



DSA CODE AMENDMENT DEVELOPMENT

TRACKING

Date Received:

DSA Tracking Number: S1

Date Reviewed: September 10, 2025

Status: Stakeholder Meeting

APPLICABLE CODE

Applicable Code Section(s): CBC Part 2, Chapter 11B, Section 11B-202.4

Topic: Path of Travel Requirements in Housing

CURRENT CODE LANGUAGE

11B-202.4 Path of travel requirements in alterations, additions and structural repairs. ...

Exceptions:

1. Residential dwelling units shall comply with Section 11B-233.3.4.2.
2. ...

SUGGESTED TEXT OF PROPOSED AMENDMENT

11B-202.4 Path of travel requirements in alterations, additions and structural repairs. ...

Exceptions:

1. ~~Residential dwelling units shall comply with Section 11B-233.3.4.2.~~ Additions or alterations to residential dwelling units and common use areas within public housing facilities shall comply with Section 11B-233.3.3 or 11B-233.3.4, as applicable.
2. ...

CODE TEXT IF ADOPTED

11B-202.4 Path of travel requirements in alterations, additions and structural repairs. ...

Exceptions:

1. *Additions or alterations to residential dwelling units and common use areas within public housing facilities shall comply with Section 11B-233.3.3 or 11B-233.3.4, as applicable.*
2. ...

STATEMENT OF REASONS

Under Section 504 of the Rehabilitation Act, any entity receiving federal financial assistance is legally required to ensure that all its programs and activities are accessible, regardless of how those funds are allocated or through whom they are administered. Federal financial assistance has been broadly defined by the courts to encompass grants, loans, contracts, services, and

property interests. Federal funding triggers compliance obligations not only for the entity itself but also for any services or programs provided through subgrantees or contractual relationships. As confirmed in *Access Living of Metropolitan Chicago, Inc. v. City of Chicago* (2024), the United States District Court, N. D. Illinois, Eastern Division emphasized that “...a public entity may not discriminate on the basis of disability, directly or indirectly, such as through contractual, licensing, or other arrangements,...” and that “Section 504 requires that individuals with disabilities be provided with meaningful access to the benefit that the grantee offers.” California receives federal funds for public housing, which is redistributed to local municipalities and specific projects, requiring compliance with Section 504.

The Department of Housing and Urban Development (HUD) adopts the Uniform Federal Accessibility Standards (UFAS) as the standard for public housing projects and programs receiving federal funds. HUD has allowed the use of the Americans with Disabilities Act Standards (ADAS) as long as certain provisions in UFAS that provide greater accessibility are maintained. These specific provisions were noticed in the Federal Register; Vol. 79, No. 100; Friday, May 23, 2014; Rules and Regulations; 29671; Department of Housing and Urban Development; 24 CFR Part 8; Docket No. FR-5784-N-01: The 2010 Americans with Disabilities Act Standards (ADAS) Section 202.4 is not deemed as equivalent to the Uniform Federal Accessibility Standards (Deeming Notice):

“Section 202.4 of the 2010 Standards includes a path of travel obligation when areas containing a primary function are altered. Under the Exception to Section 202.4, residential dwelling units are exempted from the requirement. Under HUD’s Section 504 regulation, when accessible dwelling units are newly constructed or where alterations include the provision of accessible dwelling units, the dwelling units must be on an accessible route. HUD is not permitting use of the Exception to Section 202.4 because this may conflict with HUD’s Section 504 regulation.”

While the CBC applies Section 11B-202.4 to all alterations, not just alterations to primary function areas, the requirements specific to residential facilities and dwelling units remains unclear to many code users. DSA proposes to clarify that the requirements for alterations and additions including residential dwelling units and the common use areas associated with them are located at Sections 11B-233.3.3 and 11B-233.3.4, and are not in Section 11B-202.4.

This proposal is necessary to conform with minimum existing federal accessibility laws, standards, and regulations.

DSA COMMENTS

This item is related to Item S3.



DSA CODE AMENDMENT DEVELOPMENT

TRACKING

Date Received:

DSA Tracking Number: S2

Date Reviewed: September 10, 2025

Status: Stakeholder Meeting

APPLICABLE CODE

Applicable Code Section(s): CBC Part 2, Chapter 11B, Section 11B-206.2.8

Topic: Employee Work Areas

CURRENT CODE LANGUAGE

11B-206.2.8 Employee work areas. Common use circulation paths within employee work areas shall comply with *Section 11B-402*.

Exceptions:

1. **Reserved.**
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 *Section 11B-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 *Section 11B-402*.

SUGGESTED TEXT OF PROPOSED AMENDMENT

11B-206.2.8 Employee work areas. Common use areas and employee work areas shall comply with Section 11B-248. Common use circulation paths within employee work areas shall comply with *Section 11B-402*.

Exceptions:

1. **Reserved.**
2. In facilities not required to comply with Section 11B-233, common 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 *Section 11B-402*.
3. In facilities not required to comply with Section 11B-233, common Common use circulation paths located within exterior employee work areas that are fully exposed to the weather shall not be required to comply with *Section 11B-402*.

CODE TEXT IF ADOPTED

11B-206.2.8 Employee work areas. *Common use areas and employee work areas shall comply with Section 11B-248. Common use circulation paths within employee work areas shall comply with Section 11B-402.*

Exceptions:

1. **Reserved.**
2. *In facilities not required to comply with Section 11B-233, 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 Section 11B-402.*
3. *In facilities not required to comply with Section 11B-233, common use circulation paths located within exterior employee work areas that are fully exposed to the weather shall not be required to comply with Section 11B-402.*

STATEMENT OF REASONS

Under Section 504 of the Rehabilitation Act, any entity receiving federal financial assistance is legally required to ensure that all its programs and activities are accessible, regardless of how those funds are allocated or through whom they are administered. Federal financial assistance has been broadly defined by the courts to encompass grants, loans, contracts, services, and property interests. Federal funding triggers compliance obligations not only for the entity itself but also for any services or programs provided through subgrantees or contractual relationships. As confirmed in *Access Living of Metropolitan Chicago, Inc. v. City of Chicago* (2024), the United States District Court, N. D. Illinois, Eastern Division emphasized that “...a public entity may not discriminate on the basis of disability, directly or indirectly, such as ‘through contractual, licensing, or other arrangements,...’” and that “Section 504 requires that individuals with disabilities be provided with meaningful access to the benefit that the grantee offers.” California receives federal funds for public housing, which is redistributed to local municipalities and specific projects, requiring compliance with Section 504.

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of disability by entities receiving federal financial assistance, including subgrantees and contractors. The Department of Housing and Urban Development (HUD) adopts the Uniform Federal Accessibility Standards (UFAS) as the standard for public housing projects and programs receiving federal funds. HUD has allowed the use of the Americans with Disabilities Act Standards (ADAS) as long as certain provisions in UFAS that provide greater accessibility are maintained. These specific provisions were noticed in the Federal Register; Vol. 79, No. 100; Friday, May 23, 2014; Rules and Regulations; 29671; Department of Housing and Urban Development; 24 CFR Part 8; Docket No. FR-5784-N-01: The 2010 Americans with Disabilities Act Standards (ADAS) Sections 203.9, 206.2.8, 403.5 exc., and 405.8 exc. are not deemed as equivalent to the Uniform Federal Accessibility Standards (Deeming Notice):

“The 2010 Standards require a more limited level of access within employee work areas in ADA-covered facilities than UFAS, which requires employee work areas to be fully accessible. As stated above, the Department has no authority to allow the use of an alternative standard that may reduce accessibility for individuals with disabilities without notice and comment rulemaking. Section 203.9, as well as Section 206.2.8, the Exception to Section 403.5, and the Exception to Section 405.8, all require less accessibility in employee work areas than UFAS. For this reason, HUD is not permitting use of the aforementioned sections of the 2010 Standards for employee work areas.”

DSA proposes to clarify that exceptions 2 and 3 are allowed only in buildings or facilities that are not public housing required to comply with Section 11B-233. DSA also proposes to include

a reference to Section 11B-248 for additional clarity. DSA does not propose to change Section 11B-203.9 as it has already been replaced with California language that provides greater accessibility, equivalent to the UFAS requirement. The exception to Section 11B-405.8 referred to in the Notice has already been removed in the CBC.

This proposal is necessary to conform with minimum existing federal accessibility laws, standards, and regulations.

DSA COMMENTS

This item is related to Item S4.



DSA CODE AMENDMENT DEVELOPMENT

TRACKING

Date Received:
DSA Tracking Number: S3
Date Reviewed: September 10, 2025
Status: Stakeholder Meeting

APPLICABLE CODE

Applicable Code Section(s): CBC Part 2, Chapter 11B, Section 11B-233.3
Topic: Public Housing Facilities, Additions and Alterations

CURRENT CODE LANGUAGE

11B-233.3.3 Additions. Where an addition to an existing building results in an increase in the number of residential dwelling units, the requirement of *Section 11B-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 *Section 11B-233.3.1*. Residential dwelling units required to comply with *Sections 11B-233.3.1.1 and 11B-233.3.1.2* shall be on an accessible route as required by *Section 11B-206*.

11B-233.3.4 Alterations. Alterations shall comply with *Section 11B-233.3.4*.

Exception: Where compliance with *Section 11B-809.2*, *11B-809.3* or *11B-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 *Sections 11B-809.2* through *11B-809.4* provided that the minimum number of residential dwelling units required by *Sections 11B-233.3.1.1 and 11B-233.3.1.3*, as applicable, is satisfied.

11B-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 *Sections 11B-809.2* through *11B-809.4* and shall be on an accessible route as required by *Section 11B-206*. ...

11B-233.3.4.2 Alterations to individual residential dwelling units. ...

11B-233.3.4.3 Alterations to residential dwelling units with adaptable features. ...

SUGGESTED TEXT OF PROPOSED AMENDMENT

11B-233.3.3 Additions. Where an addition to an existing building results in an increase in the number of residential dwelling units, the requirement of *Section 11B-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 *Section 11B-233.3.1*. Residential dwelling

units required to comply with Sections 11B-233.3.1.1 and 11B-233.3.1.2 shall be on an accessible route as required by Section 11B-206.

11B-233.3.3.1 Entrances. Where an addition to an existing building or facility does not provide an entrance, at least one existing entrance in the existing building or facility shall comply with Section 11B-206.4.

11B-233.3.3.2 Accessible route. Where an addition to an existing building or facility uses an existing entrance, at least one accessible route complying with Section 11B-206 shall be provided. The accessible route shall be continuous from site arrival points to the addition and connect with all rooms, spaces and elements required to be accessible.

11B-233.3.3.3 Toilet and bathing facilities. Where public or common use toilet and bathing facilities are provided in the existing building but not in the addition, at least one toilet and bathing facility in the existing building shall comply with Section 11B-213 and be on an accessible route complying with Section 11B-206.

11B-233.3.3.4 Elements, spaces, and common use areas. Where elements, spaces, or common use areas are provided in the existing building and equivalent elements, spaces or common use areas are not provided in the addition, at least one of each type of element, space, or common use area in the existing building or facility shall comply with the applicable requirements of Division 2.

11B-233.3.4 Alterations. Alterations shall comply with Section 11B-233.3.4.

Exception: Where compliance with Section 11B-809.2, 11B-809.3 or 11B-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 Sections 11B-809.2 through 11B-809.4 provided that the minimum number of residential dwelling units required by Sections 11B-233.3.1.1 and 11B-233.3.1.3, as applicable, is satisfied.

11B-233.3.4.1 Alterations to vacated buildings. Where a building or facility is vacated for the purposes of alteration, and the altered building or facility contains more than 15 residential dwelling units, at least 5 percent of the residential dwelling units shall comply with Sections 11B-809.2 through 11B-809.4 and shall be on an accessible route as required by Section 11B-206. ...

11B-233.3.4.2 Alterations to individual residential dwelling units. ...

11B-233.3.4.3 Alterations to residential dwelling units with adaptable features. ...

11B-233.3.4.4 Substantial Alterations. When the adjusted construction cost, as defined, of alterations to facilities containing 15 or more dwelling units exceeds 50% of either the facility replacement value, fair market value or assessed value, whichever value is least, the minimum number of residential dwelling units complying with 11B-233.3.1 shall be provided and shall comply with Sections 11B-233.3.4.4. through 11B-233.3.4.4.4.

11B-233.3.4.4.1 Elements, spaces, and common use areas. Where elements, spaces, or common use areas are altered, each element, space, or common use area shall comply with the applicable requirements of Division 2.

11B-233.3.4.4.2 Entrances. All altered entrances, but no less than one entrance shall comply with Section 11B-404.

11B-233.3.4.4.3 Accessible Route. *At least one accessible route to each altered floor and area shall comply with Section 11B-206.*

11B-233.3.4.4.4 Toilet facilities. *Where common use toilet facilities are provided in a building or facility, a minimum of one accessible common use toilet facility shall be provided and shall comply with Section 11B-213. Where common use toilet facilities are provided on substantially altered floors, a minimum of one toilet facility on each substantially altered floor shall comply with Section 11B-213.*

11B-233.3.4.4.5 Bathing facilities. *Where common use bathing facilities are provided in a building or facility, a minimum of one accessible common use bathing facility shall be provided and shall comply with Section 11B-213. Common use bathing facilities provided on substantially altered floors shall comply with Section 11B-213.*

CODE TEXT IF ADOPTED

11B-233.3.3 Additions. Where an addition to an existing building results in an increase in the number of residential dwelling units, the requirement of Section 11B-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 Section 11B-233.3.1. Residential dwelling units required to comply with Sections 11B-233.3.1.1 and 11B-233.3.1.2 shall be on an accessible route as required by Section 11B-206.

11B-233.3.3.1 Entrances. *Where an addition to an existing building or facility does not provide an entrance, at least one existing entrance in the existing building or facility shall comply with Section 11B-206.4.*

11B-233.3.3.2 Accessible route. *Where an addition to an existing building or facility uses an existing entrance, at least one accessible route complying with Section 11B-206 shall be provided. The accessible route shall be continuous from site arrival points to the addition and connect with all rooms, spaces and elements required to be accessible.*

11B-233.3.3.3 Toilet and bathing facilities. *Where public or common use toilet and bathing facilities are provided in the existing building but not in the addition, at least one toilet and bathing facility in the existing building shall comply with Section 11B-213 and be on an accessible route complying with Section 11B-206.*

11B-233.3.3.4 Elements, spaces, and common use areas. *Where elements, spaces, or common use areas are provided in the existing building and equivalent elements, spaces or common use areas are not provided in the addition, at least one of each type of element, space, or common use area in the existing building or facility shall comply with the applicable requirements of Division 2.*

11B-233.3.4 Alterations. Alterations shall comply with Section 11B-233.3.4.

Exception: Where compliance with Section 11B-809.2, 11B-809.3 or 11B-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 Sections 11B-809.2 through 11B-809.4 provided that the minimum number of residential dwelling units required by Sections 11B-233.3.1.1 and 11B-233.3.1.3, as applicable, is satisfied.

11B-233.3.4.1 Alterations to vacated buildings. Where a building or facility is vacated for the purposes of alteration, and the altered building or facility contains more than 15 residential dwelling units, at least 5 percent of the residential dwelling units shall comply

with Sections 11B-809.2 through 11B-809.4 and shall be on an accessible route as required by Section 11B-206. ...

11B-233.3.4.2 Alterations to individual residential dwelling units. ...

11B-233.3.4.3 Alterations to residential dwelling units with adaptable features. ...

11B-233.3.4.4 Substantial Alterations. *When the adjusted construction cost, as defined, of alterations to facilities containing 15 or more dwelling units exceeds 50% of either the facility replacement value, fair market value or assessed value, whichever value is least, the minimum number of residential dwelling units complying with 11B-233.3.1 shall be provided and shall comply with Sections 11B-233.3.4.4. through 11B-233.3.4.4.4.*

11B-233.3.4.4.1 Elements, spaces, and common use areas. *Where elements, spaces, or common use areas are altered, each element, space, or common use area shall comply with the applicable requirements of Division 2.*

11B-233.3.4.4.2 Entrances. *All altered entrances, but no less than one entrance shall comply with Section 11B-404.*

11B-233.3.4.4.3 Accessible Route. *At least one accessible route to each altered floor and area shall comply with Section 11B-206.*

11B-233.3.4.4.4 Toilet facilities. *Where common use toilet facilities are provided in a building or facility, a minimum of one accessible common use toilet facility shall be provided and shall comply with Section 11B-213. Where common use toilet facilities are provided on substantially altered floors, a minimum of one toilet facility on each substantially altered floor shall comply with Section 11B-213.*

11B-233.3.4.4.5 Bathing facilities. *Where common use bathing facilities are provided in a building or facility, a minimum of one accessible common use bathing facility shall be provided and shall comply with Section 11B-213. Common use bathing facilities provided on substantially altered floors shall comply with Section 11B-213.*

STATEMENT OF REASONS

Under Section 504 of the Rehabilitation Act, any entity receiving federal financial assistance is legally required to ensure that all its programs and activities are accessible, regardless of how those funds are allocated or through whom they are administered. Federal financial assistance has been broadly defined by the courts to encompass grants, loans, contracts, services, and property interests. Federal funding triggers compliance obligations not only for the entity itself but also for any services or programs provided through subgrantees or contractual relationships. As confirmed in *Access Living of Metropolitan Chicago, Inc. v. City of Chicago* (2024), the United States District Court, N. D. Illinois, Eastern Division emphasized that “...a public entity may not discriminate on the basis of disability, directly or indirectly, such as ‘through contractual, licensing, or other arrangements,...’” and that “Section 504 requires that individuals with disabilities be provided with meaningful access to the benefit that the grantee offers.” California receives federal funds for public housing, which is redistributed to local municipalities and specific projects, requiring compliance with Section 504.

The Department of Housing and Urban Development (HUD) adopts the Uniform Federal Accessibility Standards (UFAS) as the standard for public housing projects and programs receiving federal funds. HUD has allowed the use of the Americans with Disabilities Act Standards (ADAS) as long as certain provisions in UFAS that provide greater accessibility are

maintained. These specific provisions were noticed in the Federal Register; Vol. 79, No. 100; Friday, May 23, 2014; Rules and Regulations; 29671; Department of Housing and Urban Development; 24 CFR Part 8; Docket No. FR-5784-N-01: The 2010 Americans with Disabilities Act Standards (ADAS) Section 202.4 is not deemed as equivalent to the Uniform Federal Accessibility Standards (Deeming Notice):

“Alterations – 28 CFR 35.151

The 2010 Standards at 28 CFR 35.151(b) and section 202 contain criteria detailing when alterations of facilities must be made accessible. In certain situations, application of the 2010 Standards may result in fewer units containing accessibility features. Because HUD cannot use this document to permit the use of a lesser requirement than that required by its Section 504 regulation, HUD is not permitting use of <Section> 35.151(b). Therefore, multifamily housing projects must continue to utilize the terms “substantial alterations” and “other alterations” as defined in HUD’s Section 504 regulation to determine accessibility requirements. <24 CFR part 8, subpart C.> This does not preclude HUD from considering changes to its alterations criteria for residential dwelling units when it revises its regulation to adopt a new accessibility standard.”

“Additions – Section 202.2 of the 2010 Standards

Section 202.2 of the 2010 Standards contains scoping requirements which may, in certain situations, afford less accessibility for individuals with disabilities than is currently provided by HUD’s rules at 24 CFR part 8 and UFAS. Because the Department is precluded from permitting the use of an alternative standard that might reduce accessibility for individuals with disabilities in housing settings without notice and comment rulemaking, HUD is not permitting use of the scoping requirements for additions at section 202.4 because this may conflict with HUD’s Section 504 regulation.”

DSA proposes to amend the ADAS requirements, which is the model code for the CBC, to align with the HUD adopted UFAS requirements specific to residential dwelling units and common use areas in public housing facilities by expanding upon the information already provided at Sections 11B-233.3.3 and 11B-233.3.4.

This proposal is necessary to conform with minimum existing federal accessibility laws, standards, and regulations.

DSA COMMENTS

This item is related to Item S1.



DSA CODE AMENDMENT DEVELOPMENT

TRACKING

Date Received:
DSA Tracking Number: S4
Date Reviewed: September 10, 2025
Status: Stakeholder Meeting

APPLICABLE CODE

Applicable Code Section(s): CBC Part 2, Chapter 11B, Section 11B-403.5
Topic: Walking Surface Clearance, Employee Work Areas

CURRENT CODE LANGUAGE

11B-403.5 Clearances. ...

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.

SUGGESTED TEXT OF PROPOSED AMENDMENT

11B-403.5 Clearances. ...

Exception: Within employee work areas *in facilities not required to comply with Section 11B-233*, 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.

CODE TEXT IF ADOPTED

11B-403.5 Clearances. ...

Exception: Within employee work areas *in facilities not required to comply with Section 11B-233*, 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.

STATEMENT OF REASONS

Under Section 504 of the Rehabilitation Act, any entity receiving federal financial assistance is legally required to ensure that all its programs and activities are accessible, regardless of how those funds are allocated or through whom they are administered. Federal financial assistance has been broadly defined by the courts to encompass grants, loans, contracts, services, and property interests. Federal funding triggers compliance obligations not only for the entity itself but also for any services or programs provided through subgrantees or contractual relationships. As confirmed in *Access Living of Metropolitan Chicago, Inc. v. City of Chicago* (2024), the United States District Court, N. D. Illinois, Eastern Division emphasized that "...a

public entity may not discriminate on the basis of disability, directly or indirectly, such as 'through contractual, licensing, or other arrangements,...' and that "Section 504 requires that individuals with disabilities be provided with meaningful access to the benefit that the grantee offers." California receives federal funds for public housing, which is redistributed to local municipalities and specific projects, requiring compliance with Section 504.

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of disability by entities receiving federal financial assistance, including subgrantees and contractors. The Department of Housing and Urban Development (HUD) adopts the Uniform Federal Accessibility Standards (UFAS) as the standard for public housing projects and programs receiving federal funds. HUD has allowed the use of the Americans with Disabilities Act Standards (ADAS) as long as certain provisions in UFAS that provide greater accessibility are maintained. These specific provisions were noticed in the Federal Register; Vol. 79, No. 100; Friday, May 23, 2014; Rules and Regulations; 29671; Department of Housing and Urban Development; 24 CFR Part 8; Docket No. FR-5784-N-01: The 2010 Americans with Disabilities Act Standards (ADAS) Sections 203.9, 206.2.8, 403.5 exc., and 405.8 exc. are not deemed as equivalent to the Uniform Federal Accessibility Standards (Deeming Notice):

"The 2010 Standards require a more limited level of access within employee work areas in ADA-covered facilities than UFAS, which requires employee work areas to be fully accessible. As stated above, the Department has no authority to allow the use of an alternative standard that may reduce accessibility for individuals with disabilities without notice and comment rulemaking. Section 203.9, as well as Section 206.2.8, the Exception to Section 403.5, and the Exception to Section 405.8, all require less accessibility in employee work areas than UFAS. For this reason, HUD is not permitting use of the aforementioned sections of the 2010 Standards for employee work areas."

DSA proposes to clarify that the exception to Section 11B- 403.5 is allowed only in buildings or facilities that are not public housing required to comply with Section 11B-233. DSA does not propose to change Section 11B-203.9 as it has already been replaced with California language that provides greater accessibility, equivalent to the UFAS requirement. The exception to Section 11B-405.8 referred to in the Notice has already been removed in the CBC.

This proposal is necessary to conform with minimum existing federal accessibility laws, standards, and regulations.

DSA COMMENTS

This item is related to Item S2.