1133B.8 Hazards. 1133B.8.1 Warning curbs.** Abrupt changes in level, except between a walk or sidewalk and an adjacent street or driveway, exceeding 4 inches (102 mm) in a vertical dimension, such as at planters or fountains located in or adjacent to walks, sidewalks or other pedestrian ways, shall be identified by curbs projecting at least 6 inches (152 mm) in height above the walk or sidewalk surface to warn the blind of a potential drop off. When a guard or handrail is provided, no curb is required when a guide rail is provided centered 3 inches (76 mm) plus or minus 1 inch (25 mm) above the surface of the walk or sidewalk, the walk is 5 percent or less gradient or no adjacent hazard exists.	2010 CBC **does not address** 2010 ADA req.	1. CBC 1133B.8.1 is similar to 2010 ADA Stds. 1005.3.1 but requires a minimum 6 inch high curb instead of a 2 inch curb, which is intended to protect the blind. The 2010 ADA Stds. edge protection would protect both the blind as well as wheelchair users.	1. Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1959	**1005.3.2 Extended Ground or Deck Surface.** The ground or deck surface shall extend 12 inches (305 mm) minimum beyond the inside face of the railing. Toe clearance shall be provided and shall be 30 inches (760 mm) wide minimum and 9 inches (230 mm) minimum above the ground or deck surface beyond the railing.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	NA	1. Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1960	**1005.4 Clear Floor or Ground Space.** At each location where there are railings, guards, or handrails complying with 1005.2.1, a clear floor or ground *space* complying with 305 shall be provided. Where there are no railings, guards, or handrails, at least one clear floor or ground *space* complying with 305 shall be provided on the fishing pier or platform.		**1118B.4 Clear floor or ground space for wheelchairs. 1. Size and approach.** The minimum clear floor or ground space required to accommodate a single, stationary wheelchair and occupant is 30 inches by 48 inches (762 mm by 1219 mm). The minimum clear floor or ground space for wheelchairs may be positioned for forward or parallel approach to an object. Clear floor or ground space for wheelchairs may be part of the knee space required under some objects. See Figure 11B-5A.	2010 CBC **does not address** 2010 ADA req.	CBC contains similar requirements for clear floor or ground space for wheelchairs but does not specifically require them at each location at fishing piers where railings, guards or handrails occur and at least one clear floor or ground space is required where there are not railings, guards or handrails.	1. Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1961	**1005.5 Turning Space.** At least one turning *space* complying with 304.3 shall be provided on fishing piers and platforms.		**1118B.3 Wheelchair turning space.** The space required for a wheelchair to make a 180-degree turn is a clear space of 60 inches (1524 mm) diameter [see Figure 11B-12(a)] or a T-shaped space. See Figure 11B-12(b).	2010 CBC is **equivalent** to 2010 ADA.	1. CBC contains similar requirements for wheelchair turning space but does not specifically require them at fishing piers and platforms. 2. However, CBC 1132B.2#4 requires fishing piers to be accessible so 1118B.3 is inferred by reference.	1. Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1962	**1006 Golf Facilities**		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,

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1963	**1006.1 General.** Golf *facilities* shall comply with 1006.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1964	**1006.2 Accessible Routes.** *Accessible* routes serving *teeing grounds*, practice *teeing grounds*, putting greens, practice putting greens, teeing stations at driving ranges, course weather shelters, golf car rental areas, bag drop areas, and course toilet rooms shall comply with Chapter 4 and shall be 48 inches (1220 mm) wide minimum. Where handrails are provided, *accessible* routes shall be 60 inches (1525 mm) wide minimum.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1965	**1006.2 EXCEPTION:** Handrails shall not be required on golf courses. Where handrails are provided on golf courses, the handrails shall not be required to comply with 505.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1966	**Advisory 1006.2 Accessible Routes.** The 48 inch (1220 mm) minimum width for the accessible route is necessary to ensure passage of a golf car on either the accessible route or the golf car passage. This is important where the accessible route is used to connect the golf car rental area, bag drop areas, practice putting greens, practice teeing grounds, course toilet rooms, and course weather shelters. These are areas outside the boundary of the golf course, but are areas where an individual using an adapted golf car may travel. A golf car passage may not be substituted for other accessible routes to be located outside the boundary of the course. For example, an accessible route connecting an accessible parking space to the entrance of a golf course clubhouse is not covered by this provision. Providing a golf car passage will permit a person that uses a golf car to practice driving a golf ball from the same position and stance used when playing the game. Additionally, the space required for a person using a golf car to enter and maneuver within the teeing stations required to be accessible should be considered.					
1967	**1006.3 Golf Car Passages.** *Golf car passages* shall comply with 1006.3.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1968	**1006.3.1 Clear Width.** The clear width of *golf car passages* shall be 48 inches (1220 mm) minimum.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1969	**1006.3.2 Barriers.** Where curbs or other constructed barriers prevent golf cars from entering a fairway, openings 60 inches (1525 mm) wide minimum shall be provided at intervals not to exceed 75 yards (69 m).		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1970	**1006.4 Weather Shelters.** A clear floor or ground *space* 60 inches (1525 mm) minimum by 96 inches (2440 mm) minimum shall be provided within weather shelters.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
1971	**1007 Miniature Golf Facilities**		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CBC 1132B Outdoor Occupancies is the most comparable section to 2010 ADA Stds. 1007 but makes no mention of miniature golf courses.	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.

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1972	**1007.1 General.** Miniature golf *facilities* shall comply with 1007.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CBC 1132B Outdoor Occupancies is the most comparable section to 2010 ADA Stds. 1007 but makes no mention of miniature golf courses.	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1973	**1007.2 Accessible Routes.** *Accessible* routes serving holes on miniature golf courses shall comply with Chapter 4. *Accessible* routes located on playing surfaces of miniature golf holes shall be permitted to use the exceptions in 1007.2.		**1114B.1.2 Accessible route of travel**. When a building, or portion of a building, is required to be accessible or adaptable, an accessible route of travel complying with Sections 1102B, 1114B, 1124B, 1133B.3, 1133B.5, 1133B.7 and 1133B.8.6 shall be provided to all portions of the building, to accessible building entrances and between the building and the public way. All walks, halls, corridors, aisles, skywalks, tunnels, and other spaces that are part of an accessible route shall comply with the applicable provisions of this code. The accessible route shall, to the maximum extent feasible, coincide with the route for the general public. At least one accessible route shall connect accessible buildings, facilities, elements and spaces that are on the same site. **Exception:** Where an elevator is provided for vertical access, only one elevator is required. Where more than one elevator is provided, all elevators shall be accessible. See Section 1114B.1.1 for a list of code sections applicable to accessible routes of travel.	2010 CBC **does not address** 2010 ADA req.	CBC does not include the exceptions for accessible routes located on playing surfaces of miniature golf holes.	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1974	**1007.2 EXCEPTIONS: 1.** Playing surfaces shall not be required to comply with 302.2. **2.** Where *accessible* routes intersect playing surfaces of holes, a 1 inch (25 mm) maximum curb shall be permitted for a width of 32 inches (815 mm) minimum. **3.** A slope not steeper than 1:4 for a 4 inch (100 mm) maximum rise shall be permitted. **4.** *Ramp* landing slopes specified by 405.7.1 shall be permitted to be 1:20 maximum. **5.** *Ramp* landing length specified by 405.7.3 shall be permitted to be 48 inches (1220 mm) long minimum. **6.** *Ramp* landing size specified by 405.7.4 shall be permitted to be 48 inches (1220 mm) minimum by 60 inches (1525 mm) minimum. **7.** Handrails shall not be required on holes. Where handrails are provided on holes, the handrails shall not be required to comply with 505.		CBC does not have equivalent exceptions.	2010 CBC **does not address** 2010 ADA req.	2010 ADA Stds. recognizes that miniature golf courses have unique characteristics, several of which are in conflict with strict accessibility requirements. The requirements for stable, firm and slip-resistant surfaces, carpet, openings, untreated changes in level and ramps would be inconsistent with a miniature golf course environment.	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1975	**1007.3 Miniature Golf Holes.** Miniature golf holes shall comply with 1007.3.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CBC has no comparable design requirements for start of play areas or reach range for golf clubs adjacent to holes.	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1976	**1007.3.1 Start of Play.** A clear floor or ground *space* 48 inches (1220 mm) minimum by 60 inches (1525 mm) minimum with slopes not steeper than 1:48 shall be provided at the start of play.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CBC has no comparable design requirements for start of play areas.	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1977	**1007.3.2 Golf Club Reach Range Area.** All areas within holes where golf balls rest shall be within 36 inches (915 mm) maximum of a clear floor or ground *space* 36 inches (915 mm) wide minimum and 48 inches (1220 mm) long minimum having a *running slope* not steeper than 1:20. The clear floor or ground *space* shall be served by an *accessible* route.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CBC has no comparable design requirements for reach range for golf clubs adjacent to holes.	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1978	**Advisory 1007.3.2 Golf Club Reach Range Area.** The golf club reach range applies to all holes required to be accessible. This includes accessible routes provided adjacent to or, where provided, on the playing surface of the hole.		NA	NA	NA	NA

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1979	**1008 Play Areas**		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	The CA State Parks Accessibility Guidelines 2009 Edition is the most comparable document to the 2010 ADA Stds. requirements for play areas. These guidelines are not enforceable as law. Section 27 is titled "Play Areas" and is the most comparable section to 2010 ADA Stds. Section 1008.	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1980	**1008.1 General.** *Play areas* shall comply with 1008.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	The CA State Parks Accessibility Guidelines 2009 Edition is the most comparable document to the 2010 ADA Stds. requirements for play areas. These guidelines are not enforceable as law. Section 27 is titled "Play Areas" and is the most comparable section to 2010 ADA Stds. Section 1008.	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1981	**1008.2 Accessible Routes.** *Accessible* routes serving play areas shall comply with Chapter 4 and 1008.2 and shall be permitted to use the exceptions in 1008.2.1 through 1008.2.3. Where *accessible* routes serve *ground level play components*, the vertical clearance shall be 80 inches high (2030 mm) minimum.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.III.A requires that "Except as amended in this section, when required within the boundary of a play area, accessible routes shall meet the requirements for exterior routes of travel." CA State Parks Accessibility Guidelines Section 27.III.E requires that "No object may protrude into the ground level accessible route below 80" from the ground surface."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1982	**1008.2.1 Ground Level and Elevated Play Components.** *Accessible* routes serving *ground level play components* and *elevated play components* shall be permitted to use the exceptions in 1008.2.1.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.III.F.1.a requires that "Where transfer systems are provided, an elevated play component shall be permitted to connect to another elevated play component in lieu of an accessible route. However, where 20 or more elevated play components are provided, no more than 25% of the elevated components are permitted to be connected by transfer systems."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1983	**1008.2.1 EXCEPTIONS: 1.** Transfer systems complying with 1008.3 shall be permitted to connect *elevated play components* except where 20 or more *elevated play components* are provided, no more than 25 percent of the *elevated play components* shall be permitted to be connected by transfer systems. **2.** Where transfer systems are provided, an *elevated play component* shall be permitted to connect to another *elevated play component* as part of an *accessible* route.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.III.F.1.a requires that "Where transfer systems are provided, an elevated play component shall be permitted to connect to another elevated play component in lieu of an accessible route. However, where 20 or more elevated play components are provided, no more than 25% of the elevated components are permitted to be connected by transfer systems."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1984	**1008.2.2 Soft Contained Play Structures.** *Accessible* routes serving *soft contained play structures* shall be permitted to use the exception in 1008.2.2.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines do not include a similar exception.	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1985	**1008.2.2 EXCEPTION:** Transfer systems complying with 1008.3 shall be permitted to be used as part of an *accessible* route.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines do not include a similar requirement.	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1986	**1008.2.3 Water Play Components.** *Accessible* routes serving water *play components* shall be permitted to use the exceptions in 1008.2.3.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines do not include a similar requirement.	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1987	**1008.2.3 EXCEPTIONS: 1.** Where the surface of the *accessible* route, clear floor or ground *spaces*, or turning *spaces* serving water *play components* is submerged, compliance with 302, 403.3, 405.2, 405.3, and 1008.2.6 shall not be required. **2.** Transfer systems complying with 1008.3 shall be permitted to connect *elevated play components* in water.		CBC does not have equivalent exceptions.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines do not include similar exceptions.	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.

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1988	**Advisory 1008.2.3 Water Play Components.** Personal wheelchairs and mobility devices may not be appropriate for submerging in water when using play components in water. Some may have batteries, motors, and electrical systems that when submerged in water may cause damage to the personal mobility device or wheelchair or may contaminate the water. Providing an aquatic wheelchair made of non-corrosive materials and designed for access into the water will protect the water from contamination and avoid damage to personal wheelchairs.		NA	NA	NA	NA
1989	**1008.2.4 Clear Width.** *Accessible* routes connecting *play components* shall provide a clear width complying with 1008.2.4.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.III.E.2 & 3 include similar requirements to 2010 ADA Stds. 1008.2.4.	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1990	**1008.2.4.1 Ground Level.** At ground level, the clear width of *accessible* routes shall be 60 inches (1525 mm) minimum.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.III.E.2 requires that "The clear width of the ground level accessible route shall be 60" minimum except that in play areas less than 1,000 square feet the clear width may be reduced to 44" provided that at least one turning space that is a 60" diameter circle or T-shape is provided every 30 feet."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1991	**1008.2.4.1 EXCEPTIONS: 1.** In *play areas* less than 1000 square feet (93 m2), the clear width of *accessible* routes shall be permitted to be 44 inches (1120 mm) minimum, if at least one turning *space* complying with 304.3 is provided where the restricted *accessible* route exceeds 30 feet (9145 mm) in length. **2.** The clear width of *accessible* routes shall be permitted to be 36 inches (915 mm) minimum for a distance of 60 inches (1525 mm) maximum provided that multiple reduced width segments are separated by segments that are 60 inches (1525 mm) wide minimum and 60 inches (1525 mm) long minimum.		CBC does not have equivalent exceptions.	2010 CBC **does not address** 2010 ADA req.	1. CA State Parks Accessibility Guidelines Section 27.III.E.2 requires that "The clear width of the ground level accessible route shall be 60" minimum except that in play areas less than 1,000 square feet the clear width may be reduced to 44" provided that at least one turning space that is a 60" diameter circle or T-shape is provided every 30 feet." 2. CA State Parks Accessibility Guidelines Section 27.III.E.3 requires that "The clear width of any ground level accessible route in a play area may be reduced to 36" minimum for a distance of 60" maximum provided that multiple reduced width segments are separated by segments that are 60" wide for at least 60" in length."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1992	**1008.2.4.2 Elevated.** The clear width of *accessible* routes connecting *elevated play components* shall be 36 inches (915 mm) minimum.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.III.F.2 requires that "The clear width of an elevated accessible route connecting elevated play components shall be 36."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1993	**1008.2.4.2 EXCEPTIONS: 1.** The clear width of *accessible* routes connecting *elevated play components* shall be permitted to be reduced to 32 inches (815 mm) minimum for a distance of 24 inches (610 mm) maximum provided that reduced width segments are separated by segments that are 48 inches (1220 mm) long minimum and 36 inches (915 mm) wide minimum. **2.** The clear width of transfer systems connecting *elevated play components* shall be permitted to be 24 inches (610 mm) minimum.		CBC does not have equivalent exceptions.	2010 CBC **does not address** 2010 ADA req.	1. CA State Parks Accessibility Guidelines Section 27.III.F.2.a requires that "The clear width of any elevated accessible route in a play area may be reduced to 32" minimum for a distance of 24" maximum, provided that reduced width segments are separated by segments that are 48" in length and 36" minimum width." 2. CA State Parks Accessibility Guidelines Section 27.III.F.2.b requires that "The clear width of transfer systems connecting elevated play components shall be 24" minimum."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1994	**1008.2.5 Ramps.** Within *play areas*, *ramps* connecting *ground level play components* and *ramps* connecting *elevated play components* shall comply with 1008.2.5.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.IV.A requires that "Any part of an accessible route with a slope greater than 1:20 (5%) shall be considered a ramp and shall meet the guidelines for ramps, except as modified by this section."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1995	**1008.2.5.1 Ground Level.** *Ramp* runs connecting *ground level play components* shall have a *running slope* not steeper than 1:16.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.IV.B requires that "The maximum slope on ramps connecting ground level play components shall be 1:16 (6.24%)	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.

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1996	**1008.2.5.2 Elevated.** The rise for any *ramp* run connecting *elevated play components* shall be 12 inches (305 mm) maximum.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.IV.C requires that "Where a ramp connects elevated components, the maximum rise of any length run shall not exceed 12"."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1997	**1008.2.5.3 Handrails.** Where required on *ramps* serving *play components*, the handrails shall comply with 505 except as modified by 1008.2.5.3.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.V.A requires that "Except as modified in this section, handrails shall meet the guidelines for handrails."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1998	**1008.2.5.3 EXCEPTIONS: 1.** Handrails shall not be required on *ramps* located within ground level *use zones*. **2.** Handrail extensions shall not be required.		CBC does not have equivalent exceptions.	2010 CBC **does not address** 2010 ADA req.	1. CA State Parks Accessibility Guidelines Section 27.V.B requires that "Handrails are not required at ramps located within ground level use zones." 2. CA State Parks Accessibility Guidelines Section 27.V.C requires that "Handrail extensions are not required in play areas."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
1999	**1008.2.5.3.1 Handrail Gripping Surfaces.** Handrail gripping surfaces with a circular cross section shall have an outside diameter of 0.95 inch (24 mm) minimum and 1.55 inches (39 mm) maximum. Where the shape of the gripping surface is non-circular, the handrail shall provide an equivalent gripping surface.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.V.D requires that "The diameter or width of the grip portion of handrails shall be 0.95" minimum to 1.55" maximum, or the shape shall provide an equivalent gripping surface."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
2000	**1008.2.5.3.2 Handrail Height.** The top of handrail gripping surfaces shall be 20 inches (510 mm) minimum and 28 inches (710 mm) maximum above the *ramp* surface.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.V.E requires that "The top of the handrail gripping surface shall be 20" minimum to 28" maximum above the ramp surface."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
2001	**1008.2.6 Ground Surfaces.** Ground surfaces on *accessible* routes, clear floor or ground *spaces*, and turning *spaces* shall comply with 1008.2.6.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.III.A requires that "Except as amended in this section, when required within the boundary of a play area, accessible routes shall meet the requirements for exterior routes of travel."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
2002	**Advisory 1008.2.6 Ground Surfaces.** Ground surfaces must be inspected and maintained regularly to ensure continued compliance with the ASTM F 1951 standard. The type of surface material selected and play area use levels will determine the frequency of inspection and maintenance activities.		NA	NA	NA	NA
2003	**1008.2.6.1 Accessibility.** Ground surfaces shall comply with ASTM F 1951 (incorporated by reference, see “Referenced Standards” in Chapter 1). Ground surfaces shall be inspected and maintained regularly and frequently to ensure continued compliance with ASTM F 1951.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.III.C requires that "Accessible route surfaces inside play areas must comply with the American Society for Testing and Materials (ASTM) "F 1951-99 Standard Specifications for Determination of Accessible Surface Systems Under and Around Playground Equipment.""	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
2004	**1008.2.6.2 Use Zones.** Ground surfaces located within *use zones* shall comply with ASTM F 1292 (1999 edition or 2004 edition) (incorporated by reference, see “Referenced Standards” in Chapter 1).		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.III.D requires that "Use zones differ from accessible routes inside a play area in that they constitute the area beneath and immediately adjacent to a play structure or piece of equipment. This is the surface upon which it is predicted a user would land when falling from or exiting the equipment and these surfaces are required to comply with the ASTM "F 1292-04 Standard Specifications for Impact Attenuation of Surface Systems Under and Around Playground Equipment."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
2005	**1008.3 Transfer Systems.** Where transfer systems are provided to connect to *elevated play components*, transfer systems shall comply with 1008.3.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.VI Transfer Platforms in Play Areas and 27.VII Transfer Steps contains requirements similar to 2010 ADA Stds. Section 1008.3.	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.

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2006	**Advisory 1008.3 Transfer Systems.** Where transfer systems are provided, consideration should be given to the distance between the transfer system and the elevated play components. Moving between a transfer platform and a series of transfer steps requires extensive exertion for some children. Designers should minimize the distance between the points where a child transfers from a wheelchair or mobility device and where the elevated play components are located. Where elevated play components are used to connect to another elevated play component instead of an accessible route, careful consideration should be used in the selection of the play components used for this purpose.		NA	NA	NA	NA
2007	**1008.3.1 Transfer Platforms.** Transfer platforms shall be provided where transfer is intended from wheelchairs or other mobility aids. Transfer platforms shall comply with 1008.3.1.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.VI.A requires that "Where transfer is intended to be from a wheelchair or other mobility device, transfer platforms shall be provided.	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
2008	**1008.3.1.1 Size.** Transfer platforms shall have level surfaces 14 inches (355 mm) deep minimum and 24 inches (610 mm) wide minimum.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.VI.B requires that "Transfer platforms shall have a level surface, 14" minimum depth and 24" minimum width, located between 11" and 18" above the ground or floor surface."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
2009	**1008.3.1.2 Height.** The height of transfer platforms shall be 11 inches (280 mm) minimum and 18 inches (455 mm) maximum measured to the top of the surface from the ground or floor surface.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.VI.B requires that "Transfer platforms shall have a level surface, 14" minimum depth and 24" minimum width, located between 11" and 18" above the ground or floor surface."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
2010	**1008.3.1.3 Transfer Space.** A transfer *space* complying with 305.2 and 305.3 shall be provided adjacent to the transfer platform. The 48 inch (1220 mm) long minimum dimension of the transfer *space* shall be centered on and parallel to the 24 inch (610 mm) long minimum side of the transfer platform. The side of the transfer platform serving the transfer *space* shall be unobstructed.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.VI.C requires that "A clear and level 30" by 48" transfer space that adjoins or overlaps the accessible route shall be provided at each transfer platform. The 48" long dimension of this clear space must be located so that it is parallel to the 24" unobstructed wide side of the transfer platform."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
2011	**1008.3.1.4 Transfer Supports.** At least one means of support for transferring shall be provided.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.VI.D requires that "A means of support such as handrails, handgrips or custom designed handholds shall be provided at each level where transferring is the intended method of access."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
2012	**1008.3.2 Transfer Steps.** Transfer steps shall be provided where movement is intended from transfer platforms to levels with *elevated play components* required to be on *accessible* routes. Transfer steps shall comply with 1008.3.2.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.VII.A requires that "Transfer steps shall be provided where movement is intended from a transfer platform to a level with elevated play components that is required to be on an accessible route."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
2013	**1008.3.2.1 Size.** Transfer steps shall have level surfaces 14 inches (355 mm) deep minimum and 24 inches (610 mm) wide minimum.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.VII.B requires that "Transfer steps shall have a level surface, 14" minimum depth, 24" minimum width and each step shall have a maximum height of 8"."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
2014	**1008.3.2.2 Height.** Each transfer step shall be 8 inches (205 mm) high maximum.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.VII.B requires that "Transfer steps shall have a level surface, 14" minimum depth, 24" minimum width and each step shall have a maximum height of 8"."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
2015	**1008.3.2.3 Transfer Supports.** At least one means of support for transferring shall be provided.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CBC does not have an equivalent section.	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
2016	**Advisory 1008.3.2.3 Transfer Supports.** Transfer supports are required on transfer platforms and transfer steps to assist children when transferring. Some examples of supports include a rope loop, a loop type handle, a slot in the edge of a flat horizontal or vertical member, poles or bars, or D rings on the corner posts.		NA	NA	NA	NA

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2017	**1008.4 Play Components.** *Ground level play components* on *accessible* routes and *elevated play components* connected by *ramps* shall comply with 1008.4.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	1. CA State Parks Accessibility Guidelines Section 27.VIII.A requires that "Where ground level play components are provided, at least one of each type provided shall be located on an accessible route." 2. Section 27.VIII.B requires that "Where elevated play components are provided, ground level play components shall be provided in accordance with the chart on the following page:"	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
2018	**1008.4.1 Turning Space.** At least one turning *space* complying with 304 shall be provided on the same level as *play components*. Where swings are provided, the turning *space* shall be located immediately adjacent to the swing.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	1. CA State Parks Accessibility Guidelines Section 27.VIII.D requires that "Clear space as well as maneuvering space shall be provided on the same level as all accessible play components and must adjoin or overlap an accessible route." 2. Section 27.VIII.D.2 requires that "Maneuvering space shall be a 60" diameter circle or T-shape that does not exceed 2% in any direction." 3. Section 27.VIII.D.2.a requires that "Maneuvering space required for a swing shall be located immediately adjacent to the swing."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
2019	**1008.4.2 Clear Floor or Ground Space.** Clear floor or ground *space* complying with 305.2 and 305.3 shall be provided at *play components*.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.VIII.D.1 requires that "Clear space must be 30" by 48" minimum and shall not exceed 2% slope in any direction."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
2020	**Advisory 1008.4.2 Clear Floor or Ground Space.** Clear floor or ground spaces, turning spaces, and accessible routes are permitted to overlap within play areas. A specific location has not been designated for the clear floor or ground spaces or turning spaces, except swings, because each play component may require that the spaces be placed in a unique location. Where play components include a seat or entry point, designs that provide for an unobstructed transfer from a wheelchair or other mobility device are recommended. This will enhance the ability of children with disabilities to independently use the play component. When designing play components with manipulative or interactive features, consider appropriate reach ranges for children seated in wheelchairs. The following table provides guidance on reach ranges for children seated in wheelchairs. These dimensions apply to either forward or side reaches. The reach ranges are appropriate for use with those play components that children seated in wheelchairs may access and reach. Where transfer systems provide access to elevated play components, the reach ranges are not appropriate.		NA	NA	NA	NA
2021	**1008.4.3 Play Tables.** Where play tables are provided, knee clearance 24 inches (610 mm) high minimum, 17 inches deep (430 mm) minimum, and 30 inches (760 mm) wide minimum shall be provided. The tops of rims, curbs, or other obstructions shall be 31 inches (785 mm) high maximum.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.VIII.E requires that "Where play tables are provided, knee clearance minimum 24" high by 17" deep and 30" wide shall be provided and the top of table rims, curbs or other obstructions shall be 31" high maximum."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
2022	**1008.4.3 EXCEPTION:** Play tables designed and constructed primarily for children 5 years and younger shall not be required to provide knee clearance where the clear floor or ground *space* required by 1008.4.2 is arranged for a parallel approach.		CBC does not have an equivalent exception.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.VIII.E.1 requires that "Play tables designed or constructed primarily for children ages five and under shall not be required to provide knee clearance if the clear floor or ground space is arranged for a parallel approach and if the table is 31" high maximum."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
2023	**1008.4.4 Entry Points and Seats.** Where *play components* require transfer to entry points or seats, the entry points or seats shall be 11 inches (280 mm) minimum and 24 inches (610 mm) maximum from the clear floor or ground *space*.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.VIII.F requires that "With the exception of entry points on slides, where a play component requires transfer to the entry point or seat, the entry point of seat shall be 11" minimum and 24" maximum from the ground or floor surface and a means of support for transferring such as handrails, handgrips or custom designed handholds shall be provided."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.

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2024	**1008.4.4 EXCEPTION:** Entry points of slides shall not be required to comply with 1008.4.4.		CBC does not have an equivalent exception.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.VIII.F requires that "With the exception of entry points on slides, where a play component requires transfer to the entry point or seat, the entry point of seat shall be 11" minimum and 24" maximum from the ground or floor surface and a means of support for transferring such as handrails, handgrips or custom designed handholds shall be provided."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
2025	**1008.4.5 Transfer Supports.** Where *play components* require transfer to entry points or seats, at least one means of support for transferring shall be provided.		CBC does not have an equivalent section.	2010 CBC **does not address** 2010 ADA req.	CA State Parks Accessibility Guidelines Section 27.VIII.F requires that "With the exception of entry points on slides, where a play component requires transfer to the entry point or seat, the entry point of seat shall be 11" minimum and 24" maximum from the ground or floor surface and a means of support for transferring such as handrails, handgrips or custom designed handholds shall be provided."	Incorporate the 2010 ADA Stds. definitions, requirements and exceptions.
2026	**1009 Swimming Pools, Wading Pools, and Spas**		... 4. Swimming pool …	2010 CBC **does not address** 2010 ADA req.	CBC only address swimming pools	Adopt ADA language in a separate section
2027	**1009.1 General.** Where provided, pool lifts, sloped entries, transfer walls, transfer systems, and pool stairs shall comply with 1009.		... 4. Swimming pool ... a mechanism to assist persons with disabilities in gaining entry into the pool and in exiting from the pool shall be provided. …	2010 CBC provides **less access** than 2010 ADA.	CBC only addresses lifts and basically only the seat requirements for lifts	Adopt ADA language in a separate section
2028	**1009.2 Pool Lifts.** Pool lifts shall comply with 1009.2.		... 4. Swimming pool ... a mechanism to assist persons with disabilities in gaining entry into the pool and in exiting from the pool shall be provided. Such a mechanism may consist of a swimming pool lift device …	2010 CBC is **equivalent** to 2010 ADA.	CBC addresses pool lift seats only	Adopt ADA language for pool lifts
2029	**Advisory 1009.2 Pool Lifts.** There are a variety of seats available on pool lifts ranging from sling seats to those that are preformed or molded. Pool lift seats with backs will enable a larger population of persons with disabilities to use the lift. Pool lift seats that consist of materials that resist corrosion and provide a firm base to transfer will be usable by a wider range of people with disabilities. Additional options such as armrests, head rests, seat belts, and leg support will enhance accessibility and better accommodate people with a wide range of disabilities.		NA			
2030	**1009.2.1 Pool Lift Location.** Pool lifts shall be located where the water level does not exceed 48 inches (1220 mm).		... 4. Swimming pool ... a mechanism to assist persons with disabilities in gaining entry into the pool and in exiting from the pool shall be provided. Such a mechanism may consist of a swimming pool lift device ... Be positioned so that, if the pool has water of different depths, it will place the operator into water that is at least 3 feet (914 mm) deep. ...	2010 CBC provides **less access** than 2010 ADA.	ADA requires the pool lift to be located where the water is 48" or less deep whereas CBC requires it to be placed 36" min if the water has varying depths	Adopt the ADA language
2031	**1009.2.1 EXCEPTIONS: 1.** Where the entire pool depth is greater than 48 inches (1220 mm), compliance with 1009.2.1 shall not be required. **2.** Where multiple pool lift locations are provided, no more than one pool lift shall be required to be located in an area where the water level is 48 inches (1220 mm) maximum.		... 4. Swimming pool ... a mechanism to assist persons with disabilities in gaining entry into the pool and in exiting from the pool shall be provided. Such a mechanism may consist of a swimming pool lift device ... Be positioned so that, if the pool has water of different depths, it will place the operator into water that is at least 3 feet (914 mm) deep. ...	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language for exceptions

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2032	**1009.2.2 Seat Location.** In the raised position, the centerline of the seat shall be located over the deck and 16 inches (405 mm) minimum from the edge of the pool. The deck surface between the centerline of the seat and the pool edge shall have a slope not steeper than 1:48.		... 4. Swimming pool ... a mechanism to assist persons with disabilities in gaining entry into the pool and in exiting from the pool shall be provided. Such a mechanism may consist of a swimming pool lift device... 4.1.2. The seat shall be not less than 17 inches (423 mm) and not more than 19 inches (483 mm), inclusive of any cushioned surface that might be provided, above the pool deck; ...	2010 CBC **does not address** 2010 ADA req.	CBC does not address the distance from the edge of the pool nor the slope of the deck flooring in the lift area	Adopt ADA language
2033	**1009.2.3 Clear Deck Space.** On the side of the seat opposite the water, a clear deck *space* shall be provided parallel with the seat. The space shall be 36 inches (915 mm) wide minimum and shall extend forward 48 inches (1220 mm) minimum from a line located 12 inches (305 mm) behind the rear edge of the seat. The clear deck *space* shall have a slope not steeper than 1:48.		... 4. Swimming pool ... a mechanism to assist persons with disabilities in gaining entry into the pool and in exiting from the pool shall be provided. Such a mechanism may consist of a swimming pool lift device…	2010 CBC **does not address** 2010 ADA req.	CBC does not address the seat clr flr space	Adopt ADA language
2034	**1009.2.4 Seat Height.** The height of the lift seat shall be designed to allow a stop at 16 inches (405 mm) minimum to 19 inches (485 mm) maximum measured from the deck to the top of the seat surface when in the raised (load) position.		... 4. Swimming pool ... a mechanism to assist persons with disabilities in gaining entry into the pool and in exiting from the pool shall be provided. Such a mechanism may consist of a swimming pool lift device... 4.1.2. The seat shall be not less than 17 inches (423 mm) and not more than 19 inches (483 mm), inclusive of any cushioned surface that might be provided, above the pool deck; ...	2010 CBC **does not address** 2010 ADA req.	CBC does not allow the range of seat hts above the deck that ADA allows; ADA also allows the seat ht stops to be different as long as there is a stop within the compliant range	Adopt ADA language
2035	**1009.2.5 Seat Width.** The seat shall be 16 inches (405 mm) wide minimum.		... 4. Swimming pool ... a mechanism to assist persons with disabilities in gaining entry into the pool and in exiting from the pool shall be provided. Such a mechanism may consist of a swimming pool lift device …	2010 CBC **does not address** 2010 ADA req.	CBC does not address the seat width Note that CBC addresses a back rest, rigid seat, and occupant restraint that ADA does not address	Adopt ADA language
2036	**1009.2.6 Footrests and Armrests.** Footrests shall be provided and shall move with the seat. If provided, the armrest positioned opposite the water shall be removable or shall fold clear of the seat when the seat is in the raised (load) position.		... 4. Swimming pool ... a mechanism to assist persons with disabilities in gaining entry into the pool and in exiting from the pool shall be provided. Such a mechanism may consist of a swimming pool lift device ... 4.1.3. The seat shall have two armrests. The armrest on the side of the seat by which access is gained shall be either removable or fold clear of the seat; ...	2010 CBC provides **less access** than 2010 ADA.	CBC does not address footrests ADA requires a removable or foldable armrest only when there is a footrest	Adopt ADA language
2037	**1009.2.6 EXCEPTION:** Footrests shall not be required on pool lifts provided in spas.		NA	2010 CBC **does not address** 2010 ADA req.	CBC does not address spas	Adopt ADA language
2038	**1009.2.7 Operation.** The lift shall be capable of unassisted operation from both the deck and water levels. Controls and operating mechanisms shall be unobstructed when the lift is in use and shall comply with 309.4.		... 4. Swimming pool ... a mechanism to assist persons with disabilities in gaining entry into the pool and in exiting from the pool shall be provided. Such a mechanism may consist of a swimming pool lift device ... 4.2. Be capable of unassisted operation from both the deck and water levels. ...	2010 CBC **does not address** 2010 ADA req.	CBC does not address the portion on the controls and operating mechanism	Adopt ADA language

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2039	**Advisory 1009.2.7 Operation.** Pool lifts must be capable of unassisted operation from both the deck and water levels. This will permit a person to call the pool lift when the pool lift is in the opposite position. It is extremely important for a person who is swimming alone to be able to call the pool lift when it is in the up position so he or she will not be stranded in the water for extended periods of time awaiting assistance. The requirement for a pool lift to be independently operable does not preclude assistance from being provided.		NA			
2040	**1009.2.8 Submerged Depth.** The lift shall be designed so that the seat will submerge to a water depth of 18 inches (455 mm) minimum below the stationary water level.		... 4. Swimming pool... a mechanism to assist persons with disabilities in gaining entry into the pool and in exiting from the pool shall be provided. Such a mechanism may consist of a swimming pool lift device... Lower the operator at least 18 inches (457 mm) below the surface of the water.	2010 CBC is **equivalent** to 2010 ADA.	Language in the ADA is clearer	Adopt ADA language
2041	**1009.2.9 Lifting Capacity.** Single person pool lifts shall have a weight capacity of 300 pounds (136 kg) minimum and be capable of sustaining a static load of at least one and a half times the rated load.		... 4. Swimming pool ... a mechanism to assist persons with disabilities in gaining entry into the pool and in exiting from the pool shall be provided. Such a mechanism may consist of a swimming pool lift device ... Be designed to have a live-load capacity of not less than 300 pounds (137 kg). ...	2010 CBC **does not address** 2010 ADA req.	CBC does not address the language regarding the static load	Adopt ADA language
2042	**Advisory 1009.2.9 Lifting Capacity.** Single person pool lifts must be capable of supporting a minimum weight of 300 pounds (136 kg) and sustaining a static load of at least one and a half times the rated load. Pool lifts should be provided that meet the needs of the population they serve. Providing a pool lift with a weight capacity greater than 300 pounds (136 kg) may be advisable.		NA			
2043	**1009.3 Sloped Entries.** Sloped entries shall comply with 1009.3.		... 4. Swimming pool ... a mechanism to assist persons with disabilities in gaining entry into the pool and in exiting from the pool shall be provided. …	2010 CBC **does not address** 2010 ADA req.	CBC does not address sloped entry access	Adopt ADA language
2044	**Advisory 1009.3 Sloped Entries.** Personal wheelchairs and mobility devices may not be appropriate for submerging in water. Some may have batteries, motors, and electrical systems that when submerged in water may cause damage to the personal mobility device or wheelchair or may contaminate the pool water. Providing an aquatic wheelchair made of non-corrosive materials and designed for access into the water will protect the water from contamination and avoid damage to personal wheelchairs or other mobility aids.		NA			
2045	**1009.3.1 Sloped Entries.** Sloped entries shall comply with Chapter 4 except as modified in 1109.3.1 through 1109.3.3.		NA	2010 CBC **does not address** 2010 ADA req.		Adopt ADA language
2046	**1009.3.1 EXCEPTION:** Where sloped entries are provided, the surfaces shall not be required to be slip resistant.		NA	2010 CBC **does not address** 2010 ADA req.		Adopt ADA language
2047	**1009.3.2 Submerged Depth.** Sloped entries shall extend to a depth of 24 inches (610 mm) minimum and 30 inches (760 mm) maximum below the stationary water level. Where landings are required by 405.7, at least one landing shall be located 24 inches (610 mm) minimum and 30 inches (760 mm) maximum below the stationary water level.		NA	2010 CBC **does not address** 2010 ADA req.		Adopt ADA language

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2048	**1009.3.2 EXCEPTION:** In wading pools, the sloped entry and landings, if provided, shall extend to the deepest part of the wading pool.		NA	2010 CBC **does not address** 2010 ADA req.		Adopt ADA language
2049	**1009.3.3 Handrails.** At least two handrails complying with 505 shall be provided on the sloped entry. The clear width between required handrails shall be 33 inches (840 mm) minimum and 38 inches (965 mm) maximum.		... 4. Swimming pool ... a mechanism to assist persons with disabilities in gaining entry into the pool and in exiting from the pool shall be provided. …	2010 CBC provides **less access** than 2010 ADA.		Adopt ADA language
2050	**1009.3.3 EXCEPTIONS: 1.** Handrail extensions specified by 505.10.1 shall not be required at the bottom landing serving a sloped entry. **2.** Where a sloped entry is provided for wave action pools, leisure rivers, sand bottom pools, and other pools where user access is limited to one area, the handrails shall not be required to comply with the clear width requirements of 1009.3.3. **3.** Sloped entries in wading pools shall not be required to provide handrails complying with 1009.3.3. If provided, handrails on sloped entries in wading pools shall not be required to comply with 505.		NA	2010 CBC **does not address** 2010 ADA req.		Adopt ADA language
2051	**1009.4 Transfer Walls.** Transfer walls shall comply with 1009.4.		NA	2010 CBC **does not address** 2010 ADA req.		Adopt ADA language
2052	**1009.4.1 Clear Deck Space.** A clear deck *space* of 60 inches (1525 mm) minimum by 60 inches (1525 mm) minimum with a slope not steeper than 1:48 shall be provided at the base of the transfer wall. Where one grab bar is provided, the clear deck *space* shall be centered on the grab bar. Where two grab bars are provided, the clear deck *space* shall be centered on the clearance between the grab bars.		NA	2010 CBC **does not address** 2010 ADA req.		Adopt ADA language
2053	**1009.4.2 Height.** The height of the transfer wall shall be 16 inches (405 mm) minimum and 19 inches (485 mm) maximum measured from the deck.		NA	2010 CBC **does not address** 2010 ADA req.		Adopt ADA language
2054	**1009.4.3 Wall Depth and Length.** The depth of the transfer wall shall be 12 inches (305 mm) minimum and 16 inches (405 mm) maximum. The length of the transfer wall shall be 60 inches (1525 mm) minimum and shall be centered on the clear deck *space* .		NA	2010 CBC **does not address** 2010 ADA req.		Adopt ADA language
2055	**1009.4.4 Surface.** Surfaces of transfer walls shall not be sharp and shall have rounded edges.		NA	2010 CBC **does not address** 2010 ADA req.		Adopt ADA language
2056	**1009.4.5 Grab Bars.** At least one grab bar complying with 609 shall be provided on the transfer wall. Grab bars shall be perpendicular to the pool wall and shall extend the full depth of the transfer wall. The top of the gripping surface shall be 4 inches (100 mm) minimum and 6 inches (150 mm) maximum above transfer walls. Where one grab bar is provided, clearance shall be 24 inches (610 mm) minimum on both sides of the grab bar. Where two grab bars are provided, clearance between grab bars shall be 24 inches (610 mm) minimum.		NA	2010 CBC **does not address** 2010 ADA req.		Adopt ADA language
2057	**1009.4.5 EXCEPTION:** Grab bars on transfer walls shall not be required to comply with 609.4.		NA	2010 CBC **does not address** 2010 ADA req.		Adopt ADA language
2058	**1009.5 Transfer Systems.** Transfer systems shall comply with 1009.5.		NA	2010 CBC **does not address** 2010 ADA req.		Adopt ADA language

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2059	**1009.5.1 Transfer Platform.** A transfer platform shall be provided at the head of each transfer system. Transfer platforms shall provide 19 inches (485 mm) minimum clear depth and 24 inches (610 mm) minimum clear width.	NA		2010 CBC **does not address** 2010 ADA req.		Adopt ADA language
2060	**1009.5.2 Transfer Space.** A transfer *space* of 60 inches (1525 mm) minimum by 60 inches (1525 mm) minimum with a slope not steeper than 1:48 shall be provided at the base of the transfer platform surface and shall be centered along a 24 inch (610 mm) minimum side of the transfer platform. The side of the transfer platform serving the transfer *space* shall be unobstructed.	NA		2010 CBC **does not address** 2010 ADA req.		Adopt ADA language
2061	**1009.5.3 Height.** The height of the transfer platform shall comply with 1009.4.2.	NA		2010 CBC **does not address** 2010 ADA req.		Adopt ADA language
2062	**1009.5.4 Transfer Steps.** Transfer step height shall be 8 inches (205 mm) maximum. The surface of the bottom tread shall extend to a water depth of 18 inches (455 mm) minimum below the stationary water level.	NA		2010 CBC **does not address** 2010 ADA req.		Adopt ADA language
2063	**Advisory 1009.5.4 Transfer Steps.** Where possible, the height of the transfer step should be minimized to decrease the distance an individual is required to lift up or move down to reach the next step to gain access.	NA				
2064	**1009.5.5 Surface.** The surface of the transfer system shall not be sharp and shall have rounded edges.	NA		2010 CBC **does not address** 2010 ADA req.		Adopt ADA language
2065	**1009.5.6 Size.** Each transfer step shall have a tread clear depth of 14 inches (355 mm) minimum and 17 inches (430 mm) maximum and shall have a tread clear width of 24 inches (610 mm) minimum.	NA		2010 CBC **does not address** 2010 ADA req.		Adopt ADA language
2066	**1009.5.7 Grab Bars.** At least one grab bar on each transfer step and the transfer platform or a continuous grab bar serving each transfer step and the transfer platform shall be provided. Where a grab bar is provided on each step, the tops of gripping surfaces shall be 4 inches (100 mm) minimum and 6 inches (150 mm) maximum above each step and transfer platform. Where a continuous grab bar is provided, the top of the gripping surface shall be 4 inches (100 mm) minimum and 6 inches (150 mm) maximum above the step nosing and transfer platform. Grab bars shall comply with 609 and be located on at least one side of the transfer system. The grab bar located at the transfer platform shall not obstruct transfer.	NA		2010 CBC **does not address** 2010 ADA req.		Adopt ADA language
2067	**1009.5.7 EXCEPTION:** Grab bars on transfer systems shall not be required to comply with 609.4.	NA		2010 CBC **does not address** 2010 ADA req.		Adopt ADA language
2068	**1009.6 Pool Stairs.** Pool stairs shall comply with 1009.6.	NA		2010 CBC **does not address** 2010 ADA req.		Adopt ADA language
2069	**1009.6.1 Pool Stairs.** Pool stairs shall comply with 504.	NA		2010 CBC **does not address** 2010 ADA req.		Adopt ADA language

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2070	**1009.6.1 EXCEPTION:** Pool step riser heights shall not be required to be 4 inches (100 mm) high minimum and 7 inches (180 mm) high maximum provided that riser heights are uniform.		NA	2010 CBC **does not address** 2010 ADA req.		Adopt ADA language
2071	**1009.6.2 Handrails.** The width between handrails shall be 20 inches (510 mm) minimum and 24 inches (610 mm) maximum. Handrail extensions required by 505.10.3 shall not be required on pool stairs.		NA	2010 CBC **does not address** 2010 ADA req.		Adopt ADA language
2072	**1010 Shooting Facilities with Firing Positions**		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
2073	**1010.1 Turning Space.** A circular turning *space* 60 inches (1525 mm) diameter minimum with slopes not steeper than 1:48 shall be provided at shooting facilities with firing positions.		There is no equivalent section in the CBC	2010 CBC **does not address** 2010 ADA req.		Adopt the ADA language,
2074	z* * * * * * * END 1991 Sections * * * * * * *	z* * * * * * * END 1991 Sections * * * * * * *	z***END***	z***END***	z***END***	z***END***