APPROVED BY THE CALIFORNIA BUILDING STANDARDS COMMISSION

FEBRUARY 27, 2025

# COMMISSION ACTION MATRIX Accessibility (access) CODE ADVISORY COMMITTEE

## 2025 california building code and 2025 california existing building code, TITLE 24, PARTs 2 and 10, 2024 international building code (IBC) and 2024 international existing building code (IeBC) AGENCY: division of the state architect, DSA-AC 01/24

### LEGEND:

**CAC Actions:** Approve, Disapprove, Approve as Amended, Further Study Required

**Agency Responses:** Accept, Disagree, Withdraw

**CBSC Actions:** Approve, Disapprove, Approve as Amended, Further Study Required

**Matrix Paper Color** (for commission action only): GREEN = uncontested items, YELLOW = challenged items, SALMON = withdrawn, no action required

If using assistive technology, please adjust your settings to recognize underline, strikeout, italic and ellipsis.

* Model Code language appears upright
* Existing California amendments appear in *italic*
* Amended model code or new California amendments appear *underlined & italic*
* Repealed model code language appears ~~upright and in strikeout~~
* Repealed California amendments appear in *~~italic and strikeout~~*
* Ellipses (…) indicate existing text remains unchanged

### 2025 CALIFORNIA BUILDING CODE

#### ITEM 1, CHAPTER 2, SECTION 202 - DEFINITIONS

Propose to amend Section 202 as listed below.

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| **DSA-AC 01/24 ITEM 1** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **1-1** | ***Multi-Bedroom Housing Unit*** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, Disability Rights California (DRC) Recommends: Approve | Modify and change the term “toilet and bathing room” for “bathroom.” | **Approve** |

#### ITEM 2, Chapter 11B, accessibility to public buildings, public accommodations, commercial buildings and public housing, Section 11B-213.2 Toilet rooms and bathing rooms

Propose to amend Sections in Chapter 11B from the 2022 CBC into the 2025 CBC as listed below.

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| **DSA-AC 01/24 ITEM 2** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **2-1** | ***11B*-213.2 Toilet rooms and bathing rooms.** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Propose to remove the language in exception 5 to eliminate duplicative language. | **Approve** |

#### ITEM 3, Chapter 11B, Section 11B-224 Transient lodging guest rooms, housing at a place of education and social service center establishments

Propose to amend Sections in Chapter 11B from the 2022 CBC into the 2025 CBC as listed below.

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| **DSA-AC 01/24 ITEM 3** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **3-1** | ***11B*-224.1 General.** | **Further Study** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Propose to amend this section by adding “housing at a place of education for undergraduate students” to appropriately determine the required scope for these facilities.  **CAC: 9 Point Criteria #6** Text “housing at a place of education for undergraduate students” incorrectly eliminates the applicability of the requirement for other types of housing at a place of education.  **After CAC:** Modified amendment to remove phrase “for undergraduate students”. | **Approve** |
| **3-2** | ***11B*-224.1.2 Guest room doors and doorways.** | **Further Study** | **Disagree** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Propose to amend this section by adding “transient lodging facilities.” To distinguish from “housing at a place of education…”  **CAC: 9 Point Criteria #6** No suggested amendment for this section.  **After CAC:** No change to existing amendment as the CAC comment applies to Items 3-1 and 3-4 only. | **Approve** |
| **3-3** | ***11B*-224.1.4 Guest room toilet and bathing rooms.** | **Further Study** | **Disagree** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Propose to amend this section by adding “transient lodging facilities.” To distinguish from “housing at a place of education…”  **CAC: 9 Point Criteria #6** No suggested amendment for this section.  **After CAC:** No change to existing amendment as the CAC comment applies to Items 3-1 and 3-4 only. | **Approve** |
| **3-4** | ***11B-*224.2 Guest rooms with mobility features.** | **Further Study** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Propose to amend this section by adding: “housing at a place of education …” and “transient lodging facilities” to provide applicable scoping.  **CAC: 9 Point Criteria #6** Text “housing at a place of education for undergraduate students” incorrectly eliminates the applicability of the requirement for other types of housing at a place of education.  **After CAC:** Modified amendment to remove phrase “for undergraduate students”. | **Approve** |

#### ITEM 4, Chapter 11B, section 11B-228.3.2 minimum number

Propose to amend Sections in Chapter 11B from the 2022 CBC into the 2025 CBC as listed below.

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| **DSA-AC 01/24 ITEM 4** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **4-1** | ***11B-228.3.2 Minimum number.*** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, Disability Rights California (DRC). Recommends: Further Study | Propose to amend the exceptions to provide clarity.  **After 45-day:** No changes to Express Terms. See FSOR. | **Approve** |

#### ITEM 5, Chapter 11B, section 11B-233.3 public housing facilities

Propose to amend Sections in Chapter 11B from the 2022 CBC into the 2025 CBC as listed below.

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| **DSA-AC 01/24 ITEM 5** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **5-1** | ***11B-*233.3 *Public housing facilities.*** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Propose to amend section to add a reference pointer directing code users to Section 11B-809. | **Approve** |
| **5-2** | ***11B-*233.3.1.1 Residential dwelling units with mobility features.** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Propose to amend section to correct reference pointer. | **Approve** |
| **5-3** | ***11B-233.3.1.2 Residential dwelling units with adaptable features*** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Propose to amend section to add “shall” to note that code user must comply with this section and also remove reference pointer for clarity. | **Approve** |

#### ITEM 6, Chapter 11B, Section 11B-233.3.1.2.6.1 Single building with one common (lobby) entrance

Propose to amend Sections in Chapter 11B from the 2022 CBC into the 2025 CBC as listed below.

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| **DSA-AC 01/24 ITEM 6** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **6-1** | ***11B-233.3.1.2.6.1 Single building with one common (lobby) entrance.*** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve  with recommended changes for next cycle | Propose to provide the correct reference the unusual characteristic test of site impracticality. | **Approve** |

#### ITEM 7, Chapter 11B, section 11B-233.3.1.2.6.5 additional requirements

Propose to amend Sections in Chapter 11B from the 2022 CBC into the 2025 CBC as listed below.

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| **DSA-AC 01/24 ITEM 7** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **7-1** | ***11B-233.3.1.2.6.5 Additional requirements.*** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve  with recommended changes for next cycle | Propose to provide additional information regarding the applicability of the section with new text language and correct some referenced pointers. | **Approve** |

#### ITEM 8, Chapter 11B, section 11b-603.6 guest room toilet and bathing rooms

Propose to amend Sections in Chapter 11B from the 2022 CBC into the 2025 CBC as listed below.

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| **DSA-AC 01/24 ITEM 8** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **8-1** | ***11B-603.6 Guest room toilet and bathing rooms.*** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Propose to clarify a California specific requirement applicable to transient lodging facilities only. | **Approve** |

#### ITEM 9, Chapter 11B, section 11b-705.1.2.5 blended transitions

Propose to amend Sections in Chapter 11B from the 2022 CBC into the 2025 CBC as listed below.

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| **DSA-AC 01/24 ITEM 9** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **9-1** | ***11B-705.1.2.5 Blended transitions.*** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve as amended | Propose to clarify requirements for detectable warning surfaces at blended transitions.  **After 45-day:** No changes to Express Terms. See FSOR. | **Approve** |

#### ITEM 10, Chapter 11B, section 11b-806.2.3.1 personal lift device floor space

Propose to amend Sections in Chapter 11B from the 2022 CBC into the 2025 CBC as listed below.

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| **DSA-AC 01/24 ITEM 10** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **10-1** | ***11B-806.2.3.1 Personal lift device floor space.*** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve as amended | Propose to amend the technical requirements to clarify that the requirement is applicable to transient lodging.  **After 45-day:** No changes to Express Terms. See FSOR. | **Approve** |

#### ITEM 11, Chapter 11B, section 11b-806.2.4.1 vanity counter top space

Propose to amend Sections in Chapter 11B from the 2022 CBC into the 2025 CBC as listed below.

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| **DSA-AC 01/24 ITEM 11** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **11-1** | ***11B-806.2.4.1* Vanity counter top space.** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Propose to amend this section for transient lodging facilities and housing at a place of education where the terms for “bathroom” and “toilet or bathing rooms” denote applicability in both type of facilities. | **Approve** |

#### ITEM 12, Chapter 11B, Section 11B-809 Residential dwelling units

Propose to amend Sections in Chapter 11B from the 2022 CBC into the 2025 CBC as listed below.

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| **DSA-AC 01/24 ITEM 12** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **12-1** | ***11B-*809.1 General** | **Further Study** | **Disagree** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Propose to amend section providing new referenced section numbers.  **CAC: 9 Point Criteria #6** No suggested amendment for this section.  **After CAC:** No change to existing amendment. | **Approve** |
| **12-2** | ***11B-809.1.1 Door signal devices.*** | **Further Study** | **Disagree** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve as amended | Propose to add new section to clarify requirements for door signal devices in buildings with 3 or more dwelling units.  **CAC: 9 Point Criteria #6** Provide additional clarity as terms are not defined in the code.  **After CAC:** No change to existing amendment as terms are defined in standard collegiate dictionary and mirrors Section 11B-809.8.4.  **After 45-day:** No changes to Express Terms. See FSOR. | **Approve** |
| **12-3** | ***11B-809.1.2 Viewing devices.*** | **Further Study** | **Accept/ Disagree** | **45-day public comment**  Eugene Lozano, Jr. Recommends: Approve as amended  Kendra Muller, DRC Recommends: Approve as amended | Propose to add new section to clarify the requirements for viewing devices, to include a lower viewing device when devices are provided.  **CAC: 9 Point Criteria #6** Clarify height of viewing device and minimum range of view, begin sentence with “each viewing device”.  **After CAC:** DSA revised ET to clarify height requirement but declined to amend language for the range of view.  **After 45-day:** No changes to Express Terms. See FSOR. | **Approve** |
| **12-4** | ***11B-809.1.3 Washing machines and clothes dryers.*** | **Further Study** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve as amended | Propose to add new section to provide a requirement for washer and dryers in residential dwelling units with mobility features.  **CAC: 9 Point Criteria #6** Clarify requirements in regard to equivalency for all residential units.  **After CAC:** Language amended according to CAC comments.  **After 45-day:** No changes to Express Terms. See FSOR. | **Approve** |

#### ITEM 13, Chapter 11B, section 11b-809.6 residential dwelling units with adaptable features

Propose to amend Sections in Chapter 11B from the 2022 CBC into the 2025 CBC as listed below.

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| **DSA-AC 01/24 ITEM 13** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **13-1** | ***11B-809.6 Residential dwelling units with adaptable features.*** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Propose to amend section removing “multifamily” from the residential dwelling units with adaptable features. Terms defines the unit, not the building. | **Approve** |

#### ITEM 14, Chapter 11B, Section 11B-809.8 Doors

Propose to amend Sections in Chapter 11B from the 2022 CBC into the 2025 CBC as listed below.

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| **DSA-AC 01/24 ITEM 14** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **14-1** | ***11B-809.8 Doors.*** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Propose to amend this section to provide clarity for interior doors within residential dwelling units with adaptable features. | **Approve** |
| **14-2** | ***11B-809.8.1 Door thresholds.*** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Propose to amend this section to clarify doors intended for user passage shall have thresholds complying with Section 11B-404.2.5 | **Approve** |
| **14-3** | ***11B-809.8.2 Door opening force.*** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Propose to amend section and clarify doors to comply with Section 11B-404.2.9 and put existing language as an exception. | **Approve** |
| **14-4** | ***11B-809.8.3 Door maneuvering clearance.*** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Propose to amend this section to provide additional clarity to the code user maneuvering clearances shall extend the full width of the doorway. | **Approve** |
| **14-5** | ***11B-809.3.1 Floor or ground surface.*** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Adopt new section to clarify the requirements for maneuvering clearances at the floor or ground surface. | **Approve** |

#### ITEM 15, Chapter 11B, 11B-809.10 Bathrooms and powder rooms

Propose to amend Sections in Chapter 11B from the 2022 CBC into the 2025 CBC as listed below.

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| **DSA-AC 01/24 ITEM 15** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **15-1** | ***11B-809.10 ~~Toilet and bathing rooms~~ Bathroom and powder rooms.*** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Propose to repeal original title: Toilet and bathing rooms to Bathrooms and powder rooms. | **Approve** |
| **15-2** | ***11B-809.10.1 General*** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Propose to add additional reference to this section which requires backing for grab bars at bathtubs | **Approve** |
| **15-3** | ***11B-809.10.2 Number of complying ~~bathing rooms~~ bathrooms and fixtures.*** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Propose to change the reference to “toilet and bathing rooms” to “bathrooms” applicable to residential dwelling units with adaptable features. | **Approve** |
| **15-4** | ***11B-809.10.3 Powder rooms.*** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Propose to amend section removing references to grab bars in bathtubs and showers that don’t belong in a powder room. | **Approve** |
| **15-5** | ***11B-809.10.4 Sufficient maneuvering space.*** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Propose to amend section to repeal toilet and bathing rooms and add bathrooms. | **Approve** |
| **15-6** | ***11B-809.10.8 Lavatories, vanities, mirrors and towel bars.*** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Propose to amend section to repeal toilet and bathing rooms and add bathrooms. | **Approve** |

#### ITEM 16, Chapter 11B, section 11b-809.10.6.1 size

Propose to amend Sections in Chapter 11B from the 2022 CBC into the 2025 CBC as listed below.

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| **DSA-AC 01/24 ITEM 16** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **16-1** | ***11B-809.10.6.1 Size*** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve  with recommended changes for next cycle | Propose to amend section which incorrectly included requirements for fully accessible showers. Proposal brings for applicable requirements for showers. | **Approve** |

#### ITEM 17, Chapter 11B, 11B-809.10.6.3 Clearance

Propose to amend Sections in Chapter 11B from the 2022 CBC into the 2025 CBC as listed below.

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| **DSA-AC 01/24 ITEM 17** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **17-1** | ***11B-809.10.6.3 Clearance ~~Floor space~~.*** | **Approve as Amended** | **Disagree** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve  with recommended changes for next cycle | Propose to amend section to increase the clear floor space width from 30’ to 36” at showers in residential dwelling units with adaptable features.  **CAC: 9 Point Criteria #6.** No suggested amendment for this section.  **After CAC**: No amendments made to this section. | **Approve** |
| **17-2** | ***FIGURE 11B-809.10.6.3 Transfer Type Shower Clearance.*** | **Approve as Amended** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Adopt new figure.  **CAC: 9 Point Criteria #6.** Match the name of the figure with the name of the associated code section.  **After CAC**: Changed the title of the figure from “Transfer Type Shower Clear Floor Space” to “Transfer Type Shower Clearance”. | **Approve** |

#### ITEM 18, Chapter 11B, section 11b-902.2.1 overlap

Propose to amend Sections in Chapter 11B from the 2022 CBC into the 2025 CBC as listed below.

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| **DSA-AC 01/24 ITEM 18** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **18-1** | ***11B-902.2.1 Overlap*** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | Propose to adopt new section to prohibit overlap where the clear floor space and an accessible route are required in the dining area. | **Approve** |

#### ITEM 19, Chapter 15 rooftop structures, section 1511.9.6 accessibility and egress

Propose to amend Sections in Chapter 11B from the 2022 CBC into the 2025 CBC as listed below.

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| **DSA-AC 01/24 ITEM 19** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **19-1** | **1511.9.6 Accessibility and egress.** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve | New code section to be amended to repeal the reference to Chapter 11 and provide a reference California adopted Chapters 11A and 11B. | **Approve** |

### 2025 CALIFORNIA EXISTING BUILDING CODE

#### ITEM 20, Chapter 3 PROVISIONS FOR ALL COMPLIANCE METHODS, Section 306 Accessibility for existing buildings

Propose not to adopt Section 306 from the 2024 IEBC and carry forward existing amendments with modifications listed below.

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| **DSA-AC 01/24 ITEM 20** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **20-1** | **306 Accessibility for existing buildings.** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Approve as amended | Propose to remove the text of IEBC Section 306 et seq. and amend existing DSA-AC language in this section to state that public buildings, public accommodations, commercial facilities, and public housing are required to comply with Chapter 11B.  **After 45-day:** No changes to Express Terms. See FSOR. | **Approve** |

#### ITEM 21, Chapter 16 referenced standards

Propose to amend Chapter 16 from the 2024 IEBC as listed below.

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| **DSA-AC 01/24 ITEM 21** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **21-1** | **ICC A117.1-17 Accessible and Usable Buildings and Facilities** | **Approve** | **Accept** | **45-day public comment**  Kendra Muller, DRC Recommends: Disapprove | DSA does not adopt ICCs referenced standard A117.1-17 for accessibility requirements. DSA amends the referenced standard eliminating the Section 306 subsections that reference ICC A117.1.  **After 45-day:** No changes to Express Terms. See FSOR. | **Approve** |