



## DSA CODE AMENDMENT DEVELOPMENT

### TRACKING

Date Received:

DSA Tracking Number: 1

Date Reviewed: August 29, 2025

Status: Stakeholder Meeting

### APPLICABLE CODE

Applicable Code Section(s): CBC Part 2, Chapter 2, Section 202 Definitions

### CURRENT CODE LANGUAGE

N/A

### SUGGESTED TEXT OF PROPOSED AMENDMENT

**EDUCATIONAL ENTITIES IN RECEIPT OF PUBLIC FUNDS.** *Any college, university, or other postsecondary institution, or a public system of higher education, or a K-12 educational entity; system of career and technical education, or other school system; or any corporation, partnership, or other private organization including a sole proprietorship which is principally engaged in the business of providing education, any part of which is extended or receives state or federal financial assistance including, but not limited to federal Pell Grants, work-study programs, or any other publicly funded financial aid to students.*

### CODE TEXT IF ADOPTED

**EDUCATIONAL ENTITIES IN RECEIPT OF PUBLIC FUNDS.** *Any college, university, or other postsecondary institution, or a public system of higher education, or a K-12 educational entity; system of career and technical education, or other school system; or any corporation, partnership, or other private organization including a sole proprietorship which is principally engaged in the business of providing education, any part of which is extended or receives state or federal financial assistance including, but not limited to federal Pell Grants, work-study programs, or any other publicly funded financial aid to students.*

### STATEMENT OF REASONS

DSA proposes to add this definition to distinguish between educational entities that meet this definition and those that do not in order to further clarify which entities are permitted to utilize certain exceptions existing in the CBC. While educational entities that do not meet this definition are required to provide residential dwelling units with adaptable features in covered multifamily dwellings according to CBC Section 11B-224.7, and CBC Section 11B-809.6 through CBC Section 11B-809.12, those entities may also utilize the site impracticability provisions when applicable. Entities meeting this proposed definition are not permitted to utilize the site impracticability provisions when covered multifamily dwellings are provided because they are required to meet the minimum standards in the Uniform Federal Accessibility Standards (UFAS) which does not permit the use of site impracticability.

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of disability in any program or activity in receipt of Federal financial assistance, including funding received directly or indirectly through states, political subdivisions, or instrumentalities of the same, and includes any successor, assignee, or transferee of a recipient. Federal financial assistance is defined broadly and includes grants, loans, contracts, or any other arrangements in the form of funds, services, or property interest. Court rulings have upheld that educational entities in receipt of federal funds are recipients of federal financial assistance and must comply with Section 504 regulations. See *Bennett-Nelson v. Louisiana Board of Regents*, 431 F.3d. 448 (5<sup>th</sup> Cir. 2005) and *Grove City College v. Bell*, 465 U.S. 555, 104 S.Ct. 1211 (1984); a private college receiving federal Basic Educational Opportunity Grants was considered a recipient of federal financial assistance.

California Government Code Section 11135 also prohibits discrimination on the basis of disability in any program or activity that is funded by or in receipt of any financial assistance from the state. Those programs and activities are required to meet either the Americans with Disabilities Act or federal or state regulations that prescribe stronger protections. UFAS provides the most stringent protections in not allowing site impracticality.

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

## **DSA COMMENTS**

This item is related to Items 2, 12 and 14.



# DSA CODE AMENDMENT DEVELOPMENT

## TRACKING

Date Received:  
DSA Tracking Number: 14 (23-052)  
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Status: Stakeholder Meeting

## APPLICABLE CODE

Applicable Code Section(s): CBC Part 2, Chapter 11B, Section 11B-233.3.1.2.6  
Topic: Public Housing Facility Site Impracticality

## CURRENT CODE LANGUAGE

**11B-233.3.1.2.6 Public housing facility site impracticality.** *The site impracticality tests in this section may be used to determine the number of required residential dwelling units with adaptable features in buildings without an elevator, located on sites with difficult terrain conditions or unusual characteristics.*

*Except as provided for in Section 11B-233.3.1.2.5, the provisions of this section do not apply to multi-story dwelling units in non-elevator buildings.*

**11B-233.3.1.2.6.1 Single building with one common (lobby) entrance. ...**

***Provisions to Test Nos. 1 and 2. ...***

**11B-233.3.1.2.6.2 Test number one, individual building test ...**

**11B-233.3.1.2.6.3 Test number two, site analysis test ...**

**11B-233.3.1.2.6.4 Test number three, unusual characteristics test ...**

**11B-233.3.1.2.6.5 Additional requirements.**

*In buildings without elevators and where site impracticality test numbers one, two or three reduce the required number of residential dwelling units with adaptable features, the remaining units shall provide the following:*

1. ...
2. ...
3. ...
4. ...
5. ...
6. ...
7. ...
8. ...
9. ...

## **SUGGESTED TEXT OF PROPOSED AMENDMENT**

**11B-233.3.1.2.6 ~~Public housing facility site~~Site impracticality.** *The site impracticality tests in this section may be used by housing facilities provided by entities which are not educational entities in receipt of public funds, as defined, to determine the number of required residential dwelling units with adaptable features in buildings without an elevator, located on sites with difficult terrain conditions or unusual characteristics.*

*Except as provided for in Section 11B-233.3.1.2.5, the provisions of this section do not apply to multi-story dwelling units in non-elevator buildings.*

**11B-233.3.1.2.6.1 Single building with one common (lobby) entrance....**

***Provisions to Test Nos. 1 and 2....***

**11B-233.3.1.2.6.2 Test number one, individual building test...**

**11B-233.3.1.2.6.3 Test number two, site analysis test...**

**11B-233.3.1.2.6.4 Test number three, unusual characteristics test...**

**11B-233.3.1.2.6.5 Additional requirements.**

*In buildings without elevators and where site impracticality test numbers one, two or three reduce the required number of residential dwelling units with adaptable features, the remaining units shall provide the following:*

1. ...
2. ...
3. ...
4. ...
5. ...
6. ...
7. ...
8. ...
9. ...
10. ...

## **CODE TEXT IF ADOPTED**

**11B-233.3.1.2.6 Site impracticality.** *The site impracticality tests in this section may be used by housing facilities provided by entities which are not defined as educational entities in receipt of public funds to determine the number of required residential dwelling units with adaptable features in buildings without an elevator, located on sites with difficult terrain conditions or unusual characteristics.*

*Except as provided for in Section 11B-233.3.1.2.5, the provisions of this section do not apply to multi-story dwelling units in non-elevator buildings.*

**11B-233.3.1.2.6.1 Single building with one common (lobby) entrance....**

***Provisions to Test Nos. 1 and 2....***

**11B-233.3.1.2.6.2 Test number one, individual building test...**

**11B-233.3.1.2.6.3 Test number two, site analysis test...**

**11B-233.3.1.2.6.4 Test number three, unusual characteristics test...**

**11B-233.3.1.2.6.5 Additional requirements.**

*In buildings without elevators and where site impracticality test numbers one, two or three reduce the required number of residential dwelling units with adaptable features, the remaining units shall provide the following:*

1. ...
2. ...
3. ...
4. ...
5. ...
6. ...
7. ...
8. ...
9. ...
10. ...

## **STATEMENT OF REASONS**

DSA is proposing to amend CBC Section 11B-233.3.1.2.6 to limit application solely to entities which are not EDUCATIONAL ENTITIES IN RECEIPT OF PUBLIC FUNDS to align with HUD Section 504 regulations for housing at a place of education.

Facilities that are PUBLIC HOUSING and EDUCATIONAL ENTITIES IN RECEIPT OF PUBLIC FUNDS, as defined and as proposed to be defined in the CBC, that must comply with HUD Section 504 requirements are not permitted to utilize the site impracticality exceptions because doing so may result in fewer residential units with mobility features than required by code. Additionally, such entities are not permitted to select a site that cannot be made accessible, as doing so would exclude people with disabilities.

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 203.8 is not deemed as equivalent to the Uniform Federal Accessibility Standards (Deeming Notice):

“Under § 35.151(a)(2) full compliance with the requirements of the 2010 Standards is not required in new construction where a public entity can demonstrate that it is structurally impracticable to do so. Full compliance is considered structurally impracticable “only in those rare circumstances when the unique characteristics of terrain prevent the incorporation of accessibility features.” [28 CFR 35.151 (a)(2)(i)]. HUD’s Section 504 regulation does not contain a comparable exception from compliance with the applicable accessibility requirements when HUD recipients undertake new construction of facilities. HUD’s regulation also precludes a HUD recipient from selecting a site or location of a facility which would have the purpose or effect of excluding qualified individuals with disabilities from, denying benefits of, or

otherwise subjecting them to discrimination under, any program or activity that receives Federal financial assistance [24 CFR 8.4 (b)(5)]. Under HUD's Section 504 regulation, if a site cannot be made accessible to individuals with disabilities, it must not be selected."

Court rulings have upheld that educational entities in receipt of federal funds are recipients of federal financial assistance and must comply with Section 504 regulations. See *Bennett-Nelson v. Louisiana Board of Regents*, 431 F.3d. 448 (5<sup>th</sup> Cir. 2005) and *Grove City College v. Bell*, 465 U.S. 555, 104 S.Ct. 1211 (1984); a private college receiving federal Basic Educational Opportunity Grants was considered a recipient of federal financial assistance.

Educational entities not meeting the proposed definition are not required to comply with Section 504, but are still public accommodations that may be required to comply with the Fair Housing Act (FHA) if the proposed facility is a covered multi-family dwelling. Such entities may use site impracticality. DSA additionally proposes changing the title of the section in question, a proposed change which is non-regulatory, in order to further clarify what facilities may use said exception.

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

## **DSA COMMENTS**

This item is related to Item 1, 2 and 12.



## DSA CODE AMENDMENT DEVELOPMENT

### TRACKING

Date Received:  
DSA Tracking Number: 3  
Date Reviewed: August 29, 2025  
Status: Stakeholder Meeting

### APPLICABLE CODE

Applicable Code Section(s): CBC Chapter 2, Section 202 Definitions  
Topic: Public Housing

### CURRENT CODE LANGUAGE

**PUBLIC HOUSING. [DSA-AC & HCD 1-AC]** *Housing facilities constructed or altered by, for, or on behalf of a public entity, or constructed or altered as part of a public entity's program to provide housing pursuant to United States Code of Federal Regulations, 28 CFR Part 35, Section 35.102(a), including but not limited to the following:*

1. *One- or two-family dwelling units or congregate residences;*
2. *Buildings or complexes with three or more residential dwelling units;*
3. *Homeless shelters, group homes, halfway houses and similar social service establishments;*
4. *Transient lodging, such as hotels, motels, hostels and other facilities providing accommodations of a short-term nature of not more than 30 days duration;*
5. *Housing at a place of education, such as housing on or serving a public school, public college or public university.*

**Note:** ...

### SUGGESTED TEXT OF PROPOSED AMENDMENT

**PUBLIC HOUSING. [DSA-AC & HCD 1-AC]** *Housing facilities constructed or altered by, for, or on behalf of a public entity, or constructed or altered as part of a public entity's program to provide housing pursuant to United States Code of Federal Regulations, 28 CFR Part 35, Section 35.102(a), including but not limited to the following:*

1. *One- or two-family dwelling units or congregate residences;*
2. *Buildings or complexes with three or more residential dwelling units;*
3. *Homeless shelters, group homes, halfway houses and similar social service center establishments;*
4. ~~*Transient lodging, such as hotels, motels, hostels and other facilities providing accommodations of a short-term nature of not more than 30 days duration;*~~

4. Employer-provided housing for an employee or an employee and their immediate family members, either temporary or permanent, including but not limited to fire station dormitories and staff housing for a public institution.
5. Housing at a place of education, such as housing on or serving a public school, public college or public university.

**Note: ...**

#### **CODE TEXT IF ADOPTED**

**PUBLIC HOUSING. [DSA-AC & HCD 1-AC]** Housing facilities constructed or altered by, for, or on behalf of a public entity, or constructed or altered as part of a public entity's program to provide housing pursuant to United States Code of Federal Regulations, 28 CFR Part 35, Section 35.102(a), including but not limited to the following:

1. One- or two-family dwelling units or congregate residences;
2. Buildings or complexes with three or more residential dwelling units;
3. Homeless shelters, group homes, halfway houses and similar social service center establishments;
4. Employer-provided housing for an employee or an employee and their immediate family members, either temporary or permanent, including but not limited to fire station dormitories and staff housing for a public institution.
5. Housing at a place of education, such as housing on or serving a public school, public college or public university.

**Note: ...**

#### **STATEMENT OF REASONS**

DSA is proposing to amend this definition to clarify that housing facilities that are provided by public entities for the use of employees, or for the use of the employee and their family, is still public housing. DSA is asked about facilities such as fire station dormitories, which are not expressly scoped but meet the definition of public housing. DSA also proposes to remove the language regarding transient lodging as it is no longer necessary due to the clarifications adopted in the 2025 Triennial Code Cycle, separating the different requirements for transient lodging and public housing. Last, DSA is proposing to amend list item 3 to use the same terminology as proposed for the definition of "social service center establishment" for consistency in language used.

This proposal is necessary for clarity of existing regulations and does not materially alter the substance or intent of the existing regulations.

#### **DSA COMMENTS**

This item is related to Item 15.





## DSA CODE AMENDMENT DEVELOPMENT

### TRACKING

Date Received:

DSA Tracking Number: 15

Date Reviewed: August 29, 2025

Status: Stakeholder Meeting

### APPLICABLE CODE

Applicable Code Section(s): CBC Part 2, Chapter 11B, Section 11B-233.3.7

Topic: Employer-provided Public Housing

### CURRENT CODE LANGUAGE

N/A

### SUGGESTED TEXT OF PROPOSED AMENDMENT

***11B-233.3.7 Employer-provided public housing. Housing provided by, for or on behalf of a public entity for employee use as either temporary sleeping accommodations or long-term residential dwelling units shall comply with Sections 11B-233.3 and 11B-809.2 through 11B-809.4 or 11B-809.6 through 11B-809.12, as applicable.***

### CODE TEXT IF ADOPTED

***11B-233.3.7 Employer-provided public housing. Housing provided by, for or on behalf of a public entity for employee use as either temporary sleeping accommodations or long-term residential dwelling units shall comply with Sections 11B-233.3 and 11B-809.2 through 11B-809.4 or 11B-809.6 through 11B-809.12, as applicable.***

### STATEMENT OF REASONS

DSA proposes this new subsection to clarify that the requirements for public housing including housing provided for the use of employees, or employees and their families, must comply with requirements for accessible public residential facilities. This is applicable to a wide variety of employee sleeping accommodations, which may include either temporary or permanent sleeping accommodations, or a combination of both, and may be an individual sleeping room or may be shared facilities in a variety of configurations.

Housing constructed by, for, or on behalf of a public entity is public housing under the CBC Chapter 2 definition. This proposal is necessary to clarify existing regulations and does not materially alter the substance or intent of the existing regulations.

### DSA COMMENTS

This item is related to Item 3.





## DSA CODE AMENDMENT DEVELOPMENT

### TRACKING

Date Received:

DSA Tracking Number: 5 (23-052)

Date Reviewed: August 29, 2025

Status: Stakeholder Meeting

### APPLICABLE CODE

Applicable Code Section(s): CBC Part 2, Chapter 11B, Section 11B-203.8

Topic: General Exceptions, Residential Facilities.

### CURRENT CODE LANGUAGE

**11B-203.8 Residential facilities.** In residential facilities, common use areas that do not serve residential dwelling units required to provide mobility features complying with *Sections 11B-809.2 through 11B-809.4 or adaptable features complying with Sections 11B-809.6 through 11B-809.12* shall not be required to comply with these requirements or to be on an accessible route.

### SUGGESTED TEXT OF PROPOSED AMENDMENT

**11B-203.8 Reserved. Residential facilities.** In residential facilities, common use areas that do not serve residential dwelling units required to provide mobility features complying with *Sections 11B-809.2 through 11B-809.4 or adaptable features complying with Sections 11B-809.6 through 11B-809.12* shall not be required to comply with these requirements or to be on an accessible route.

### CODE TEXT IF ADOPTED

**11B-203.8 Reserved.**

### STATEMENT OF REASONS

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) Section 203.8 is not deemed as equivalent to the Uniform Federal Accessibility Standards (Deeming Notice):

“Common Use Areas in Residential Facilities—Section 203.8 of the 2010 Standards

Section 203.8 of the 2010 Standards provides that, in residential facilities, common use areas that do not serve residential dwelling units required to provide mobility features are not required to be accessible or on an accessible route. By contrast, common use areas in residential facilities subject to the new construction requirements of the FHAct must comply with FHAct accessibility requirements, including the requirement to be on an accessible route, regardless of whether or not the common use areas serve units required to have mobility features pursuant to the ADA or Section 504. The only exception would be common use areas provided on upper stories of a non-elevator building provided the same common use areas are provided on the ground floor. In addition, this general exception for common use areas may result in less accessibility than is currently required under HUD's Section 504 regulation and UFAS. Accordingly, HUD is not permitting use of Section 203.8 under this document."

DSA proposes to align the CBC with these specific provisions, to provide conformity with federal UFAS requirements. DSA proposes this deletion and an exception at CBC Section 11B-248.1 aligned with the HUD language for providing the same elements on different floors.

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

#### **DSA COMMENTS**

This item is related to Items 8 and 16.



## DSA CODE AMENDMENT DEVELOPMENT

### TRACKING

Date Received:

DSA Tracking Number: 8 (23-052)

Date Reviewed: August 29, 2025

Status: Stakeholder Meeting

### APPLICABLE CODE

Applicable Code Section(s): CBC Part 2 Chapter 11B, Section 11B-206.2.3 Exc. 4

Topic: Accessible Routes in Residential Facilities

### CURRENT CODE LANGUAGE

**11B-206.2.3 Multistory buildings and facilities.** At least one accessible route shall connect each story and mezzanine in multistory buildings and facilities.

#### Exceptions:

1. ...
2. ...
3. ...
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 *Sections 11B-809.2 through 11B-809.4, residential dwelling units with adaptable features complying with Sections 11B-809.6 through 11B-809.12*, all common use areas serving residential dwelling units with mobility features required to comply with *Sections 11B-809.2 through 11B-809.4, all common use areas serving residential dwelling units with adaptable features complying with Sections 11B-809.6 through 11B-809.12*, and public use areas serving residential dwelling units are on an accessible route.

### SUGGESTED TEXT OF PROPOSED AMENDMENT

**11B-206.2.3 Multistory buildings and facilities.** At least one accessible route shall connect each story and mezzanine in multistory buildings and facilities.

#### Exceptions:

1. ...
2. ...
3. ...
4. In residential facilities required to comply with Section 11B-233, an accessible route shall not be required to connect stories where residential

dwelling units with mobility features required to comply with *Sections 11B-809.2 through 11B-809.4, residential dwelling units with adaptable features complying with Sections 11B-809.6 through 11B-809.12*, all common use areas serving residential dwelling units with mobility features required to comply with *Sections 11B-809.2 through 11B-809.4, all common use areas serving residential dwelling units with adaptable features complying with Sections 11B-809.6 through 11B-809.12*, and all public use areas serving residential dwelling units are on an accessible route.

## CODE TEXT IF ADOPTED

**11B-206.2.3 Multistory buildings and facilities.** At least one accessible route shall connect each story and mezzanine in multistory buildings and facilities.

### Exceptions:

1. ...
2. ...
3. ...
4. In residential facilities *required to comply with Section 11B-233*, an accessible route shall not be required to connect stories where residential dwelling units with mobility features required to comply with *Sections 11B-809.2 through 11B-809.4, residential dwelling units with adaptable features complying with Sections 11B-809.6 through 11B-809.12*, all common use areas serving residential dwelling units with mobility features required to comply with *Sections 11B-809.2 through 11B-809.4, all common use areas serving residential dwelling units with adaptable features complying with Sections 11B-809.6 through 11B-809.12*, and *all* public use areas are on an accessible route.

## STATEMENT OF REASONS

DSA proposes to modify the exceptions to accessible routes for residential facilities to align with HUD Section 504 regulations and the Americans with Disabilities Act Standards.

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 206.2.1 exc. 2 and 206.2.2 exc. are not deemed as equivalent to the Uniform Federal Accessibility Standards. (Deeming Notice):

“The 2010 Standards contain specific exceptions to the general provision requiring at least one accessible route to connect each story and mezzanine in multi-story buildings or facilities (Section 206.2.3). Exception 1 to Section 206.2.3 of the 2010 Standards contains an elevator exception for private buildings or facilities that are less than three stories or that have less than 3,000 square feet per story (unless the type of building is

omitted in the standard from the exception, e.g., a shopping center, a shopping mall, the professional office of a health care provider, etc.). HUD's Section 504 regulation does not impose different requirements on recipients that are public entities as compared to recipients that are private entities. In order to ensure that all HUD recipients are subject to the same accessibility requirements, regardless of whether they are public or private entities, HUD is not permitting use of Exception 1 to Section 206.2.3 by private entities subject to its Section 504 regulation."

DSA is proposing minor changes to clarify the existing requirements. Public use areas do not serve residential dwelling units and must be on an accessible route in all cases. Additional language pointing to CBC Section 11B-233 adds clarity when combined with other items in this proposal package. DSA notes that only public housing is covered under Chapter 11B, so the HUD language regarding private facilities is not applicable to these housing regulations.

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

## **DSA COMMENTS**

This item is related to Items 5 and 16.







## DSA CODE AMENDMENT DEVELOPMENT

### TRACKING

Date Received:  
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Status: Stakeholder Meeting

### APPLICABLE CODE

Applicable Code Section(s): CBC Part 2, Chapter 11B, Section 11B-248.1  
Topic: Common Use Areas

### CURRENT CODE LANGUAGE

**11B-248.1 Common use areas.** *Common use areas shall comply with this chapter.*

### SUGGESTED TEXT OF PROPOSED AMENDMENT

**11B-248.1 Common use areas.** *Common use areas shall comply with this chapter.*

**Exception:** *In residential facilities required to comply with Section 11B-233, common use areas on levels that are not ground floors shall not be required to comply with these requirements when equivalent common use areas are provided on an accessible route.*

### CODE TEXT IF ADOPTED

**11B-248.1 Common use areas.** *Common use areas shall comply with this chapter.*

**Exception:** *In residential facilities required to comply with Section 11B-233, common use areas on levels that are not ground floors shall not be required to comply with these requirements when equivalent common use areas are provided on an accessible route.*

### STATEMENT OF REASONS

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) Section 203.8 is not deemed as equivalent to the Uniform Federal Accessibility Standards. HUD's Deeming Notice does not provide an exception for common use areas that do not serve residential units required to provide mobility features, but does except common use areas that are not on ground floors as long as equivalent common use areas are provided on accessible levels. The Deeming Notice reads:

“Common Use Areas in Residential Facilities—Section 203.8 of the 2010 Standards  
Section 203.8 of the 2010 Standards provides that, in residential facilities, common use areas that do not serve residential dwelling units required to provide mobility features are not required to be accessible or on an accessible route. By contrast, common use areas in residential facilities subject to the new construction requirements of the FHAct must comply with FHAct accessibility requirements, including the requirement to be on an accessible route, regardless of whether or not the common use areas serve units required to have mobility features pursuant to the ADA or Section 504. The only exception would be common use areas provided on upper stories of a non-elevator building provided the same common use areas are provided on the ground floor.”

This item clarifies that common use areas must be accessible in residential facilities, with this one exception. DSA proposes to align the CBC with these specific provisions, to provide clarity and consistency between state and federal requirements.

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

## **DSA COMMENTS**

This item is related to Items 5 and 8.



## DSA CODE AMENDMENT DEVELOPMENT

### TRACKING

Date Received:  
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### APPLICABLE CODE

Applicable Code Section(s): CBC Part 2, Chapter 11B, Sections 11B-206.2.1 and 11B-206.2.2  
Topic: Accessible Routes in Residential Facilities

### CURRENT CODE LANGUAGE

**11B-206.2 Where required.** Accessible routes shall be provided where required by *Section 11B-206.2*.

**11B-206.2.1 Site arrival points.** At least one accessible route shall be provided within the site from accessible parking spaces and accessible passenger *drop-off and* loading zones; public streets and sidewalks; and public transportation stops to the accessible building or facility entrance they serve. *Where more than one route is provided, all routes must be accessible.*

**Exceptions:**

1. ...
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.
3. ...

**11B-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.

**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.

### SUGGESTED TEXT OF PROPOSED AMENDMENT

**11B-206.2 Where required.** Accessible routes shall be provided where required by *Section 11B-206.2*.

**11B-206.2.1 Site arrival points.** At least one accessible route shall be provided within the site from accessible parking spaces and accessible passenger *drop-off and* loading

zones; public streets and sidewalks; and public transportation stops to the accessible building or facility entrance they serve. *Where more than one route is provided, all routes must be accessible.*

**Exceptions:**

1. ...
2. *In non-residential facilities, an* ~~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.
3. ...

**11B-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.

**Exception:** *In non-residential facilities, an* ~~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.

## CODE TEXT IF ADOPTED

**11B-206.2 Where required.** Accessible routes shall be provided where required by *Section 11B-206.2.*

**11B-206.2.1 Site arrival points.** At least one accessible route shall be provided within the site from accessible parking spaces and accessible passenger *drop-off and* loading zones; public streets and sidewalks; and public transportation stops to the accessible building or facility entrance they serve. *Where more than one route is provided, all routes must be accessible*

**Exceptions:**

1. ...
2. *In non-residential facilities, 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.
3. ...

**11B-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.

**Exception:** *In non-residential facilities, 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.

## STATEMENT OF REASONS

DSA proposes to modify the exceptions to providing accessible pedestrian routes to permit the exceptions only in facilities that are not public housing and to align with HUD Section 504 regulations.

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 206.2.1 exc. 2 and 206.2.2 exc. are not deemed as equivalent to the Uniform Federal Accessibility Standards. (Deeming Notice):

“The 2010 Standards contain an exception for accessibility at site arrival points which provides that 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” (Section 206.2.1 Site Arrival Points, Exception 2). The 2010 Standards also contain an exception for accessibility within a site which provides that 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” (Section 206.2.2 Within a Site, Exception). Neither exception is in UFAS [see Sections 4.1.1(1), 4.1.1.(2) and 4.3], which requires pedestrian access routes, and both conflict with HUD’s Section 504 regulation, which requires that all programs and activities receiving Federal funds be readily accessible to and usable by persons with disabilities, as well as the requirements of the FHAct and HUD’s Fair Housing Accessibility Guidelines. Accordingly, HUD is not permitting the use of Exception 2 to Section 206.2.1 Site Arrival Points, and the Exception to Section 206.2.2 Within a Site.”

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

## **DSA COMMENTS**





## DSA CODE AMENDMENT DEVELOPMENT

### TRACKING

Date Received:

DSA Tracking Number: 9 (23-052)

Date Reviewed: August 29, 2025

Status: Stakeholder Meeting

### APPLICABLE CODE

Applicable Code Section(s): CBC Part 2, Chapter 11B, Section 11B-214

Topic: Washing Machines and Clothes Dryers

### CURRENT CODE LANGUAGE

#### **11B-214 Washing machines and clothes dryers**

##### **11B-214.1 General. ...**

**11B-214.2 Washing machines.** Where three or fewer washing machines are provided, at least one shall comply with *Section 11B-611*. Where more than three washing machines are provided, at least two shall comply with *Section 11B-611*.

**11B-214.3 Clothes dryers.** Where three or fewer clothes dryers are provided, at least one shall comply with *Section 11B-611*. Where more than three clothes dryers are provided, at least two shall comply with *Section 11B-611*.

### SUGGESTED TEXT OF PROPOSED AMENDMENT

#### **11B-214 Washing machines and clothes dryers**

##### **11B-214.1 General. ...**

**11B-214.2 Washing machines.** Where three or fewer washing machines are provided, at least one shall comply with *Section 11B-611*. Where more than three washing machines are provided, at least two shall comply with *Section 11B-611*.

*Exception: In residential facilities, all washing machines provided in common use areas shall be front loading and shall comply with Section 11B-611.*

**11B-214.3 Clothes dryers.** Where three or fewer clothes dryers are provided, at least one shall comply with *Section 11B-611*. Where more than three clothes dryers are provided, at least two shall comply with *Section 11B-611*.

*Exception: In residential facilities, all clothes dryers provided in common use areas shall be front loading and shall comply with Section 11B-611.*

### CODE TEXT IF ADOPTED

#### **11B-214 Washing machines and clothes dryers**

##### **11B-214.1 General. ...**

**11B-214.2 Washing machines.** Where three or fewer washing machines are provided, at least one shall comply with *Section 11B-611*. Where more than three washing machines are provided, at least two shall comply with *Section 11B-611*.

*Exception: In residential facilities, all washing machines provided in common use areas shall be front loading and shall comply with Section 11B-611.*

**11B-214.3 Clothes dryers.** Where three or fewer clothes dryers are provided, at least one shall comply with *Section 11B-611*. Where more than three clothes dryers are provided, at least two shall comply with *Section 11B-611*.

*Exception: In residential facilities, all clothes dryers provided in common use areas shall be front loading and shall comply with Section 11B-611.*

## STATEMENT OF REASONS

DSA proposes to amend the scoping requirements for clothes washers and dryers in residential facilities to align with the more stringent federal requirements found in the Uniform Federal Accessibility Standards (UFAS).

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of disability by entities in receipt of federal financial assistance, including subgrantees and contractors. The Department of Housing and Urban Development (HUD) adopts UFAS as the standard for public housing projects and programs in receipt of federal funds. HUD has allowed the use of the Americans with Disabilities Act Standards (ADAS) as long as certain UFAS provisions providing greater accessibility are met. 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 203.8 is not deemed as equivalent to the Uniform Federal Accessibility Standards (Deeming Notice):

“Washing Machines; Clothes Dryers - Sections 214.2 and 214.3 of the 2010 Standards UFAS requires front loading washing machines and clothes dryers in common use laundry rooms in facilities serving accessible residential dwelling units [UFAS, Section 4.34.7.2]. UFAS’ requirements for front-loading machines reflect the fact that not all persons with disabilities will be able to use top loading machines. The 2010 Standards, however, permit either top loading or front loading machines in such facilities (Section 214.2 Washing Machines; Section 214.3 Clothes Dryers). Consequently, HUD is not permitting application of the scoping requirements for washing and drying machines found at sections 214.2 and 214.3 of the 2010 Standards. Recipients must continue to comply with section 4.34.7 of UFAS. These requirements apply to each laundry room except that HUD’s Section 504 regulation and UFAS would not require a laundry room on an upper story of a non-elevator building to be accessible provided that there is an accessible laundry room serving that same building on the ground floor.”

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

## DSA COMMENTS





## DSA CODE AMENDMENT DEVELOPMENT

### TRACKING

Date Received:  
DSA Tracking Number: 10 (23-052)  
Date Reviewed: August 29, 2025  
Status: Stakeholder Meeting

### APPLICABLE CODE

Applicable Code Section(s): CBC Part 2, Chapter 11B, Section 11B-215.1  
Topic: Fire Alarm Systems

### CURRENT CODE LANGUAGE

**11B-215.1 General.** Where fire alarm systems *and carbon monoxide alarm systems* provide audible alarm coverage, alarms shall comply with *Section 11B-215*.

**Exception:** In existing facilities, visible alarms *for fire alarm systems* shall not be required except where an existing fire alarm system is upgraded or replaced, or a new fire alarm system is installed.

### SUGGESTED TEXT OF PROPOSED AMENDMENT

**11B-215.1 General.** Where fire alarm systems *and carbon monoxide alarm systems* provide audible alarm coverage, alarms shall comply with *Section 11B-215*.

**Exception:** In existing *non-residential* facilities, visible alarms *for fire alarm systems* shall not be required except where an existing fire alarm system is upgraded or replaced, or a new fire alarm system is installed.

### CODE TEXT IF ADOPTED

**11B-215.1 General.** Where fire alarm systems *and carbon monoxide alarm systems* provide audible alarm coverage, alarms shall comply with *Section 11B-215*.

**Exception:** In existing *non-residential* facilities, visible alarms *for fire alarm systems* shall not be required except where an existing fire alarm system is upgraded or replaced, or a new fire alarm system is installed.

### STATEMENT OF REASONS

DSA proposes to amend this section to limit its application to only commercial facilities and public accommodations, and not to public housing.

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of disability by entities in receipt of 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 in receipt of federal funds. HUD has allowed the use of the Americans with Disabilities Act

Standards (ADAS) as long as certain UFAS provisions providing greater accessibility are met. 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 215.1 is not deemed as equivalent to the Uniform Federal Accessibility Standards (Deeming Notice):

“Section 215.1 includes a new exception for visible alarms in the alteration of existing facilities, providing that visible alarms must be installed only when an existing fire alarm system is upgraded or replaced, or a new fire alarm system is installed. Under this exception, visible alarms would not be required as part of alterations unless the alarm system is upgraded, replaced, or newly installed. HUD is not permitting use of this exception because its application may result in less accessibility than is currently required under HUD’s Section 504 regulation. Instead, recipients engaged in alterations must refer to HUD’s regulation at 24 CFR 8.22, 8.23, 8.24, and 8.25 to determine whether visible alarms must be installed. For recipients engaged in substantial alterations, the new construction requirements apply (with the exception that building alterations are not required that have little likelihood of being accomplished without removing or altering a load-bearing structural member) and visible alarms would be included in the alterations. For recipients engaged in other alterations not rising to the level of substantial alterations, any alterations (including alterations to dwelling units, common areas, or parts of facilities that affect accessibility of existing housing facilities) must, to the maximum extent feasible, be made to be readily accessible to and usable by individuals with disabilities. “To the maximum extent feasible” means recipients are not required to make alterations if doing so would impose undue financial and administrative burdens on the operation of the multifamily housing project, but must provide for accessibility up to the point of undue financial and administrative burdens. This is a high threshold to meet. Therefore, HUD recipients must continue to comply with the provisions in HUD’s Section 504 regulation, and not utilize the exception in the 2010 Standards.”

For alterations in existing residential facilities where providing visible alarms may create an undue financial or administrative burden, project owners may request a finding of unreasonable hardship from the Authority Having Jurisdiction (AHJ) per CBC Section 11B-202.4, Exception 8, or may propose an alternate design or technology providing equivalent facilitation under CBC Section 11B-103, however these alternate means of compliance are project specific and shall be applied on a case by case basis.

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

## **DSA COMMENTS**



## DSA CODE AMENDMENT DEVELOPMENT

### TRACKING

Date Received:

DSA Tracking Number: 2

Date Reviewed: August 29, 2025

Status: Stakeholder Meeting

### APPLICABLE CODE

Applicable Code Section(s): CBC Part 2, Chapter 2, Section 202 Definitions

Topic: Place of Public Accommodation

### CURRENT CODE LANGUAGE

**PLACE OF PUBLIC ACCOMMODATION.** *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, ...*
- (2) *A restaurant, bar or ...*
- (3) *A motion picture house ...*
- (4) *An auditorium, convention center ...*
- (5) *A bakery, grocery store, ...*
- (6) *A laundromat, dry-cleaner, bank, barber shop, ...*
- (7) *A terminal, depot or ...*
- (8) *A museum, library, gallery or ...*
- (9) *A park, zoo, amusement park or ...*
- (10) *A nursery, elementary, secondary, undergraduate or post graduate private school, or other place of education;*
- (11) *A day-care center, senior citizen center, ...*
- (12) *A gymnasium, health spa ...*
- (13) *A religious facility;*
- (14) *An office building; and*
- (15) *A public curb or sidewalk.*

### SUGGESTED TEXT OF PROPOSED AMENDMENT

**PLACE OF PUBLIC ACCOMMODATION.** *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, ...*
- (2) *A restaurant, bar or ...*
- (3) *A motion picture house ...*
- (4) *An auditorium, convention center ...*
- (5) *A bakery, grocery store, ...*
- (6) *A laundromat, dry-cleaner, bank, barber shop, ...*
- (7) *A terminal, depot or ...*
- (8) *A museum, library, gallery or ...*

- (9) A park, zoo, amusement park or ...
- (10) A nursery, elementary, secondary, undergraduate or post graduate private school, or other place of education; including housing facilities provided by, for, or on behalf of the private school and made available to students;
- (11) A day-care center, senior citizen center, ...
- (12) A gymnasium, health spa ...
- (13) A religious facility;
- (14) An office building; and
- (15) A public curb or sidewalk.

## CODE TEXT IF ADOPTED

**PLACE OF PUBLIC ACCOMMODATION.** 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, ...
- (2) A restaurant, bar or ...
- (3) A motion picture house ...
- (4) An auditorium, convention center ...
- (5) A bakery, grocery store, ...
- (6) A laundromat, dry-cleaner, bank, barber shop, ...
- (7) A terminal, depot or ...
- (8) A museum, library, gallery or ...
- (9) A park, zoo, amusement park or ...
- (10) A nursery, elementary, secondary, undergraduate or post graduate private school, or other place of education, including housing facilities provided by, for, or on behalf of the private school and made available to students;
- (11) A day-care center, senior citizen center, ...
- (12) A gymnasium, health spa ...
- (13) A religious facility;
- (14) An office building; and
- (15) A public curb or sidewalk.

## STATEMENT OF REASONS

DSA is proposing to amend this definition to include housing facilities that are provided by private educational entities. Housing offered by private educational entities is a public accommodation under the Americans with Disabilities Act (ADA) and is subject to the requirements for residential facilities found in the ADA Standards (ADAS). Amending the language in the CBC to specifically include housing facilities provided by educational entities is needed to clarify the scoping requirements for such facilities are found in CBC Chapter 11B.

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

## DSA COMMENTS

This item is related to Item 1, 12 and 14.



## DSA CODE AMENDMENT DEVELOPMENT

### TRACKING

Date Received:  
DSA Tracking Number: 12  
Date Reviewed: August 29, 2025  
Status: Stakeholder Meeting

### APPLICABLE CODE

Applicable Code Section(s): CBC Part 2, Chapter 11B, Section 11B-224.7  
Topic: Housing at a Place of Education

### CURRENT CODE LANGUAGE

**11B-224.7 Housing at a place of education.** *Housing at a place of education subject to this section shall comply with Sections 11B-224.1 through 11B-224.6 and 11B-806 for transient lodging guest rooms. For the purposes of the application of this section, the term “sleeping room” is interchangeable with “guest room” as used in the transient lodging standards.*

### SUGGESTED TEXT OF PROPOSED AMENDMENT

**11B-224.7 Housing at a place of education.** *Housing at a place of education subject to this section shall comply with Sections 11B-224.1 through 11B-224.6 11B-224.7 and 11B-806. ~~for transient lodging guest rooms.~~ For the purposes of the application of ~~this~~ these sections, the term “sleeping room” is interchangeable with “guest room”. ~~as used in the transient lodging standards.~~*

### CODE TEXT IF ADOPTED

**11B-224.7 Housing at a place of education.** *Housing at a place of education shall comply with Sections 11B-224.1 through 11B-224.7 and 11B-806. For the purposes of the application of these sections, the term “sleeping room” is interchangeable with “guest room”.*

### STATEMENT OF REASONS

DSA proposes to amend this section to clarify that although housing at a place of education must comply with transient lodging requirements under federal regulations, it is housing, that must also comply with regulations for public where applicable. Housing at a place of education is included in the definition in of PUBLIC HOUSING in CBC Chapter 2, Section 202, where provided by a public entity. Housing at a place of education provided by private entities that are not an EDUCATIONAL ENTITIES IN RECEIPT OF PUBLIC FUNDS are defined as a PLACE OF PUBLIC ACCOMMODATION.

This proposal is necessary for clarity of existing regulations and does not materially alter the substance or intent of the existing regulations.

### DSA COMMENTS

This item is related to Item 1, 2 and 14.



## DSA CODE AMENDMENT DEVELOPMENT

### TRACKING

Date Received:

DSA Tracking Number: 4

Date Reviewed: August 29, 2025

Status: Stakeholder Meeting

### APPLICABLE CODE

Applicable Code Section(s): CBC Part 2, Chapter 2, Section 202 Definitions

Topic: Social Service Center Establishments

### CURRENT CODE LANGUAGE

N/A

### SUGGESTED TEXT OF PROPOSED AMENDMENT

**SOCIAL SERVICE CENTER ESTABLISHMENT.** *A facility that provides short and/or long-term sleeping accommodations or housing and one or more social services such as counseling, welfare, referrals, refugee, disaster, temporary relief, non-medical care, meals, or transportation. Social service center establishments include, but are not limited to, halfway houses, shelters, and licensed group homes.*

### CODE TEXT IF ADOPTED

***SOCIAL SERVICE CENTER ESTABLISHMENT.*** *A facility that provides short and/or long-term sleeping accommodations or housing and one or more social services such as counseling, welfare, referrals, refugee, disaster, temporary relief, non-medical care, meals, or transportation. Social service center establishments include, but are not limited to, halfway houses, shelters, and licensed group homes.*

### STATEMENT OF REASONS

DSA has received requests from multiple code users and stakeholders asking for clarity between transient lodging, public housing, and social service center establishments. The proposed definition clarifies that social service center establishments provide additional resources beyond housing, and may include either short-term or long-term stays or a combination of both. This proposal aligns with the existing definitions of “group home” found in HUD’s federal regulations at Title 24, Section 982.4.

HUD regulations at Title 24 CFR Section 982.4 defines a group home as: “A dwelling unit that is licensed by a State as a group home for the exclusive residential use of two to twelve persons who are elderly or persons with disabilities (including any live-in aide). A special housing type: see Sections 982.610 to 982.614.” Section 82.614 requires sanitary facilities to be “readily accessible to and usable by residents, including persons with disabilities.”

Social service center establishments may be provided by municipal entities, by charitable organizations, or by commercial entities. Any such social service center establishment is required to comply with the Americans with Disabilities Act (ADA) as either public housing or as a place of public accommodation, as applicable.

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

#### **DSA COMMENTS**

This item is related to Item 13.





## DSA CODE AMENDMENT DEVELOPMENT

### TRACKING

Date Received:  
DSA Tracking Number: 13  
Date Reviewed: August 29, 2025  
Status: Stakeholder Meeting

### APPLICABLE CODE

Applicable Code Section(s): CBC Part 2, Chapter 11B, Section 11B-224.8  
Topic: Social Service Center Establishments

### CURRENT CODE LANGUAGE

**11B-224.8 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 subject to this section shall comply with Section 11B-233.3.*

**11B-224.8.1 More than 25-bed sleeping rooms.** ...

**11B-224.8.2 More than 50-bed facilities.** ...

### SUGGESTED TEXT OF PROPOSED AMENDMENT

**11B-224.8 Social service center establishments.** ~~Group homes, halfway houses, shelters or similar social~~ Social service center establishments that provide either temporary sleeping accommodations or residential dwelling units subject to this section shall comply with Sections 11B-233.3 and 11B-806.2.3.

**11B-224.8.1 More than 25-bed sleeping rooms.** ...

**11B-224.8.2 More than 50-bed facilities.** ...

### CODE TEXT IF ADOPTED

**11B-224.8 Social service center establishments.** *Social service center establishments shall comply with Sections 11B-233.3 and 11B-806.2.3.*

**11B-224.8.1 More than 25-bed sleeping rooms.** ...

**11B-224.8.2 More than 50-bed facilities.** ...

### STATEMENT OF REASONS

DSA proposes to clarify that social service center establishments that provide sleeping accommodations or housing must comply with requirements for accessible residential facilities regardless of the length of the stay. This is necessary to align with the requirements of the Americans with Disabilities Act (ADA) and the requirements found in HUD's federal regulations at Title 24, Section 982.4.

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

## **DSA COMMENTS**

This item is related to Item 4.

# DSA CODE AMENDMENT DEVELOPMENT

## TRACKING

Date Received:  
 DSA Tracking Number: 6 (24-007)  
 Date Reviewed: August 29, 2025  
 Status: Stakeholder Meeting

## APPLICABLE CODE

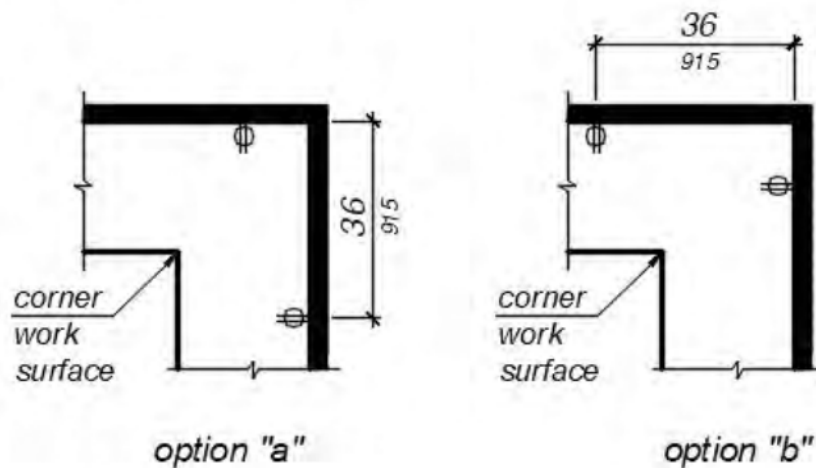
Applicable Code Section(s): CBC Part 2, Chapter 11B, Section 11B-205.1, Exception 9  
 Topic: Corner Receptacles

## CURRENT CODE LANGUAGE

**11B-205.1 General.** Operable parts on accessible elements, accessible routes, and in accessible rooms and spaces shall comply with *Section 11B-309*.

### Exceptions:

1. ...
9. *In residential dwelling units with mobility features where receptacles are provided in a kitchen at a corner work surface, one receptacle shall be located 36 inches (915 mm) from either wall at the inside corner.*



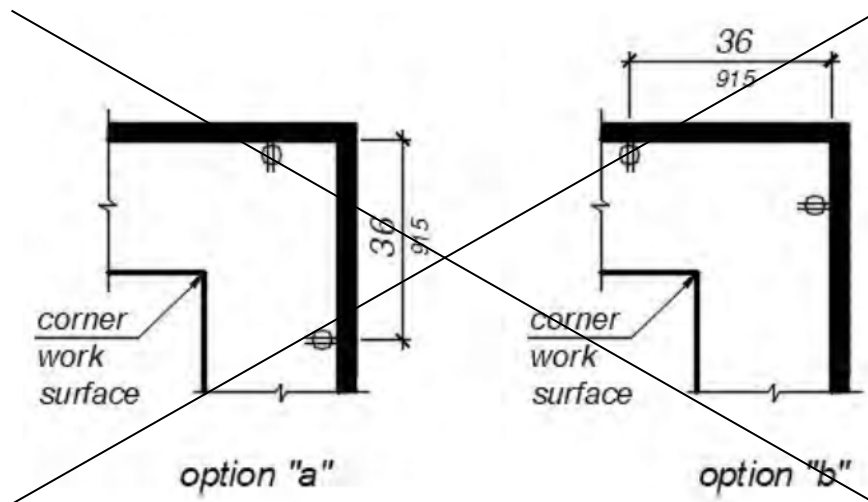
**FIGURE 11B-205.1 Ex. 9**  
**ELECTRICAL RECEPTACLES AT CORNER WORKSURFACES**

## SUGGESTED TEXT OF PROPOSED AMENDMENT

**11B-205.1 General.** Operable parts on accessible elements, accessible routes, and in accessible rooms and spaces shall comply with *Section 11B-309*.

### Exceptions:

1. ...
9. ~~*In residential dwelling units with mobility features where receptacles are provided in a kitchen at a corner work surface, one receptacle shall be located 36 inches (915 mm) from either wall at the inside corner.*~~



~~FIGURE 11B-205.1 Ex. 9  
ELECTRICAL RECEPTACLES AT CORNER WORKSURFACES~~

## CODE TEXT IF ADOPTED

**11B-205.1 General.** Operable parts on accessible elements, accessible routes, and in accessible rooms and spaces shall comply with *Section 11B-309*.

### Exceptions:

1. ...

## STATEMENT OF REASONS

DSA is proposing to relocate the technical requirements for electrical receptacles at corner worksurfaces in residential dwelling units with mobility features from scoping at CBC Section 11B-205.1, Exception 9 to the more appropriate technical requirement section at CBC Section 11B-308 adjacent to reach range requirements for electrical switches and electrical receptacle outlets. The technical requirements for electrical receptacles at corner worksurfaces in residential dwelling units with mobility features are the same for those requirements for electrical receptacles at corner worksurfaces in residential dwelling units with adaptable features as stipulated in CBC Section 11B-809.12; co-locating both technical requirements is a

single location will prevent potential confusion and misinterpretation by design professionals and code users.

This proposed relocation is intended to avoid duplicative building standards per Health and Safety Code 18930, Point 1. This proposal is necessary for clarity of existing regulations and does not materially alter the substance or intent of the existing regulations.

## **DSA COMMENTS**

This item is related to Items 17 and 19.



## DSA CODE AMENDMENT DEVELOPMENT

### TRACKING

Date Received:  
DSA Tracking Number: 17  
Date Reviewed: August 29, 2025  
Status: Stakeholder Meeting

### APPLICABLE CODE

Applicable Code Section(s): CBC Part 2, Chapter 11B, Section 11B-308.1.2.1  
Topic: Corner Receptacle

### CURRENT CODE LANGUAGE

N/A

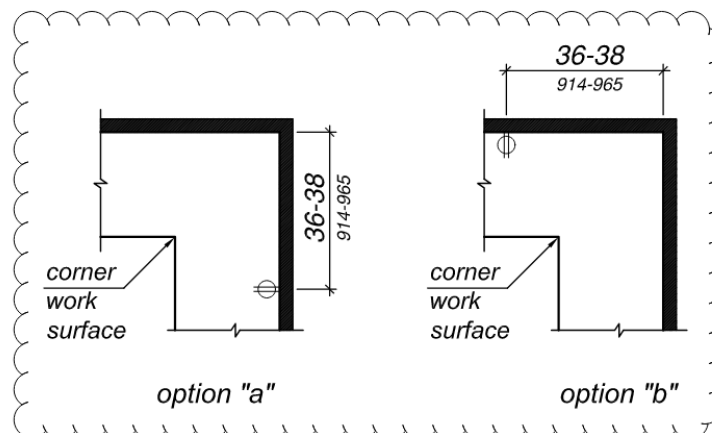
### SUGGESTED TEXT OF PROPOSED AMENDMENT

**11B-308.1 General.** Reach ranges shall comply with *Section 11B-308*.

**11B-308.1.1 Electrical switches.** *Controls and switches ...*

**11B-308.1.2 Electrical receptacle outlets.** ...

**11B-308.1.2.1.** Where a receptacle is provided at an inside corner of a work surface over a base cabinet, at least one shall be located 36 inches (914 mm) minimum to 38 inches (965 mm) maximum from either wall at the inside corner.



**FIGURE 11B-308.1.2.1**  
**ELECTRICAL RECEPTACLE AT AN INSIDE CORNER**

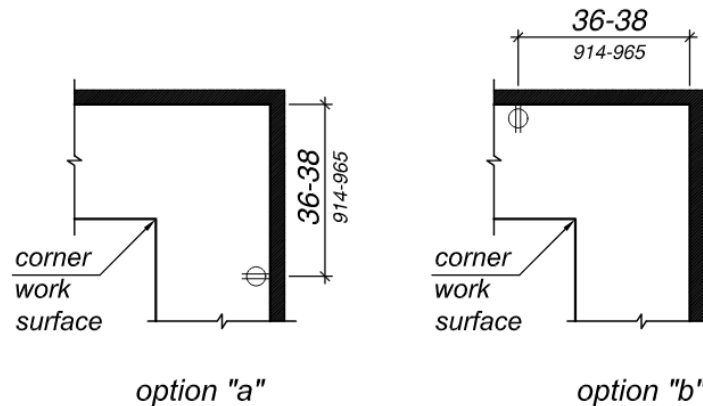
## CODE TEXT IF ADOPTED

**11B-308.1 General.** Reach ranges shall comply with *Section 11B-308*.

**11B-308.1.1 Electrical switches.** *Controls and switches ...*

**11B-308.1.2 Electrical receptacle outlets.** *...*

**11B-308.1.2.1.** *Where a receptacle is provided at an inside corner of a work surface over a base cabinet, at least one shall be located 36 inches (914 mm) minimum to 38 inches (965 mm) maximum from either wall at the inside corner.*



**FIGURE 11B-308.1.2.1**  
**ELECTRICAL RECEPTACLE AT AN INSIDE CORNER**

## STATEMENT OF REASONS

DSA received petitions from multiple stakeholders requesting modification to kitchen corner receptacle locations in residential dwelling units with mobility features; currently presented as an absolute dimension in CBC Section 11B-205.1, Exception 9. This proposed change provides an allowable range for the location of kitchen corner receptacles.

The inclusion of an absolute dimension in the CBC was based on Fair Housing Act (FHA) standards, and the FHA is an older standard that allows for no construction tolerance. The Americans with Disabilities Act Standards (ADAS) is a newer standard that allows for a dimensional range thereby providing construction tolerance in the field. This proposed change to a dimensional range is synonymous with the existing absolute dimension and does not represent a substantive change; this increases accessibility to the outlet location as stipulated in the CBC. This change presents the same requirement, simply stated differently.

Additionally, this proposed change relocates technical requirements for kitchen corner receptacles at corner work surfaces in residential dwelling units with mobility features from CBC Section 11B-205.1, Exception 9, and for residential units with adaptable features at CBC Section 11B-809.12 to the more appropriate location at CBC Section 11B-308 where these requirements can be co-located with reach range requirements for electrical switches and electrical receptacle outlets.

The proposed relocation of the technical requirements for kitchen corner receptacles in residential dwelling units with mobility features from CBC Section 11B-205.1, Exception 9, and



kitchen corner receptacles in residential dwelling units with adaptable features from CBC Section 11B-809.12, to CBC Section 11B-308 to co-locate with existing reach range requirements for electrical switches and electrical receptacle outlets prevents duplicative building standards per Health and Safety Code, Section 18930, Item 1.

This proposal is necessary for clarity of existing regulations and does not materially alter the substance or intent of the existing regulations.

#### **DSA COMMENTS**

This item is related to Items 6 and 19.





## DSA CODE AMENDMENT DEVELOPMENT

### TRACKING

Date Received:  
DSA Tracking Number: 19 (24-007)  
Date Reviewed: August 29, 2025  
Status: Stakeholder Meeting

### APPLICABLE CODE

Applicable Code Section(s): CBC Part 2, Chapter 11B, Section 11B-809.12  
Topic: Electrical Receptacles, Controls and Switches in Residential Dwelling Units with Adaptable Features

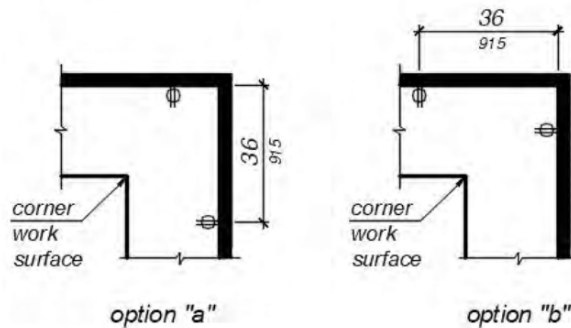
### CURRENT CODE LANGUAGE

**11B-809.12 Electrical receptacles, controls and switches.** *Electrical receptacles on branch circuits of 30 amperes or less, communication system receptacles, controls and switches shall be located as follows:*

1. *Where there is no obstruction, 48 inches (1219 mm) maximum measured from the top of the receptacle box and 15 inches (381 mm) minimum measured from the bottom of the receptacle box to the finish floor.*
2. *Where the reach is over an obstruction, electrical receptacles, controls and switches shall comply with Sections 11B-308.3 and 11B-309.2.*
3. *When the reach is over a kitchen work surface and base cabinet, the work surface shall be 36 inches (914 mm) maximum above the finish floor and 25 1/2 inches (650 mm) maximum in depth. The base cabinet shall be 24 inches (610 mm) maximum in depth.*
4. *Where receptacles are provided in a kitchen at a corner work surface, one receptacle shall be located 36 inches (915 mm) from either wall at the inside corner.*

**Exceptions:**

- a. *Electrical receptacles installed as part of permanently installed baseboard heaters.*
- b. *Electrical receptacles in floors adjacent to sliding panels or walls.*
- c. *Baseboard electrical receptacles in relocatable partitions, window walls or other electrical convenience floor outlets.*
- d. *Appliances (e.g., stoves, dishwashers, range hoods, microwave ovens and similar appliances) which have controls located on the appliance.*
- e. *Electrical receptacles dedicated to specific appliances.*
- f. *Circuit breakers.*



**FIGURE 11B-809.12  
ELECTRICAL RECEPTACLES AT CORNER WORKSURFACES**

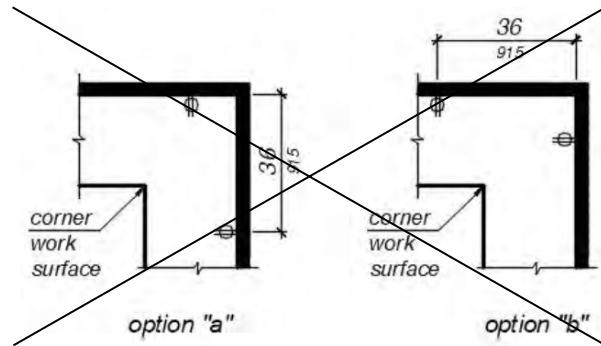
### **SUGGESTED TEXT OF PROPOSED AMENDMENT**

**11B-809.12 Electrical receptacles, controls and switches.** *Electrical receptacles on branch circuits of 30 amperes or less, communication system receptacles, controls and switches shall be located as follows: comply with Sections 11B-308 and 11B-309.*

1. ~~Where there is no obstruction, 48 inches (1219 mm) maximum measured from the top of the receptacle box and 15 inches (381 mm) minimum measured from the bottom of the receptacle box to the finish floor.~~
2. ~~Where the reach is over an obstruction, electrical receptacles, controls and switches shall comply with Sections 11B-308.3 and 11B-309.2.~~
31. ~~When the reach is over a kitchen~~ Where receptacles, controls and switches are located over a work surface and base cabinet, the work surface shall be permitted to be 36 inches (914 mm) maximum above the finish floor and 25 1/2 inches (650 mm) maximum in depth. The base cabinet shall be 24 inches (610 mm) maximum in depth. (Relocated to Exception 1)
4. ~~Where receptacles are provided in a kitchen at a corner work surface, one receptacle shall be located 36 inches (915 mm) from either wall at the inside corner.~~

**Exceptions:**

- a. ~~Electrical receptacles installed as part of permanently installed baseboard heaters.~~
- b. ~~Electrical receptacles in floors adjacent to sliding panels or walls.~~
- c. ~~Baseboard electrical receptacles in relocatable partitions, window walls or other electrical convenience floor outlets.~~
- D2. ~~Appliances (e.g., stoves, dishwashers, range hoods, microwave ovens and similar appliances) which have controls located on the appliance.~~
- e. ~~Electrical receptacles dedicated to specific appliances.~~
- f. ~~Circuit breakers.~~



**FIGURE 11B-809.12**  
**ELECTRICAL RECEPTACLES AT CORNER WORKSURFACES**

### CODE TEXT IF ADOPTED

**11B-809.12 Electrical receptacles, controls and switches.** *Electrical receptacles on branch circuits of 30 amperes or less, communication system receptacles, controls and switches shall comply with Sections 11B-308 and 11B-309.*

**Exceptions:**

1. *Where receptacles, controls and switches are located over a work surface and base cabinet, the work surface shall be permitted to be 36 inches (914 mm) maximum above the finish floor.*
2. *Appliances (e.g. stoves, dishwashers, range hoods, microwave ovens and similar appliances) which have controls located on the appliance.*

### STATEMENT OF REASONS

DSA is proposing the following changes to CBC Section 11B-809.12; the relocation of the technical requirements for electrical receptacles at corner worksurfaces in residential dwelling units with adaptable features from this section to the more appropriate technical CBC Section 11B-308 adjacent to reach range requirements for electrical switches and electrical receptacle outlets in addition to the modification of existing code language that has become outdated and no longer relevant due to current CBC building standards.

Language presented in CBC Section 11B-809.12 addressing baseboard heaters conflicts with California Energy Code language that disallows their use and as such should be removed. Additionally, the requirements in CBC Section 11B-809 apply to new covered multi-family dwelling units and not residential dwelling units or remodels and should be modified to clarify intent. The technical requirements for electrical receptacles at corner worksurfaces in residential dwelling units with adaptable features are the same for those requirements for electrical receptacles at corner worksurfaces in residential dwelling units with mobility features as stipulated in CBC Section 11B-205.1, which are also proposed for relocation as part of this rule making cycle; co-locating both technical requirements in a single location will prevent potential confusion and misinterpretation by design professionals and code users.

These proposed changes also include specific pointer language to CBC Section 11B-308 and CBC Section 11B-309 while simplifying existing language and clarifying the intent of CBC Section 11B-809 while also clarifying that this code language applies to all kitchen counters

and not only those that are forward approach work surfaces. These modifications are intended to avoid duplicative building standards per Health and Safety Code 18930, Point 1.

This proposal is necessary for clarity of existing regulations and does not materially alter the substance or intent of the existing regulations.

#### **DSA COMMENTS**

This item is related to Items 6 and 17.



## DSA CODE AMENDMENT DEVELOPMENT

### TRACKING

Date Received:

DSA Tracking Number: 11

Date Reviewed: August 29, 2025

Status: Stakeholder Meeting

### APPLICABLE CODE

Applicable Code Section(s): CBC Part 2, Chapter 2, Section 11B-223.2.3

Topic: On-call Rooms in Medical Facilities

### CURRENT CODE LANGUAGE

**11B-223.2.3 On-call rooms.** *Where physician or staff on-call sleeping rooms are provided, at least 10 percent, but no fewer than one, of the on-call rooms shall provide mobility features complying with Sections 11B-806.2.3, 11B-806.2.4 and 11B-806.2.6.*

### SUGGESTED TEXT OF PROPOSED AMENDMENT

**11B-223.2.3 On-call rooms.** *Where physician or staff on-call sleeping rooms are provided, at least 10 percent, but no fewer than one, of the on-call rooms shall provide mobility features complying with Sections ~~11B-806.2.3, 11B-806.2.4 and 11B-806.2.6.~~ 11B-805.2.*

### CODE TEXT IF ADOPTED

**11B-223.2.3 On-call rooms.** *Where physician or staff on-call sleeping rooms are provided, at least 10 percent, but no fewer than one, of the on-call rooms shall provide mobility features complying with Section 11B-805.2.*

### STATEMENT OF REASONS

DSA proposes this change to provide conformity with the federal requirements for medical care facilities at the request of the California Department of Health Care Access and Information (HCAI).

Medical care facilities, which include sleeping rooms used only by on-call staff, are specifically excluded from the definitions of transient lodging provided at Chapter 1, Section 106 of the 2010 Americans with Disabilities Act Standards (ADAS) and Chapter 2, Section 202 of the CBC. This proposal removes the reference to CBC Sections 11B-806.2.3, 11B-806.2.4, and 11B-806.2.6 in transient lodging requirements, and adds a reference to Section 11B-805.2, the technical requirements applicable to medical care facilities.

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

### DSA COMMENTS

This item is related to Item 18.







## DSA CODE AMENDMENT DEVELOPMENT

### TRACKING

Date Received:  
DSA Tracking Number: 18  
Date Reviewed: August 29, 2025  
Status: Stakeholder Meeting

### APPLICABLE CODE

Applicable Code Section(s): CBC Part 2, Chapter 11B, Section 11B-805.2  
Topic: Sleeping Rooms

### CURRENT CODE LANGUAGE

**11B-805.2 Patient bedrooms and resident sleeping rooms.** *Patient bedrooms and resident sleeping rooms required to provide mobility features shall comply with Section 11B-805.2.*

**11B-805.2.1 Hand washing fixtures.** ...

**11B-805.2.2 Beds.** ...

**11B-805.2.3 Turning space.** ...

**11B-805.2.4 Toilet and bathing rooms.** ...

### SUGGESTED TEXT OF PROPOSED AMENDMENT

**11B-805.2 Patient bedrooms, ~~and resident sleeping rooms, and staff on-call rooms.~~**  
*Patient bedrooms, ~~and resident sleeping rooms, and staff on-call rooms~~ required to provide mobility features shall comply with Section 11B-805.2.*

**11B-805.2.1 Hand washing fixtures.** ...

**11B-805.2.2 Beds.** ...

**11B-805.2.3 Turning space.** ...

**11B-805.2.4 Toilet and bathing rooms.** ...

### CODE TEXT IF ADOPTED

**11B-805.2 Patient bedrooms, resident sleeping rooms, and staff on-call rooms.** *Patient bedrooms, resident sleeping rooms, and staff on-call rooms required to provide mobility features shall comply with Section 11B-805.2.*

**11B-805.2.1 Hand washing fixtures.** ...

**11B-805.2.2 Beds.** ...

**11B-805.2.3 Turning space.** ...

**11B-805.2.4 Toilet and bathing rooms.** ...

### STATEMENT OF REASONS

DSA proposes this change to provide conformity with the federal requirements for medical care facilities at the request of the California Department of Health Care Access and Information (HCAI).

Medical care facilities, which include sleeping rooms used only by on-call staff, are specifically excluded from the definitions of transient lodging provided at Chapter 1, Section 106 of the 2010 Americans with Disabilities Act Standards (ADAS) and Chapter 2, Section 202 of the CBC.

The current reference to transient lodging requirements at CBC Section 11B-806.2.3 allows accessible plumbing fixtures to be located in separate toilet and bathing areas as long as proximity conditions are met. Medical care facilities require plumbing fixtures to be located in the same toilet and bathing room, when provided. This proposal also clarifies that the transient lodging requirements for a personal lift device clear floor space found at CBC Section 11B-806.2.3.1 and for vanity counter space at CBC Section 11B-806.2.4.1 are applicable only to transient lodging facilities and not to medical care facilities.

Additionally, this change removes the ability for on-call rooms to use the exception to CBC Section 11B-806.2.3, which permits an alternate configuration providing a single clear floor space between two beds in a transient lodging guest room. The clear floor space requirement is replaced with CBC Section 11B-805.2.2, which requires a clear floor space on both sides of the bed. Employees using these rooms may not have a choice of bed, so requiring the clear floor space on both sides ensures staff can use their preferred transfer side.

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

#### **DSA COMMENTS**

This item is related to Item 11.



## DSA CODE AMENDMENT DEVELOPMENT

### TRACKING

Date Received:  
DSA Tracking Number: 21  
Date Reviewed: August 29, 2025  
Status: Stakeholder Meeting

### APPLICABLE CODE

Applicable Code Section(s): CBC Part 2, Chapter 35, Reference Standards  
Topic: DSA Adopted Versions of ASME Referenced Standards

### CURRENT CODE LANGUAGE

**ASME** American Society of Mechanical Engineers ...

**A17.1—2019/CSA B44—19: Safety Code for Elevators and Escalators**

*11B-407.1, 11B-407.1.1, 11B-407.4.9, 11B-408.1, 11B-409.1, 11B-411.1, 11B-810.9, 1607.11.1, 3001.4*

...

**A18.1—2020: Safety Standard for Platform Lifts and Stairway Chairlifts**

*1110.9, Table 3001.3*

### SUGGESTED TEXT OF PROPOSED AMENDMENT

**ASME** American Society of Mechanical Engineers ...

**A17.1—2019/CSA B44—19: Safety Code for Elevators and Escalators**

~~*11B-407.1, 11B-407.1.1, 11B-407.4.9, 11B-408.1, 11B-409.1, 11B-411.1, 11B-810.9, 1607.11.1, 3001.4*~~

**A17.1-13 CSA B44-2013: Safety Code for Elevators and Escalators**

*11B-407.1, 11B-407.1.1, 11B-407.4.9, 11B-408.1, 11B-409.1, 11B-411.1, 11B-810.9*

...

**A18.1—2020: Safety Standard for Platform Lifts and Stairway Chairlifts**

~~*1110.9, Table 3001.3*~~

**A18.1-2008: Safety Standard for Platform Lifts and Stairway Chairlifts**

*11B-410.1*

## CODE TEXT IF ADOPTED

**ASME** American Society of Mechanical Engineers ...

**A17.1—2019/CSA B44—19: Safety Code for Elevators and Escalators**

1607.11.1, 3001.4

**A17.1-13 CSA B44-2013: Safety Code for Elevators and Escalators**

11B-407.1, 11B-407.1.1, 11B-407.4.9, 11B-408.1, 11B-409.1, 11B-411.1, 11B-810.9

...

**A18.1—2020: Safety Standard for Platform Lifts and Stairway Chairlifts**

Table 3001.3

**A18.1-2008: Safety Standard for Platform Lifts and Stairway Chairlifts**

11B-410.1

## STATEMENT OF REASONS

DSA proposes to correct the American Society of Mechanical Engineers (ASME) referenced standard versions listed in CBC Chapter 35 with the versions adopted during the 2015 triennial rulemaking cycle. In accordance with the authority granted under Government Code 4450, DSA adopted ASME A17.1/CSA B44 and A18.1-2008 during the 2012 rulemaking cycle to conform with minimum accessibility standards per the 2010 Americans with Disabilities Act Standards (ADAS). DSA carried this adoption forward during the 2015 rulemaking cycle and has not adopted subsequently released versions of these ASME standards.

As part of their standard process, the International Code Council (ICC) modified the citation to include the current release of each referenced standard cited in Chapter 35 during each printing cycle. DSA identified this discrepancy and, in conjunction with CBSC, is proposing this correction using the formal rulemaking process to assure transparency.

Newer versions of these standards provide options that DSA has determined are not in compliance with current regulations in CBC Chapter 11B, creating confusion. This proposal is necessary for clarity of existing regulations and does not materially alter the substance or intent of the existing regulations.

## DSA COMMENTS

This item is related to Item 22.



## DSA CODE AMENDMENT DEVELOPMENT

### TRACKING

Date Received:  
DSA Tracking Number: 22  
Date Reviewed: August 29, 2025  
Status: Stakeholder Meeting

### APPLICABLE CODE

Applicable Code Section(s): CBC Part 2, Chapter 35, Reference Standards  
Topic: DSA Adopted Versions of BHMA Referenced Standards

### CURRENT CODE LANGUAGE

**BHMA** Builders Hardware Manufacturers' Association ...

**A 156.10—2017: Power Operated Pedestrian Doors**

1010.3.2, 11B-404.2.9, 11B-404.3

**A 156.19—2019: Standard for Power Assist and Low Energy Power Operated Doors**

1010.3.2, 11B-404.2.9, 11B-404.3, 11B-408.3.2.1, 11B-409.3.1

### SUGGESTED TEXT OF PROPOSED AMENDMENT

**BHMA** Builders Hardware Manufacturers' Association ...

**A 156.10—2017: Power Operated Pedestrian Doors**

1010.3.2, ~~11B-404.2.9, 11B-404.3~~

**A 156.19—2019: Standard for Power Assist and Low Energy Power Operated Doors**

1010.3.2, ~~11B-404.2.9, 11B-404.3, 11B-408.3.2.1, 11B-409.3.1~~

**A 156.10—2011: Power Operated Pedestrian Doors**

11B-404.2.9, 11B-404.3

**A 156.19—2013: Standard for Power Assist and Low Energy Power Operated Doors**

11B-404.2.9, 11B-404.3, 11B-408.3.2.1, 11B-409.3.1

## CODE TEXT IF ADOPTED

**BHMA** Builders Hardware Manufacturers' Association ...

**A 156.10—2017: Power Operated Pedestrian Doors**

1010.3.2

**A 156.19—2019: Standard for Power Assist and Low Energy Power Operated Doors**

1010.3.2

***A 156.10—2011: Power Operated Pedestrian Doors***

*11B-404.2.9, 11B-404.3*

***A 156.19—2013: Standard for Power Assist and Low Energy Power Operated Doors***

*11B-404.2.9, 11B-404.3, 11B-408.3.2.1, 11B-409.3.1*

## STATEMENT OF REASONS

DSA proposes to correct the Builders Hardware Manufacturers' Association (BHMA) referenced standard versions listed in CBC Chapter 35 with the versions adopted during the 2015 triennial rulemaking cycle. In accordance with the authority granted under Government Code 4450, DSA adopted BHMA A 156.10-2011 and A 156.19-2013 during the 2012 rulemaking cycle to conform with minimum accessibility standards per the 2010 Americans with Disabilities Act Standards (ADAS). DSA carried this adoption forward during the 2015 rulemaking cycle and has not adopted subsequently released versions of these BHMA standards.

As part of their standard process, the International Code Council (ICC) modified the citation to include the current release of each referenced standard cited in Chapter 35 during each printing cycle. DSA identified this discrepancy and, in conjunction with CBSC, is proposing this correction using the formal rulemaking process to assure transparency.

Newer versions of these standards provide options that DSA has determined are not in compliance with current regulations in CBC Chapter 11B, creating confusion. This proposal is necessary for clarity of existing regulations and does not materially alter the substance or intent of the existing regulations.

## DSA COMMENTS

This item is related to Item 21.



## DSA CODE AMENDMENT DEVELOPMENT

### TRACKING

Date Received:  
DSA Tracking Number: 20  
Date Reviewed: August 29, 2025  
Status: Stakeholder Meeting

### APPLICABLE CODE

Applicable Code Section(s): CBC Part 2, Chapter 11B, Section 11B-812.4  
Topic: Vertical Clearance at Electric Vehicle Charging Stations (EVCS)

### CURRENT CODE LANGUAGE

**11B-812.4 Vertical clearance.** *Vehicle spaces, access aisles serving them, and vehicular routes serving them shall provide a vertical clearance of 98 inches (2489 mm) minimum. Where provided, overhead cable management systems shall not obstruct required vertical clearance.*

### SUGGESTED TEXT OF PROPOSED AMENDMENT

**11B-812.4 Vertical clearance.** *Vehicle spaces, access aisles serving them, and vehicular routes serving them shall provide a vertical clearance of 98 inches (2489 mm) minimum. Where provided, overhead cable management systems shall not obstruct required vertical clearance.*

**Exception:** *In existing multistory parking facilities, ambulatory accessible EVCS and standard accessible EVCS shall provide a vertical clearance of 80 inches (2032 mm) minimum. Existing vertical clearance in excess of 80 inches (2032 mm) and less than 98 inches (2489 mm) shall be maintained. This exception shall not apply to van accessible EVCS or vehicular routes serving them.*

### CODE TEXT IF ADOPTED

**11B-812.4 Vertical clearance.** *Vehicle spaces, access aisles serving them, and vehicular routes serving them shall provide a vertical clearance of 98 inches (2489 mm) minimum. Where provided, overhead cable management systems shall not obstruct required vertical clearance.*

**Exception:** *In existing multistory parking facilities, ambulatory accessible EVCS and standard accessible EVCS shall provide a vertical clearance of 80 inches (2032 mm) minimum. Existing vertical clearance in excess of 80 inches (2032 mm) and less than 98 inches (2489 mm) shall be maintained. This exception shall not apply to van accessible EVCS or vehicular routes serving them.*

## STATEMENT OF REASONS

DSA proposes to clarify that the vertical clearance exception allowed for parking spaces in existing parking facilities as stipulated in CBC Section 11B-502.5 is also applicable to electrical vehicle charging stations (EVCS) when installed within existing parking facilities.

Vertical clearance requirements at EVCS within existing parking facilities are often determined to be technically infeasible, per CBC Section 11B-202.3, Exception 2, by local jurisdictions. This proposed exception for EVCS vertical clearance is equivalent to the existing exception for vertical clearance currently granted to existing parking spaces within existing parking facilities and may be applied to EVCS as it mirrors an existing building standard. This proposed code language provides clarity of existing regulations as the vertical clearance at existing parking spaces and EVCS were intended to be equivalent.

This proposed language is intended to clarify that the existing code language for parking spaces within existing parking facilities shall also apply to EVCS within existing parking facilities per Health and Safety Code 18930, Point 1, also known as the 9-Point Criteria.

This proposal is necessary for clarity of existing regulations and does not materially alter the substance or intent of the existing regulations.

## DSA COMMENTS





## DSA CODE AMENDMENT DEVELOPMENT

### TRACKING

Date Received:

DSA Tracking Number: 23

Date Reviewed: August 29, 2025

Status: Stakeholder Meeting

### APPLICABLE CODE

Applicable Code Section(s): CRC Part 2.5, Chapter 3, Section R328.1

Topic: Aging-in-Place Design Fall Protection, Backing for Grab Bars

### CURRENT CODE LANGUAGE

***R328.1 Aging-in-place design and fall prevention.*** Newly constructed dwellings subject to the requirements of this code shall be designed and constructed in accordance with Sections R328.1.1 through R328.1.4.

*Exceptions:*

1. ...
2. *Public housing and places of public accommodation required to comply with Chapter 11B of the California Building Code.*

### SUGGESTED TEXT OF PROPOSED AMENDMENT

***R328.1 Aging-in-place design and fall prevention.*** Newly constructed dwellings subject to the requirements of this code shall be designed and constructed in accordance with Sections R328.1.1 through R328.1.4.

*Exceptions:*

1. ...
2. *Public housing and places of public accommodation Residential dwelling units with mobility features within public housing facilities* required to comply with Chapter 11B of the California Building Code.

### CODE TEXT IF ADOPTED

***R328.1 Aging-in-place design and fall prevention.*** Newly constructed dwellings subject to the requirements of this code shall be designed and constructed in accordance with Sections R328.1.1 through R328.1.4.

*Exceptions:*

1. ...
2. *Residential dwelling units with mobility features within public housing facilities required to comply with Chapter 11B of the California Building Code.*

## **STATEMENT OF REASONS**

DSA proposes to amend this section for clarity. Residential Code Section R328.1 requires all one- and two-family dwellings to provide aging in place features. The present exception was intended to address only residential dwelling units with mobility features in public housing facilities, which have more restrictive requirements for accessibility. With the amended language, one- and two-family residential dwelling unit public housing facilities that are not required to have mobility features will not be excepted from the aging in place requirements. This proposal is necessary for clarity of existing requirements.

## **DSA COMMENTS**