

# Access Code Update Stakeholder Forum

September 21, 2016

## *Suggested Code Amendments*

The Division of the State Architect (DSA) has received a large number of suggested code amendments and has conducted a preliminary review and categorization of these items. The following categorized lists reflect staff's preliminary categorization and may be revised. The categorized items are presented in no particular order and do not imply that DSA is or is not planning to develop them for formal submittal to the Building Standards Commission.

### **STATE LEGISLATIVE MANDATE**

1. 11B-226.5(?) Adult Changing Places/Facilities – Add scoping and/or technical requirements as applicable.

### **NEEDED TO COMPLY WITH FEDERAL STANDARDS**

1. Add new Public Rights-of-Way Accessibility Guidelines upon adoption by USDOJ.
2. Add new Outdoor Developed Areas requirements upon adoption by USDOJ.

### **PETITIONS AND ITEMS REFERRED BY THE BUILDING STANDARDS COMMISSION**

1. Consider Chapter 2 definition of "Equivalent facilitation"
2. Consider Chapter 2 definition of "Reasonable portion"
3. Consider Chapter 2 definition of "Accessible route"
4. Consider Chapter 2 definition of "Technically infeasible"
5. Consider Chapter 4, Section 419.7 "Live / work units accessibility"
6. Consider Chapter 9, Section 11B-908.4.2.2 "Manual fire alarm boxes – height"
7. Consider Chapter 11B, Section 11B-202.4 Exception 2 Path of travel requirements "preceding edition"

### **ITEMS IDENTIFIED BY STAKEHOLDERS AND/OR STAFF**

#### **Chapter 2 Definitions**

1. Revise definition of "accessible" - consider deleting use of derogatory term "persons with disabilities".
2. Revise definition of "accessible route" - consider deleting use of derogatory term "persons with disabilities".
3. Revise definition of "alteration" to align with new definition of "adjusted construction cost" – consider last sentence, "Normal maintenance, reroofing, painting or wallpapering, or changes to mechanical and electrical systems are not alterations unless they affect the usability of the building or facility."

4. Revise definition of “alteration” to capitalize the term “occupancy” and/or add the word “group” to indicate the term refers to the Occupancy Groups of CBC Chapter 3.
5. Revise the definition of “assembly area” to clarify what is meant by the term “public meeting rooms”, specifically are public meeting rooms considered public use areas for use by the general public versus employee meeting rooms or team rooms?
6. Revise the definition of “assembly area” to add language to indicate assembly area is any place two or more may assemble; and assembly areas may occur in any occupancy.
7. Revise new definition of SIGN to include “displayed verbal information” consistent with 2013 CBC definition of SIGNAGE.
8. Revise the definition of “technically infeasible” – the phrase “other existing physical or site constraints” is vague, without clear definitions, and requires subjective interpretation.
9. Revise definitions to clarify relationship or difference between WORKSTATION (one or a small number of employees) and COMMON USE (two or more people).

## **Chapter 9 – Fire Protection Systems**

- 10.907.4.2 Manual fire alarm boxes – Clarify access requirements.
- 11.907.4.2.2, Exception, Manual fire alarm boxes – Should exception exempting height of existing fire alarm boxes continue to be carried forward in future cycles.

## **Chapter 10 – Means of Egress**

- 12.1010.1.5 Exception 6 – Door, floor elevation – correct bad reference to Section 1103.2.9.
- 13.1013.4 Raised character and braille exit signs - Delete reference to Section 1013.1 within item 5.

## **Chapter 11B – Accessibility to Public Buildings, Public Accommodations, Commercial Buildings and Public Housing**

- 14.Division 2 Scoping – Add Chapter 2 scoping requirements and Chapter 6 technical requirements for eye-wash stations.
- 15.11B-202.4 Path of travel – add: “If the primary path of travel is fully compliant, then additional paths of travel shall be considered until a site, complex, campus or other facility are fully accessible and compliant.”
- 16.11B-202.4 Path of travel Exception for seismic mitigation – Further study exception limiting access upgrades when there is a seismic mitigation project in an existing building.
- 17.11B-202.4 Path of travel Exception for seismic mitigation – Don’t reduce regulations for alterations or earthquake safety.
- 18.11B-202.4 Exception 7 Path of travel – Add fire sprinklers, fire suppression systems, and fire alarm systems to list of projects that do not trigger path of travel requirements.

19. 11B-203.9 Employee workstations – Clarify scoping requirements for electrical switches & receptacles in private offices – see related items for 11B-308.1.1 and 11B- 308.1.2.
20. 11B-206.2.1 Site arrival points – Add language to prohibit accessible routes from going behind parked vehicles.
21. 11B-206.2.1 Exceptions 2 & 3 Site arrival points – Rescind Exceptions 2 & 3
22. 11B-206.2.3.2 Distance to elevators – Section requires elevators to be within 200' of travel of each stair. Clarification needed to indicate where on the stairway the measurement begins. Use of “stairway” rather than “stair” may be helpful.
23. 11B-206.2.4 Spaces and elements – Clarify the meaning /intent of the phrase “unless exempted by Section 11B-206.2.3, Exceptions 1 through 7” as it relates to mezzanines – is accessibility always required or can the elevator exceptions be applied? 11B-206.2.3 Multi-story buildings and facilities, Exception 1 provides an exception for certain types of multi-story buildings.
24. 11B-206.2.8 Employee work areas – Coordinate with the terminology of related section 11B-203.9, specifically circulation paths located within “employee workstations” vs “employee work areas”.
25. 11B-206.4.1 Accessible routes, Entrances - Possible conflict between 11B-206.4.1 and 11B-206.4.4, 11B-206.4.6, 11B-206.4.8, and 11B-206.4.9; does requirement for all entrances to be accessible override case-specific requirements?
26. 11B-206.4.8 Service entrances – Clarify requirements for service entrances. Example: at truck loading docks are service entrances required to comply? ...accessible route from the truck well to the entrance?
27. 11B-208 & 11B-501 – Develop requirements for curbside van accessible parking
28. 11B-208.3.1 Parking spaces, Location, General (and 11B-502.5) – Is Exception 1 (permitting van parking spaces to be grouped on one level within multi-story parking facilities) applicable to all facilities or just existing facilities? See related proposed code change for 11B-502.5 Vertical Clearance.
29. 11B-209 Passenger drop-off and loading zones and bus stops – Terminology was changed from “passenger loading zone” to “passenger drop-off and loading zone” in previous code cycle – coordinate the terminology of 11B-206.2.1 (1 location); 11B-206.4.10 (2 locations); 11B-208.1, Exc (1 location); 11B-503.5 (2 locations).
30. 11B-213.3.1 Toilet compartments – add new exception to require women’s toilet rooms to provide an ambulatory toilet compartment, even if it has fewer than six water closets, when an adjacent men’s toilet room is required to provide an ambulatory toilet compartment.
31. 11B-216 Signs – 11B-703.7.2.7 provides technical requirements for pole-supported pedestrian traffic-control buttons – should Division 2 also provide scoping requirements?

32. 11B-216.1 – Signs in detention and correctional facilities – Amend exception to clarify public use areas means open to the general public, such as visiting or parole hearing facilities.
33. 11B-216.1 Exception 1 Signs, General – Do not exempt building directories.
34. 11B-216.5 Parking – add exception to not require accessible parking spaces to be identified in parking lots with two or fewer total parking spaces.
35. 11B-233 Residential facilities – Revise Chapter 11B housing requirements to be consistent with standards adopted by the federal Department of Housing and Urban Development, including the 2014 HUD standards.
36. 11B-233 Residential facilities – Clarify scope of Chapter 11B to make explicit that “publicly funded” and “public use” housing includes all covered housing that receives any kind of public funding and not just publicly owned housing.
37. 11B-233.3.1.2 Residential dwelling units with adaptable features – It is not clear whether Section 11B-233.3.1.2 applies to covered multifamily dwellings only (as required in Chapter 11A), or to all dwelling units, including single family dwellings. The exception may also be misleading and could create a conflict with Chapter 11A, based on different requirements for dwelling unit kitchens in Chapters 11A and 11B.
38. 11B-233.3.1.2 Residential dwelling units with adaptable features – consider adding Chapter 11A, Division IV requirements for adaptable units to Chapter 11B, Section 11B-809 and deleting all references to Chapter 11A within Chapter 11B.
39. 11B-233.3.1.2.3 Ground floors above grade – Chapter 11A exempts carriage units. Does DSA-AC intentionally not address carriage units in this section?
40. 11B-233.3.1.2.4 Multi-story residential dwelling units – The first paragraph (and numbered items) of this section address elevator buildings, while the exception sets requirements for non-elevator buildings. It appears that the exception is not really an exception to the first paragraph (elevator buildings), but prescribes separate requirements for non-elevator buildings. HCD believes it may provide more clarity to separate this exception from this subsection and create a separate subsection for non-elevator buildings. Additionally, if the intent of this section is to align with Chapter 11A, Chapter 11A requires a bathroom (or powder room) and a kitchen on the primary entry level for multistory dwelling units in elevator buildings.
41. 11B-233.3.4.1 Alterations to vacated buildings – The existing language in Sections 11B-233.3.4, 11B-233.3.4.1, 11B-3.4.2 and 11B-233.1, as well as the definition of PUBLIC HOUSING, does not clarify the scoping. This has resulted in varying interpretations and enforcement by the local jurisdictions. HCD recommends that DSA-AC clarify the scoping.
42. 11B-245.3 Public accommodations located in private residences – Amend “commercial facility” to “public accommodation” to be consistent with recent change.
43. 11B-246 (?) Develop requirements for accessibility of camp shelters and cabins at camp grounds and camping facilities.

44. 11B-247 Detectable warnings – Study scoping requirements to clarify use of DWs at hazardous vehicular areas.
45. 11B-247.1.2.2 Detectable warnings at curb ramps – DWs should not be required at on-site locations away from the PROW. DWs cause slips, trips and falls.
46. 11B-303.5 Changes in level, Warning curbs – clarify language where warning curb is required. 2010 CBC 1133B.8.1 included “such as at planters and fountains”
47. 11B-306.2 Toe Clearance and 11B-306.3 Knee Clearance – 11B-306.2.3, Ex 2, refers to ‘built-in’ dining and work surfaces; 11B-306.3.3, Ex 2, does not include the term ‘built-in’; 11B-306.3.4, Ex, refers to ‘built-in’ dining and work surfaces. Shouldn’t they all be consistent?
48. 11B-306.2 Toe Clearance and 11B-306.3 Knee Clearance - Consider deleting the reference to 11B-226.1 found in 11B-306.3.2, Ex 2 & 11B-306.3.3, Ex 2 so that picnic tables are not excluded from the requirements for toe and knee clearance.
49. 11B-306.3.3 Knee clearance at lavatories – modify to eliminate 29” high knee clearance at front edge of a counter with a built-in lavatory.
50. 11B-308.1.1 and 308.1.2 Electrical switches and receptacles - Should scoping provisions be moved into Division 2? See related item for 11B-203.9.
51. 11B-309.4 Operable parts, Operation – Exempt emergency exit and panic hardware from 5 pounds maximum force.
52. 11B-403.5.1 Walking surfaces, Clear width – Amend sidewalk/walk width to 36” minimum, in alterations where 36” is infeasible reduce to the minimum necessary. Provide specified conditions to determine infeasibility.
53. 11B-403.5.1 Walking surfaces, Clear width – Why are Chapter 10 corridor & aisle width requirements duplicated in this section?
54. 11B-404.2 Doors, doorways, and gates, Manual doors – Require electric openers for heavy entry doors.
55. 11B-404.2 Doors, doorways, and gates, Manual doors – Require automatic doors at business entrances.
56. 11B-404.2.3 Doors, doorways, and gates, Manual doors, clear width – Require 36” minimum width doorways.
57. 11B-404.2.4.3 Recessed doors and gates – Figures indicate that the 8” dimension is measured from the face of the wall, not the face of the door, as indicated in the text.
58. 11B-404.2.4.3 Recessed doors and gates – Clarify that 24” dimension is applicable at exterior side of door only.
59. 11B-404.2.5 Doors, doorways, and gates, Manual doors, Thresholds – require thresholds to be flat with no rise whatsoever.
60. 11B-404.2.7 Door and gate hardware – Study adding SFM requirement (or reference to SFM requirement) for lever hardware with return that extends to within ½” of door in hotels.

61. 11B-405.7.5 (Ramps) Doorways – Consider adding a similar section to the requirements for curb ramps. Often doors are located at the landings of curb ramps, especially since parking spaces are supposed to be closest to the entrance.
62. 11B-406 Curb ramps, blended transitions and islands – revise section to require curb ramps at all intersection corners with 1:12 maximum slope, 5' landing, no side ramps.
63. 11B-406 Curb ramps, blended transitions and islands – Section 11B-406 is inefficient because it fails to provide a requirement to paint the flared sides of curb ramps to match the color of the adjacent curb. Such failure most likely causes increased pedestrian trips, stumbles, falls and sever injuries.
64. 11B-406.5.9 Clear space at diagonal curb ramps – Clarify intent of section if there is a “dedicated right turn lane.”
65. 11B-407.4.9 Elevators, Elevator car requirements, Emergency communication – Require Video Relay Services in elevators for two-way communication with people who are deaf, hard of hearing, or speech impaired.
66. 11B-411.2 Destination oriented elevators, Elevator landing requirements – Consider changing the word “pressed” to “activated” in several subsections.
67. 11B-411.2.1.1, Exception Destination oriented elevators, Elevator landing requirements, Hall call consoles, Location – Consider the following revision:  
11B-411.2.1.1 Location. Hall call consoles shall be ...

Exception: Hall call consoles beyond those required by Section 11B-411.2.1.1 shall be permitted to be provided outside the elevator landing and to be wall-mounted, pedestal-mounted, or mounted on a kiosk or security turnstile. Additional hall call consoles or devices integrated with elevator systems are not required to meet the requirements of 11B-411.2.

68. 11B-411.2.1.2.4.3 Destination oriented elevators, Elevator landing requirements, Hall call consoles, Required features, Display screen, Duration – Consider the following revision:  
11B-411.2.1.2.4.3 Duration. Elevator assignment characters shall be displayed for a minimum of ~~5~~ 3 seconds.
69. 11B-411.2.1.4.1.2 Destination oriented elevators, Elevator landing requirements, Hall call consoles, Additional features, Hall call console additional buttons, Identification – Consider the following revision:  
11B-411.2.1.4.1.2 Identification. Buttons shall be identified by raised characters and symbols, white on a black background, complying with Section 11B-703.2 and Braille complying with Section 11B-703.3. Identification shall be placed on the control button or immediately to the left of the control button to which the designation applies.
70. 11B-411.2.1.5.1 Destination oriented elevators, Elevator landing requirements, Hall call consoles, Button requirements, Size – Consider the following revision:  
11B-411.2.1.5 Button requirements. ...  
  
11B-411.2.1.5.1 Size. Buttons shall have square shoulders, be 3/4 inch (19.1 mm) minimum in the smallest dimension and shall be raised 1/8 inch (3.2 mm) plus or minus 1/32 inch (0.8 mm) above the surrounding surface. ~~The buttons shall be activated by a mechanical motion that is detectable.~~

71. 11B-411.4.11 Destination oriented elevators, Elevator door requirements, Floor destination indicators – Consider the following revision:  
11B-411.4.11 Floor destination indicators. There shall be a visual display on each elevator car door jamb ~~a visual display or inside the car~~ indicating floor destinations.
72. 11B-411.4.11 Destination oriented elevators, Elevator door requirements, Floor destination indicators – Consider the following revision:  
11B-411.4.11 Floor destination indicators. There shall ... floor destinations.
- Exception: Visual displays indicating floor destinations in addition to those required by 11B-411.4.11 are not required to meet the requirements of 11B-411.4.11.
73. 11B-411.4.11 Destination oriented elevators, Elevator door requirements, Floor destination indicators, Height – Consider the following revision:  
11B-411.4.11.1 Height. Floor destination characters shall be ~~4 inch (25 mm)~~ 5/8 inch (16 mm) high minimum complying with Section 11B-703.5.3.
74. 11B-502.2 Parking spaces, Vehicle spaces – Study proposed new Exception 2 permitting overhang of landscape areas (and 11B-502.7.2) – Should permitted overhang be 24" or 36"? Should overhang of circulation paths be permitted for consistency? How to regulate what type of vegetation is installed? See related proposed code change for 11B-502.7.2 Wheel stops.
75. 11B-502.2 Parking spaces, Vehicle spaces – Modify figures to show wheel stop location 3' from head end of parking stall.
76. 11B-502.3.2 Parking spaces, Access aisle, Length – Commenter noted that the language of 11B-202.4, Exc 2 in the 2016 CBC will refer to the 2013 CBC, not the 2010 CBC; thereby creating a conflict with existing angled parking spaces and the requirements of 11B-502.3.2. The commenter proposed that a new exception for existing angled parking be added to 11B-502.3.2:  
Exception: The length of access aisles at existing angled parking spaces constructed in compliance with the 2010 California Building Code shall not be required to comply with Section 11B-202.4.
77. Figure 11B-502.3.3 Parking spaces, Access aisle, Parking identification – since ISA is not required to have a border, remove depiction of border.
78. 11B-502.4 Exception Parking floor or ground surfaces – require 5% maximum slope outside of accessible parking and access aisle to transition to the surface of the adjacent ground.
79. 11B-502.5 Parking structure vehicle height - add new exception permitting 80" instead of 98" min. vertical clearance at parking spaces & access aisles and vehicular routes serving them in existing multi-story parking facilities.
80. 11B-502.5 Parking structure vehicle height – Keep 98"/do not reduce to 80"
81. 11B-502.8 Parking spaces, Additional signs – Clarify sign required to be visible from each accessible parking space?
82. 11B-505.2.1 Handrails, Where required, Orientation (stair handrails) – New section requires at least one handrail to be in the direction of the stair run and perpendicular to

the nosing. Consider expanding to include ramp handrails with an exception for curved ramps.

- 83. Figure 11B-505.7.2 Handrail non-circular cross section – Revise to show a thickness for the handrail in section. As drawn, it appears the inside of the handrail material must have a 2-1/4" cross-sectional dimension rather than the outside of the handrail material.
- 84. 11B-505.10 Exception 1 Handrails, Handrail extensions – change language from “dogleg stairs and ramps” to “dogleg stairs or ramps”
- 85. 11B-507 (?) Accessible routes through parking – Consider adding new section consistent with proposed changes to ANSI 117.1 for 2015:  
507 Accessible Routes through Parking: Where accessible routes pass through parking facilities, the routes shall be physically separated from vehicular traffic.

Exceptions:

- 1. Accessible routes crossing drive aisles ...
- 2. Accessible routes only from parking spaces and access aisles ...
- 86. 11B-604.4 Water closets and toilet compartments, Seats – Prohibit use of add-on toilet seat risers. The gap between the seat riser and the bowl creates unsanitary conditions.
- 87. 11B-604.7 Water closets and toilet compartments, Dispensers – Add standards for placement of sanitary napkin/tampon disposal units – 12" in front of toilet, 19" minimum above floor, below grab bar.
- 88. 11B-604.7 Water closets and toilet compartments, Dispensers – Add standards for allowable type of toilet paper dispensers and placement below grab bar within a foot of the front of the toilet. Large TP dispensers require users to have good hand, arm, finger dexterity to grasp the paper; they also require the user to reach up into the unit past the saw edge. Outlaw these units from accessible toilet stalls.
- 89. 11B-605 Urinals – Consider adding new code requirements for urinal compartments to address the trend towards communal or gender-shared restroom facilities where the toilet and urinal fixtures are all in partitioned compartments and the shared lavatories are in an open area.
- 90. 11B-606.5 Lavatories and sinks, Exposed pipes and surfaces – Should the requirements of 11B-606.5 apply to all sinks & lavatories?
- 91. 11B-608.4 Shower seats – Add exception to allow fixed, ligature-resistant seats in detention and correctional facilities.
- 92. 11B-608.5.3 Shower compartments, Controls, Alternate roll-in type shower compartments – Confirm CBC language regarding centerline location of controls at 39" to 41" above the shower floor does not conflict with ADA Standards. Clarify location of controls in text and/or add centerline to figure.
- 93. 11B-608.6 Shower spray unit and water – Issue of disabled users sitting in cold water waiting for water to warm when fixed shower heads are permitted in lieu of hand-held spray unit.
- 94. 11B-608.6 Shower spray unit and water – consider adding new exception to address anti-ligature concerns:



Where subject to excessive vandalism, two fixed shower heads shall be permitted instead of a hand-held spray unit in medical care, detention, and other facilities required to provide anti-ligature elements. Each shower head shall be installed so it can be operated independently of the other. One shower head shall be located at a height of 48 inches (1219 mm) maximum above the shower finish floor.

95. 11B-609.3 Grab bars, Spacing – Prohibit vertical grab bars above the horizontal grab bar.
96. 11B-609.4 Grab bars, Position of grab bars - Change mounting height of toilet grab bars to 33" above floor to centerline of bar.
97. 11B-703.7.2.6.1, 11B-703.7.2.6.2, & 11B-703.7.2.6.3 Signs, Symbols of Accessibility, Symbols, Toilet and bathing facilities geometric symbols – These sections indicate that the geometric symbols "shall contrast with the door" – since not every entrance to toilet or bathing rooms has a door, shouldn't these sections indicate contrast with the surface the geometric symbols are being installed on, instead of the door?
98. 11B-703.7.2.6.4 Edges and vertices on geometric symbols - Add the requirements of this section to the general requirements for tactile signs.
99. Table 11B-703.8.4 Low Resolution VMS Character Height – Consider adding an asterisk (\*) to the end of Table 703.8.4 header and the related footnote (\*) below the table: *\* For elevator variable messaging signs see Title 24 Part 30.*
100. 11B-705 Detectable warnings – Study technical requirements to clarify use of DWs at hazardous vehicular areas.
101. Figure 11B-705.1(a) – Detectable warnings - correct dome height to correspond with text - 0.2"
102. 11B-705.1.1.2 Detectable warnings, Dome spacing – add requirements for detectable warnings installed in radial pattern – study dome spacing.
103. 11B-706 Assistive Listening Systems – Clarify technical requirements (and 11B-219 scoping requirements).
104. 11B-706 Assistive Listening Systems – Add International Electrotechnical Commission standard for induction loop installation.
105. 11B-805.4.1 Medical care and long-term care facilities; Examination, diagnostic and treatment rooms; Beds, exam tables, procedure tables, gurneys and lounge chairs – requirement for 36" wide clear space, full-length of each side of beds, exam tables, procedure tables, gurneys and lounge chairs is "excessive" and not consistent with 2010 ADAS requirement for 30x48 clear floor space.
106. 11B-805.7 Built-in cabinets and work surfaces in medical care facilities – Add exception to not require knee space and counter height requirements at workstations normally used by standing persons; where five or more workstations are located together, one shall be repositionable so it can be made accessible.
107. 11B-806.2.3 Transient lodging guest rooms – Add requirements for standard height from floor to top of mattress.
108. 11B-812.5.2 Electric vehicle charging stations, Accessible routes, Accessible route to EV charger – The wording of this section that requires an accessible route

“between the vehicle space and the EV charger which serves it” is not clear. It seems to imply a 48” space is required between the vehicle space and the charger, but this is not reflected in the figure. The language should be further amended to change the word “between” to “connecting”.

109. 11B-812.5.4 Electric vehicle charging stations, Accessible routes, Arrangement – The phrase “to the maximum extent feasible” lacks specificity. Consider the definition provided in the ADA Title III regulations.
110. 11B-812.8.1 Electric vehicle charging stations, Identification signs, Four or fewer – Clarify that where there are 4 or fewer EVCS, a “van accessible” sign is not required.
111. Figure 11B-812.9 Electric vehicle charging stations, Surface marking – Revise figure to be consistent w/ Manual on Uniform Traffic Control Devices – text should be shown on 3 lines: EV CHARGING ONLY
112. 11B-902 Dining surfaces and work surfaces – Revise the reference to 11B-306 within Section 11B-902.2 to clarify requirements for knee space at dining and work surfaces. Section 11B-902.2 should reference 11B-306.3.2 & 11B-306.3.3, Exception 2, not 11B-306 in its entirety.
113. 11B-1003.2 Boarding piers at boat launch ramps. Revise requirements to 1:12 maximum slope with level areas every 30 feet or so.

#### **CURRENTLY ADDRESSED BY THE CBC AND/OR REFERENCED STANDARDS**

1. Residential facilities, General – Clarify what type of housing is covered by the term “Public Housing”. Is it: 1) Housing owned and/or operated by public entities (State agencies, local government agencies, housing authorities); 2) Privately owned housing operated by or on behalf of a public entity; or 3) Privately owned housing using public funds for alterations? (e.g. seismic retrofitting, energy upgrade, weatherization programs, alterations of substandard housing, CDBG projects, etc)?  
[DSA: refer to Chapter 2 definition of Public Housing]
2. Require sidewalks to be free from obstructions – telephone & electric poles, utility boxes, café tables, chairs, fences  
[DSA: refer to 11B-108 and 11B-403.5.1]
3. No double entry doors into restrooms that could trap  
[DSA: refer to 11B-404.2.6]
4. Mirrors over bathroom sinks to see myself when washing hands  
[DSA: refer to 11B-603.3]
5. Toilets – sometimes too low  
[DSA: refer to 11B-108 and 11B-604.4]
6. Toilets – sometimes crowded by storage items  
[DSA: refer to 11B-108]
7. Hallways – sometimes crowded by storage items  
[DSA: refer to 11B-108]

8. Van parking access aisle – need 8' clearance  
[DSA: refer to 11B-502.2 Exception and 11B-502.3.1]
9. Accessible route from accessible parking to the building entrance  
[DSA: refer to 11B-208.3]
10. Accessible route from entrance to accessible seating  
[DSA: refer to 11B-206.2.4]
11. Prohibit large TP dispensers above the horizontal grab bar.  
[DSA: refer to 11B-604.9.6 and 11B-609.3]

#### **OUTSIDE SCOPE AND APPLICATION OF THE CBC**

1. Multiple chemical sensitivities, electohypersensitivities – don't rollback regulations.
2. Restore requirements for access at movable restaurant tables.

#### **OUTSIDE DSA's AUTHORITY**

1. Lack of curb cuts in Richmond
2. Condition of roadways
3. Non-accessible restaurant in Berkeley

#### **INCONSISTENT WITH FEDERAL OR STATE LAW**

1. 11B-707.3 Automatic teller machines, fare machines and point-of-sale devices,  
Operable parts – revise language to require sound and touch instead of sound or touch.
2. 11B-602.7 Drinking fountain for standing persons – require spout outlets to be 40"-50"  
above finish floor or ground
3. 11B-604.4 Toilets, seats – Change toilet seat height to 18"-20" range.
4. 11B-609.3 Grab bar spacing – add exception to allow a nominal 1/8" reduction of the 1 1/2"  
gap between the grab bar and a recessed combination seat cover, toilet paper  
dispenser, and sanitary napkin disposal unit.

#### **INCONSISTENT WITH FORMAT OR ORGANIZATION OF THE CBC**

- 1.