

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>1 PURPOSE</p> <p>This document sets guidelines for accessibility to places of public accommodation and commercial facilities by individuals with disabilities. These guidelines are to be applied during the design, construction, and alteration of such buildings and facilities to the extent required by regulations issued by Federal agencies, including the Department of Justice, under the Americans with Disabilities Act of 1990.</p>	101.2	<p>Purpose.</p> <p>The purpose of this code is to ensure that barrier-free design is incorporated in all buildings, facilities, site work and other developments to which this code applies and to ensure that they are accessible to and usable by persons with disabilities.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>The Title 24 purpose section does not reference The Americans with Disabilities Act of 1990. Adopt language from Chapter 11B into "purpose".</p>	<p>Purpose. The purpose of this code is to ensure that barrier-free design is incorporated in all buildings, facilities, site work and other developments to which this code applies and to ensure that they are accessible to and usable by persons with disabilities.</p> <p><u>Notwithstanding any other provision of law, the application and scope of accessibility regulations in the California Building Standards Code shall not be less than the application and scope of accessibility requirements of the federal Americans with Disabilities Act of 1990 as adopted by the United States Department of Justice, the Uniform Federal Accessibility Standards, and the federal Architectural Barriers Act.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
Purpose (cont.)	101.3.1	<p>Scope.</p> <p>The provisions of the model codes which are adopted by these regulations, are applicable to all occupancy groups and uses regulated by this code. The amendments to the model codes are applicable only to those occupancies or uses, which the state agency adopting the amendments is, authorized to regulate as listed in Section 101.17.</p> <p><u>EXCEPTION: Outdoor environments and uses shall be classified according to accessibility uses described in Chapters 11A, 11B and 11C, and life safety concerns.</u></p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	No action required.	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	Added "exception" requirement for completeness.

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Purpose (cont.)	101.17.11	<p>Access Compliance, Division of the State Architect.</p> <p>General. To assure that barrier-free design is incorporated in all buildings, facilities, site work and other improvements to which this code applies in compliance with state law to assure that these improvements are accessible to and usable by persons with disabilities. Additions, alterations and structural repairs in all buildings and facilities shall comply with these provisions for new buildings, except as otherwise provided and specified herein.</p> <p>The provisions of these regulations shall apply to any portable buildings leased or owned by a school district, and shall also apply to temporary and emergency buildings and facilities.</p> <p>In addition, to incorporate standards at least as restrictive as those required by the federal government for barrier-free design under (1) Title III (Public Accommodations and Commercial Facilities), Subpart D (New Construction and Alteration) and Appendix A (Americans with Disabilities Act Accessibility Guidelines) (see 28 C.F.R., Part 36), and (2) Title II (Public Entities), Section 35.151 (New Construction and Alterations) (see 28 C.F.R., Part 35) both from the Americans with Disabilities Act of 1990, and (3) under the Fair Housing Amendments of 1988. Some of these regulations may be more stringent than state law in order to meet the federal requirement.</p> <p><u>2. Application. All privately funded public accommodations, as defined, and commercial facilities, as defined, shall be accessible to persons with physical disabilities as follows:</u></p> <p><u>EXCEPTION: Certain types of privately funded multistory buildings do not require installation of an elevator to provide access above and below the first floor. See Chapter 11B.</u></p> <p><u>NOTE: Exceptions for multistoried buildings formerly located in this section have been moved to Chapter 11B.</u></p> <p><u>2.1 Any building, structure, facility, complex, or improved area, or portions thereof, which are used by the general public.</u></p> <p><u>2.2 Any sanitary facilities which are made available for the public, clients or employees in such accommodations or facilities.</u></p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Added "Application" in section 101.17.11, Item 2 for completeness.</p> <p>Also, Appendix A is officially entitled Standards for Accessible Design and not Americans with Disabilities Act Accessibility Guidelines.</p>

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		<p><u>2.3 Any curb or sidewalk intended for public use that is constructed in this state with private funds.</u> <u>2.4 All existing privately funded public accommodations when alterations, structural repairs or additions are made to such public accommodations as set forth under Chapter 11B.</u></p>				
<p>2 GENERAL 2.1 Provisions for Adults. The specifications in these guidelines are based upon adult dimensions and anthropometrics.</p>	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG language as follows.	<u>Provisions for Adults. The dimensions and specifications in these regulations are based upon adult dimensions and anthropometrics.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Identify the section number where this provision would appear.
<p>2.2 Equivalent Facilitation. Departures from particular technical and scoping requirements of this guideline by the use of other designs and technologies are permitted where the alternative designs and technologies used will provide substantially equivalent or greater access to and usability of the facility.</p>	1102B	EQUIVALENT FACILITATION is an alternate means of complying with the literal requirements of these standards and specifications that provides access in terms of the purpose of these standards and specifications. NOTES: 1. See Section 101.2, Purpose. 2. In determining equivalent facilitation, consideration shall be given to means that provide for the maximum independence of persons with disabilities while presenting the least risk of harm, injury or other hazard to such persons or others.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 language does not include the term technologies and substantially equivalent or greater access. ADAAG language will be added as note 3.	EQUIVALENT FACILITATION is an alternate means of complying with the literal requirements of these standards and specifications that provides access in terms of the purpose of these standards and specifications. NOTES: 1. See Section 101.2, Purpose. 2. In determining equivalent facilitation, consideration shall be given to means that provide for the maximum independence of persons with disabilities while presenting the least risk of harm, injury or other hazard to such persons or others. <u>3. Departures from particular technical and scoping requirements of these regulations by the use of other designs and technologies are permitted where the alternative designs and technologies used will provide substantially equivalent or greater access to and usability of the facility.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA only if "NOTES" are enforceable provisions.

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3.1 Graphic Conventions. Graphic conventions are shown in Table 1. Dimensions that are not marked minimum or maximum are absolute, unless otherwise indicated in the text or captions.	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG language and table 1.	<u>Graphic conventions are shown in Table 1. Dimensions that are not marked minimum or maximum are absolute, unless otherwise indicated in the text or captions.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Identify the section number where this provision would appear.
3.2 Dimensional Tolerances. All dimensions are subject to conventional building industry tolerances for field conditions.	1101B.4	DIMENSIONAL TOLERANCES. All dimensions are subject to conventional building industry tolerances for field conditions.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
3.3 Notes. The text of these guidelines does not contain notes or footnotes. Additional information, explanations, and advisory materials are located in the Appendix. Paragraphs marked with an asterisk have related non-mandatory material in the Appendix. In the Appendix, the corresponding paragraph numbers are preceded by an A.	None	None	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment The ADAAG appendix material is not mandatory and is only there to provide guidance.	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Chapter 11B does not have an equivalent provision but DOJ agrees with DSA that no action is required.
3.4 General Terminology. comply with. Meet one or more specifications of these guidelines. if, if... then. Denotes a specification that applies only when the conditions described are present. may. Denotes an option or alternative. shall. Denotes a mandatory specification or requirement. should. Denotes an advisory specification or recommendation.	219-R <u>220-S</u>	RECOMMEND does not require mandatory acceptance, but identifies a suggested action that shall be considered for the purpose of providing a greater degree of accessibility to persons with disabilities. <u>SHALL, as used in this code, is mandatory.</u> <u>SHOULD. See "Recommend."</u>	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt General Terminology into section 1102B.	<u>General Terminology. comply with. Meet one or more specifications of these guidelines. if, if... then. Denotes a specification that applies only when the conditions described are present. may. Denotes an option or alternative. shall. Denotes a mandatory specification or requirement. should. Denotes an advisory specification or recommendation.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section reference 220-S and terms "SHALL" and "SHOULD."
3.5 Definitions.	1102B	Definitions	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment: Heading for definition section.	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

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Access Aisle. An accessible pedestrian space between elements, such as parking spaces, seating, and desks, that provides clearances appropriate for use of the elements.	202-A	AISLE is a circulation path between objects, such as seats, tables, merchandise, equipment, displays, shelves, desks, etc.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment The Title 24 definition for aisle does not address clearances or the space adjacent to parking spaces. Adopt proposed definition for access aisle.	Aisle – is a circulation path between objects, such as seats, tables, merchandise, equipment, displays, shelves, desks, etc. <u>that provides clearances in conformance with this code.</u> <u>Access Aisle. An accessible pedestrian space adjacent to or between parking spaces that provides clearances in conformance with this code.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Accessible. Describes a site, building, facility, or portion thereof that complies with these guidelines.	1102B	ACCESSIBLE is approachable and usable by persons with disabilities in conformance with this code. ACCESSIBILITY is the combination of various elements in a building or area, which allows access, circulation and the full use of the building and facilities by persons with disabilities.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Amend the definition for accessibility.	ACCESSIBILITY is the combination of various elements in a building, <u>facility, site, or area, or portion thereof</u> which allows access, circulation and the full use of the building and facilities by persons with disabilities <u>in conformance with this code.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Accessible Element. An element specified by these guidelines (for example, telephone, controls, and the like).	202-A	ACCESSIBLE ELEMENT Is an element specified by the regulations adopted by the Division of the State Architect/ Access Compliance.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Accessible Route. A continuous unobstructed path connecting all accessible elements and spaces of a building or facility. Interior accessible routes may include corridors, floors, ramps, elevators, lifts, and clear floor space at fixtures. Exterior accessible routes may include parking access aisles, curb ramps, crosswalks at vehicular ways, walks, ramps, and lifts.	1102B	ACCESSIBLE ROUTE OF TRAVEL is a continuous unobstructed path connecting all accessible elements and spaces in an accessible building or facility that can be negotiated by a person with a severe disability using a wheelchair, and that is also safe for and usable by persons with other disabilities, and that is consistent with the definition of "path of travel" in Section 217.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Current Title 24 language does not reference the specific elements in ADAAG.	ACCESSIBLE ROUTE OF TRAVEL is a continuous unobstructed path connecting all accessible elements and spaces in an accessible building or facility that can be negotiated by a person with a severe disability using a wheelchair, and that is also safe for and usable by persons with other disabilities, and that is consistent with the definition of "path of travel" in Section 217. <u>Interior accessible routes may include corridors, floors, ramps, elevators, lifts, and clear floor space at fixtures. Exterior accessible routes may include parking access aisles, curb ramps, crosswalks at vehicular ways, walks, ramps, and lifts.</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Delete the word "severe" from the proposed language.

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Accessible Space. Space that complies with these guidelines.	202-A	ACCESSIBLE SPACE is a space that complies with the regulations adopted by the Division of the State Architect/Access Compliance.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Adaptability. The ability of certain building spaces and elements, such as kitchen counters, sinks, and grab bars, to be added or altered so as to accommodate the needs of individuals with or without disabilities or to accommodate the needs of persons with different types or degrees of disability.	1102A.1-A 1102B	ADAPTABLE DWELLING UNIT is an accessible dwelling unit within a covered multifamily building as designed with elements and spaces allowing the dwelling unit to be adapted or adjusted to accommodate the user. See Sections 1109A and 1112A ADAPTABILITY refers to the capability of spaces or facilities to be readily modified and made accessible.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Deleted section 1102A.1-A and ADAPTABLE DWELLING UNIT. Added section 1102B and ADAPTABILITY.
Addition. An expansion, extension, or increase in the gross floor area of a building or facility.	202-A	ADDITION is an extension or increase in floor area or height of a building or structure.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 definition does not include the words "expansion" or "facility".	ADDITION is an extension, <u>expansion</u> , or increase in floor area or height of a building, <u>facility</u> , or structure.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Administrative Authority. A governmental agency that adopts or enforces regulations and guidelines for the design, construction, or alteration of buildings and facilities.	None	None	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG definition in section 1102B.	<u>Administrative Authority. A governmental agency that adopts or enforces regulations and guidelines for the design, construction, or alteration of buildings and facilities.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Identify the section number where this provision would appear.

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<p>Alteration. An alteration is a change to a building or facility made by, on behalf of, or for the use of a public accommodation or commercial facility, that affects or could affect the usability of the building or facility or part thereof. Alterations include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historic restoration, changes or rearrangement of the structural parts or elements, and changes or rearrangement in the plan configuration of walls and full-height partitions. 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.</p>	202-A	<p>ALTER or ALTERATION is any change, addition or modification in construction or occupancy or structural repair or change in primary function to an existing structure other than repair or addition.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Amend to include the following language from ADAAG.</p>	<p>ALTER or ALTERATION is any change, addition or modification in construction or occupancy or structural repair or change in primary function to an existing structure other than repair or addition <u>made by, on behalf of, or for the use of a public accommodation or commercial facility, that affects or could affect the usability of the building or facility or part thereof.</u></p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>DSA's proposed language should include the following ADA examples of alterations: "Alterations include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historic restoration, changes or rearrangement of the structural parts or elements, and changes or rearrangement in the plan configuration of walls and full-height partitions. " DSA should also delete the phrase "other than repair or addition" because addition and structural repair are alterations as described in section 202-A.</p>
	1134B.2.1 Exception 4.	<p>4. Projects which consist only of heating, ventilation, air conditioning, reroofing, electrical work not involving placement of switches and receptacles, cosmetic work that does not affect items regulated by this code, such as painting, equipment not considered to be a part of the architecture of the building or area, such as computer terminals, office equipment, etc., are not considered alteration projects for the purposes of accessibility for persons with disabilities and shall not be subject to this code.</p> <p>NOTE: The only purpose of this exception is to exclude projects from activating the provisions of this section. The exceptions are not intended to relieve projects from complying with other applicable provisions of this code (e.g., replacement of carpet does not activate the provisions of this section; however, it still must comply with Section 1124B.3).</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Amend to include the following language from ADAAG:</p>	<p>4. Projects which consist only of heating, ventilation, air conditioning, reroofing, electrical work not involving placement of switches and receptacles, cosmetic work that does not affect items regulated by this code, such as painting, equipment not considered to be a part of the architecture of the building or area, such as computer terminals, office equipment, etc., are not considered alteration projects for the purposes of accessibility for persons with disabilities and shall not be subject to this code <u>unless they affect the usability of the building or facility.</u></p> <p>NOTE: The only purpose of this exception is to exclude projects from activating the provisions of this section. The exceptions are not intended to relieve projects from complying with other applicable provisions of this code (e.g., replacement of carpet does not activate the provisions of this section; however, it still must comply with Section 1124B.3).</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

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Area of Rescue Assistance. An area, which has direct access to an exit, where people who are unable to use stairs may remain temporarily in safety to await further instructions or assistance during emergency evacuation.	None 1102B	None <u>AREA FOR EVACUATION ASSISTANCE is an accessible space which is protected from fire and smoke and which facilitates a delay in egress.</u>	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG definition into section 1102B.	<u>Area of Rescue Assistance. An area, which has direct access to an exit, where people who are unable to use stairs may remain temporarily in safety to await further instructions or assistance during emergency evacuation.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1102B and the term "area for evacuation assistance." DSA's proposed language meets the ADA but having both the terms area for evacuation assistance and area of rescue assistance may confuse code users. Either replace the term area for evacuation assistance with the term area of rescue assistance or change the definition of area for evacuation assistance with the proposed language.
Assembly Area. A room or space accommodating a group of individuals for recreational, educational, political, social, or amusement purposes, or for the consumption of food and drink.	None	None	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment California has assembly areas under the requirements for group A and B occupancies. This definition will be adopted into section 1102B or section 202-A and referenced in the appropriate occupancy categories when assembly areas are present.	<u>Assembly Area. A room or space accommodating a group of individuals for recreational, educational, political, social, or amusement purposes, or for the consumption of food and drink.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Automatic Door. A door equipped with a power-operated mechanism and controls that open and close the door automatically upon receipt of a momentary actuating signal. The switch that begins the automatic cycle may be a photoelectric device, floor mat, or manual switch (see power-assisted door).	1102B	AUTOMATIC DOOR is a door equipped with a power operated mechanism and controls that open and close the door automatically upon receipt of a momentary actuating signal. The switch that begins the automatic cycle may be a photoelectric device, floor mat, or manual switch.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required-	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

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Building. Any structure used and intended for supporting or sheltering any use or occupancy.	203-B	<p>BUILDING is any structure as to which state agencies have regulatory power, used or intended for supporting or sheltering any use or occupancy, [for DSA/AC] housing or enclosure of persons, animals, chattels, equipment or property of any kind, and also includes structures wherein things may be grown, made, produced, kept, handled, stored or disposed of, and all appendages, accessories, apparatus, appliances and equipment installed as a part thereof.</p> <p>"Building" shall not include machinery, equipment or appliances installed for manufacture or process purposes only, nor shall it include any construction installations which are not a part of a building, any tunnel, mine shaft, highway or bridge, or include any house trailer or vehicle which conforms to the Vehicle Code.</p> <p>NOTE: BUILDING shall have the same meaning as defined in Health and Safety Code Section 17920 and 18908 for the applications specified in sections 101.17.9 and 101.17.10.</p>	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment ADAAG does not distinguish portable vehicles such as commercial coaches from permanent structures. ADAAG does not limit application to tunnels, or mine shafts which may house public accommodations in California. Revise Title 24 section as follows.	<p>BUILDING is any structure as to which state agencies have regulatory power, used or intended for supporting or sheltering any use or occupancy, [for DSA/AC] housing or enclosure of persons, animals, chattels, equipment or property of any kind, and also includes structures wherein things may be grown, made, produced, kept, handled, stored or disposed of, and all appendages, accessories, apparatus, appliances and equipment installed as a part thereof.</p> <p>"Building" shall not include machinery, equipment or appliances installed for manufacture or process purposes only, nor shall it include any construction installations which are not a part of a building, any tunnel, mine shaft, highway or bridge, or include any house trailer or vehicle which conforms to the Vehicle Code.</p> <p>NOTE: BUILDING shall have the same meaning as defined in Health and Safety Code Section 17920 and 18908 for the applications specified in sections 101.17.9 and 101.17.10.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	DSA needs to clarify the meaning of "construction installations."
Circulation Path. An exterior or interior way of passage from one place to another for pedestrians, including, but not limited to, walks, hallways, courtyards, stairways, and stair landings.	204-C	<p>CIRCULATION PATH</p> <p>Is an exterior or interior way of passage from one place to another for pedestrians, including, but not limited to, walks, hallways, courtyards, stairways, and stair landings.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Clear. Unobstructed.	None	None	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG definition into 1102B.	<u>Clear. Unobstructed.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

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Clear Floor Space. The minimum unobstructed floor or ground space required to accommodate a single, stationary wheelchair and occupant.	None	None	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG definition into 1102B.	<u>Clear Floor Space. The minimum unobstructed floor or ground space required to accommodate a single, stationary wheelchair and occupant.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Closed Circuit Telephone. A telephone with dedicated line(s) such as a house phone, courtesy phone or phone that must be used to gain entrance to a facility.	204-C	CLOSED CIRCUIT TELEPHONE is a telephone with dedicated line(s) such as a house phone, courtesy phone or phone that must be used to gain entrance to a facility.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

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<p>Commercial Facilities. (28 C.F.R. § 36.104). Commercial facilities means facilities --</p> <p>(1) Whose operations will affect commerce;</p> <p>(2) That are intended for nonresidential use by a private entity; and</p> <p>(3) That are not --</p> <p>(i) Facilities that are not covered or expressly exempted from coverage under the Fair Housing Act of 1968, as amended (42 U.S.C. 3601-3631);</p> <p>(ii) Aircraft; or</p> <p>(iii) Railroad locomotives, railroad freight cars, railroad cabooses, commuter or intercity passenger rail cars (including coaches, dining cars, sleeping cars, lounge cars, and food service cars), and any other railroad cars described in section 242 of the Act or covered under title II of the Act, or railroad rights-of-way. For purposes of this definition, "rail" and "railroad" have the meaning given the term "railroad" in section 202(e) of the Federal Railroad Safety Act of 1970 (45 U.S.C. 431(e)).</p>	204-C	<p>COMMERCIAL FACILITIES are facilities that are intended for nonresidential use and whose operations will affect commerce, including factories, warehouses, office buildings, and other buildings in which employment may occur. Commercial facilities shall not include railroad locomotives, railroad freight cars, railroad cabooses, railroad cars covered under Title III of the Americans with Disabilities Act of 1990, or facilities that are covered or expressly exempted from coverage under the Fair Housing Amendment Act of 1988 (42 USC 3601-3631, et seq.)</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Definition of commercial facilities in section 204-C meets the ADA, but the reference to Title III of the ADA is incorrect. Railroad locomotives and etc. are covered by Title II of the ADA.</p>

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<p>Commercial facilities located in private residences. (28 C.F.R. § 36.401(b)).</p> <p>(1) When a commercial facility is located in a private residence, the portion of the residence used exclusively as a residence is not covered by this subpart, but that portion used both for the commercial facility and for residential purposes is covered by the new construction and alterations requirements of this subpart.</p> <p>(2) The portion of the residence covered under paragraph (b)(1) of this section extends to those elements used to enter the commercial facility, including the homeowner's front sidewalk, if any, the door or entryway, and hallways; and those portions of the residence, interior or exterior, available to or used by employees or visitors of the commercial facility, including restrooms.</p>	None	None	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment No equivalent section in Title 24. Adopt the language from ADAAG.	<p><u>Commercial facilities located in private residences.</u></p> <p><u>(1) When a commercial facility is located in a private residence, the portion of the residence used exclusively as a residence is not covered by this subpart, but that portion used both for the commercial facility and for residential purposes is covered by the new construction and alterations requirements of this code.</u></p> <p><u>(2) The portion of the residence covered extends to those elements used to enter the commercial facility, including the homeowner's front sidewalk, if any, the door or entryway, and hallways; and those portions of the residence, interior or exterior, available to or used by employees or visitors of the commercial facility, including restrooms.</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>Common Use. Refers to those interior and exterior rooms, spaces, or elements that are made available for the use of a restricted group of people (for example, occupants of a homeless shelter, the occupants of an office building, or the guests of such occupants).</p>	None 1102B	<p>None</p> <p><u>Common Use Areas are public areas where the uses of the space is not limited exclusively to owners, residents or individual employees.</u></p>	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG language into 1102B.	<p><u>Common Use. Refers to those interior and exterior rooms, spaces, or elements that are made available for the use of a restricted group of people (for example, occupants of a homeless shelter, the occupants of an office building, or the guests of such occupants).</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Added the phrase common use areas for completeness.</p> <p>DSA's proposed revision meets the ADA. But section 1102B contains a definition for the term common use areas that does not meet the ADA. DSA should delete the definition for the phrase common use areas and incorporate the proposed definition.</p>
<p>Cross Slope. The slope that is perpendicular to the direction of travel (see running slope).</p>	1102B	CROSS SLOPE is the slope that is perpendicular to the direction of travel.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>Curb Ramp. A short ramp cutting through a curb or built up to it.</p>	1102B	<p>CURB RAMP is a sloping pedestrian way, intended for pedestrian traffic, which provides access between a walk or sidewalk to a surface located above or below an adjacent curb face.</p> <p><u>CURB CUT is an interruption of a curb at a pedestrian way, which separates surfaces that are substantially at the same elevation.</u></p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Added the definition of curb cut for completeness.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
Detectable Warning. A standardized surface feature built in or applied to walking surfaces or other elements to warn visually impaired people of hazards on a circulation path.	1102B	DETECTABLE WARNING is a standardized surface or feature built into or applied to walking surfaces or other elements to warn visually impaired persons of hazards in the path of travel. Only approved DSA/AC detectable warning products and directional surfaces shall be installed as provided in the California Code of Regulations (CCR), Title 24, Part 1, Articles 2, 3, and 4. Refer to CCR Title 24, Part 12, Chapter 12-11A and B, for building and facility access specifications for product approval for detectable warning products and directional surfaces. DSA/AC NOTE: Detectable warning products and directional surfaces installed after January 1, 2001, shall be evaluated by an independent entity, selected by the Department of General Service's, Division of the State Architect – Access Compliance, for all occupancies, including transportation and other outdoor environments, except that when products and surfaces are for use in residential housing evaluation shall be in consultation with the Department of Housing and Community Development. See Government Code Section 4460.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Disability. (28 C.F.R § 36.104). Disability means, with respect to an individual, a physical or mental impairment that substantially limits one or more of the major life activities of such individual; a record of such an impairment; or being regarded as having such an impairment.	None 205-D	None <u>DISABILITY is (1) a physical or mental impairment that substantially limits one or more of the major life activities of an individual, or (2) a record of such an impairment, or (3) being regarded as having such an impairment.</u>	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Although included in chapter 11A, there is no definition of Disability in 11B. Add ADAAG definition in 1102B.	<u>DISABILITY means, with respect to an individual, a physical or mental impairment that substantially limits one or more of the major life activities of such individual; a record of such an impairment; or being regarded as having such an impairment.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 205-D and the term disability.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>Dwelling Unit. A single unit which provides a kitchen or food preparation area, in addition to rooms and spaces for living, bathing, sleeping, and the like. Dwelling units include a single family home or a townhouse used as a transient group home; an apartment building used as a shelter; guestrooms in a hotel that provide sleeping accommodations and food preparation areas; and other similar facilities used on a transient basis. For purposes of these guidelines, use of the term "Dwelling Unit" does not imply the unit is used as a residence.</p>	1102B	<p>DWELLING UNIT is a single unit of residence for a family of one or more persons. Examples of dwelling units covered by this chapter include condominiums, an apartment unit within an apartment building, and other types of dwellings in which sleeping accommodations are provided but toileting or cooking facilities are shared by occupants of more than one room or portion of the dwelling. Examples of the latter include dormitory rooms and sleeping accommodations in shelters intended for occupancy as residences for homeless persons.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Incorporate ADAAG language.</p>	<p>DWELLING UNIT is a single unit of residence for a family of one or more persons. Examples of dwelling units covered by this chapter include condominiums, an apartment unit within an apartment building, and other types of dwellings in which sleeping accommodations are provided but toileting or cooking facilities are shared by occupants of more than one room or portion of the dwelling. Examples of the latter include dormitory rooms and sleeping accommodations in shelters intended for occupancy as residences for homeless persons. <u>For purposes of these guidelines, use of the term "Dwelling Unit" does not imply the unit is used as a residence.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>Egress, Means of. A continuous and unobstructed way of exit travel from any point in a building or facility to a public way. A means of egress comprises vertical and horizontal travel and may include intervening room spaces, doorways, hallways, corridors, passageways, balconies, ramps, stairs, enclosures, lobbies, horizontal exits, courts and yards. An accessible means of egress is one that complies with these guidelines and does not include stairs, steps, or escalators. Areas of rescue assistance or evacuation elevators may be included as part of accessible means of egress.</p>	None	None	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>No equivalent definition in Title 24. Adopt the ADAAG definition</p>	<p><u>Egress, Means of. A continuous and unobstructed way of exit travel from any point in a building or facility to a public way. A means of egress comprises vertical and horizontal travel and may include intervening room spaces, doorways, hallways, corridors, passageways, balconies, ramps, stairs, enclosures, lobbies, horizontal exits, courts and yards. An accessible means of egress is one that complies with these guidelines and does not include stairs, steps, or escalators. Areas of rescue assistance or evacuation elevators may be included as part of accessible means of egress.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	Identify the section number where this provision would appear.
<p>Element. An architectural or mechanical component of a building, facility, space, or site, e.g., telephone, curb ramp, door, drinking fountain, seating, or water closet.</p>	None	None	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>No equivalent definition in Title 24. Incorporate ADAAG definition into 206-E.</p>	<p><u>ELEMENT an architectural or mechanical component of a building, facility, space, or site, e.g., telephone, curb ramp, door, drinking fountain, seating, or water closet.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
Entrance. Any access point to a building or portion of a building or facility used for the purpose of entering. An entrance includes the approach walk, the vertical access leading to the entrance platform, the entrance platform itself, vestibules if provided, the entry door(s) or gate(s), and the hardware of the entry door(s) or gate(s).	206E	ENTRANCE shall mean any entrance to a facility which has a substantial flow of pedestrian traffic to any specific major function of the facility.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Replace Title 24 definition with ADAAG definition. The Title 24 definition does not contain the same level of specificity.	<u>ENTRANCE Any access point to a building or portion of a building or facility used for the purpose of entering. An entrance includes the approach walk, the vertical access leading to the entrance platform, the entrance platform itself, vestibules if provided, the entry door(s) or gate(s), and the hardware of the entry door(s) or gate(s).</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Facility. All or any portion of buildings, structures, site improvements, complexes, equipment, roads, walks, passageways, parking lots, or other real or personal property located on a site.	1102B	FACILITY (or FACILITIES) is a building, structure, room, site, complex or any portion thereof, that is built, altered, improved or developed to serve a particular purpose.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Incorporate ADAAG definition. Existing Title 24 definition doesn't contain the same level of specificity.	<u>FACILITY (or FACILITIES) is a building, structure, room, site, complex or any portion thereof, that is built, altered, improved or developed to serve a particular purpose. Facilities shall include all or any portion of buildings, structures, site improvements, complexes, equipment, roads, walks, passageways, parking lots, or other real or personal property located on a site.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA. However, please clarify DSA's use of the phrase site improvement, which is not defined, instead of the phrase site development, which is defined in 220S.
Ground Floor. Any occupiable floor less than one story above or below grade with direct access to grade. A building or facility always has at least one ground floor and may have more than one ground floor as where a split level entrance has been provided or where a building is built into a hillside.	1102A.7-G	GROUND FLOOR is the floor of a building with a building entrance on an accessible route. A building may have one or more ground floors. Where the first floor containing dwelling units in a building is above grade, all units on that floor must be served by a building entrance on an accessible route. This floor will be considered to be a ground floor.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Existing Title 24 definition doesn't contain the same level of specificity. Replace with ADAAG definition. Add to Section 208-G and 11B.	<u>Ground Floor is any occupiable floor less than one story above or below grade with direct access to grade. A building or facility always has at least one ground floor and may have more than one ground floor as where a split level entrance has been provided or where a building is built into a hillside.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The definition of Ground Floor in section 1102A.7-G applies to residential housing and not public accommodations and commercial facilities. However, DSA's proposed action meets the ADA.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
Marked Crossing. A crosswalk or other identified path intended for pedestrian use in crossing a vehicular way.	214M, 1102B	MARKED CROSSING is a crosswalk or other identified path intended for pedestrian use in crossing a vehicular way.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added reference to 1102B.
Maximum Extent Feasible. (28 C.F.R. § 36.402(c)). The phrase, "to the maximum extent feasible," as used in this section, applies to the occasional case where the nature of an existing facility makes it virtually impossible to comply fully with applicable accessibility standards through a planned alteration. In these circumstances, the alteration shall provide the maximum physical accessibility feasible. Any altered features of the facility that can be made accessible shall be made accessible. If providing accessibility in conformance with this section to individuals with certain disabilities (e.g., those who use wheelchairs) would not be feasible, the facility shall be made accessible to persons with other types of disabilities (e.g., those who use crutches, those who have impaired vision or hearing, or those who have other impairments).	Health & Safety Code, § 19959 and § 19957	<p>§ 19959 – Alterations of existing public accommodations – Every existing public accommodation constructed prior to July 1, 1970, which is not exempted by Section 19956, shall be subject to the requirements of this chapter when any alterations, structural repairs or additions are made to such public accommodation. This requirement shall only apply to the area of specific alteration, structural repair or addition and shall not be construed to mean that the entire building or facility is subject to this chapter.</p> <p>§ 19957 – Exceptions from literal requirements of standards and specifications in hardship, etc., cases – In cases of practical difficulty, unnecessary hardship, or extreme differences, a building department responsible for the enforcement of this part may grant exceptions from the literal requirements of the standards and specifications required by this part or permit the use of other methods or materials, but only when it is clearly evident that equivalent facilitation and protection are thereby secured.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment The California Health and Safety code contains prescriptive requirements for altered buildings and when an exception is allowed. It does not include the ADA Title III limitation "to the maximum extent feasible".	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Sections 19959 and 19957 of the California Health and Safety Code do not seem to address ADA's definition of maximum extent feasible. However, the absence of an ADA equivalent definition of maximum extent feasible will not hinder certification.
Mezzanine or Mezzanine Floor. That portion of a story which is an intermediate floor level placed within the story and having occupiable space above and below its floor.	214-M	Mezzanine or Mezzanine Floor is an intermediate floor placed within a room	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment The Title 24 definition does not require that there be occupiable space above and below a mezzanine.	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
Multifamily Dwelling. Any building containing more than two dwelling units.	None	None	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG definition.	<u>Multifamily Dwelling is any building containing more than two dwelling units.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Identify the section number where this provision would appear.
Occupiable. A room or enclosed space designed for human occupancy in which individuals congregate for amusement, educational or similar purposes, or in which occupants are engaged at labor, and which is equipped with means of egress, light, and ventilation.	216-O	OCCUPIABLE is a room or enclosed space designed for human occupancy in which individuals congregate for amusement, educational or similar purposes, or in which occupants are engaged at labor, and which is equipped with means of egress, light and ventilation.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Operable Part. A part of a piece of equipment or appliance used to insert or withdraw objects, or to activate, deactivate, or adjust the equipment or appliance (for example, coin slot, pushbutton, handle).	216-O	OPERABLE PART is a part of a piece of equipment or appliance used to insert or withdraw objects, or to activate, deactivate or adjust the equipment or appliance (for example, coin slot, pushbutton, handle).	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>Path of Travel. (28 C.F.R. § 36.403(e)).</p> <p>(1) A "path of travel" includes a continuous, unobstructed way of pedestrian passage by means of which the altered area may be approached, entered, and exited, and which connects the altered area with an exterior approach (including sidewalks, streets, and parking areas), an entrance to the facility, and other parts of the facility.</p> <p>(2) An accessible path of travel may consist of walks and sidewalks, curb ramps and other interior or exterior pedestrian ramps; clear floor paths through lobbies, corridors, rooms, and other improved areas; parking access aisles; elevators and lifts; or a combination of these elements.</p> <p>(3) For the purposes of this part, the term "path of travel" also includes the restrooms, telephones, and drinking fountains serving the altered area.</p>	217-P	PATH OF TRAVEL is a passage that may consist of walks and sidewalks, curb ramps and pedestrian ramps, lobbies and corridors, elevators, other improved areas, or a necessary combination thereof, that provides free and unobstructed access to and egress from a particular area or location for pedestrians and/or wheelchair users.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Incorporate the language from the ADA Title III definition. Strike out the word "altered" as the Title 24 definition also applies to new facilities.	<p>PATH OF TRAVEL is a passage that may consist of walks and sidewalks, curb ramps and pedestrian ramps, lobbies and corridors, elevators, other improved areas, or a necessary combination thereof, that provides free and unobstructed access to and egress from a particular area or location for pedestrians and/or wheelchair users.</p> <p><u>A "path of travel" includes a continuous, unobstructed way of pedestrian passage by means of which the altered area may be approached, entered, and exited, and which connects the altered area with an exterior approach (including sidewalks, streets, and parking areas), an entrance to the facility, and other parts of the facility</u></p> <p><u>For the purposes of this part, the term "path of travel" also includes the restrooms, telephones, and drinking fountains serving the altered area.</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed language meets the ADA. However, the phrase "the altered area," which appears three times, should be replaced with the phrase "a particular area."

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>Place of Public Accommodation. (28 C.F.R. § 36.104). Place of public accommodation means a facility, operated by a private entity, whose operations affect commerce and fall within at least one of the following categories --</p> <p>(1) An inn, hotel, motel, or other place of lodging, except for an establishment located within a building that contains not more than five rooms for rent or hire and that is actually occupied by the proprietor of the establishment as the residence of the proprietor;</p> <p>(2) A restaurant, bar, or other establishment serving food or drink;</p> <p>(3) A motion picture house, theater, concert hall, stadium, or other place of exhibition or entertainment;</p> <p>(4) An auditorium, convention center, lecture hall, or other place of public gathering; establishment;</p> <p>(5) A bakery, grocery store, clothing store, hardware store, shopping center, or other sales or rental.</p> <p>(6) A Laundromat, dry-cleaner, bank, barber shop, beauty shop, travel service, shoe repair service, funeral parlor, gas station, office of an accountant or lawyer, pharmacy, insurance office, professional office of a health care provider, hospital, or other service establishment;</p> <p>(7) A terminal, depot, or other station used for specified public transportation;</p> <p>(8) A museum, library, gallery, or other place of public display or collection;</p> <p>(9) A park, zoo, amusement park, or other place of recreation;</p> <p>(10) A nursery, elementary, secondary, undergraduate, or postgraduate private school, or other place of education;</p>	217-P	<p>PUBLIC ACCOMMODATION includes, but is not limited to, any building or facility or other specific public use facilities not listed in Items 1 through 12 if they fall into one or more of the following categories: 1. Places of public lodging. 2. Establishments serving food or drink open to public use. 3. Places of exhibition or entertainment open to public use. 4. Places of public gathering. 5. Sales or rental establishments open to public use. 6. Service establishments open to public use. 7. Stations used for public transportation. 8 Places of public display or collection. 9. Places of public recreation. 10. Places of public education. 11. Social service center establishments open to public use. 12. Places of exercise or recreation open to public use.</p> <p>Examples of public accommodations for purposes of this code shall include, but not be limited to, the following private entities: 1. An inn, hotel, motel or other place of lodging, except for a lodging house located within a building that contains not more than five rooms for rent or hire. 2. A restaurant, bar, or other establishment serving food or drink. 3. A motion picture house, theater, concert hall, stadium or other place of exhibition or entertainment. 4. An auditorium, convention center, lecture hall, or other place of public gathering. 5. A bakery, grocery store, clothing store, hardware store, shopping center, or other sales or retail establishment. 6. A Laundromat, dry cleaner, bank, barber shop, beauty shop, travel service, shoe repair service, funeral parlor, gas station, office of an accountant or lawyer, pharmacy, insurance office, professional office of a health care provider, hospital or other service establishment. 7. A terminal, depot, or other station used for specified public transportation. 8. A museum, library, gallery, or other place of public display or collection. 9. A park, zoo, amusement park, or other place of recreation. 10. A nursery, elementary, secondary, undergraduate, or post-graduate private school, or other place of education. 11. A day-care center, senior citizen center, homeless shelter, food bank, adoption agency or other social service center establishment. 12. A gymnasium, health spa, bowling alley, golf course, or other place of exercise. 13. A church. 14. an office building. 15. A public curb or sidewalk.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
(11) A day care center, senior citizen center, homeless shelter, food bank, adoption agency, or other social service center establishment; and (12) A gymnasium, health spa, bowling alley, golf course, or other place of exercise or recreation.						
Power-assisted Door. A door used for human passage with a mechanism that helps to open the door, or relieves the opening resistance of a door, upon the activation of a switch or a continued force applied to the door itself.	217-P	POWER ASSISTED DOOR is a door used for human passage with a mechanism that helps to open the door, or relieves the opening resistance of a door, upon the activation of a switch or a continued force applied to the door itself.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Primary Function. (28 C.F.R. § 36.403(b)). A "primary function" is a major activity for which the facility is intended. Areas that contain a primary function include, but are not limited to, offices and other work areas in which the activities of the public accommodation or other private entity using the facility are carried out. Mechanical rooms, boiler rooms, supply storage rooms, employee lounges or locker rooms, janitorial closets, entrances, corridors, and restrooms are not areas containing a primary function.	None	None	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment The Title 24 definition for Alteration includes the language "change in primary function", however no definition of this term is included in the code. Adopt ADAAG definition into section 217-P.	<u>PRIMARY FUNCTION is a major activity for which the facility is intended. Areas that contain a primary function include, but are not limited to, offices and other work areas in which the activities of the public accommodation or other private entity using the facility are carried out. Mechanical rooms, boiler rooms, supply storage rooms, employee lounges or locker rooms, janitorial closets, entrances, corridors, and restrooms are not areas containing a primary function.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
Professional Office of a Health Care Provider. (28 C.F.R. § 36.401(d)(i)). A location where a person or entity, regulated by a State to provide professional services related to the physical or mental health of an individual, makes such services available to the public. The facility housing the "professional office of a health care provider" only includes floor levels housing at least one health care provider, or any floor level designed or intended for use by at least one health care provider.	None	None	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 has no equivalent definition. Adopt ADAAG definition.	<u>PROFESSIONAL OFFICE OF A HEALTH CARE PROVIDER. A location where a person or entity, regulated by a State to provide professional services related to the physical or mental health of an individual, makes such services available to the public. The facility housing the "professional office of a health care provider" only includes floor levels housing at least one health care provider, or any floor level designed or intended for use by at least one health care provider.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed language meets the ADA, but DSA needs to identify the section number where this provision would appear.
Public Use. Describes interior or exterior rooms or spaces that are made available to the general public. Public use may be provided at a building or facility that is privately or publicly owned.	1102B	PUBLIC USE AREAS means interior or exterior rooms or spaces of a building that are made available to the general public. Public use may be provided at a building or facility that is privately or publicly owned.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Section 1102B does not include a definition of public use areas. Section 1102A includes a definition of public use areas but this section applies to residential housing and not public accommodations and commercial facilities.
Ramp. A walking surface which has a running slope greater than 1:20.	1102B	PEDESTRIAN RAMP is a sloping path of travel intended for pedestrian traffic and as differentiated from a curb ramp.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Incorporate ADAAG language into existing Title 24 definition.	<u>PEDESTRIAN RAMP is a walking surface which has a running slope greater than 1:20 a sloping path of travel</u> intended for pedestrian traffic and as differentiated from a curb ramp.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Running Slope. The slope that is parallel to the direction of travel (see cross slope).	219-R	RUNNING SLOPE is the slope that is parallel to the direction of travel.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Add ADAAG reference to cross slope.	<u>RUNNING SLOPE is the slope that is parallel to the direction of travel (see definition for cross slope section 1102B).</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
Service Entrance. An entrance intended primarily for delivery of goods or services.	None	None	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG language.	<u>SERVICE ENTRANCE is an entrance intended primarily for delivery of goods or services.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed language meets the ADA but DSA needs to identify the section number where this provision would appear.
Signage. Displayed verbal, symbolic, tactile, and pictorial information.	220-S	SIGNAGE is displayed verbal, symbolic, tactile, and/or pictorial information.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Site. A parcel of land bounded by a property line or a designated portion of a public right-of-way.	220-S	SITE is a parcel of land bounded by a property line or a designated portion of a public right of way.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Site Improvement. Landscaping, paving for pedestrian and vehicular ways, outdoor lighting, recreational facilities, and the like, added to a site.	220-S	SITE DEVELOPMENT is "on-site" and "off-site" work, including, but not limited to, walks, sidewalks, ramps, curbs, curb ramps, parking facilities, stairs, planting areas, pools, promenades, exterior gathering or assembly areas and raised or depressed paved areas.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Sleeping Accommodations. Rooms in which people sleep; for example, dormitory and hotel or motel guest rooms or suites.	1102B	SLEEPING ACCOMMODATIONS are rooms in which people may sleep; for example, dormitory and hotel or motel guestrooms or suites.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Space. A definable area, e.g., room, toilet room, hall, assembly area, entrance, storage room, alcove, courtyard, or lobby.	220-S	SPACE is a definable area, e.g., room, toilet room, hall, assembly area, entrance, storage room, alcove, courtyard, or lobby.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Specified Public Transportation. (28 C.F.R. § 36.104). Transportation by bus, rail, or any other conveyance (other than by aircraft) that provides the general public with general or special service (including charter service) on a regular and continuing basis.	None	None	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG Title III language into Chapter 2.	<u>SPECIFIED PUBLIC TRANSPORTATION by bus, rail, or any other conveyance (other than by aircraft) that provides the general public with general or special service (including charter service) on a regular and continuing basis.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
Story. That portion of a building included between the upper surface of a floor and upper surface of the floor or roof next above. If such portion of a building does not include occupiable space, it is not considered a story for purposes of these guidelines. There may be more than one floor level within a story as in the case of a mezzanine or mezzanines.	220-S	STORY is that portion of a building included between the upper surface of any floor and the upper surface of the floor next above, except that the top most story shall be that portion of a building included between the upper surface of the topmost floor and the ceiling or roof above. If the finished floor level directly above a usable or unused under-floor space is more than 50 percent of the total perimeter or is more than 12 feet above grade as defined herein at any point, such usable or unused under-floor space shall be considered as a story.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment The title 24 definition does not contain the ADAAG language referencing more than one floor level within a story.	STORY is that portion of a building included between the upper surface of any floor and the upper surface of the floor next above, except that the top most story shall be that portion of a building included between the upper surface of the topmost floor and the ceiling or roof above. If the finished floor level directly above a usable or unused under-floor space is more than 50 percent of the total perimeter or is more than 12 feet above grade as defined herein at any point, such usable or unused under-floor space shall be considered as a story. <u>There may be more than one floor level within a story as in the case of a mezzanine or mezzanines.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Structural Frame. The structural frame shall be considered to be the columns and the girders, beams, trusses and spandrels having direct connections to the columns and all other members which are essential to the stability of the building as a whole.	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG definition.	<u>Structural Frame. The structural frame shall be considered to be the columns and the girders, beams, trusses and spandrels having direct connections to the columns and all other members which are essential to the stability of the building as a whole.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed language meets the ADA but DSA needs to identify the section number where this provision would appear.
Tactile. Describes an object that can be perceived using the sense of touch.	221-T	TACTILE describes an object that can be perceived using the sense of touch.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Text Telephone. Machinery or equipment that employs interactive graphic (i.e., typed) communications through the transmission of coded signals across the standard telephone network. Text telephones can include, for example, devices known as TDDs (telecommunication display devices or telecommunication devices for deaf persons) or computers.	221-T	TEXT TELEPHONE is machinery or equipment that employs interactive graphic (i.e., typed) communications through the transmission of coded signals across the standard telephone network. Text telephones can include, for example, devices known as TDDs (telecommunication display devices) or computers.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Transient Lodging. A building, facility, or portion thereof, excluding inpatient medical care facilities, that contains one or more dwelling units or sleeping accommodations. Transient lodging may include, but is not limited to, resorts, group homes, hotels, motels, and dormitories (see Place of Public Accommodation).	221-T	TRANSIENT LODGING is a building, facility, or portion thereof, excluding inpatient medical care facilities, that contains one or more dwelling units or sleeping accommodations. Transient lodging may include, but is not limited to, resorts, group homes, hotels, motels, and dormitories.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.1.1 (2) Application Based on Building Use. Special application sections 5 through 10 provide additional requirements for restaurants and cafeterias, medical care facilities, business and mercantile, libraries, accessible transient lodging, and transportation facilities. When a building or facility contains more than one use covered by a special application section, each portion shall comply with the requirements for that use.	1103B.1	BUILDING ACCESSIBILITY General. Accessibility to buildings or portions of buildings shall be provided for all occupancy classifications except as modified or enhanced by this chapter. Occupancy requirements in this chapter may modify general requirements, but never to the exclusion of them. Multistory buildings must provide access by ramp or elevator.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 compartmentalizes accessibility requirements into each specific occupancy type and does not address situations where there are a variety of uses within a specific occupancy type. The following ADAAG language should be incorporated.	BUILDING ACCESSIBILITY General. Accessibility to buildings or portions of buildings shall be provided for all occupancy classifications except as modified or enhanced by this chapter. Occupancy requirements in this chapter may modify general requirements, but never to the exclusion of them. Multistory buildings must provide access by ramp or elevator. <u>When a building or facility contains more than one use, the occupancy specific accessibility provisions for each portion of the building or facility shall apply.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	<u>1105B</u> <u>1105B.1</u>	<u>Group B Occupancies shall be accessible as provided in this chapter. See also the general requirements listed in Section 1114B.1.1.</u> <u>General. The provisions of the section apply to the specified types of facilities and identify specific requirements of accessibility and usability which shall be provided for each of the listed occupancy uses.</u>			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added sections 1105B and 1105B.1.
	<u>1106B</u> <u>1106B.1</u>	<u>ACCESSIBILITY FOR GROUP E OCCUPANCIES</u> <u>General. Group E Occupancies shall be accessible as provided in this chapter. See also the general requirements listed in Section 1114B.1.1.</u>			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added sections 1106B and 1106B.1.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.1.1 (3)* Areas Used Only by Employees as Work Areas. Areas that are used only as work areas shall be designed and constructed so that individuals with disabilities can approach, enter, and exit the areas. These guidelines do not require that any areas used only as work areas be constructed to permit maneuvering within the work area or be constructed or equipped (i.e., with racks or shelves) to be accessible.	1123B.1	Access to Employee Areas. 1. General. Employee areas shall conform to all requirements of Office of the State Architect/Access Compliance in the California Building Code, Plumbing Code, and Electrical Code.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1123B.2	Work stations. Specific work stations need only comply with aisle width (Section 1133B.6.1.and 1133B.6.2) and floors and levels (Section 1120B), and entry ways shall be 32 inches in clear width. <u>EXCEPTION: Accessibility is not required to (1) observation galleries used primarily for security purposes; or (2) in nonoccupiable spaces accessed only by ladders, catwalks, crawl spaces, very narrow passageways, or freight (nonpassenger) elevators, and frequented only by service personnel for repair purposes; such spaces include but are not limited to, elevator pits, elevator penthouses, mechanical rooms, piping or equipment catwalks.</u>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added exception for completeness.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.1.1 (4) Temporary Structures. These guidelines cover temporary buildings or facilities as well as permanent facilities. Temporary buildings and facilities are not of permanent construction but are extensively used or are essential for public use for a period of time. Examples of temporary buildings or facilities covered by these guidelines include, but are not limited to: reviewing stands, temporary classrooms, bleacher areas, exhibit areas, temporary banking facilities, temporary health screening services, or temporary safe pedestrian passageways around a construction site. Structures, sites and equipment directly associated with the actual processes of construction, such as scaffolding, bridging, materials hoists, or construction trailers are not included.</p>	101.17.11	<p>Access Compliance, Division of the State Architect. General. To assure that barrier-free design is incorporated in all buildings, facilities, site work and other improvements to which this code applies in compliance with state law to assure that these improvements are accessible to and usable by persons with disabilities. Additions, alterations and structural repairs in all buildings and facilities shall comply with these provisions for new buildings, except as otherwise provided and specified herein.</p> <p>The provisions of these regulations shall apply to any portable buildings leased or owned by a school district, and shall also apply to temporary and emergency buildings and facilities.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not contain the same level of specificity regarding the types of temporary structures covered. Add ADAAG language as amended.</p>	<p>Access Compliance, Division of the State Architect. General. To assure that barrier-free design is incorporated in all buildings, facilities, site work and other improvements to which this code applies in compliance with state law to assure that these improvements are accessible to and usable by persons with disabilities. Additions, alterations and structural repairs in all buildings and facilities shall comply with these provisions for new buildings, except as otherwise provided and specified herein.</p> <p>The provisions of these regulations shall apply to any portable buildings leased or owned by a school district, and shall also apply to temporary and emergency buildings and facilities.</p> <p><u>Temporary buildings and facilities are not of permanent construction but are extensively used or are essential for public use for a period of time.</u></p> <p><u>Examples of temporary buildings or facilities covered by these guidelines include, but are not limited to: reviewing stands, temporary classrooms, bleacher areas, exhibit areas, temporary banking facilities, temporary health screening services, or temporary safe pedestrian passageways around a construction site.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.1.1 (5) General Exceptions. (a) In new construction, a person or entity is not required to meet fully the requirements of these guidelines where that person or entity can demonstrate that it is structurally impracticable to do so. Full compliance will be considered structurally impracticable only in those rare circumstances when the unique characteristics of terrain prevent the incorporation of accessibility features. If full compliance with the requirements of these guidelines is structurally impracticable, a person or entity shall comply with the requirements to the extent it is not structurally impracticable. Any portion of the building or facility which can be made accessible shall comply to the extent that it is not structurally impracticable.</p>	Various locations	This section shall not apply in those conditions where, due to legal or physical constraints, the site of the project will not allow compliance with these building standards or equivalent facilitation without creating an unreasonable hardship. See Section 101.17.11, Item 4.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Section 101.17.11, Item 4 and section 101.17.11, Item 5 (refer to next page) do not seem to address ADA's structurally impracticable exception. Also, DSA's proposed language (below) to include ADA's structurally impracticable exception seems to be broader than the ADA's exception. However, the absence of an ADA equivalent structurally impracticable exception will not hinder certification.
<p>28 C.F.R. § 36.401(c)(3). If providing accessibility in conformance with this section to individuals with certain disabilities (e.g., those who use wheelchairs) would be structurally impracticable, accessibility shall nonetheless be ensured to persons with other types of disabilities (e.g., those who use crutches or who have sight, hearing, or mental impairments) in accordance with this section.</p>	Various locations	These provisions shall not apply to existing buildings when legal or physical constraints will not allow compliance with these regulations or equivalent facilitation without creating an unreasonable hardship. See Section 101.17.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.		

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	101.17.11, Item 5	Special Conditions for Persons with Disabilities Requiring Appeals Action Ratification. Whenever reference is made in these regulations to this section, the findings and determinations required to be rendered by the local enforcing agency shall be subject to ratification through an appeals process.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 allows exceptions based on site constraints on a very limited basis. Adopt ADAAG language modified as follows.	<p>Special Conditions for Persons with Disabilities Requiring Appeals Action Ratification. Whenever reference is made in these regulations to this section, the findings and determinations required to be rendered by the local enforcing agency shall be subject to ratification through an appeals process.</p> <p><u>In new construction only, a project is not required to meet fully the requirements of these standards where it can be demonstrated that it is structurally impracticable to do so. Full compliance will be considered structurally impracticable only in those rare circumstances when the unique characteristics of terrain prevent the incorporation of accessibility features.</u></p> <p><u>If it is determined that full compliance with the requirements of these regulations is not possible due to legal or physical constraints or is structurally impracticable, a project shall comply with the requirements to the extent it does not present a legal or physical constraint or is not structurally impracticable. Any portion of the building or facility which can be made accessible shall comply to the extent that it is not structurally impracticable.</u></p> <p><u>If providing accessibility in conformance with this section to individuals with certain disabilities (e.g., those who use wheelchairs) would be structurally impracticable, accessibility shall nonetheless be ensured to persons with other types of disabilities (e.g., those who use crutches or who have sight, hearing, or mental impairments) in accordance with this section.</u></p>		

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.1.2 (1) At least one accessible route complying with 4.3 shall be provided within the boundary of the site from public transportation stops, accessible parking spaces, passenger loading zones if provided, and public streets or sidewalks, to an accessible building entrance.	1127B.1	Site development and grading shall be designed to provide access to all entrances and exterior ground-floor exits, and access to normal paths of travel, and where necessary to provide access, shall incorporate pedestrian ramps, curb ramps, etc. When more than one building or facility is located on a site, accessible routes of travel shall be provided between buildings and accessible site facilities. The accessible route of travel shall be the most practical direct route between accessible building entrances, accessible site facilities and the accessible entrance to the site.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not contain the same level of specificity regarding the scope of accessible routes. Add ADAAG language as amended.	Site development and grading shall be designed to provide access to all entrances and exterior ground-floor exits, and access to normal paths of travel, and where necessary to provide access, shall incorporate pedestrian ramps, curb ramps, etc. <u>Access shall be provided within the boundary of the site from public transportation stops, accessible parking spaces, passenger loading zones if provided, and public streets or sidewalks.</u> When more than one building or facility is located on a site, accessible routes of travel shall be provided between buildings and accessible site facilities. The accessible route of travel shall be the most practical direct route between accessible building entrances, accessible site facilities and the accessible entrance to the site.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA but it should reference all sections concerning accessible routes: 1102B, 1114B, 1124B, 1133B.3., 1133B.5, 1133B.7, 1133B.8.6.
4.1.2 (2) At least one accessible route complying with 4.3 shall connect accessible buildings, accessible facilities, accessible elements, and accessible spaces that are on the same site.	1127B.1	When more than one building or facility is located on a site, accessible routes of travel shall be provided between buildings and accessible site facilities. The accessible route of travel shall be the most practical direct route between accessible building entrances, accessible site facilities and the accessible entrance to the site.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment Title 24 does not contain the same level of specificity regarding the scope of accessible routes. Add ADAAG language as follows.	When more than one building or facility is located on a site, accessible routes of travel shall be provided between buildings and accessible site facilities, <u>accessible elements, and accessible spaces that are on the same site.</u> The accessible route of travel shall be the most practical direct route between accessible building entrances, accessible site facilities and the accessible entrance to the site.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.1.2 (3) All objects that protrude from surfaces or posts into circulation paths shall comply with 4.4.	None	None	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment For reference only.	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Not Addressed, but DOJ agrees with DSA that no action is required.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.1.2 (4) Ground surfaces along accessible routes and in accessible spaces shall comply with 4.5.	None	None	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment For reference only.	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Not Addressed, but DOJ agrees with DSA that no action is required.
4.1.2 (5) (a) If parking spaces are provided for self-parking by employees or visitors, or both, then accessible spaces complying with 4.6 shall be provided in each such parking area in conformance with the table below. Spaces required by the table need not be provided in the particular lot. They may be provided in a different location if equivalent or greater accessibility in terms of distance from an accessible entrance, cost and convenience is ensured.	1129B.1	Each lot or parking structure where parking is provided for the public as clients, guests or employees, shall provide accessible parking as required by this section. Accessible parking spaces serving a particular building shall be located on the shortest accessible route of travel from adjacent parking to an accessible entrance. In parking facilities that do not serve a particular building, accessible parking shall be located on the shortest accessible route of travel to an accessible pedestrian entrance of the parking facility. In buildings with multiple accessible entrances with adjacent parking, accessible parking spaces shall be dispersed and located closest to the accessible entrances. Table 11B–6 establishes the number of accessible parking spaces required. EXCEPTION: This subsection shall not apply to existing facilities where compliance with local ordinances precludes satisfying the above requirements or of providing equivalent facilitation unless a change of occupancy occurs.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment ADAAG does not include an exception from meeting parking the accessible parking ratio based on local ordinance. Remove Title 24 exception.	Each lot or parking structure where parking is provided for the public as clients, guests or employees, shall provide accessible parking as required by this section. Accessible parking spaces serving a particular building shall be located on the shortest accessible route of travel from adjacent parking to an accessible entrance. In parking facilities that do not serve a particular building, accessible parking shall be located on the shortest accessible route of travel to an accessible pedestrian entrance of the parking facility. In buildings with multiple accessible entrances with adjacent parking, accessible parking spaces shall be dispersed and located closest to the accessible entrances. Table 11B–6 establishes the number of accessible parking spaces required. EXCEPTION: This subsection shall not apply to existing facilities where compliance with local ordinances precludes satisfying the above requirements or of providing equivalent facilitation unless a change of occupancy occurs.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	<u>1129B.2</u>	<u>Less Than Five Spaces. When less than five parking spaces are provided at buildings and facilities subject to these regulations, one shall be 14 feet (4267 mm) wide and lined to provide a 9-foot (2743 mm) parking area and a 5-foot (1524 mm) loading and unloading area. However, there is no requirement that the space be reserved exclusively or identified for use by persons with disabilities only.</u>			<input type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1129B.2 for completeness. Section 1129B.2 meets the ADA only if the parking space required in section 1129B.2 is in addition to the accessible parking space required in section 1129B.1. Section 1129B.2 does not meet the ADA if the parking space required in section 1129B.2 is in lieu of the accessible parking space required in section 1129B.1.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments																																														
<p>4.1.2 (5) (a) Required Minimum Number Total Parking in Lot of Accessible Spaces</p> <table border="0"> <tr><td>1 to 25</td><td>1</td></tr> <tr><td>26 to 50</td><td>2</td></tr> <tr><td>51 to 75</td><td>3</td></tr> <tr><td>76 to 100</td><td>4</td></tr> <tr><td>101 to 150</td><td>5</td></tr> <tr><td>151 to 200</td><td>6</td></tr> <tr><td>201 to 300</td><td>7</td></tr> <tr><td>301 to 400</td><td>8</td></tr> <tr><td>401 to 500</td><td>9</td></tr> <tr><td>501 to 1000</td><td>2 percent of total</td></tr> <tr><td>1001 and over</td><td>20 plus 1 for each 100 over 1000</td></tr> </table> <p>Except as provided in (b), access aisles adjacent to accessible spaces shall be 60 in (1525 mm) wide minimum.</p>	1 to 25	1	26 to 50	2	51 to 75	3	76 to 100	4	101 to 150	5	151 to 200	6	201 to 300	7	301 to 400	8	401 to 500	9	501 to 1000	2 percent of total	1001 and over	20 plus 1 for each 100 over 1000	1129B.1 Table 11B-6	<p>SPACES REQUIRED Establishes the number of accessible parking spaces required</p> <table border="0"> <tr><td>Total Number of Parking Spaces in Lot or Garage</td><td>Minimum Required Number of Spaces</td></tr> <tr><td>1 to 25</td><td>1</td></tr> <tr><td>26 to 50</td><td>2</td></tr> <tr><td>51 to 75</td><td>3</td></tr> <tr><td>76 to 100</td><td>4</td></tr> <tr><td>101 to 150</td><td>5</td></tr> <tr><td>151 to 200</td><td>6</td></tr> <tr><td>201 to 300</td><td>7</td></tr> <tr><td>301 to 400</td><td>8</td></tr> <tr><td>401 to 500</td><td>9</td></tr> <tr><td>501 to 1000</td><td>2 percent of total</td></tr> <tr><td>1001 and over</td><td>20 plus 1 for each 100, or fraction thereof over 1001</td></tr> </table>	Total Number of Parking Spaces in Lot or Garage	Minimum Required Number of Spaces	1 to 25	1	26 to 50	2	51 to 75	3	76 to 100	4	101 to 150	5	151 to 200	6	201 to 300	7	301 to 400	8	401 to 500	9	501 to 1000	2 percent of total	1001 and over	20 plus 1 for each 100, or fraction thereof over 1001	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Access aisle width is addressed in section 1129B.3 & 1129B.4.	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Deleted section 1129B.3 because it addresses parking spaces at medical care outpatient facilities.
1 to 25	1																																																			
26 to 50	2																																																			
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1001 and over	20 plus 1 for each 100, or fraction thereof over 1001																																																			
4.1.2 (5) (b) One in every eight accessible spaces, but not less than one, shall be served by an access aisle 96 in (2440 mm) wide minimum and shall be designated "van accessible" as required by 4.6.4. The vertical clearance at such spaces shall comply with 4.6.5. All such spaces may be grouped on one level of a parking structure. EXCEPTION: Provision of all required parking spaces in conformance with "Universal Parking Design" (see appendix A4.6.3) is permitted.	1129B.4	2. Van space(s). One in every eight accessible spaces, but not less than one, shall be served by an access aisle 96 inches (2438 mm) wide minimum placed on the side opposite the driver's side when the vehicle is going forward into the parking space and shall be designated van accessible as required by Section 1129B.5. All such spaces may be grouped on one level of a parking structure. The words NO PARKING shall be painted on the ground within eight-foot (2438 mm) loading and unloading access aisle. This notice shall be painted in white letters no less than 12-inches (154 mm) high and located so that it is visible to traffic enforcement officials. See Figure 11B-18B.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment See Title 24 sections 1129B.5 for signage and 1130B for vertical clearance.	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																																															
4.1.2 (5) (c) If passenger loading zones are provided, then at least one passenger loading zone shall comply with 4.6.6.	1131B.1	When provided, passenger drop-off and loading zones shall be located on accessible route of travel.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Amend Title 24 section as follows.	When provided, passenger drop-off and loading zones shall be located on accessible route of travel and shall comply with 1131B.2.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																																															

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.1.2 (5) (d) At facilities providing medical care and other services for persons with mobility impairments, parking spaces complying with 4.6 shall be provided in accordance with 4.1.2(5)(a) except as follows:</p> <p>(i) Outpatient units and facilities: 10 percent of the total number of parking spaces provided serving each such outpatient unit or facility;</p> <p>(ii) Units and facilities that specialize in treatment or services for persons with mobility impairments: 20 percent of the total number of parking spaces provided serving each such unit or facility.</p>	1129B.3	<p>Medical care outpatient facilities. At facilities providing medical care and other services for persons with mobility impairments, parking spaces complying with this section shall be provided in accordance with Table 11B-6 except as follows:</p> <p>1. Outpatient units and facilities: 10 percent of the total number of parking spaces provided serving each such outpatient unit or facility;</p> <p>2. Units and facilities that specialize in treatment or services for persons with mobility impairments: 20 percent of the total number of parking spaces provided serving each such unit or facility.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>4.1.2 (5) (e)* Valet parking: Valet parking facilities shall provide a passenger loading zone complying with 4.6.6 located on an accessible route to the entrance of the facility. Paragraphs 5(a), 5(b), and 5(d) of this section do not apply to valet parking facilities.</p>	1131B.3	<p>Valet parking facilities shall provide a passenger loading zone complying with Section 1131B.2 above and shall be located on an accessible route to the entrance of the facility. The parking space requirements of Sections 1129B through 1130B apply to facilities with valet parking.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.1.2 (6) If toilet facilities are provided on a site, then each such public or common use toilet facility shall comply with 4.22. If bathing facilities are provided on a site, then each such public or common use bathing facility shall comply with 4.23.</p> <p>For single user portable toilet or bathing units clustered at a single location, at least 5% but no less than one toilet unit or bathing unit complying with 4.22 or 4.23 shall be installed at each cluster whenever typical inaccessible units are provided. Accessible units shall be identified by the International Symbol of Accessibility.</p> <p>EXCEPTION: Portable toilet units at construction sites used exclusively by construction personnel are not required to comply with 4.1.2(6).</p>	<p>101.17.11</p> <p>220S</p>	<p>2. Application. All privately funded public accommodations, as defined, and commercial facilities, as defined, shall be accessible to persons with disabilities as follows:</p> <p>2.2 Any sanitary facilities which are made available for the public, clients or employees in such accommodations or facilities.</p> <p><u>Sanitary Facility is any single water closet, urinal, lavatory, bathtub or shower, or a combination thereof, together with the room or space in which they are housed.</u></p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>For new construction, Title 24 requires that all restrooms and bathing facilities be accessible. Title 24 does not specifically address portable toilet units. Some California municipalities have adopted policy to require 50% of portable toilet facilities accessible. Amend this section as follows.</p>	<p>2. Application. All privately funded public accommodations, as defined, and commercial facilities, as defined, shall be accessible to persons with disabilities as follows:</p> <p>2.2 Any sanitary facilities which are made available for the public, clients or employees in such accommodations or facilities.</p> <p><u>For single user portable toilet or bathing units clustered at a single location, at least 50% but no less than one toilet unit or bathing unit installed shall be accessible at each cluster. Accessible units shall be identified by the International Symbol of Accessibility.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Added the definition of sanitary facility in section 220S.</p>
<p>4.1.2 (7) Building Signage. Signs which designate permanent rooms and spaces shall comply with 4.30.1, 4.30.4, 4.30.5 and 4.30.6. Other signs which provide direction to, or information about, functional spaces of the building shall comply with 4.30.1, 4.30.2, 4.30.3, and 4.30.5.</p> <p>Elements and spaces of accessible facilities which shall be identified by the International Symbol of Accessibility and which shall comply with 4.30.7 are:</p> <p>(a) Parking spaces designated as reserved for individuals with disabilities;</p> <p>(b) Accessible passenger loading zones;</p>	<p>1114B.1 1114B.1.1</p>	<p>Design and Construction.</p> <p>General. When accessibility is required by this chapter, it shall be designed and constructed to meet the minimum requirements of the following sections: Chapter 11B. Accessibility; Division I, New Buildings; Division II, Site Accessibility; Division III, Accessibility for Entrances, Exits and Paths of Travel; and Division IV, Accessibility for Existing Buildings</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Amend to include the following reference to signs and identification.</p>	<p>When accessibility is required by this chapter, it shall be designed and constructed to meet the minimum requirements of the following sections: Chapter 11B. Accessibility; Division I, New Buildings; Division II, Site Accessibility; Division III, Accessibility for Entrances, Exits and Paths of Travel; and Division IV, Accessibility for Existing Buildings</p> <p>Signs and Identification -1117B.5.1</p> <p><u>Signs and Identification -1117B.5</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Replaced DSA's proposed section reference from 1117B.5.1 to 1117B.5.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>(c) Accessible entrances when not all are accessible (inaccessible entrances shall have directional signage to directional signage to indicate the route to the nearest accessible entrance);</p> <p>(d) Accessible toilet and bathing facilities when not all are accessible.</p>	1127B.3	<u>Signs. At every primary public entrance and at every major junction along or leading to an accessible route of travel, there shall be a sign displaying the international symbol of accessibility. Signs shall indicate the direction to accessible building entrances and facilities and shall comply with the requirements found in Sections 1117B.5 through 1117B.5.9.</u>			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1127B.3.
	1117B.5.1, Item 2	Identification signs. When signs identify permanent rooms and spaces of a building or site, they shall comply with 1117B.5.2, 1117B.5.3, 1117B.5.5, 1117B.5.6, and 1117B.5.7.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1117B.5.1, Item 3	Directional and informational signs. When signs direct to or give information about permanent rooms and space of a building or site, they shall comply with 1117B.5.2, 1117B.5.3, and 1117B.5.4.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment Adopt ADAAG terminology as follows.	Directional and informational signs. When signs direct to or give information about permanent rooms and <u>functional spaces</u> of a building or site, they shall comply with 1117B.5.2, 1117B.5.3, and 1117B.5.4.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1117B.5.1, Item 4	Accessibility signs. When signs identify, direct or give information about accessible elements and feature of a building or site, they shall include the appropriate symbol of accessibility and shall comply with 1117B.5.2 and, when applicable, 1117B.5.8.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	1129B.5	Identification of Parking Spaces for Off-Street Parking Facilities. Each parking space reserved for persons with disabilities shall be identified by a reflectorized sign permanently posted immediately adjacent to and visible from each stall or space, consisting of a profile view of a wheelchair with occupant in white on dark blue background.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment The ISA has specific proportions that must be met not reflected in Title 24. Adopt ADAAG language as follows.	Identification of Parking Spaces for Off-Street Parking Facilities. Each parking space reserved for persons with disabilities shall be identified by a reflectorized sign permanently posted immediately adjacent to and visible from each stall or space, consisting of a profile view of a wheelchair with occupant <u>the International Symbol of Accessibility</u> in white on dark blue background.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1131B.2	Passenger Loading Zones. 1. General. Where provided, one passenger drop-off and loading zone shall provide an access aisle at least 60 inches (1524 mm) wide and 20 feet (6096 mm) long adjacent and parallel to the vehicle pull-up space. Such zones shall be located on a surface with a slope not exceeding 1 unit vertical in 50 units horizontal (2% slope). If there are curbs between the access aisle and the vehicle pull-up space, a curb ramp shall be provided.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not require ISA posted at passenger drop off and loading zones. Adopt ADAAG language as follows.	Passenger Loading Zones. 1.General. Where provided, one passenger drop-off and loading zone shall provide an access aisle at least 60 inches (1524 mm) wide and 20 feet (6096 mm) long adjacent and parallel to the vehicle pull-up space. Such zones shall be located on a surface with a slope not exceeding 1 unit vertical in 50 units horizontal (2% slope). If there are curbs between the access aisle and the vehicle pull-up space, a curb ramp shall be provided. <u>Each passenger drop-off and loading zone designed for persons with disabilities shall be identified by a reflectorized sign permanently posted immediately adjacent to and visible from the passenger drop-off or loading zone, consisting of the International Symbol of Accessibility in white on dark blue background.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	1117B.5.8.1.2	Entrance signs. All building entrances that are accessible to and usable by persons with disabilities shall be identified with a minimum of one International Symbol of Accessibility and with additional directional signs, utilizing the symbol, at junctions, to be visible to persons along approaching pedestrian ways	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not require directional signage at inaccessible entrances that identifies the nearest accessible entrance. Adopt ADAAG language as follows.	Entrance signs. All building entrances that are accessible to and usable by persons with disabilities shall be identified with a minimum of one International Symbol of Accessibility and with additional directional signs, utilizing the symbol, at junctions, to be visible to persons along approaching pedestrian ways. <u>Inaccessible entrances shall have directional signage to indicate the route to the nearest accessible entrance.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1117B.5.8.1.3	Information posted. Buildings that have been remodeled to provide specific sanitary facilities and/or elevators for public use that conform to these building standards shall have this information posted in the building lobby, preferably as part of the building directory. The information shall be accompanied by the International Symbol of Accessibility.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not require directional signage at inaccessible toilet and bathing facilities that identifies the nearest accessible facilities. Adopt ADAAG language as follows.	Information posted. Buildings that have been remodeled to provide specific sanitary facilities and/or elevators for public use that conform to these building standards shall have this information posted in the building lobby, preferably as part of the building directory. The information shall be accompanied by the International Symbol of Accessibility. <u>Inaccessible toilet and bathing facilities shall have directional signage to indicate the location of the nearest accessible toilet and bathing facility.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA but it needs to delete the reference to "[b]uildings that have been remodeled" because ADA's requirement for signage applies to new construction and alterations like remodeling.
4.1.3 Accessible Buildings: New Construction. Accessible buildings and facilities shall meet the following minimum requirements:	Chapter 11B 1101B.1	DIVISION I - NEW BUILDINGS General. Buildings or portions of buildings shall be accessible to persons with disabilities as required by this chapter.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	1101B.2	<u>Design. The design and construction of accessible building elements shall be in accordance with this chapter and sections that are listed in Section 1114B.1.1.</u>			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added sections 1101B.2. Section 1101B.2 requires that accessible building elements comply with section 1114B.1.1. As per discussion in the technical assistance letter comment number "1.a.," the Department recommends deleting the following: The design and construction of accessible building elements shall be in accordance with this chapter and sections that are listed in Section 1114B.1.1.
	1103B.1	Building Accessibility General. Accessibility to buildings or portions of buildings shall be provided for all occupancy classifications except as modified or enhanced by this chapter. Occupancy requirements in this chapter may modify general requirements, but never to the exclusion of them.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment The Title 24 standards do not specify that projects cannot dip below the new construction and alteration provisions of the ADA. Adopting the language from California Government Code 4459 into 1103B.1 will clarify this.	Building Accessibility General Scope Accessibility to buildings or portions of buildings shall be provided for all occupancy classifications except as modified or enhanced by this chapter. Occupancy requirements in this chapter may modify general requirements, but never to the exclusion of them. Multistory buildings must provide access by ramp or elevator. <u>Notwithstanding any other provision of law, the application and scope of accessibility regulations in the California Building Standards Code shall not be less than the application and scope of accessibility requirements of the federal Americans with Disabilities Act of 1990 as adopted by the United States Department of Justice. See Government Code Section 4459.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.1.3 (1) At least one accessible route complying with 4.3 shall connect accessible building or facility entrances with all accessible spaces and elements within the building or facility.	1103B.1	General Accessibility to buildings or portions of buildings shall be provided for all occupancy classifications except as modified or enhanced by this chapter. Occupancy requirements in this chapter may modify general requirements, but never to the exclusion of them. Multistory buildings must provide access by ramp or elevator.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not contain specific language that connects elements and spaces within a building or facility. Adopt ADAAG language as follows.	<u>Scope</u> Accessibility to buildings or portions of buildings shall be provided for all occupancy classifications except as modified or enhanced by this chapter. Occupancy requirements in this chapter may modify general requirements, but never to the exclusion of them. Multistory buildings must provide access by ramp or elevator. <u>An accessible route of travel will connect all elements and spaces within a building or facility (see 1102B)</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA but it needs to reference all sections concerning accessible routes: 1102B, 1114B, 1124B, 1133B.3., 1133B.5, 1133B.7, 1133B.8.6.
	<u>1104B.3.2</u>	<u>Accessibility to key facilities. Seating for persons with disabilities shall be accessible from the main lobby or from a primary entrance, together with related toilet facilities.</u>			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1104B.3.2.
4.1.3 (2) All objects that overhang or protrude into circulation paths shall comply with 4.4.	None	None	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment For reference only.	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Not Addressed, but DOJ agrees with DSA that no action is required.
4.1.3 (3) Ground and floor surfaces along accessible routes and in accessible rooms and spaces shall comply with 4.5.	None	None	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment For reference only.	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Not Addressed, but DOJ agrees with DSA that no action is required.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.1.3 (4) Interior and exterior stairs connecting levels that are not connected by an elevator, ramp, or other accessible means of vertical access shall comply with 4.9.</p>	<p>1103B.1</p>	<p>Exceptions 1. This section shall not apply with respect to stairs used solely for emergency egress. 2. Floors or portions of floors not customarily occupied, including, but not limited to, nonoccupiable or employee spaces accessed only by ladders, catwalks, crawl spaces, very narrow passageways or freight (nonpassenger) elevators, and frequented only by service personnel for repair or maintenance purposes: such spaces as elevator pits and elevator penthouses, piping and equipment catwalks and machinery rooms. Stair stripping shall be required on stairs. 3. The following types of privately funded multistory buildings do not require a ramp or elevator above and below the first floor: 3.1 Multistoried office buildings (other than the professional office of a health care provider) and passenger vehicle service stations less than three stories high or less than 3,000 square feet (279 m2) per story. 3.2 Any other privately funded multistoried building that is not a shopping center, shopping mall or the professional office of a health care provider, and that is less than three stories high or less than 3,000 square feet (279 m2) per story if a reasonable portion of all facilities and accommodations normally sought and used by the public in such a building are accessible to and usable by persons with disabilities.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not specify that stairs must still meet accessibility requirements in facilities that do not require and elevator. Adopt ADAAG language as follows.</p>	<p>Exceptions 1. This section shall not apply with respect to stairs used solely for emergency egress. 2. Floors or portions of floors not customarily occupied, including, but not limited to, nonoccupiable or employee spaces accessed only by ladders, catwalks, crawl spaces, very narrow passageways or freight (nonpassenger) elevators, and frequented only by service personnel for repair or maintenance purposes: such spaces as elevator pits and elevator penthouses, piping and equipment catwalks and machinery rooms. Stair stripping shall be required on stairs. 3. The following types of privately funded multistory buildings do not require a ramp or elevator above and below the first floor: 3.1 Multistoried office buildings (other than the professional office of a health care provider) and passenger vehicle service stations less than three stories high or less than 3,000 square feet (279 m2) per story. 3.2 Any other privately funded multistoried building that is not a shopping center, shopping mall or the professional office of a health care provider, and that is less than three stories high or less than 3,000 square feet (279 m2) per story if a reasonable portion of all facilities and accommodations normally sought and used by the public in such a building are accessible to and usable by persons with disabilities.</p> <p><u>Note: Interior and exterior stairs connecting levels that are not connected by an elevator, ramp, or other accessible means of vertical access shall comply with section 1133B.4 Stairways.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Added section 1103B.1, exception 1.</p> <p>DSA's proposed language to include a note meets the ADA only if "NOTES" are enforceable provisions. Also, section 1103B.1, exception 1 must comply with section 1114B.2.2 regarding areas of rescue assistance.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.1.3 (4) Interior and exterior stairs connecting levels that are not connected by an elevator, ramp, or other accessible means of vertical access shall comply with 4.9.</p>	<p>1134B.2.1</p>	<p>Exceptions 2. Certain types of privately funded, multistory buildings and facilities were formerly exempt from accessibility requirements above and below the first floor under this code, but as of the effective date of this regulation are no longer exempt due to more restrictive provisions in the federal Americans with Disabilities Act. In alteration projects involving buildings and facilities previously approved and built without elevators, areas above and below the ground floor are subject to the 20 percent disproportionality provisions described in Exception 1, above, even if the value of the project exceeds the valuation threshold in Exception 1. The types of buildings and facilities are: 2.1 Office buildings and passenger vehicle service stations of three stories or more and 3,000 or more square feet (279 m2) per floor. 2.2 Offices of physicians and surgeons. 2.3 Shopping centers. 2.4 Other buildings and facilities three stories or more and more than 3,000 square feet (279 m2) per floor if a reasonable portion of services sought and used by the public is available on the accessible level. NOTE: For the general privately funded multistory building exception applicable to new construction and alterations, see Section 1103B.1, Exception 2.1.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not specify that \ stairs must still meet accessibility requirements in existing facilities that do not require and elevator. Adopt ADAAG language as follows.</p>	<p>Exceptions 2. Certain types of privately funded, multistory buildings and facilities were formerly exempt from accessibility requirements above and below the first floor under this code, but as of the effective date of this regulation are no longer exempt due to more restrictive provisions in the federal Americans with Disabilities Act. In alteration projects involving buildings and facilities previously approved and built without elevators, areas above and below the ground floor are subject to the 20 percent disproportionality provisions described in Exception 1, above, even if the value of the project exceeds the valuation threshold in Exception 1. The types of buildings and facilities are: 2.1 Office buildings and passenger vehicle service stations of three stories or more and 3,000 or more square feet (279 m2) per floor. 2.2 Offices of physicians and surgeons. 2.3 Shopping centers. 2.4 Other buildings and facilities three stories or more and more than 3,000 square feet (279 m2) per floor if a reasonable portion of services sought and used by the public is available on the accessible level. NOTE: For the general privately funded multistory building exception applicable to new construction and alterations, see Section 1103B.1, Exception 2.1.</p> <p><u>NOTE: Interior and exterior stairs connecting levels that are not connected by an elevator, ramp, or other accessible means of vertical access shall comply with section 1133B.4 Stairways.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>DSA's proposed language to include a note meets the ADA only if "NOTES are enforceable provisions. Also, section 1134B.2.1, exception 2, item 2.4 may contain an error. The phrase "more than 3,000 square feet" should be changed to "3,000 or more square feet."</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.1.3 (5)* One passenger elevator complying with 4.10 shall serve each level, including mezzanines, in all multi-story buildings and facilities unless exempted below. If more than one elevator is provided, each full passenger elevator shall comply with 4.10.	1103B.1	General. Accessibility to buildings or portions of buildings shall be provided for all occupancy classifications except as modified or enhanced by this chapter. Occupancy requirements in this chapter may modify general requirements, but never to the exclusion of them. Multistory buildings must provide access by ramp or elevator.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG language as follows.	General. Accessibility to buildings or portions of buildings shall be provided for all occupancy classifications except as modified or enhanced by this chapter. Occupancy requirements in this chapter may modify general requirements, but never to the exclusion of them. Multistory buildings must provide access by ramp or elevator. <u>One passenger elevator complying with section 1116B shall serve each level, including mezzanines, in all multi-story buildings and facilities unless exempted below. If more than one elevator is provided, each full passenger elevator shall comply with 1116B.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1116B.1.1	In buildings two or more stories in height, served by an elevator, or a building served by an elevator required by Chapter 11B, or a building served by an elevator required for accessibility by Section 101.17, all elevators provided shall accommodate a wheelchair.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG language as follows.	In buildings two or more stories in height, served by an elevator, or a building served by an elevator required by Chapter 11B, or a building served by an elevator required for accessibility by Section 101.17, all elevators provided shall accommodate a wheelchair. <u>if more than one elevator is provided, each full passenger elevator shall comply with this chapter.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>EXCEPTION 1: Elevators are not required in facilities that are less than three stories or that have less than 3000 square feet per story unless the building is a shopping center, a shopping mall, or the professional office of a health care provider, or [a terminal, depot, or other station used for specified public transportation, or an airport passenger terminal. In such a facility, any area housing passenger services, including boarding and debarking loading and unloading baggage claim, dining facilities, and other common areas open to the public, must be on an accessible route from an accessible entrance (28 C.F.R. § 36.401(d)(2)(ii)].</p>	1103B.1	<p>EXCEPTION 3. The following types of privately funded multistory buildings do not require a ramp or elevator above and below the first floor:</p> <p>3.1. Multistoried office buildings (other than the professional office of a health care provider) and passenger vehicle service stations less than three stories high or less than 3,000 square feet per story.</p> <p>3.2. Any other privately funded multistoried building that is not a shopping center, shopping mall or the professional office of a health care provider, and that is less than three stories high or less than 3,000 square feet per story if a reasonable portion of all facilities and accommodations normally sought and used by the public in such a building are accessible to and usable by persons with disabilities</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Adopt ADAAG language as follows.</p>	<p>EXCEPTION 3. The following types of privately funded multistory buildings do not require a ramp or elevator above and below the first floor:</p> <p>3.1. Multistoried office buildings (other than the professional office of a health care provider) and passenger vehicle service stations less than three stories high or less than 3,000 square feet per story.</p> <p>3.2. Any other privately funded multistoried building that is not a shopping center, shopping mall or the professional office of a health care provider, <u>or a terminal, depot, or other station used for specified public transportation, or an airport passenger terminal [In such a facility, any area housing passenger services, including boarding and debarking loading and unloading baggage claim, dining facilities, and other common areas open to the public, must be on an accessible route from an accessible entrance and that is less than three stories high or less than 3,000 square feet per story if a reasonable portion of all facilities and accommodations normally sought and used by the public in such a building are accessible to and usable by persons with disabilities.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>DSA's proposed language meets the ADA only if "passenger vehicle service stations" are not transportation facilities.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>The elevator exemption set forth in this paragraph does not obviate or limit in any way the obligation to comply with the other accessibility requirements established in section 4.1.3. For example, floors above or below the accessible ground floor must meet the requirements of this section except for elevator service. If toilet or bathing facilities are provided on a level not served by an elevator, then toilet or bathing facilities must be provided on the accessible ground floor.</p>	1103B.1	<p>EXCEPTION 3. The following types of privately funded multistory buildings do not require a ramp or elevator above and below the first floor:</p> <p>3.1. Multistoried office buildings (other than the professional office of a health care provider) and passenger vehicle service stations less than three stories high or less than 3,000 square feet per story.</p> <p>3.2. Any other privately funded multistoried building that is not a shopping center, shopping mall or the professional office of a health care provider, and that is less than three stories high or less than 3,000 square feet per story if a reasonable portion of all facilities and accommodations normally sought and used by the public in such a building are accessible to and usable by persons with disabilities.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Adopt ADAAG language as follows.</p>	<p>EXCEPTION 3. The following types of privately funded multistory buildings do not require a ramp or elevator above and below the first floor:</p> <p>3.1. Multistoried office buildings (other than the professional office of a health care provider) and passenger vehicle service stations less than three stories high or less than 3,000 square feet per story.</p> <p>3.2. Any other privately funded multistoried building that is not a shopping center, shopping mall or the professional office of a health care provider, and that is less than three stories high or less than 3,000 square feet per story if a reasonable portion of all facilities and accommodations normally sought and used by the public in such a building are accessible to and usable by persons with disabilities.</p> <p><u>The elevator exemption set forth in this section does not obviate or limit in any way the obligation to comply with the other accessibility requirements in this code. For example, floors above or below the accessible ground floor must meet the requirements of this section except for elevator service. If toilet or bathing facilities are provided on a level not served by an elevator, then toilet or bathing facilities must be provided on the accessible ground floor.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>DSA's proposed language meets the ADA only if "passenger vehicle service stations" are not transportation facilities.</p>
	1134B.2.1	<p>Exceptions</p> <p>2. Certain types of privately funded, multistory buildings and facilities were formerly exempt from accessibility requirements above and below the first floor under this code, but as of the effective date of this regulation are no longer exempt due to more restrictive provisions in the federal Americans with Disabilities Act. In alteration projects involving buildings and facilities previously approved and built without elevators, areas above and below the ground floor are subject to the 20 percent disproportionality provisions described in Exception 1, above, even if the value of the project exceeds the valuation threshold in Exception 1. The types of buildings and facilities are:</p> <p>2.1 Office buildings and passenger vehicle service stations of three stories or more and 3,000 or more square feet (279 m²) per floor.</p> <p>2.2 Offices of physicians and surgeons.</p> <p>2.3 Shopping centers.</p> <p>2.4 Other buildings and facilities three stories or more and</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Adopt ADAAG language as follows.</p>	<p>Exceptions</p> <p>2. Certain types of privately funded, multistory buildings and facilities were formerly exempt from accessibility requirements above and below the first floor under this code, but as of the effective date of this regulation are no longer exempt due to more restrictive provisions in the federal Americans with Disabilities Act. In alteration projects involving buildings and facilities previously approved and built without elevators, areas above and below the ground floor are subject to the 20 percent disproportionality provisions described in Exception 1, above, even if the value of the project exceeds the valuation threshold in Exception 1. The types of buildings and facilities are:</p> <p>2.1 Office buildings and passenger vehicle service stations of three stories or more and 3,000 or more square feet (279 m²) per floor.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>DSA's proposed language meets the ADA.</p> <p>Corrected reference from section 1103B.1, Exception 2.1 to Exception 3.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
		<p>more than 3,000 square feet (279 m2) per floor if a reasonable portion of services sought and used by the public is available on the accessible level.</p> <p>NOTE: For the general privately funded multistory building exception applicable to new construction and alterations, see Section 1103B.1, Exception 2.1.</p>		<p>2.2 Offices of physicians and surgeons. 2.3 Shopping centers. 2.4 Other buildings and facilities three stories or more and more than 3,000 square feet (279 m2) per floor if a reasonable portion of services sought and used by the public is available on the accessible level.</p> <p>NOTE: For the general privately funded multistory building exception applicable to new construction and alterations, see Section 1103B.1, Exception 2.4 3.</p> <p><u>The elevator exception set forth in this section does not obviate or limit in any way the obligation to comply with the other accessibility requirements in this code. For example, floors above or below the accessible ground floor must meet the requirements of this section except for elevator service. If toilet or bathing facilities are provided on a level not served by an elevator, then toilet or bathing facilities must be provided on the accessible ground floor.</u></p>		

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>In new construction if a building or facility is eligible for this exemption but a full passenger elevator is nonetheless planned, that elevator shall meet the requirements of 4.10 and shall serve each level in the building. A full passenger elevator that provides service from a garage to only one level of a building or facility is not required to serve other levels.</p>	1103B.1	<p>EXCEPTION 3. The following types of privately funded multistory buildings do not require a ramp or elevator above and below the first floor:</p> <p>3.1. Multistoried office buildings (other than the professional office of a health care provider) and passenger vehicle service stations less than three stories high or less than 3,000 square feet per story.</p> <p>3.2. Any other privately funded multistoried building that is not a shopping center, shopping mall or the professional office of a health care provider, and that is less than three stories high or less than 3,000 square feet per story if a reasonable portion of all facilities and accommodations normally sought and used by the public in such a building are accessible to and usable by persons with disabilities.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Adopt ADAAG language as follows.</p>	<p>EXCEPTION 3. The following types of privately funded multistory buildings do not require a ramp or elevator above and below the first floor:</p> <p>3.1. Multistoried office buildings (other than the professional office of a health care provider) and passenger vehicle service stations less than three stories high or less than 3,000 square feet per story.</p> <p>3.2. Any other privately funded multistoried building that is not a shopping center, shopping mall or the professional office of a health care provider, and that is less than three stories high or less than 3,000 square feet per story if a reasonable portion of all facilities and accommodations normally sought and used by the public in such a building are accessible to and usable by persons with disabilities.</p> <p><u>If a building or facility is eligible for this exception but a full passenger elevator is nonetheless planned, that elevator shall meet the requirements of 1116B and shall serve each level in the building. A full passenger elevator that provides service from a garage to only one level of a building or facility is not required to serve other levels.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

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<p>28 C.F.R. § 36.401(d)(ii). Shopping center or shopping mall means --</p> <p>(A) A building housing five or more sales or rental establishments; or</p> <p>(B) A series of buildings on a common site, either under common ownership or common control or developed either as one project or as a series of related projects, housing five or more sales or rental establishments. For purposes of this section, places of public accommodation of the types listed in paragraph (5) of the definition of "place of public accommodation" in section 36.104 are considered sales or rental establishments. The facility housing a "shopping center or shopping mall" only includes floor levels housing at least one sales or rental establishment, or any floor level designed or intended for use by at least one sales or rental establishment.</p>	220-S	SHOPPING CENTER is one or more sales establishments or stores.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>4.1.3 (5) EXCEPTION 2: Elevator pits, elevator penthouses, mechanical rooms, piping or equipment catwalks are exempted from this requirement.</p>	1103B.1	<p>EXCEPTIONS: 2. Floors or portions of floors not customarily occupied, including, but not limited to, elevator pits, piping and equipment catwalks and machinery rooms.</p> <p><u>Floors or portions of floors not customarily occupied, including, but not limited to, nonoccupiable or employee spaces accessed only by ladders, catwalks, crawl spaces, very narrow passageways or freight (nonpassenger) elevators, and frequented only by service personnel for repair or maintenance purposes: such spaces as elevator pits and elevator penthouses, piping and equipment catwalks and machinery rooms. Stair stripping shall be required on stairs.</u></p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Corrected section 1103B.1, Exception 2 for completeness.
<p>4.1.3 (5) EXCEPTION 3: Accessible ramps complying with 4.8 may be used in lieu of an elevator.</p>	1103B.1	Multistory buildings must provide access by a ramp or elevator.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	In the above section 4.1.3(5) of the ADA Standards for Accessible Design (ADA Standards), DSA proposed to delete this sentence. DSA should resolve this conflict.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.1.3 (5) EXCEPTION 4: Platform lifts (wheelchair lifts) complying with 4.11 of this guideline and applicable state or local codes may be used in lieu of an elevator only under the following conditions:</p> <p>(a) To provide an accessible route to a performing area in an assembly occupancy.</p> <p>(b) To comply with the wheelchair viewing position line-of-sight and dispersion requirements of 4.33.3.</p> <p>(c) To provide access to incidental occupiable spaces and rooms which are not open to the general public and which house no more than five persons, including but not limited to equipment control rooms and projection booths.</p> <p>(d) To provide access where existing site constraints or other constraints make use of a ramp or an elevator infeasible.</p>	1116B.2	<p>Special access wheelchair lifts may be provided between levels in lieu of passenger elevators when the vertical distance between landings, as well as the structural design and safeguards are as allowed by the State of California, Division of the State Architect, Access Compliance, the Department of Industrial Relations, Division of Occupational Safety and Health and any applicable safety regulations of other administrative authorities having jurisdiction.</p> <p>If lifts are provided, they shall be designed and constructed to facilitate unassisted entry, operation and exit from the lift and shall comply with the restrictions and enhancements of this section in conjunction with Sections 3093 to 3094, Part 7 of the California Code of Regulations.</p> <p>Additionally, lifts may be provided as part of an accessible route only for the following conditions:</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Exception 4 in section 4.1.3(5) of the ADA Standards for Accessible Design allows the use of a wheelchair lift in lieu of an elevator in new construction only under four conditions. Section 1116B.2 allows the use of lifts in more situations than the ADA.
	1116B.2.1	To provide an accessible route to a performing area in an assembly occupancy, or to a speaking area or similar place (such as a dais for "head table") in an assembly or Group B Occupancy.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1116B.2.2	To comply with the wheelchair viewing position line-of-sight and dispersion requirements of Section 1104B.3.5.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1116B.2.3	To provide access to incidental occupiable spaces and rooms which are not open to the general public and which house no more than five persons, including, but not limited to, equipment control rooms and projection booths.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1116B.2.4	To provide access where existing site constraints or other constraints make use of a ramp or an elevator infeasible.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.1.3 (6) Windows: (Reserved).	None	None	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.1.3 (7) Doors:</p> <p>(a) At each accessible entrance to a building or facility, at least one door shall comply with 4.13.</p> <p>(b) Within a building or facility, at least one door at each accessible space shall comply with 4.13.</p> <p>(c) Each door that is an element of an accessible route shall comply with 4.13.</p> <p>(d) Each door required by 4.3.10, Egress, shall comply with 4.13.</p>	1127B.1	<p>Exterior Routes of Travel, General. Site development and grading shall be designed to provide access to all entrances and exterior ground-floor exits, and access to normal paths of travel, and where necessary to provide access, shall incorporate pedestrian ramps, curb ramps, etc. When more than one building or facility is located on a site, accessible routes of travel shall be provided between buildings and accessible site facilities. The accessible route of travel shall be the most practical direct route between accessible building entrances, accessible site facilities and the accessible entrance to the site.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unclear whether section 1127B.1 and 1114B.1.2 addresses requirements in section 4.1.3 (7) of the ADA Standards. DSA should clarify.
	1114B.1.2	<p>When a building, or portion of a building, is required to be accessible or adaptable, an accessible route of travel shall be provided to all portions of the building, to accessible building entrances and between the building and the public way. Except within an individual dwelling unit, an accessible route of travel shall not pass through kitchens, storage rooms, restrooms, closets or other spaces used for similar purposes. At least one accessible route within the boundary of the site shall be provided from public transportation stops, accessible parking and accessible passenger loading zones, and public streets or sidewalks, to the accessible building entrance they serve. The accessible route shall, to the maximum extent feasible, coincide with the route for the general public. At least one accessible route shall connect accessible buildings, facilities, elements and spaces that are on the same site. At least one accessible route shall connect accessible building or facility entrances with all accessible spaces and elements and with all accessible dwelling units within the building or facility. An accessible route shall connect at least one accessible entrance of each accessible dwelling unit with those exterior and interior spaces and facilities that serve the accessible dwelling unit.</p> <p>Where more than one route of travel is provided, all routes shall be accessible.</p> <p><u>EXCEPTION: Where an elevator is provided for vertical access, only one elevator is required. Where more than one elevator is provided, all elevators shall be accessible.</u></p> <p><u>See Section 1114B.1.1 for a list of code sections applicable to accessible route of travel.</u></p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>Added the text for the exception in section 1114B1.2.</p> <p>Unclear whether section 1127B.1 and 1114B.1.2 addresses requirements in section 4.1.3 (7) of the ADA Standards. DSA should clarify.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.1.3 (8) In new construction, at a minimum, the requirements in (a) and (b) below shall be satisfied independently:</p> <p>(a) (i) At least 50% of all public entrances (excluding those in (b) below) must be accessible. At least one must be a ground floor entrance. Public entrances are any entrances that are not loading or service entrances.</p> <p>(ii) Accessible entrances must be provided in a number at least equivalent to the number of exits required by the applicable building/fire codes. (This paragraph does not require an increase in the total number of entrances planned for a facility.)</p> <p>(iii) An accessible entrance must be provided to each tenancy in a facility (for example, individual stores in a strip shopping center).</p> <p>One entrance may be considered as meeting more than one of the requirements in (a). Where feasible, accessible entrances shall be the entrances used by the majority of people visiting or working in the building.</p>	<p>1133B.1.1.1.1</p> <p>1114B1.3</p>	<p>All entrances and exterior ground-floor exit doors to buildings and facilities shall be made accessible to persons with disabilities. Doorways shall have a minimum clear opening of 32 inches (813 mm) with the door open 90 degrees, measured between the face of the door and the opposite stop. Openings more than 24 inches (610 mm) in depth shall comply with Sections 1118B.1 and 1118B.2.</p> <p><u>Primary entry access. All entrances and all exterior ground-level exits shall be accessible in compliance with Section 1133B.1.1.</u></p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Added section 1114B.1.3.</p>
	<p>1127B.1</p>	<p>Site development and grading shall be designed to provide access to all entrances and exterior ground floor exits, and access to normal paths of travel, and where necessary to provide access shall incorporate pedestrian ramps, etc.</p> <p>Where more than one building or facility is located on a site, accessible routes shall be provided between buildings and accessible site facilities. The accessible route of travel shall be the most practical direct route between accessible site facilities and accessible entrances to the site.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>4.1.3 (8) (b) (i) In addition, if direct access is provided for pedestrians from an enclosed parking garage to the building, at least one direct entrance from the garage to the building must be accessible.</p> <p>(ii) If access is provided for pedestrians from a pedestrian tunnel or elevated walkway, one entrance to the building from each tunnel or walkway must be accessible.</p> <p>One entrance may be considered as meeting more than one of the requirements in (b).</p>	<p>1130B</p>	<p>All entrances to and vertical clearances within parking structures shall have a minimum vertical clearance of 8 feet 2 inches (2489 mm) where required for accessibility to accessible parking spaces.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not provide the same level of specificity as ADAAG. Adopt the following language.</p>	<p>All entrances to and vertical clearances within parking structures shall have a minimum vertical clearance of 8 feet 2 inches (2489 mm) where required for accessibility to accessible parking spaces.</p> <p><u>In addition, if direct access is provided for pedestrians from an enclosed parking garage to the building, at least one direct entrance from the garage to the building must be accessible.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
Because entrances also serve as emergency exits whose proximity to all parts of buildings and facilities is essential, it is preferable that all entrances be accessible.	1127B.1	<p>Site development and grading shall be designed to provide access to all entrances and exterior ground floor exits, and access to normal paths of travel, and where necessary to provide access shall incorporate pedestrian ramps, etc.</p> <p>Where more than one building or facility is located on a site, accessible routes shall be provided between buildings and accessible site facilities. The accessible route of travel shall be the most practical direct route between accessible site facilities and accessible entrances to the site.</p>	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not provide the same level of specificity as ADAAG. Adopt the following language.	<p>Site development and grading shall be designed to provide access to all entrances and exterior ground floor exits, and access to normal paths of travel, and where necessary to provide access shall incorporate pedestrian ramps, etc.</p> <p>Where more than one building or facility is located on a site, accessible routes shall be provided between buildings and accessible site facilities. The accessible route of travel shall be the most practical direct route between accessible site facilities and accessible entrances to the site. <u>If access is provided for pedestrians from a pedestrian tunnel or elevated walkway, entrances to the building from each tunnel or walkway must be accessible.</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.1.3 (8) (c) If the only entrance to a building, or tenancy in a facility, is a service entrance, that entrance shall be accessible.	1133B.1.1.1.1	All entrances and exterior ground-floor exit doors to buildings and facilities shall be made accessible to persons with disabilities. Doorways shall have a minimum clear opening of 32 inches (813 mm) with the door open 90 degrees, measured between the face of the door and the opposite stop. Openings more than 24 inches (610 mm) in depth shall comply with Sections 1118B.1 and 1118B.2.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.1.3 (8) (d) Entrances which are not accessible shall have directional signage complying with 4.30.1, 4.30.2, 4.30.3 and 4.30.5, which indicates the location of the nearest accessible entrance.	1117B.5.8.1.2	All building entrances that are accessible to and usable by persons with disabilities shall be identified with a minimum of one International Symbol of Accessibility and with additional directional signs, utilizing the symbol, at junctions, to be visible to persons along approaching pedestrian ways	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not require directional signs at inaccessible entrances. Incorporate ADAAG language as follows.	All building <u>and facility</u> entrances that are accessible to and usable by persons with disabilities shall be identified with a minimum of one International Symbol of Accessibility and with additional directional signs, utilizing the symbol, at junctions, to be visible to persons along approaching pedestrian ways. <u>Entrances which are not accessible shall have directional signage complying with 1117B.5, which indicates the location of the nearest accessible entrance.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.1.3 (9)* In buildings or facilities, or portions of buildings or facilities, required to be accessible, accessible means of egress shall be provided in the same number as required for exits by local building/life safety regulations. Where a required exit from an occupiable level above or below a level of accessible exit discharge is not accessible, an area of rescue assistance shall be provided on each such level (in a number equal to that of inaccessible required exits). Areas of rescue assistance shall comply with 4.3.11. A horizontal exit, meeting the requirements of local building/life safety regulations, shall satisfy the requirement for an area of rescue assistance. EXCEPTION: Areas of rescue assistance are not required in buildings or facilities having a supervised automatic sprinkler system.</p>	1114B.2.1	<p>In buildings or portions of buildings required to be accessible, accessible means of egress shall be provided in the same number as required for exits by Chapter 10. When an exit required by Chapter 10 is not accessible, an area for evacuation assistance shall be provided. Areas for evacuation assistance shall comply with the requirements of this code and shall adjoin an accessible route of travel complying with this code. EXCEPTIONS: 1. Areas of evacuation assistance are not required in buildings or facilities having a supervised automatic sprinkler system. 2. In alterations of existing buildings, areas of evacuation assistance are not required</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not reference facilities as contained in ADAAG.</p>	<p>In buildings or facilities, or portions of buildings or facilities, required to be accessible, accessible means of egress shall be provided in the same number as required for exits by Chapter 10. When an exit required by Chapter 10 is not accessible, an area for evacuation assistance shall be provided. Areas for evacuation assistance shall comply with the requirements of this code and shall adjoin an accessible route of travel complying with this code. EXCEPTIONS: 1. Areas of evacuation assistance are not required in buildings or facilities having a supervised automatic sprinkler system. 2. In alterations of existing buildings, areas of evacuation assistance are not required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>4.1.3 (10)* Drinking Fountains: (a) Where only one drinking fountain is provided on a floor there shall be a drinking fountain which is accessible to individuals who use wheelchairs in accordance with 4.15 and one accessible to those who have difficulty bending or stooping. (This can be accommodated by the use of a "hi-lo" fountain; by providing one fountain accessible to those who use wheelchairs and one fountain at a standard height convenient for those who have difficulty bending; by providing a fountain accessible under 4.15 and a water cooler; or by such other means as would achieve the required accessibility for each group on each floor.) (b) Where more than one drinking fountain or water cooler is provided on a floor, 50% of those provided shall comply with 4.15 and shall be on an accessible route.</p>	1117B.1.1	<p>General. Where water fountains are provided, they shall comply with this section. In new construction, where only one drinking fountain area is provided on a floor, there shall be a drinking fountain that is accessible to individuals who use wheelchairs in accordance with 1115B.2.1.13 and one accessible to those who have difficulty bending or stooping. This can be accommodated by the use of "hi-low" fountains, or by such other means as would achieve the required accessibility for each group on each floor.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	No action required.	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>It is unclear how many water fountains must be accessible when more than one drinking fountain is provided. Also, section 1117B.1.1 references section 1115B.2.1.2, which addresses lavatories. This side by side analysis references section 1115B.2.1.13, which does not exist. The correct reference should be section 1115B.2.1.5, which addresses drinking fountains.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.1.3 (11) Toilet Facilities: If toilet rooms are provided, then each public and common use toilet room shall comply with 4.22. Other toilet rooms provided for the use of occupants of specific spaces (i.e., a private toilet room for the occupant of a private office) shall be adaptable. If bathing rooms are provided, then each public and common use bathroom shall comply with 4.23. Accessible toilet rooms and bathing facilities shall be on an accessible route.</p>	<p>1115B 1115B.1</p>	<p>Bathing and Toilet Facilities Sanitary facilities that serve buildings, facilities or portions of buildings or facilities that are required by these standards to be accessible to persons with disabilities, shall conform to the following requirements, except as specifically exempted in other portions of this code.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Section 1115B.1 meets the ADA but we must verify that the exemptions also meet the ADA. Please identify the sections where the requirements of section 1115B.1 are exempted.</p>
	<p><u>1115B.2</u></p>	<p><u>Toilet Facilities. Where separate facilities are provided for nondisabled persons of each sex, separate facilities shall be provided for persons with disabilities of each sex also. Where unisex facilities are provided for persons without disabilities, at least one unisex facility shall be provided for persons with disabilities within close proximity to the nonaccessible facility. (See Figure 11B-1A.)</u></p>			<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
	<p>1115B.6</p>	<p>Where facilities for bathing are provided for the public, clients or employees, including showers, bathtubs or lockers, at least one such facility, and not less than 1 percent of all facilities, shall conform to the following standards unless specifically exempted by other portions of these regulations.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment ADAAG does not limit the number of bathing facilities to 1% of the total. Amend Title 24 requirement as follows.</p>	<p>Where facilities for bathing are provided for the public, clients or employees, including showers, bathtubs or lockers, at least one such facility, and not less than 1 percent of all facilities, they shall conform to the following standards unless specifically exempted by other portions of these regulations.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>DSA's proposed language for section 1115B.6 meets the ADA but we must verify that the exemptions also meet the ADA. Please identify the sections where the requirements of section 1115B.6 are exempted.</p>
	<p><u>1104B.3.13</u></p>	<p><u>Miscellaneous areas. Public toilets and other public areas shall be made accessible to persons with disabilities.</u></p>			<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Added section 1104B.3.13.</p>
<p>4.1.3 (12) Storage, Shelving and Display Units: (a) If fixed or built-in storage facilities such as cabinets, shelves, closets, and drawers are provided in accessible spaces, at least one of each type provided shall contain storage space complying with 4.25. Additional storage may be provided outside of the dimensions required by 4.25.</p>	<p>1125B.1</p>	<p>If fixed storage facilities such as cabinets, shelves, closets or drawers are provided where access is required by Section 101.17.11, at least one of each type shall comply with this section. Additional storage may be provided outside of the reach ranges shown in Figure 11B-5D.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
(b) Shelves or display units allowing self-service by customers in mercantile occupancies shall be located on an accessible route complying with 4.3. Requirements for accessible reach range do not apply.	1110B.2.1	Circulation Circulation aisles and pedestrian ways shall be sized according to functional requirements and in no case shall be less than 36 inches (914 mm) in clear width.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not specify that self service shelves or display units must be located on an accessible route. Adopt ADAAG language as follows.	Circulation <u>Shelves or display units allowing self-service by customers in mercantile occupancies shall be located on an accessible route of travel.</u> Circulation aisles and pedestrian ways shall be sized according to functional requirements and in no case shall be less than 36 inches (914 mm) in clear width.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA but it needs to reference all sections concerning accessible routes: 1102B, 1114B, 1124B, 1133B.3., 1133B.5, 1133B.7, 1133B.8.6.
4.1.3 (13) Controls and operating mechanisms in accessible spaces, along accessible routes, or as parts of accessible elements (for example, light switches and dispenser controls) shall comply with 4.27.	1117B.6.1	Controls and operating mechanisms required to be accessible by Section 101.17.11 shall comply with the requirements of this section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG language as follows.	Controls and operating mechanisms <u>in accessible spaces, along accessible routes, or as parts of accessible elements (for example, light switches and dispenser controls)</u> and those required to be accessible by Section 101.17.11 shall comply with the requirements of this section.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.1.3 (14) If emergency warning systems are provided, then they shall include both audible alarms and visual alarms complying with 4.28. Sleeping accommodations required to comply with 9.3 shall have an alarm system complying with 4.28. Emergency warning systems in medical care facilities may be modified to suit standard health care alarm design practice.	1114B.2.4	Alarms/emergency warning systems/ accessibility. If emergency warning systems are required, they shall activate a means of warning the hearing impaired. Emergency warning systems as part of the fire-protective signaling system shall be designed and installed in accordance with NFPA 72 and 72G as amended in Chapter 35.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Deleted the words "and 72G" because section 1114B.2.4 does not contain a reference to NFPA 72G. Section 1114B.2.4 meets the ADA, but the visual alarm requirements in NFPA 72 as amended in Chapter 35 does not meet the ADA. Refer to comments below in section 4.28 of the ADA Standards.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	1111B.4.5	Visual alarms, notification devices and telephones for persons with hearing impairments. In addition to those accessible sleeping rooms and suites required by Section 1111B.4.2 to comply with this section, additional sleeping rooms and suites shall be provided with the following features in conformance with Table 11B-4 and as follows:	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Section 1111B.4.5 meets the ADA, but the visual alarm requirements in NFPA 72 as amended in Chapter 35 does not meet the ADA. Refer to comments below in section 4.28 of the ADA Standards.
	1111B.4.5.1	Visual alarms. Auxiliary visual alarms shall be provided and shall comply with Section 1114B.2.4.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Section 1111B.4.5.1 meets the ADA, but the visual alarm requirements in NFPA 72 as amended in Chapter 35 does not meet the ADA. Refer to comments below in section 4.28 of the ADA Standards.
4.1.3 (15) Detectable warnings shall be provided at locations as specified in 4.29.	None	None	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment For reference only.	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Not Addressed, but DOJ agrees with DSA that no action is required.
4.1.3 (16) Building Signage: (a) Signs which designate permanent rooms and spaces shall comply with 4.30.1, 4.30.4, 4.30.5 and 4.30.6. (b) Other signs which provide direction to or information about functional spaces of the building shall comply with 4.30.1, 4.30.2, 4.30.3, and 4.30.5. EXCEPTION: Building directories, menus, and all other signs which are temporary are not required to comply.	1117B.5.1	Signs and Identification 1. General. When new or additional signs and/or identification devices are provided, or when existing signs and/or identification devices are placed or altered, the new or altered signs and/or identification devices are replaced or altered, the new or altered signs and/or identification devices shall comply with 1117B.5. The addition of or replacement of signs and/or identification devices shall not trigger any additional path of travel requirements 2. Identification signs. When signs identify permanent rooms and spaces of a building or site, they shall comply with 1117B.5.2, 1117B.5.3, 1117B.5.6, and 1117B.5.7. 3. Directional and informational signs. When signs direct to or give information about permanent rooms and space of a building or site, they shall comply with 1117B.5.2, 1117B.5.3, and 1117B.5.4. 4. Accessibility signs. When signs identify, direct or give information about accessible elements and feature of a building or site, they shall include the appropriate symbol of accessibility and shall comply with 1117B.5.2 and, when applicable, 1117B.5.8.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments																								
<p>4.1.3 (17) Public Telephones: (a) If public pay telephones, public closed circuit telephones, or other public telephones are provided, then they shall comply with 4.31.2 through 4.31.8 to the extent required by the following table:</p> <table border="1" data-bbox="102 462 537 657"> <thead> <tr> <th>Number of each type of telephone provided on each floor</th> <th>Number of telephones required to comply with 4.31.2 through 4.31.81</th> </tr> </thead> <tbody> <tr> <td>1 or more single unit</td> <td>1 per floor</td> </tr> <tr> <td>1 bank²</td> <td>1 per floor</td> </tr> <tr> <td>2 or more banks²</td> <td>1 per bank. Accessible unit may be installed as a single unit in proximity (either visible or with signage) to the bank. At least one public telephone per floor shall meet the requirements for a forward reach telephone.</td> </tr> </tbody> </table> <p>1 Additional public telephones may be installed at any height. Unless otherwise specified, accessible telephones may be either forward or side reach telephones. 2 A bank consists of two or more adjacent public telephones, often installed as a unit. 3 EXCEPTION: For exterior installations only, if dial tone first service is available, then a side reach telephone may be installed instead of the required forward reach telephone (i.e., one telephone in proximity to each bank shall comply with 4.31).</p>	Number of each type of telephone provided on each floor	Number of telephones required to comply with 4.31.2 through 4.31.81	1 or more single unit	1 per floor	1 bank ²	1 per floor	2 or more banks ²	1 per bank. Accessible unit may be installed as a single unit in proximity (either visible or with signage) to the bank. At least one public telephone per floor shall meet the requirements for a forward reach telephone.	1117B.2.1	<p>If public telephones are provided, they shall comply with this section to the extent required by the following table. See Figure 11B-4.</p> <table border="1" data-bbox="733 397 1142 771"> <thead> <tr> <th>Number of each type of telephone provided on each floor</th> <th>Minimum number of telephones required to comply with Section 1117B.21</th> </tr> </thead> <tbody> <tr> <td>1 or more single units</td> <td>1 or at least 50 percent of telephone unit(s) per floor</td> </tr> <tr> <td>1 telephone bank</td> <td>1 or at least 50 percent of telephone unit(s) per bank</td> </tr> <tr> <td>2 or more banks</td> <td>1 or at least 50 percent of telephone unit(s) per bank at least 1 telephone per floor shall meet the requirements for a forward reach telephone</td> </tr> </tbody> </table> <p>1 Additional public telephones may be installed at any height.</p>	Number of each type of telephone provided on each floor	Minimum number of telephones required to comply with Section 1117B.21	1 or more single units	1 or at least 50 percent of telephone unit(s) per floor	1 telephone bank	1 or at least 50 percent of telephone unit(s) per bank	2 or more banks	1 or at least 50 percent of telephone unit(s) per bank at least 1 telephone per floor shall meet the requirements for a forward reach telephone	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not include coverage for closed circuit telephones. Adopt the ADAAG provisions as follows.	<p>If public telephones, <u>public closed circuit telephones, or other public telephones</u> are provided, they shall comply with this section to the extent required by the following table. See Figure 11B-4.</p> <table border="1" data-bbox="1548 438 1962 812"> <thead> <tr> <th>Number of each type of telephone provided on each floor</th> <th>Minimum number of telephones required to comply with Section 1117B.21</th> </tr> </thead> <tbody> <tr> <td>1 or more single units</td> <td>1 or at least 50 percent of telephone unit(s) per floor</td> </tr> <tr> <td>1 telephone bank</td> <td>1 or at least 50 percent of telephone unit(s) per bank</td> </tr> <tr> <td>2 or more banks</td> <td>1 or at least 50 percent of telephone unit(s) per bank at least 1 telephone per floor shall meet the requirements for a forward reach telephone</td> </tr> </tbody> </table> <p>1 Additional public telephones may be installed at any height.</p>	Number of each type of telephone provided on each floor	Minimum number of telephones required to comply with Section 1117B.21	1 or more single units	1 or at least 50 percent of telephone unit(s) per floor	1 telephone bank	1 or at least 50 percent of telephone unit(s) per bank	2 or more banks	1 or at least 50 percent of telephone unit(s) per bank at least 1 telephone per floor shall meet the requirements for a forward reach telephone	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
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4.1.3 (17) (b)* All telephones required to be accessible and complying with 4.31.2 through 4.31.8 shall be equipped with a volume control. In addition, 25 percent, but never less than one, of all other public telephones provided shall be equipped with a volume control and shall be dispersed among all types of public telephones, including closed circuit telephones, throughout the building or facility. Signage complying with applicable provisions of 4.30.7 shall be provided.	1117B.2.8	Telephone equipment for hearing impaired persons. Telephones shall be equipped with a receiver that generates a magnetic field in the area of the receiver cap. If banks of public telephones are provided, at least one in each bank and a total of at least 25 percent of the total number of public telephones, including closed-circuit telephones in a building or facility, shall be equipped with a volume control. Such telephones shall be capable of a minimum of 12 dBA and a maximum of 18 dBA above normal. If an automatic reset is provided, 18 dBA may be exceeded. Public telephones with volume control shall be hearing aid compatible and shall be identified by a sign containing a depiction of a telephone handset with radiating sound waves.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Section 4.1.3 (17) (b) of the ADA Standards require that all accessible telephones be equipped with a volume control. In addition, 25% but not less than 1 of other telephones be equipped with a volume control. Section 1117B.2.8 provides similar but not equivalent requirements.
<p>4.1.3 (17) (c) The following shall be provided in accordance with 4.31.9:</p> <p>(i) if a total number of four or more public pay telephones (including both interior and exterior phones) is provided at a site, and at least one is in an interior location, then at least one interior public text telephone shall be provided.</p> <p>(ii) if an interior public pay telephone is provided in a stadium or arena, in a convention center, in a hotel with a convention center, or in a covered mall, at least one interior public text telephone shall be provided in the facility.</p> <p>(iii) if a public pay telephone is located in or adjacent to a hospital emergency room, hospital recovery room, or hospital waiting room, one public text telephone shall be provided at each such location.</p>	1117B.2.9 1117B.2.9.1	<p>Text telephones.</p> <p>Where required. If a total of four or more public pay telephones are provided at the interior and exterior of a site, and if at least one of the total is in an interior location, then at least one interior public text telephone shall be provided.</p> <p>EXCEPTIONS:</p> <p>1. If an interior public pay telephone is provided in a stadium or arena, in a convention center, in a hotel with a convention center, or in a covered mall, at least one interior public text telephone shall be provided in the facility.</p> <p>2. If a public pay telephone is located in or adjacent to a hospital emergency room, hospital recovery room or hospital waiting room, one public text telephone shall be provided at each location.</p>	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment ADAAG provides greater specificity than Title 24. Some Title 24 scoping provisions appear as exceptions and will be clarified as follows:	<p>Where required.</p> <p>1. If a total of four or more public pay telephones (including both interior and exterior phones) are provided at the interior and exterior of a site, and if at least one of the total is in an interior location, then at least one interior public text telephone shall be provided.</p> <p>EXCEPTIONS:</p> <p>4- 2. If an interior public pay telephone is provided in a stadium or arena, in a convention center, in a hotel with a convention center, or in a covered mall, at least one interior public text telephone shall be provided in the facility.</p> <p>2- 3. If a public pay telephone is located in or adjacent to a hospital emergency room, hospital recovery room or hospital waiting room, one public text telephone shall be provided at each location.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed language meets the ADA, but the three paragraphs in section 1117B.2.9.1 has been renumbered to clarify that, if applicable, all three requirements must be satisfied. Also, for clarity we deleted the following: "the interior and exterior of."

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.1.3 (17) (d) Where a bank of telephones in the interior of a building consists of three or more public pay telephones, at least one public pay telephone in each such bank shall be equipped with a shelf and outlet in compliance with 4.31.9(2).	1117B.2.9.2	Text telephones shall comply with the following requirements: 1. Text telephones used with a pay telephone shall be permanently affixed within or adjacent to the telephone enclosure. If an acoustic coupler is used, the telephone cord shall be sufficiently long to allow connection of the text telephone and the telephone receiver. 2. Pay telephones designed to accommodate a portable text telephone shall be equipped with a shelf and an electrical outlet within or adjacent to the telephone enclosure. The telephone handset shall be capable of being placed flush on the surface of the shelf. The shelf shall be capable of accommodating a text telephone and shall have 6 inches (152 mm) minimum vertical clearance in the area where the text telephone is to be placed. 3. Equivalent facilitation may be substituted for the requirements of this section. For example, a portable text telephone may be made available in a hotel at a registration desk if it is available on a 24-hour basis for use with nearby public pay phones. In this instance, at least one pay phone shall comply with Item 2. In addition, if an acoustic coupler is used, the telephone handset cord shall be sufficiently long to allow connection of the text telephone and the telephone receiver. Directional signage shall comply with Section 1117B.5.	<input type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not provide specificity when a shelf and outlet is required. Adopt ADAAG language as follows:	Text telephones shall comply with the following requirements: 1. Text telephones used with a pay telephone shall be permanently affixed within or adjacent to the telephone enclosure. If an acoustic coupler is used, the telephone cord shall be sufficiently long to allow connection of the text telephone and the telephone receiver. 2. Pay telephones designed to accommodate a portable text telephone <u>Where a bank of telephones in the interior of a building consists of three or more public pay telephones, at least one public pay telephone in each such bank shall be equipped with a shelf and an electrical outlet within or adjacent to the telephone enclosure. The telephone handset shall be capable of being placed flush on the surface of the shelf. The shelf shall be capable of accommodating a text telephone and shall have 6 inches (152 mm) minimum vertical clearance in the area where the text telephone is to be placed.</u> 3. Equivalent facilitation may be substituted for the requirements of this section. For example, a portable text telephone may be made available in a hotel at a registration desk if it is available on a 24-hour basis for use with nearby public pay phones. In this instance, at least one pay phone shall comply with Item 2. In addition, if an acoustic coupler is used, the telephone handset cord shall be sufficiently long to allow connection of the text telephone and the telephone receiver. Directional signage shall comply with Section 1117B.5.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.1.3 (18) If fixed or built-in seating or tables (including, but not limited to, study carrels and student laboratory stations), are provided in accessible public or common use areas, at least five percent (5%), but not less than one, of the fixed or built-in seating areas or tables shall comply with 4.32. An accessible route shall lead to and through such fixed or built-in seating areas, or tables.	1122B.1	Minimum Number. Where fixed or built-in seating, tables, or counters are provided for the public, and in general employee areas, 5 percent, but never less than one, must be accessible as provided in this section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not include ADAAG language for an accessible route. Adopt ADAAG language.	Minimum Number. Where fixed or built-in seating, tables, or counters are provided for the public, and in general employee areas, 5 percent, but never less than one, must be accessible as provided in this section. <u>An accessible route of travel shall lead to and through such fixed or built-in seating areas, or tables.</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	DSA's proposed language is very similar, but not equivalent to the ADA because ADA includes in its coverage public use or common use areas.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments												
	1106B.3	Teaching Facility Cubicles, Study Carrels, etc. Teaching facility cubicles, study carrels, etc., shall have 5 percent, but always at least one cubicle or carrel in each group (language, dental, audiovisual, typing, drafting, darkrooms, etc.) made accessible to and usable by persons with disabilities in compliance with Section 1118B, "Space Allowance and Reach Ranges" and Section 1122B, "Fixed or Built-in Seating, Tables, and Counters."	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No													
	1106B.2	Laboratory Rooms. Laboratory rooms shall have at least one work station and at least 5 percent of all work stations accessible to and usable by persons with disabilities.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not include reference to sections covering accessible route of travel.	Laboratory Rooms. Laboratory rooms shall have at least one work station and at least 5 percent of all work stations accessible to and usable by persons with disabilities in compliance with Section 1118B, "Space Allowance and Reach Ranges" and Section 1122B, "Fixed or Built-in Seating, Tables, and Counters."	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No													
4.1.3 (19)* Assembly areas: (a) In places of assembly with fixed seating accessible wheelchair locations shall comply with 4.33.2, 4.33.3, and 4.33.4 and shall be provided consistent with the following table: <table border="0" data-bbox="102 974 524 1193"> <tr> <td>Capacity of Seating in Assembly Areas</td> <td>Number of Required Wheelchair Locations</td> </tr> <tr> <td>4 to 25</td> <td>1</td> </tr> <tr> <td>26 to 50</td> <td>2</td> </tr> <tr> <td>51 to 300</td> <td>4</td> </tr> <tr> <td>301 to 500</td> <td>6</td> </tr> <tr> <td>over 500</td> <td>6, plus 1 additional space for</td> </tr> </table>	Capacity of Seating in Assembly Areas	Number of Required Wheelchair Locations	4 to 25	1	26 to 50	2	51 to 300	4	301 to 500	6	over 500	6, plus 1 additional space for	1104B.3.1 <u>1104B.3.8</u>	Seating. In all assembly places where seating is provided, there shall be spaces for persons using wheelchairs and semiambulant persons, as provided in this section. <u>Seating for semiambulant individuals. In addition to spaces provided for wheelchair users as noted in Sections 1104B.3.4 through 1104B.3.7 above, there shall be provided seating for semiambulant individuals. The number of such seating shall be equal to at least 1 percent of the total seating and shall be no fewer than two. Such seats shall provide at least 24 inches (610 mm) clear leg space between the front of the seat to the nearest obstruction or to the back of the seat immediately in front.</u>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1104B.3.8.
Capacity of Seating in Assembly Areas	Number of Required Wheelchair Locations																	
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ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments																				
<p>each total seating capacity increase of 100</p> <p>In addition, one percent, but not less than one, of all fixed seats shall be aisle seats with no armrests on the aisle side, or removable or folding armrests on the aisle side. Each such seat shall be identified by a sign or marker. Signage notifying patrons of the availability of such seats shall be posted at the ticket office. Aisle seats are not required to comply with 4.33.4.</p>	<p>1104B.3.4</p>	<p>Wheelchair Spaces.</p> <p>1. The number of such spaces is as shown in Table 11B-1.</p> <p>TABLE 11B-1—WHEELCHAIR SEATING SPACES</p> <table border="1" data-bbox="739 397 1088 600"> <thead> <tr> <th>SEATING CAPACITY</th> <th>NO. OF WHEELCHAIR SEATING SPACES</th> </tr> </thead> <tbody> <tr> <td>4 to 26</td> <td>1</td> </tr> <tr> <td>27 to 50</td> <td>2</td> </tr> <tr> <td>51 to 300</td> <td>4</td> </tr> <tr> <td>301 to 500</td> <td>6</td> </tr> </tbody> </table> <p>2. When the seating capacity exceeds 500, one additional wheelchair seating space shall be provided for each total seating capacity increase of 100.</p>	SEATING CAPACITY	NO. OF WHEELCHAIR SEATING SPACES	4 to 26	1	27 to 50	2	51 to 300	4	301 to 500	6	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 seating ratio does not conform to ADAAG. Modify as follows.</p>	<p>Wheelchair Spaces.</p> <p>1. The number of such spaces is as shown in Table 11B-1.</p> <p>TABLE 11B-1—WHEELCHAIR SEATING SPACES</p> <table border="1" data-bbox="1553 422 1921 625"> <thead> <tr> <th>SEATING CAPACITY</th> <th>NO. OF WHEELCHAIR SEATING SPACES</th> </tr> </thead> <tbody> <tr> <td>4 to 26 25</td> <td>1</td> </tr> <tr> <td>27 26 to 50</td> <td>2</td> </tr> <tr> <td>51 to 300</td> <td>4</td> </tr> <tr> <td>301 to 500</td> <td>6</td> </tr> </tbody> </table> <p>2. When the seating capacity exceeds 500, one additional wheelchair seating space shall be provided for each total seating capacity increase of 100.</p>	SEATING CAPACITY	NO. OF WHEELCHAIR SEATING SPACES	4 to 26 25	1	27 26 to 50	2	51 to 300	4	301 to 500	6	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
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	<p>1105B.2</p>	<p>Group B Occupancies. Group B Occupancies used for assembly purposes, but having an occupant load of less than 50, shall conform to the requirements as specified in Sections 1105B, 1107B and 1110B.</p> <p>NOTE: For floors and levels in dining, banquet and bar facilities, see Section 1120B.</p>			<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Added section 1105B.2.</p> <p>Section 1105B.2 does not meet the ADA because section 1105B.2 excepts Group B occupancies less than 50 from the accessibility requirements in section 1114B.1.1.</p>																				
<p>4.1.3 (19) (b) This paragraph applies to assembly areas where audible communications are integral to the use of the space (e.g., concert and lecture halls,</p>	<p>1104B.2</p>	<p>Assistive-listening systems in Assembly Areas. Assembly areas, conference and meeting rooms shall provide assistive-listening systems for persons with hearing impairments as provided in this section.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>																					

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
playhouses and movie theaters, meeting rooms, etc.). Such assembly areas, if (1) they accommodate at least 50 persons, or if they have audio-amplification systems, and (2) they have fixed seating, shall have a permanently installed assistive listening system complying with 4.33. For other assembly areas, a permanently installed assistive listening system, or an adequate number of electrical outlets or other supplementary wiring necessary to support a portable assistive listening system shall be provided. The minimum number of receivers to be provided shall be equal to 4 percent of the total number of seats, but in no case less than two. Signage complying with applicable provisions of 4.30 shall be installed to notify patrons of the availability of a listening system.	1104B.2 6.	Portable systems. If portable assistive-listening systems are used for conference or meeting rooms, the system may serve more than one room. However, permanently installed assistive-listening systems are required in areas if (1) they accommodate at least 50 persons or if they have audio-amplification systems, and (2) they have fixed seating.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not include language covering electrical outlets or supplemental wiring. Adopt ADAAG language as follows.	Portable systems. If portable assistive-listening systems are used for conference or meeting rooms, the system may serve more than one room. <u>An adequate number of electrical outlets or other supplementary wiring necessary to support a portable assistive listening system shall be provided.</u> However, p Permanently installed assistive-listening systems are required in areas if (1) they accommodate at least 50 persons or if they have audio-amplification systems, and (2) they have fixed seating.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1104B.2 1.	Number of personal receivers required. The minimum number of receivers to be provided shall be equal to 4 percent of the total number of seats, but in no case less than two.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1104B.2 4.	Signage. A sign shall be posted in a prominent place indicating the availability of assistive-listening devices. The sign shall include the international symbol of access for hearing loss and wording that states "Assistive-listening System Available." See Figure 11B-14.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.1.3 (20) Where automated teller machines are provided, each machine shall comply with the requirements of 4.34 except where two or more are provided at a location, then only one must comply. EXCEPTION: Drive-up-only automated teller machines are not required to comply with 4.34.2 and 4.34.3.</p>	<p>1117B.7.2</p> <p><u>1117B.7.4.1</u></p> <p><u>1117B.7.4.2</u></p> <p><u>1117B.7.4.3</u></p>	<p>General. Where ATMs are provided for the public, they shall comply with this section.</p> <p>EXCEPTION 4: Drive-up only automated teller machines are not required to comply with this section.</p> <p><u>Where one ATM is provided. Where one ATM is provided at a location, it shall meet the specifications of Section 4.34 of the Americans with Disabilities Act Accessibility Guidelines (ADAAG) as follows....</u></p> <p><u>Where two ATMs are provided. Where two ATMs are provided at a location, one shall comply with Section 1117B.7.4.1, except that the highest operable part shall be 48 inches (1219 mm) maximum. The second ATM is not regulated as to height, including height of display.</u></p> <p><u>Where three or more ATMs are provided. Where three or more ATMs are provided, two shall be used to satisfy Section 1117B.7.4.2, above. For the additional ATMs beyond the first two, at least 50 percent shall comply with Section 1117B.7.4.1. The remainder are not regulated as to height, including height of display. If features provided differ from ATM to ATM, all features shall be equally represented among the accessible ATMs.</u></p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Added sections 1117B.7.4.1, 1117B.7.4.2, 1117B.7.4.3 for completeness. Also, the reference to ADAAG should be changed to ADA Standards for Accessible Design.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.1.3 (21) Where dressing and fitting rooms are provided for use by the general public, patients, customers or employees, 5 percent, but never less than one, of dressing rooms for each type of use in each cluster of dressing rooms shall be accessible and shall comply with 4.35.</p> <p>Examples of types of dressing rooms are those serving different genders or distinct and different functions as in different treatment or examination facilities.</p>	1110B.1.7	Fitting and dressing rooms. Where fitting or dressing rooms are provided for male or female customers, patients, employees, or the general public, 5 percent, but never less than one, of dressing rooms for each type of use in each cluster of dressing rooms shall be accessible.	<input type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Although Title 24 language conforms to ADAAG, the placement of this section limits its application to Group "M" Occupancies. This section will be modified in language and moved in Chapter 11B to it's own category heading.	Fitting and dressing rooms. Where fitting or dressing rooms are provided for male or female customers, patients, employees, or the general public, 5 percent, but never less than one, of dressing rooms for each type of use in each cluster of dressing rooms shall be accessible. <u>Examples of types of dressing rooms are those serving different genders or distinct and different functions as in different treatment or examination facilities.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.1.4 (Reserved).	None	None	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment For reference only.	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	DOJ agrees with DSA that no action is required.
<p>4.1.5 Accessible Buildings: Additions. Each addition to an existing building or facility shall be regarded as an alteration. Each space or element added to the existing building or facility shall comply with the applicable provisions of 4.1.1 to 4.1.3, Minimum Requirements (for New Construction) and the applicable technical specifications of 4.2 through 4.35 and sections 5 through 10. Each addition that affects or could affect the usability of an area containing a primary function shall comply with 4.1.6(2).</p>	1134B.1	1134B.1 Scope. The provisions of this division apply to renovation, structural repair, alteration and additions to existing buildings, including those identified as historic buildings. This division identifies minimum standards for removing architectural barriers, and providing and maintaining accessibility to existing buildings and their related facilities.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	1134B.2	General. All existing buildings and facilities, when alterations, structural repairs or additions are made to such buildings or facilities, shall comply with all provisions of Division I, New Buildings, except as modified by this division. These requirements shall apply only to the area of specific alteration, structural repair or addition and shall include those areas listed below:	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1134B.2.1	A primary entrance to the building or facility and the primary path of travel to the specific area of alteration, structural repair or addition, and sanitary facilities, drinking fountains and public telephones serving the area.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
28 C.F.R. § 36.402(a)(1). Alterations. Any alteration to a place of public accommodation or a commercial facility shall be made so as to ensure that, to the maximum extent feasible, the altered portions of the facility are readily accessible to and usable by individuals with disabilities, including individuals who use wheelchairs.	19959 – Health & Safety Code	Every existing public accommodation constructed prior to July 1, 1970, which is not exempted by Section 19956, shall be subject to the requirements of this chapter when any alterations, structural repairs or additions are made to such public accommodation. This requirement shall only apply to the area of specific alteration, structural repair or addition and shall not be construed to mean that the entire building or facility is subject to this chapter.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	It is unclear how section 19959 of the Health and Safety Code relates to 1134B. Please clarify.
	1134B.2	General. All existing buildings and facilities, when alterations, structural repairs or additions are made to such buildings or facilities, shall comply with all provisions of Division I, New Buildings, except as modified by this division. These requirements shall apply only to the area of specific alteration, structural repair or addition and shall include those areas listed below:	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.1.6 Accessible Buildings: Alterations. (1) General. Alterations to existing buildings and facilities shall comply with the following:	1134B.2	General. All existing buildings and facilities, when alterations, structural repairs or additions are made to such buildings or facilities, shall comply with all provisions of Division I, New Buildings, except as modified by this division. These requirements shall apply only to the area of specific alteration, structural repair or addition and shall include those areas listed below:	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.1.6 (1) (a) No alteration shall be undertaken which decreases or has the effect of decreasing accessibility or usability of a building or facility below the requirements for new construction at the time of alteration.	None	None	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 has no equivalent section. Adopt ADAAG language into 1134B.	<u>No alteration shall be undertaken which decreases or has the effect of decreasing accessibility or usability of a building or facility below the requirements for new construction at the time of alteration.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.1.6 (1) (b) If existing elements, spaces, or common areas are altered, then each such altered element, space, feature, or area shall comply with the applicable provisions of 4.1.1 to 4.1.3 Minimum Requirements (for New Construction). If the applicable provision for new construction requires that an element, space, or common area be on an accessible route, the altered element, space, or common area is not required to be on an accessible route except as provided in 4.1.6(2) (Alterations to an Area Containing a Primary Function).	1134B.1	General. All existing buildings and facilities, when alterations, structural repairs or additions are made to such buildings or facilities, shall comply with all provisions of Division I, New Buildings, except as modified by this division. These requirements shall apply only to the area of specific alteration, structural repair or addition and shall include those areas listed below:	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not contain the same level of specificity as ADAAG. Adopt ADAAG language as follows.	General. All existing buildings and facilities, when alterations, structural repairs or additions are made to such buildings or facilities, <u>then each such altered element, space, feature, or area</u> shall comply with all provisions of Division I, New Buildings, except as modified by this division. These requirements shall apply only to the area of specific alteration, structural repair or addition and shall include those areas listed below:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	<u>1134B.2.1, Exception 3</u>	<u>Alterations, structural repairs or additions consisting of one or more of the following shall be limited to the actual work of the project:</u> <u>3.1 Altering one building entrance to meet accessibility requirements.</u> <u>3.2 Altering one existing toilet facility to meet accessibility requirements.</u> <u>3.3 Altering existing elevators to meet accessibility requirements.</u> <u>3.4 Altering existing steps to meet accessibility requirements.</u> <u>Altering existing steps to meet accessibility requirements.</u> <u>3.5 Altering existing handrails to meet accessibility requirements.</u> <u>3.6 Alteration solely for the purpose of removing barriers undertaken....</u>			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1134B.2.1, Exception 3.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.1.6 (1) (c) If alterations of single elements, when considered together, amount to an alteration of a room or space in a building or facility, the entire space shall be made accessible.	None	None	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 has no equivalent section. Adopt ADAAG language into 1134B.	<u>If alterations of single elements, when considered together, amount to an alteration of a room or space in a building or facility, the entire room or space shall be made accessible.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.1.6 (1) (d) No alteration of an existing element, space, or area of a building or facility shall impose a requirement for greater accessibility than that which would be required for new construction. For example, if the elevators and stairs in a building are being altered and the elevators are, in turn, being made accessible, then no accessibility modifications are required to the stairs connecting levels connected by the elevator. If stair modifications to correct unsafe conditions are required by other codes, the modifications shall be done in compliance with these guidelines unless technically infeasible.	1134B.2	General. All existing buildings and facilities, when alterations, structural repairs or additions are made to such buildings or facilities, shall comply with all provisions of Division I, New Buildings, except as modified by this division. These requirements shall apply only to the area of specific alteration, structural repair or addition and shall include those areas listed below:	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 references the Division I requirements for new construction.	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.1.6 (1) (e) At least one interior public text telephone complying with 4.31.9 shall be provided if: (i) alterations to existing buildings or facilities with less than four exterior or interior public pay telephones would increase the total number to four or more telephones with at least one in an interior location; or (ii) alterations to one or more exterior or interior public pay telephones occur in an existing building or facility with four or more public telephones with at least one in an interior location.	1111A.1	If public telephones are provided, they shall comply with this section. On floors where public telephones are provided, at least one telephone shall be accessible. On any floor where two or more banks of multiple telephones are provided, at least one telephone in each bank shall be accessible.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment	If public telephones are provided, they shall comply with this section. On floors where public telephones are provided, at least one telephone shall be accessible. On any floor where two or more banks of multiple telephones are provided, at least one telephone in each bank shall be accessible. <u>If alterations to existing buildings or facilities with less than four exterior or interior public pay telephones would increase the total number to four or more telephones with at least one in an interior location; or if alterations to one or more exterior or interior public pay telephones occur in an existing building or facility with four or more public telephones with at least one in an interior location, then a text telephone in compliance with section 1111A.9 shall be provided.</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Section 1111A.1 is in Chapter 11A, which applies to housing accessibility. DSA should adopt a provision similar to 4.1.6(1)(e) of the ADA Standards into Chapter 11B.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.1.6 (1) (f) If an escalator or stair is planned or installed where none existed previously and major structural modifications are necessary for such installation, then a means of accessible vertical access shall be provided that complies with the applicable provisions of 4.7, 4.8, 4.10, or 4.11.	1103B.1	General. In new construction of buildings and only where elevators are required, pursuant to Section 1103B.1, and which exceed 10,000 square feet on any floor, an accessible means of vertical access via ramp, elevator or lift shall be provided within 200 feet of travel of each stairs and each escalators. In existing buildings that exceed 10,000 square feet on any floor and in which elevators are otherwise required pursuant to Section 1103B.1, whenever a newly constructed means of vertical access is provided via a stair or escalator, an accessible means of vertical access via ramp, elevator, or lift shall be provided within 200 feet of travel of each new stair or escalator.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Section 1103B.1 seems to require vertical accessibility only to buildings which exceed 10,000 square feet on any floor. Section 4.1.6(1)(f) of the ADA Standards does not limit its coverage only to buildings which exceed 10,000 square feet.
4.1.6 (1) (g) In alterations, the requirements of 4.1.3(9), 4.3.10 and 4.3.11 do not apply.	1134B.2.1 <u>1114B.2.1</u>	A primary entrance to the building or facility and the primary path of travel to the specific area of alteration, structural repair or addition, and sanitary facilities, drinking fountains and public telephones serving the area. <u>EXCEPTIONS:</u> <u>2. In alterations of existing buildings, areas of evacuation assistance are not required.</u>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment Title 24 does not exempt the ADAAG items for alterations.	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1114B.2.1.
4.1.6 (1) (h)* Entrances: If a planned alteration entails alterations to an entrance, and the building has an accessible entrance, the entrance being altered is not required to comply with 4.1.3(8), except to the extent required by 4.1.6(2). If a particular entrance is not made accessible, appropriate accessible signage indicating the location of the nearest accessible entrance(s) shall be installed at or near the inaccessible entrance, such that a person with disabilities will not be required to retrace the approach route from the inaccessible entrance.	1134B.2.1 <u>1133B.1.1.1.2</u>	A primary entrance to the building or facility and the primary path of travel to the specific area of alteration, structural repair or addition, and sanitary facilities, drinking fountains and public telephones serving the area. <u>Temporary restrictions. During periods of partial or restricted use of a building or facility, the entrances used for primary access shall be accessible to and usable by persons with disabilities.</u>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 regulates any entrance being altered as the "area of alteration" and the obligation to provide access would not be limited due to the fact that other entrances are accessible.	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1133B.1.1.1.2.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.1.6 (1) (i) If the alteration work is limited solely to the electrical, mechanical, or plumbing system, or to hazardous material abatement, or automatic sprinkler retrofitting, and does not involve the alteration of any elements or spaces required to be accessible under these guidelines, then 4.1.6 (2) does not apply.	1134B.2.1 Exception: 4	<p>Projects which consist only of heating, ventilation, air conditioning, reroofing, electrical work not involving placement of switches and receptacles, cosmetic work that does not affect items regulated by this code, such as painting, equipment not considered to be a part of the architecture of the building or area, such as computer terminals, office equipment, etc., are not considered alteration projects for the purposes of accessibility for persons with disabilities and shall not be subject to this code. For the purposes of this section, the term "construction cost" does not include building permit fees or discretionary permit fees.</p> <p>NOTE: The only purpose of this exception is to exclude projects from activating the provisions of this section. The exceptions are not intended to relieve projects from complying with other applicable provisions of this code (e.g., replacement of carpet does not activate the provisions of this section; however, it still must comply with Section 1124B.3).</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>4.1.6 (1) (j) EXCEPTION: In alteration work, if compliance with 4.1.6 is technically infeasible, the alteration shall provide accessibility to the maximum extent feasible. Any elements or features of the building or facility that are being altered and can be made accessible shall be made accessible within the scope of the alteration.</p> <p>Technically Infeasible. Means, with respect to an alteration of a building or a facility, that it has little likelihood of being accomplished because existing structural conditions would require removing or altering a load-bearing member which is an essential part of the structural frame; or because other existing physical or site constraints prohibit modification or addition of elements, spaces,</p>	<p>EXCEPTION various locations</p> <p>Section 101.17.11</p>	<p>In existing buildings, the provisions of this section shall not apply when legal or physical constraints will not allow compliance with these building standards or equivalent facilitation without creating an unreasonable hardship. See Section 101.17.11, Item 5.</p> <p>5. Special Conditions for Persons with Disabilities Requiring Appeals Action Ratification. Whenever reference is made in these regulations to this section, the findings and determinations required to be rendered by the local enforcing agency shall be subject to ratification through an appeals process.</p> <p>6. Authority Cited--Government Code Section 4450.</p> <p>7. Reference--Government Code Sections 4450 through 4459, 4460, 12955.1 and Health and Safety Code Sections 18949.1, 19952 through 19959.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>Section 101.17.11, Item 5 does not seem to address ADA's technically infeasible exception. However, the absence of an ADA equivalent technically infeasible exception will not hinder certification.</p> <p>Section 101.17.11 should not be compared to section 4.1.6(1)(j) of the ADA Standards because section 101.17.11 addresses "appeals action ratification" and not ADA's technically infeasible exception.</p>

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or features which are in full and strict compliance with the minimum requirements for new construction and which are necessary to provide accessibility.	EXCEPTION various locations	In existing buildings, when the enforcing agency determines that compliance with any regulation under this section would create an unreasonable hardship, an exception shall be granted when equivalent facilitation is provided.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment The Title 24 exceptions will meet the criteria for Technically Infeasible with revisions to the definition for Unreasonable Hardship.	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	ADA equivalent only if the definition of unreasonable hardship in section 222U (see below) is amended to be ADA equivalent.
	222-U	UNREASONABLE HARDSHIP exists when the enforcing agency finds that strict compliance with the building standard would make the specific work of the project affected by the building standard unfeasible, based on an overall evaluation of the following factors: <ol style="list-style-type: none"> 1. The cost of providing access. 2. The cost of all construction contemplated. 3. The impact of the proposed improvements on financial feasibility of the project. 4. The nature of the accessibility, which would be gained or lost. 5. The nature of the use of the facility under construction and its availability to persons with disabilities. The details of any finding of unreasonable hardship shall recorded and entered into the files of the enforcing agency. 		UNREASONABLE HARDSHIP exists when the enforcing agency finds that strict compliance with the building standard would make the specific work of the project affected by the building standard unfeasible Technically Infeasible [see 221-T], based on an overall evaluation of the following factors: <ol style="list-style-type: none"> 1. The cost of providing access. 2. The cost of all construction contemplated. 3. The impact of the proposed improvements on financial feasibility of the project. 1. Existing structural conditions would require removing or altering a load-bearing member which is an essential part of the structural frame of the building or facility (see definition for Structural Frame). 2. Existing physical or site constraints prohibit modification or addition of elements, spaces, or features which are in full and strict compliance with the minimum requirements for Division 1 New Buildings. 4-3. The nature of the accessibility, which would be gained or lost. 5-4. The nature of the use of the facility under construction and its availability to persons with disabilities. The details of any finding of unreasonable hardship shall recorded and entered into the <u>building permit</u> files of the enforcing agency. 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets section 4.1.6(1)(j) of the ADA Standards. However, DSA should delete factors three and four because the two additional factors seem to broaden the ADA's technically infeasible exception.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	221-T	TECHNICALLY INFEASIBLE means, with respect to an alteration of a building or a facility, that it has little likelihood of being accomplished because existing structural conditions would require removing or altering a load-bearing member which is an essential part of the structural frame; or because other existing physical or site constraints prohibit modification or addition of elements, spaces, or features which are in full and strict compliance with the minimum requirements for new construction and which are necessary to provide accessibility.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>4.1.6 (1) (k) EXCEPTION:</p> <p>(i) These guidelines do not require the installation of an elevator in an altered facility that is less than three stories or has less than 3,000 square feet per story unless the building is a shopping center, a shopping mall, the professional office of a health care provider, or [a terminal, depot, or other station used for specified public transportation, or an airport passenger terminal (28 C.F.R § 36.404(a))].</p> <p>(ii) The exemption provided in paragraph (i) does not obviate or limit in any way the obligation to comply with the other accessibility requirements established in these guidelines. For example, alterations to floors above or below the ground floor must be accessible regardless of whether the altered facility has an elevator. If a facility subject to the elevator exemption set forth in paragraph (i) nonetheless has a full passenger elevator, that elevator shall meet, to the maximum extent feasible, the accessibility requirements of these guidelines.</p>	1134B.2.1 EXCEPTION 2	<p>Certain types of privately funded, multistory buildings and facilities were formerly exempt from accessibility requirements above and below the first floor under this code, but as of the effective date of this regulation are no longer exempt due to more restrictive provisions in the federal Americans with Disabilities Act. In alteration projects involving buildings and facilities previously approved and built without elevators, areas above and below the ground floor are subject to the 20 percent disproportionality provisions described in Exception 1, above, even if the value of the project exceeds the valuation threshold in Exception 1. The types of buildings and facilities are:</p> <p>2.1 Office buildings and passenger vehicle service stations of three stories or more and 3,000 or more square feet (279 m2) per floor.</p> <p>2.2 Offices of physicians and surgeons.</p> <p>2.3 Shopping centers.</p> <p>2.4 Other buildings and facilities three stories or more and more than 3,000 square feet (279 m2) per floor if a reasonable portion of services sought and used by the public is available on the accessible level.</p>	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment <p>Title 24 does not specify that the ADAAG elevator exception does not obviate or limit in any way the obligation to comply with the other accessibility requirements on the inaccessible floors. Also, the first sentence of the section is a "holdover" from an earlier adoption and should be removed. Adopt ADAAG language as follows.</p>	<p>Certain types of privately funded, multistory buildings and facilities were formerly exempt from accessibility requirements above and below the first floor under this code, but as of the effective date of this regulation are no longer exempt due to more restrictive provisions in the federal Americans with Disabilities Act. In alteration projects involving buildings and facilities previously approved and built without elevators, areas above and below the ground floor are subject to the 20 percent disproportionality provisions described in Exception 1, above, even if the value of the project exceeds the valuation threshold in Exception 1. The types of buildings and facilities are:</p> <p>2.1 Office buildings and passenger vehicle service stations of three stories or more and 3,000 or more square feet (279 m2) per floor.</p> <p>2.2 Offices of physicians and surgeons.</p> <p>2.3 Shopping centers.</p> <p>2.4 Other buildings and facilities three stories or more and more than 3,000 square feet (279 m2) per floor if a reasonable portion of services sought and used by the public is available on the accessible level.</p> <p><u>2.5 A terminal, depot, or other station used for specified public transportation, or an airport passenger terminal.</u></p> <p><u>If the cost to install an elevator is determined to be disproportionate, it does not obviate or limit in any</u></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	DSA compares section 1134B.2.1, exception 2 to section 4.1.6(1)(k) of the ADA Standards regarding elevator exemption in alterations. However, section 1134B.2.1, exception 2 seems to address ADA's path of travel provision and not the elevator exception provision.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
				<u>way the obligation to comply with the other accessibility requirements established in these regulations. For example, alterations to floors above or below the ground floor must be accessible regardless of whether the altered facility has an elevator.</u>		
<p>28 C.F.R. § 36.404(a)(2). For purposes of this section, shopping center or shopping mall means --</p> <p>(A) A building housing five or more sales or rental establishments; or</p> <p>(B) A series of buildings on a common site, connected by a common pedestrian access route above or below the ground floor, that is either under common ownership or common control or developed either as one project or as a series of related projects, housing five or more sales or rental establishments. For purposes of this section, places of public accommodation of the types listed in paragraph (5) of the definition of "place of public accommodation" in section 36.104 are considered sales or rental establishments. The facility housing a "shopping center or shopping mall" only includes floor levels housing at least one sales or rental establishment, or any floor level designed or intended for use by at least one sales or rental establishment.</p>	220-S	SHOPPING CENTER is one or more sales establishments or stores.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG language as follows.	SHOPPING CENTER is one or more sales <u>or rental</u> establishments or stores. <u>A shopping center may include a series of buildings on a common site, connected by a common pedestrian access route above or below the ground floor, that is either under common ownership or common control or developed either as one project or as a series of related projects.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.1.6 (2) Alterations to an Area Containing a Primary Function: In addition to the requirements of 4.1.6(1), an alteration that affects or could affect the usability of or access to an area containing a primary function shall be made so as to ensure that, to the maximum extent feasible, the path of travel to the altered area and the restrooms, telephones, and drinking fountains serving the altered area, are readily accessible to	1134B.2	General. All existing buildings and facilities, when alterations, structural repairs or additions are made to such buildings or facilities, shall comply with all provisions of Division I, New Buildings, except as modified by this division. These requirements shall apply only to the area of specific alteration, structural repair or addition and shall include those areas listed below:	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>and usable by individuals with disabilities, unless such alterations are disproportionate to the overall alterations in terms of cost and scope (as determined under criteria established by the Attorney General). (See 28 C.F.R § 36.403).</p>	1134B.2.1	<p>A primary entrance to the building or facility and the primary path of travel to the specific area of alteration, structural repair or addition, and sanitary facilities, drinking fountains and public telephones serving the area.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	<p>No action required.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	1134B.2.1 EXCEPTION: 1.	<p>When the total construction cost of alterations, structural repairs or additions does not exceed a valuation threshold of \$50,000, based on January 1981, "ENR US20 Cities" average construction cost index of 3372.02 (Engineering News Record, McGraw Hill Publishing Company), and the enforcing agency finds that compliance with this code creates an unreasonable hardship, compliance shall be limited to the actual work of the project. The enforcing agency shall annually update the valuation threshold to a current amount based on the increase in the index since the last figure used. (For example, the January 2000 amount is \$90.895.07.) For purposes of this exception, an unreasonable hardship exists where the cost of providing an accessible entrance, path of travel, sanitary facilities, public phones and drinking fountains, is disproportionate to the cost of the project; that is, where it exceeds 20 percent of the cost of the project without these features.</p> <p>Where the cost of alterations necessary to make these features fully accessible is disproportionate, access shall be provided to the extent that it can be without incurring disproportionate cost. In choosing which accessible elements to provide, priority should be given to those elements that will provide the greatest access in the following order:</p> <ol style="list-style-type: none"> 1.1 An accessible entrance, 1.2 An accessible route to the altered area, 1.3 At least one accessible restroom for each sex, 1.4 Accessible telephones, 1.5 Accessible drinking fountains, and 1.6 When possible, additional accessible elements such as parking, storage and alarms. 	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Section 1134B.2.1, exception 1 meets the ADA, but clarify whether this exception applies to alterations with a total construction cost greater than the valuation threshold.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>28 C.F.R. § 36.403(c)(2). For the purposes of this section, alterations to windows, hardware, controls, electrical outlets, and signage shall not be deemed to be alterations that affect the usability of or access to an area containing a primary function.</p>	<p>1134B.2.1 EXCEPTION: 4.</p>	<p>Projects which consist only of heating, ventilation, air conditioning, reroofing, electrical work not involving placement of switches and receptacles, cosmetic work that does not affect items regulated by this code, such as painting, equipment not considered to be a part of the architecture of the building or area, such as computer terminals, office equipment, etc., are not considered alteration projects for the purposes of accessibility for persons with disabilities and shall not be subject to this code. For the purposes of this section, the term "construction cost" does not include building permit fees or discretionary permit fees.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not allow the same limitation in scope as ADAAG for these items.</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>28 C.F.R. § 36.403(f). Disproportionality. (1) Alterations made to provide an accessible path of travel to the altered area will be deemed disproportionate to the overall alteration when the cost exceeds 20% of the cost of the alteration to the primary function area.</p> <p>28 C.F.R. § 36.403(g). Duty to provide accessible features in the event of disproportionality. (1) When the cost of alterations necessary to make the path of travel to the altered area fully accessible is disproportionate to the cost of the overall alteration, the path of travel shall be made accessible to the extent that it can be made accessible without incurring disproportionate costs.</p>	<p>1134B.2.1 EXCEPTION: 1.</p>	<p>When the total construction cost of alterations, structural repairs or additions does not exceed a valuation threshold of \$50,000, based on January 1981, "ENR US20 Cities" average construction cost index of 3372.02 (Engineering News Record, McGraw Hill Publishing Company), and the enforcing agency finds that compliance with this code creates an unreasonable hardship, compliance shall be limited to the actual work of the project. The enforcing agency shall annually update the valuation threshold to a current amount based on the increase in the index since the last figure used. (For example, the January 2000 amount is \$90.895.07.) For purposes of this exception, an unreasonable hardship exists where the cost of providing an accessible entrance, path of travel, sanitary facilities, public phones and drinking fountains, is disproportionate to the cost of the project; that is, where it exceeds 20 percent of the cost of the project without these features.</p> <p>Where the cost of alterations necessary to make these features fully accessible is disproportionate, access shall be provided to the extent that it can be without incurring disproportionate cost. In choosing which accessible elements to provide, priority should be given to those elements that will provide the greatest access in the following order:</p> <ol style="list-style-type: none"> 1.1 An accessible entrance, 1.2 An accessible route to the altered area, 1.3 At least one accessible restroom for each sex, 1.4 Accessible telephones, 1.5 Accessible drinking fountains, and 1.6 When possible, additional accessible elements such as parking, storage and alarms. 	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Section 1134B.2.1, exception 1 meets the ADA, but clarify whether this exception applies to alterations with a total construction cost greater than the valuation threshold.</p>
<p>28 C.F.R. § 36.403(d). Landlord/tenant: If a tenant is making alterations as defined in Section 36.402 that would trigger the requirements of this section, those alterations by the tenant in areas that only the tenant occupies do not trigger a path of travel obligation upon the landlord with respect to areas of the facility under the landlord's authority, if those areas are not otherwise being altered.</p>	<p>None</p>	<p>None</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not limit path of travel obligations for tenant improvements made by building tenants.</p>	<p>No action required.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Not addressed, but DOJ agrees with DSA that no action is required.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>28 C.F.R. § 36.403(h). Series of smaller alterations.</p> <p>(1) The obligation to provide an accessible path of travel may not be evaded by performing a series of small alterations to the area served by a single path of travel if those alterations could have been performed as a single undertaking.</p> <p>(2) (i) If an area containing a primary function has been altered without providing an accessible path of travel to that area, and subsequent alterations of that area, or a different area on the same path of travel, are undertaken within three years of the original alteration, the total cost of alterations to the primary function areas on that path of travel during the preceding three year period shall be considered in determining whether the cost of making that path of travel accessible is disproportionate.</p>	<p>1134B.2.1 EXCEPTION: 1.</p>	<p>The obligation to provide access may not be evaded by performing a series of small alterations to the area served by a single path of travel if those alterations could have been performed as a single undertaking. If an area has been altered without providing an accessible path of travel to that area, and subsequent alterations of that area or a different area on the same path of travel are undertaken within three years of the original alteration, the total cost of alterations to the areas on that path of travel during the preceding three-year period shall be considered in determining whether the cost of making that path of travel accessible is disproportionate. Only alterations undertaken after January 26, 1992, shall be considered in determining if the cost of providing an accessible path of travel is disproportionate to the overall cost of the alterations.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>4.1.6 (3) Special Technical Provisions for Alterations to Existing Buildings and Facilities:</p> <p>(a) Ramps: Curb ramps and interior or exterior ramps to be constructed on sites or in existing buildings or facilities where space limitations prohibit the use of a 1:12 slope or less may have slopes and rises as follows:</p> <p>(i) A slope between 1:10 and 1:12 is allowed for a maximum rise of 6 inches.</p> <p>(ii) A slope between 1:8 and 1:10 is allowed for a maximum rise of 3 inches. A slope steeper than 1:8 is not allowed.</p>	<p>1133B.5.3</p>	<p>Slope. The maximum slope of a ramp that serves any exit way, provides access for persons with physical disabilities or is in the path of travel shall be 1-foot (305 mm) rise in 12 feet (3658 mm) of horizontal run (8.3% gradient).</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not allow a ramp steeper than 1:12.</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
	<p>1127B.5 3.</p>	<p>Slope of curb ramps. The slope of curb ramps shall not exceed 1 unit vertical to 12 units horizontal (8.33% slope).</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not allow a curb ramp steeper than 1:12.</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.1.6 (3) (b) Stairs: Full extension of handrails at stairs shall not be required in alterations where such extensions would be hazardous or impossible due to plan configuration.	1133B.4.2.4	Where the extension of the handrail in the direction of stair run would create a hazard, the termination of the extension shall be made either rounded or returned smoothly to the floor, wall or post.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Section 1133B.4.2.4 meets the ADA, but this section should only apply to alterations of existing buildings.
<p>4.1.6 (3) (c) Elevators:</p> <p>(i) If safety door edges are provided in existing automatic elevators, automatic door reopening devices may be omitted (see 4.10.6).</p> <p>(ii) Where existing shaft configuration or technical infeasibility prohibits strict compliance with 4.10.9, the minimum car plan dimensions may be reduced by the minimum amount necessary, but in no case shall the inside car area be smaller than 48 in by 48 in.</p> <p>(iii) Equivalent facilitation may be provided with an elevator car of different dimensions when usability can be demonstrated and when all other elements required to be accessible comply with the applicable provisions of 4.10. For example, an elevator of 47 in by 69 in (1195 mm by 1755 mm) with a door opening on the narrow dimension, could accommodate the standard wheelchair clearances shown in Figure 4.</p>	1116B.1.5	<p>Door protective and reopening devices. Doors closed by automatic means shall be provided with a door-reopening device that will function to stop and reopen a car door and adjacent hoistway door in case the car door is obstructed while closing.</p> <p>This reopening device shall also be capable of sensing an object or person in the path of a closing door without requiring contact for activation at a nominal 5 inches and 29 inches (127 mm and 737 mm) above the floor.</p> <p>Door-reopening devices shall remain effective for a period of not less than 20 seconds.</p> <p>After such an interval, the doors may close in accordance with the requirements of ANSI 17.1-86, the American Society of Mechanical Engineers (ASME) document ASME 17.1-1990.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not allow the omission of door reopening devices in existing elevators with safety door edges.	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	1116B.1.1 EXCEPTIONS : 1	When the enforcing agency determines that compliance with any regulation under this section would create an unreasonable hardship, an exception to such regulation shall be granted when equivalent facilitation is provided, and where it can be demonstrated that a person using a wheelchair can enter and operate the elevator.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 allows a cab size exception based on cost, rather than technical infeasibility. Title 24 does not contain a minimum cab size for these circumstances. Adopt ADAAG language as follows.	When the enforcing agency determines that compliance with any regulation under this section would create an unreasonable hardship, an exception to such regulation shall be granted when equivalent facilitation is provided, and where it can be demonstrated that a person using a wheelchair can enter and operate the elevator. <u>(ii) Where existing shaft configuration or technical infeasibility prohibits strict compliance with 1116B.1.8, the minimum car plan dimensions may be reduced by the minimum amount necessary, but in no case shall the inside car area be smaller than 48 in by 48 in.</u> <u>(iii) Equivalent facilitation may be provided with an elevator car of different dimensions where it can be demonstrated that a person using a wheelchair can enter and operate the elevator and when all other elements required to be accessible comply with the applicable provisions of 1116B.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA, but section 1116B.1.1 EXCEPTIONS: 1 should only apply to alterations of existing buildings.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.1.6 (3) (d) Doors: (i) Where it is technically infeasible to comply with clear opening width requirements of 4.13.5, a projection of 5/8 in maximum will be permitted for the latch side stop. (ii) If existing thresholds are 3/4 in high or less, and have (or are modified to have) a beveled edge on each side, they may remain.</p>	<p>1133B.2.3.2 EXCEPTIONS : 1.</p> <p>1134B.3</p> <p>1134B.3.1</p>	<p>The provisions of Section 1133B.2.3 shall not apply to existing buildings, except when otherwise required under conditions applicable to access for persons with disabilities. In existing buildings, the following shall apply: Where the occupant load is less than 10, except Group I, Division 1 Occupancies, doorways may be 30 inches (762 mm) in clear width. Where occupant load is greater than 10 and it is determined that compliance with Section 1133B.2.3 would create an unreasonable hardship, doorways may be 30 inches (762 mm) in clear width.</p> <p><u>General Accessibility for Entrances, Exits and Paths of Travel.</u> <u>Automatic doors. When an automatic door operator is utilized to operate a pair of doors, at least one of the doors shall provide a clear, unobstructed opening width of 32 inches (813 mm) with the door positioned at an angle of 90 degrees from its closed position.</u> <u>EXCEPTIONS:</u> <u>1. In existing buildings the following shall apply:</u></p> <p><u>1.1 Where the occupant load is less than 10, except Group I, Division 1 Occupancies, doorways may be 30 inches (762 mm) in clear width.</u></p> <p><u>1.2 Where occupant load is greater than 10, and it is determined that compliance with Section 1120A.2.3 would create an unreasonable hardship, doorways may be 30 inches (762 mm) in clear width.</u></p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 allows a 30" clear opening with a determination of unreasonable hardship. ADAAG only allows a 5/8" projection on the latch side of the door. Adopt ADAAG language as follows.</p>	<p>The provisions of Section 1133B.2.3 shall not apply to existing buildings, except when otherwise required under conditions applicable to access for persons with disabilities. In existing buildings, the following shall apply: Where the occupant load is less than 10, except Group I, Division 1 Occupancies, doorways may be 30 inches (762 mm) in clear width. <u>or W where the occupant load is greater than 10 and it is determined that compliance with Section 1133B.2.3 would create an unreasonable hardship, doorways may be 30 inches (762 mm) in clear width. a projection of 5/8 in maximum will be permitted for the latch side stop.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Assuming that the issue regarding the unreasonable hardship exception is resolved, DSA's proposed revision meets the ADA, but clarify whether DSA intends to limit the application of this provision to only automatic doors.</p> <p>Added sections 1134B.3 and 1134B.3.1 for completeness. Section 1134B.3.1, exception 1 should be revised to be similar to DSA's proposed revision for section 1133B.2.3.2, exception 1.</p>
	<p>1133B.2.4.1</p>	<p>Thresholds. The floor or landing shall not be more than 1/2 inch (12.7 mm) lower than the threshold of the doorway. Change in level between 1/4 inch (6 mm) and 1/2 inch (12.7 mm) shall be beveled with a slope no greater than 1 unit vertical to 2 units horizontal (50% slope). Change in level greater than 1/2 inch (12.7 mm) shall be accomplished by means of a ramp.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not allow a 3/4" high threshold.</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	1115B.7.1.3	<p>Accessible water closet compartment. A water closet fixture located in a compartment shall provide a minimum 28 inch-wide (711 mm) clear space from a fixture or a minimum 32 inch-wide (813 mm) clear space from a wall at one side of the water closet. The other side of the water closet shall provide 18 inches (457 mm) from the centerline of the water closet to the wall. The stall shall be a minimum of 60-inches (1524 mm) wide. <u>A minimum 48-inch-long (1219 mm) clear space shall be provided in front of the water closet if the compartment has an end-opening door (facing the water closet). A minimum 60 inch-long (1524 mm) clear space shall be provided in a compartment with the door located at the side. Grab bars shall not project more than 3 inches (76 mm) into the clear spaces as specified above.</u></p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not allow the Installation of an ADAAG alternate stall.</p>	No action required.	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	Added the additional language from section 1115B.7.1.3 for completeness.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.1.6 (3) (f) Assembly Areas:</p> <p>(i) Where it is technically infeasible to disperse accessible seating throughout an altered assembly area, accessible seating areas may be clustered. Each accessible seating area shall have provisions for companion seating and shall be located on an accessible route that also serves as a means of emergency egress.</p> <p>(ii) Where it is technically infeasible to alter all performing areas to be on an accessible route, at least one of each type of performing area shall be made accessible.</p>	1104B.3.5	<p>Placement of wheelchair locations. Wheelchair areas shall be an integral part of any fixed seating plan, and shall be arranged so as to provide persons with disabilities a choice of admission prices and lines of sight comparable to those for members of the general public. Each wheelchair area shall adjoin an accessible route which shall also serve as a means of egress in case of emergency. At least one companion fixed seat shall be provided next to each wheelchair seating area. When the seating capacity exceeds 300, wheelchair spaces shall be provided in more than one location in addition to complying with Section 1104B.3.3.</p> <p>EXCEPTION: Accessible viewing positions where seating capacity is less than 300 may be clustered for bleachers, balconies and other areas having sight lines that require slopes of greater than 5 percent. Equivalent accessible viewing positions may be located on levels having accessible egress.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not specifically address clustering seats where it would be technically infeasible to disburse seating. Adopt ADAAG language into exception as follows.</p>	<p>Placement of wheelchair locations. Wheelchair areas shall be an integral part of any fixed seating plan, and shall be arranged so as to provide persons with disabilities a choice of admission prices and lines of sight comparable to those for members of the general public. Each wheelchair area shall adjoin an accessible route which shall also serve as a means of egress in case of emergency. At least one companion fixed seat shall be provided next to each wheelchair seating area. When the seating capacity exceeds 300, wheelchair spaces shall be provided in more than one location in addition to complying with Section 1104B.3.3.</p> <p>EXCEPTIONS:</p> <ol style="list-style-type: none"> 1. Accessible viewing positions where seating capacity is less than 300 may be clustered for bleachers, balconies and other areas having sight lines that require slopes of greater than 5 percent. Equivalent accessible viewing positions may be located on levels having accessible egress. 2. <u>Where it is determined that dispersing accessible seating throughout an altered assembly area would create an unreasonable hardship, accessible seating areas may be clustered. Each accessible seating area shall have provisions for companion seating and shall be located on an accessible route that also serves as a means of emergency egress.</u> 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
	1104B.3.10	<p>Access to performing areas. An accessible route shall connect wheelchair seating locations with performing areas, including stages, arena floors, dressing rooms, locker rooms and other spaces used by performers.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 requires access to all performing areas.</p>	No action required.	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.1.6 (3) (g) Platform Lifts (Wheelchair Lifts): In alterations, platform lifts (wheelchair lifts) complying with 4.11 and applicable state or local codes may be used as part of an accessible route. The use of lifts is not limited to the four conditions in Exception 4 of 4.1.3(5).	1116B.2.4 EXCEPTION: 3	The installation of lifts as part of an accessible route for additions or alterations is not limited to the four conditions required by Section 1116B.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.1.6 (3) (h) Dressing Rooms: In alterations where technical infeasibility can be demonstrated, one dressing room for each sex on each level shall be made accessible. Where only unisex dressing rooms are provided, accessible unisex dressing rooms may be used to fulfill this requirement.	1110B.1.7	Fitting and dressing rooms. Where fitting or dressing rooms are provided for male or female customers, patients, employees, or the general public, 5 percent, but never less than one, of dressing rooms for each type of use in each cluster of dressing rooms shall be accessible.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not specifically address unisex dressing rooms. Adopt ADAAG language as follows.	Fitting and dressing rooms. Where fitting or dressing rooms are provided for male or female customers, patients, employees, or the general public, 5 percent, but never less than one, of dressing rooms for each type of use in each cluster of dressing rooms shall be accessible. <u>Where only unisex dressing rooms are provided, accessible unisex dressing rooms may be used to fulfill this requirement.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.1.7 Accessible Buildings: Historic Preservation. (1) Applicability: (a) General Rule. Alterations to a qualified historic building or facility shall comply with 4.1.6 Accessible Buildings: Alterations, the applicable technical specifications of 4.2 through 4.35 and the applicable special application sections 5 through 10 unless it is determined in accordance with the procedures in 4.1.7(2) that compliance with the requirements for accessible routes (exterior and interior), ramps, entrances, or toilets would threaten or destroy the historic significance of the building or facility in which case the alternative requirements in 4.1.7(3) may be used for the feature.	<u>1135B</u> <u>1135B.1</u> <u>8-602</u> 8-602.1	<u>HISTORIC PRESERVATION-SPECIAL STANDARDS OF ACCESSIBILITY FOR BUILDINGS WITH HISTORICAL SIGNIFICANCE</u> <u>General. Qualified historical buildings shall comply with the State Historical Building Code, Part 8, Title 24, of the California Code of Regulations as printed in Part 2, Chapter 34, Division II.</u> <u>BASIC PROVISIONS</u> Regular Code. The regular code for access for persons with disabilities shall be applied to qualified historical buildings or properties unless strict compliance with the regular code will threaten or destroy the historical significance or character-defining features of the building or property.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1135B.1 and section 8-602 for completeness.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	8-602.2	<p>Alternative Provisions. If the historical significance or character-defining features are threatened, alternative provisions for access may be applied pursuant to this chapter provided the following conditions are met:</p> <ol style="list-style-type: none"> 1. Such alternative provisions shall be applied only on an item-by-item or case-by-case basis. (See, e.g., Section 8-603.) 2. The alternative provisions are applied according to the priorities outlined in Section 8-603 whereby the alternative providing the greatest accessibility is listed first. 3. Documentation is provided stating the reasons for the application of the alternative provisions. Such documentation shall be maintained as a part of the public record. 4. If it is found that the application of the preferred alternatives listed in Section 8-603 threaten the historical significance or character defining features, the provisions of Sections 8-604 and 8-605 may be applied. 	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
(1) (b) Definition. A qualified historic building or facility is a building or facility that is: (i) Listed in or eligible for listing in the National Register of Historic Places; or (ii) Designated as historic under an appropriate State or local law.	8-218 – Q	<p>QUALIFIED HISTORICAL BUILDING OR PROPERTY Any building, site, structure, object, district or collection of structures, and their associated sites, deemed of importance to the history, architecture or culture of an area by an appropriate local, state or federal governmental jurisdiction. This shall include designated buildings or properties on, or determined eligible for, official national, state or local historical registers or official inventories, such as the National Register of Historic Places, California Register of Historical Resources, State Historical landmarks, State Points of Historical Interest, and officially adopted city or county registers, inventories, or surveys of historical or architecturally significant sites, places or landmarks.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.1.7 (2) Procedures.</p> <p>(a) Alterations to Qualified Historic buildings and Facilities Subject to Section 106 of the National Historic Preservation Act:</p> <p>(i) Section 106 Process. Section 106 of the National Historic Preservation Act (16 U.S.C. 470 f) requires that a Federal agency with jurisdiction over a Federal, federally assisted, or federally licensed undertaking consider the effects of the agency's undertaking on buildings and facilities listed in or eligible for listing in the National Register of Historic Places and give the Advisory Council on Historic Preservation a reasonable opportunity to comment on the undertaking prior to approval of the undertaking.</p> <p>(ii) ADA Application. Where alterations are undertaken to a qualified historic building or facility that is subject to section 106 of the National Historic Preservation Act, the Federal agency with jurisdiction over the undertaking shall follow the section 106 process. If the State Historic Preservation Officer or Advisory Council on Historic Preservation agrees that compliance with the requirements for accessible routes (exterior and interior), ramps, entrances, or toilets would threaten or destroy the historic significance of the building or facility; the alternative requirements in 4.1.7(3) may be used for the feature.</p>	None	None	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment Title 24 does not address buildings subject to the Section 106 process. Add ADAAG language to Sections 8-104 Review and Appeals.	<p><u>Alterations to Qualified Historic buildings and Facilities Subject to Section 106 of the National Historic Preservation Act:</u></p> <p><u>Section 106 Process. Section 106 of the National Historic Preservation Act (16 U.S.C. 470 f) requires that a Federal agency with jurisdiction over a Federal, federally assisted, or federally licensed undertaking consider the effects of the agency's undertaking on buildings and facilities listed in or eligible for listing in the National Register of Historic Places and give the Advisory Council on Historic Preservation a reasonable opportunity to comment on the undertaking prior to approval of the undertaking.</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA. However, the proposed revision should be located in new section 8-602.3.
	None	None	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not address buildings subject to the Section 106 process. Add ADAAG language as a new section 8-602.3	<p><u>Where alterations are undertaken to a qualified historic building or facility that is subject to section 106 of the National Historic Preservation Act, the Federal agency with jurisdiction over the undertaking shall follow the section 106 process. If the State Historic Preservation Officer or Advisory Council on Historic Preservation agrees that compliance with the requirements for accessible routes (exterior and interior), ramps, entrances, or toilets would threaten or destroy the historic significance of the building or facility; the preferred alternatives in section 8-603 may be used for the feature.</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.1.7 (2) (b) Alterations to Qualified Historic Buildings and Facilities Not Subject to Section 106 of the National Historic Preservation Act. Where alterations are undertaken to a qualified historic building or	8-602.1	Regular Code. The regular code for access for persons with disabilities shall be applied to qualified historical buildings or properties unless strict compliance with the regular code will threaten or destroy the historical significance or character-defining features of the building or property.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>facility that is not subject to section 106 of the National Historic Preservation Act, if the entity undertaking the alterations believes that compliance with the requirements for accessible routes (exterior and interior), ramps, entrances, or toilets would threaten or destroy the historic significance of the building or facility and that the alternative requirements in 4.1.7(3) should be used for the feature, the entity should consult with the State Historic Preservation Officer. If the State Historic Preservation Officer agrees that compliance with the accessibility requirements for accessible routes (exterior and interior), ramps, entrances or toilets would threaten or destroy the historical significance of the building or facility, the alternative requirements in 4.1.7(3) may be used.</p>	8-602.2	<p>Alternative Provisions. If the historical significance or character-defining features are threatened, alternative provisions for access may be applied pursuant to this chapter provided the following conditions are met:</p> <ol style="list-style-type: none"> 1. Such alternative provisions shall be applied only on an item-by-item or case-by-case basis. (See, e.g., Section 8-603.) 2. The alternative provisions are applied according to the priorities outlined in Section 8-603 whereby the alternative providing the greatest accessibility is listed first. 3. Documentation is provided stating the reasons for the application of the alternative provisions. Such documentation shall be maintained as a part of the public record. 4. If it is found that the application of the preferred alternatives listed in Section 8-603 threaten the historical significance or character defining features, the provisions of Sections 8-604 and 8-605 may be applied. 	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>4.1.7 (2) (c) Consultation With Interested Persons. Interested persons should be invited to participate in the consultation process, including State or local accessibility officials, individuals with disabilities, and organizations representing individuals with disabilities.</p>	8-604.3	<p>The Official charged with the enforcement of the standards shall document the reasons for the application of the alternative design and/or technologies and their effect on the historical significance or character-defining features. Such documentation shall be in accordance with Section 8-602.2, Item 3, and shall include the comments of state or local accessibility officials and a local, officially designated organization of people with disabilities. Such documentation shall be recorded and entered into the permanent file of the enforcing agency.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>Section 8-604.3 only applies to section 8-604. A similar provision is also required in section 8-602.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.1.7 (2) (d) Certified Local Government Historic Preservation Programs. Where the State Historic Preservation Officer has delegated the consultation responsibility for purposes of this section to a local government historic preservation program that has been certified in accordance with section 101(c) of the National Historic Preservation Act of 1966 (16 U.S.C. 470a (c)) and implementing regulations (36 CFR 61.5), the responsibility may be carried out by the appropriate local government body or official.</p>	<p>8-601.1</p> <p>8-601.2</p> <p>8-601.3</p>	<p>Purpose. The purpose of this chapter is to provide alternative regulations to facilitate access and use by people with disabilities to and throughout buildings or structures designated as qualified historical buildings or properties. These regulations require enforcing agencies to accept any reasonably equivalent alternatives to regular code when dealing with qualified historic buildings or properties.</p> <p><u>Intent. It is the intent of this chapter to preserve the integrity of qualified historical buildings and properties while providing access to and use by persons with disabilities.</u></p> <p><u>Scope. These regulations shall apply to every qualified historical building or property that is required to provide access to persons with disabilities.</u></p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Add ADAAG reference to certified historic preservation programs.</p>	<p>Purpose. The purpose of this chapter is to provide alternative regulations to facilitate access and use by people with disabilities to and throughout buildings or structures designated as qualified historical buildings or properties. These regulations require enforcing agencies to accept any reasonably equivalent alternatives to regular code when dealing with qualified historic buildings or properties.</p> <p><u>Certified Local Government Historic Preservation Programs. Where the State Historic Preservation Officer has delegated the consultation responsibility for purposes of this section to a local government historic preservation program that has been certified in accordance with section 101(c) of the National Historic Preservation Act of 1966 (16 U.S.C. 470a (c)) and implementing regulations (36 CFR 61.5), the responsibility may be carried out by the appropriate local government body or official.</u></p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>	<p>Added sections 8-601.2 and 8-601.3.</p>
<p>4.1.7 (3) Historic Preservation: Minimum Requirements:</p> <p>(a) At least one accessible route complying with 4.3 from a site access point to an accessible entrance shall be provided. EXCEPTION: A ramp with a slope no greater than 1:6 for a run not to exceed 2 ft (610 mm) may be used as part of an accessible route to an entrance.</p>	<p>8-602.1</p>	<p>The regular code for access for persons with disabilities shall be applied to qualified historical buildings or properties unless strict compliance with the regular code will threaten or destroy the historical significance or character-defining features of the building or property.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not include ADAAG reference to accessible routes. Adopt ADAAG language as follows.</p>	<p>The regular code for access for persons with disabilities shall be applied to qualified historical buildings or properties unless strict compliance with the regular code will threaten or destroy the historical significance or character-defining features of the building or property. <u>If strict compliance with the regular code will threaten or destroy the historical significance or character-defining features of the building or property a minimum of one accessible route from a site access point to an accessible entrance shall be provided.</u></p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>	<p>DSA needs to reference all sections concerning accessible routes: 1102B, 1114B, 1124B, 1133B.3., 1133B.5, 1133B.7, 1133B.8.6.</p>
	<p>8-603</p>	<p><u>PERFERRED ALTERNATIVES</u> <u>The alternatives below each category are listed in order of priority. These alternatives apply only to the specific building standards listed below.</u></p>			<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>	<p>Added text from section 8-603.</p>
	<p>8-603.5</p> <p>8-603.5.1</p>	<p><u>Exterior and Interior Ramps and Lifts. Alternatives listed in order of priority are:</u></p> <p><u>1. A lift or ramp of greater than standard slope but no greater than 1:10, for horizontal distances not to exceed 12 feet (3658 mm). Signs shall be posted at upper and lower levels to indicate steepness of the slope.</u></p>			<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p>Added sections 8-603.5 and 8-603.5.1. Section 8-603.5.1 does not meet section 4.1.6(3)(a)(i) of the ADA Standards because the horizontal distance cannot exceed 5 feet for a ramp with a slope between 1:10 and 1:12.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	8-603.5 2.	Access by ramps of 1:6 slope for horizontal distance not to exceed 13 inches. Signs shall be posted at upper and lower levels to indicate steepness of the slope.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.1.7 (3) (b) At least one accessible entrance complying with 4.14 which is used by the public shall be provided. EXCEPTION: If it is determined that no entrance used by the public can comply with 4.14, then access at any entrance not used by the general public but open (unlocked) with directional signage at the primary entrance may be used. The accessible entrance shall also have a notification system. Where security is a problem, remote monitoring may be used.</p>	8-603.1	<p>These alternatives do not allow exceptions for the requirement of level landings in front of doors, except as provided in Section 603.3. Alternatives listed in order of priority are:</p> <ol style="list-style-type: none"> 1. Access to any entrance used by the general public and no further than 200 feet (60960 mm) from the primary entrance. 2. Access at any entrance not used by the general public but open and unlocked with directional signs at the primary entrance and as close as possible to, but no further than 200 feet (60960 mm) from the primary entrance. 	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not include the ADAAG requirement for a notification system. Adopt ADAAG language as follows.</p>	<p>These alternatives do not allow exceptions for the requirement of level landings in front of doors, except as provided in Section 603.3. Alternatives listed in order of priority are:</p> <ol style="list-style-type: none"> 1. Access to any entrance used by the general public and no further than 200 feet (60960 mm) from the primary entrance. 2. Access at any entrance not used by the general public but open and unlocked with directional signs at the primary entrance and as close as possible to, but no further than 200 feet (60960 mm) from the primary entrance. <p><u>The accessible entrance shall also have a notification system. Where security is a problem, remote monitoring may be used.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
	<p><u>8-603.2</u></p> <p><u>8-603.3</u></p>	<p><u>Doors. Alternatives listed in order of priority are:</u></p> <ol style="list-style-type: none"> <u>1. Single-leaf door which provides a minimum 30 inches (762 mm) of clear opening.</u> <u>2. Single-leaf door which provides a minimum 29 ½ inches (749 mm) clear opening.</u> <u>3. Double door, one leaf of which provides a minimum 29 ½ inches (749 mm) clear opening.</u> <u>4. Double doors operable with a power-assist device to provide a minimum 29 1/2 inches (749 mm) clear opening when both doors are in the open position.</u> <p><u>Power-assisted Doors. A power-assisted door or doors may be considered an equivalent alternative to level landings, strikeside clearance and door-opening forces required by the regular code.</u></p>			<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Added sections 8-603.2 and 8-603.3. Both sections 8-603.2 and 8-603.3 do not meet section 4.1.7(3)(b) of the ADA Standards. DSA should delete both sections.</p>
<p>4.1.7 (3) (c) If toilets are provided, then at least one toilet facility complying with 4.22 and 4.1.6 shall be provided along an accessible route that complies with 4.3. Such toilet facility may be unisex in design.</p>	8-603.4	<p>Toilet Rooms. In lieu of separate-gender toilet facilities as required in the regular code, an accessible unisex toilet facility may be designated.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.1.7 (3) (d) Accessible routes from an accessible entrance to all publicly used spaces on at least the level of the accessible entrance shall be provided. Access shall be provided to all levels of a building or facility in compliance with 4.1 whenever practical.	8-602.1	The regular code for access for persons with disabilities shall be applied to qualified historical buildings or properties unless strict compliance with the regular code will threaten or destroy the historical significance or character-defining features of the building or property.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment The provisions for access to entrances and publicly used spaces are contained in chapters 11A, 11B.	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Section 8-602.1 does not address the requirements in ADA Standards section 4.1.7 (3) (d).
4.1.7 (3) (e) Displays and written information, documents, etc., should be located where they can be seen by a seated person. Exhibits and signage displayed horizontally (e.g., open books), should be no higher than 44 in (1120 mm) above the floor surface.	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not include this level of specificity for displays, signage, etc. Adopt ADAAG language into section 8-602.1 as follows. (note: ADAAG language is advisory).	<u>The regular code for access for persons with disabilities shall be applied to qualified historical buildings or properties unless strict compliance with the regular code will threaten or destroy the historical significance or character-defining features of the building or property</u> <u>Displays and written information, documents, etc., should be located where they can be seen by a seated person. Exhibits and signage displayed horizontally (e.g., open books), should be no higher than 44 in (1120 mm) above the floor surface.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA. However, the first paragraph should be deleted and the second paragraph should be located in section 8-603 and not in 8-602.
4.2 Space Allowance and Reach Ranges. 4.2.1* Wheelchair Passage Width. The minimum clear width for single wheelchair passage shall be 32 in (815 mm) at a point and 36 in (915 mm) continuously (see Fig. 1	1118B.1	Wheelchair Passage Width. The minimum clear width for single wheelchair passage shall be 32 inches (813 mm) at a point and 36 inches (914 mm) continuously. See Figure 11B-12.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Section 1118B.1 incorrectly references Figure 11B-12. The correct reference is Figure 11B-10.

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and 24(e)).	<p>1105B.3.6</p> <p>1133B.6 1133B.6.1</p> <p>1133B.6.2</p>	<p>Miscellaneous general standards. 1. Circulation aisles and pedestrian ways shall be sized according to functional requirements and in no case shall be less than 36 inches (914 mm) in clear width. 2. Storage areas. The doorway providing access to all such areas shall not be less than 32 inches (813 mm) in clear width. Storage areas shall be made accessible in the number and dimensions provided in Section 1125B.</p> <p>Aisles. General. Every portion of every building in which are installed seats, tables, merchandise, equipment or similar materials shall be provided with aisles leading to an exit.</p> <p>Width. Every aisle shall not be less than 36 inches (914 mm) wide if serving only one side, and not less than 44 inches (1118 mm) wide if serving both sides.</p>			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added sections 1105B.3.6, 1133B.6, 1133B.6.1, and 1133B.6.2.
Figure 1 of the ADA Standards. Minimum Clear Width for Single Wheelchair. The minimum clear passage width for a single wheelchair passage shall be 32 in (815 mm) at a point for a maximum depth of 24 in (610 mm).	Figure 11B-12	Refer to code.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	As mentioned above, the correct reference is Figure 11B-10 and not Figure 11B-12. Figure 11B-10 is equivalent to ADA Standards Figure 1.
4.2.2 Width for Wheelchair Passing. The minimum width for two wheelchairs to pass is 60 in (1525 mm) (see Fig. 2).	1118B.2	Width for Wheelchair Passing. The minimum width for two wheelchairs to pass is 60 inches (1524 mm). See Figure 11B-12.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Section 1118B.2 incorrectly references Figure 11B-12. The correct reference is Figure 11B-11.
4.2.3* Wheelchair Turning Space. The space required for a wheelchair to make a 180-degree turn is a clear space of 60 in (1525 mm) diameter (see Fig. 3(a)) or a T-shaped space (see Fig. 3(b)).	1118B.3	Wheelchair Turning Space. The space required for a wheelchair to make a 180 degree turn is a clear space of 60 inches (1524 mm) diameter [see Figure 11B-12 (a)] or a T-shaped space. See Figure 11B-12 (b).	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>Figure 3 of the ADA Standards. Wheelchair Turning Space.</p> <p>3(b) T-Shaped Space for 180 degree Turns. The T-shaped space is created by the perpendicular intersection of two routes. Each route must be a minimum of 36 in (915 mm) in width. The route forming the top of the "T" must extend at least 12 in (305 mm) beyond the intersection in each direction and the route forming the base of the "T" must extend at least 24 in (610 mm) beyond the intersection. The "T" fits within a 60 in (1525 mm) square.</p>	<p>Figure 11B-12 (a) or a T-shaped space. See Figure 11B-12 (b).</p>	<p>Refer to code.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>4.2.4* Clear Floor or Ground Space for Wheelchairs.</p> <p>4.2.4.1 Size and Approach. The minimum clear floor or ground space required to accommodate a single, stationary wheelchair and occupant is 30 in by 48 in (760 mm by 1220 mm) (see Fig. 4(a)). The minimum clear floor or ground space for wheelchairs may be positioned for forward or parallel approach to an object (see Fig. 4(b) and (c)). Clear floor or ground space for wheelchairs may be part of the knee space required under some objects.</p>	<p>1118B.4 1.</p>	<p>Clear Floor or Ground Space for Wheelchairs. Size and approach. The minimum clear floor or ground space required to accommodate a single, stationary wheelchair and occupant is 30 inches by 48 inches (762 mm by 1219 mm). The minimum clear floor or ground space for wheelchairs may be positioned for forward or parallel approach to an object. Clear floor or ground space for wheelchairs may be part of the knee space required under some objects. See Figure 11B-5A.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>4.2.4.2 Relationship of Maneuvering Clearance to Wheelchair Spaces. One full unobstructed side of the clear floor or ground space for a wheelchair shall adjoin or overlap an accessible route or adjoin another wheelchair clear floor space. If a clear floor space is located in an alcove or otherwise confined on all or part of three sides, additional maneuvering clearances shall be provided as shown in Fig. 4(d) and (e).</p>	<p>1118B.4 2.</p>	<p>Relationship of maneuvering clearances to wheelchair spaces. One full unobstructed side of the clear floor or ground space for a wheelchair shall adjoin or overlap an accessible route or adjoin another wheelchair clear floor space. If a clear floor space is located in an alcove or otherwise confined on all or a part of three sides, additional maneuvering clearances shall be provided as shown in Figure 11B-5A (b). See Figure 11B-5A.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>Figure 4 of the ADA Standards. Minimum Clear Floor Space for Wheelchairs.</p> <p>4(d) Clear Floor Space in Alcoves. For a forward approach, where the depth of the alcove is equal to or less than 24 in (610 mm), the required clear floor space is 30 in by 48 in (760 mm by 1220 mm).</p>	<p>Figure 11B-5A</p>	<p>Refer to code.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not include two of</p>	<p>See graphic.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>For a parallel approach, where the depth of the alcove is equal to or less than 15 in (380 mm), the required clear floor space is 48 in by 30 in (1220 mm by 760 mm).</p> <p>4(e) Additional Maneuvering Clearances for Alcoves. For a forward approach, if the depth of the alcove is greater than 24 in (610 mm), then in addition to the 30 in (760 mm) width, a maneuvering clearance of 6 in (150 mm) in width is required, for a total width of 36 in (915 mm). For a parallel approach, where the depth of the alcove is greater than 15 in (380 mm), then in addition to the 48 in (1220 mm) length, an additional maneuvering clearance of 12 in (305 mm) in length is required, for a total length of 60 in (1525 mm).</p>			<p>the graphics contained in ADAAG Figure 4. Adopt ADAAG figure.</p>			
<p>4.2.4.3 Surfaces for Wheelchair Spaces. Clear floor or ground spaces for wheelchairs shall comply with 4.5.</p>	None	None	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not contain equivalent language. Adopt ADAAG language into 1118B.</p>	<p><u>Surfaces for Wheelchair Spaces. Clear floor or ground spaces for wheelchairs shall comply with Section 1124B — Ground and Floor Surfaces.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

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<p>4.2.5* Forward Reach. If the clear floor space only allows forward approach to an object, the maximum high forward reach allowed shall be 48 in (1220 mm) (see Fig. 5(a)). The minimum low forward reach is 15 in (380 mm). If the high forward reach is over an obstruction, reach and clearances shall be as shown in Fig. 5(b).</p> <p>Figure 5 of the ADA Standards. Forward Reach.</p> <p>5(b) Maximum Forward Reach over an Obstruction. The maximum depth of an obstruction with knee space below is 25 in (635 mm). When the obstruction is less than 20 in (510 mm) deep, the maximum high forward reach is 48 in (1220 mm). When the depth of the obstruction is greater than 20 in (510 mm), the maximum high forward reach is 44 in (1120 mm).</p>	1118B.5	Forward Reach. If the clear floor space allows only forward approach to an object, the maximum high forward reach allowed shall be 48 inches (1219 mm) [see Figure 11B-5C (b)]. The minimum low forward reach is 15 inches (381 mm). If the high forward reach is over an obstruction, reach and clearances shall be as shown in Figure 11B-5C (a).	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Section 1118B.5 meets the ADA, but references to Figure 11B-5C(b) and 11B-5C(a) should be interchanged.
	Figure 11B-5C	Refer to code.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

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4.2.6* Side Reach. If the clear floor space allows parallel approach by a person in a wheelchair, the maximum high side reach allowed shall be 54 in (1370 mm) and the low side reach shall be no less than 9 in (230 mm) above the floor (Fig. 6(a) and (b)). If the side reach is over an obstruction, the reach and clearances shall be as shown in Fig. 6(c).	1118B.6	Side reach. If the clear floor space allows parallel approach by a person in a wheelchair, the maximum high side reach allowed shall be 54 inches (1372 mm) and the low side reach shall be no less than 9 inches (229 mm) above the floor [see Figure 11B-5D (a) and (b)]. If the side reach is over an obstruction, the reach and clearances shall be as shown in Figure 11B-5D (c). See Figure 11B-5D.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Figure 6 of the ADA Standards. Side Reach. 6(a) Clear Floor Space - Parallel Approach, and 6(b) High and Low Side Reach Limits. The clear floor space is located a maximum of 10 in (255 mm) from the wall. 6(c) Maximum Side Reach over Obstruction. If the depth of the obstruction is 24 in (610 mm) and the maximum height of the obstruction is 34 in (865 mm), the maximum high side reach over the obstruction is 46 in (1170 mm).	Figure 11B-5D	Refer to code.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.3 Accessible Route. 4.3.1* General. All walks, halls, corridors, aisles, skywalks, tunnels, and other spaces that are part of an accessible route shall comply with 4.3.	1102B	ACCESSIBLE ROUTE OF TRAVEL is a continuous unobstructed path connecting all accessible elements and spaces in an accessible building or facility that can be negotiated by a person with a severe disability using a wheelchair, and that is also safe for and usable by persons with other disabilities, and that is consistent with the definition of "path of travel" in Section 217.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 language does not reference the specific elements in ADAAG.	ACCESSIBLE ROUTE OF TRAVEL is a continuous unobstructed path connecting all accessible elements and spaces in an accessible building or facility that can be negotiated by a person with a severe disability using a wheelchair, and that is also safe for and usable by persons with other disabilities, and that is consistent with the definition of "path of travel" in Section 217. <u>All walks, halls, corridors, aisles, skywalks, tunnels, and other spaces that are part of an accessible route shall comply with the applicable provisions of this code.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA, but the proposed revision should be located in section 1114B.1.2, and not in the definitional section 1102B.

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<p>4.3.2 Location.</p> <p>(1) At least one accessible route within the boundary of the site shall be provided from public transportation stops, accessible parking, and accessible passenger loading zones, and public streets or sidewalks to the accessible building entrance they serve. The accessible route shall, to the maximum extent feasible, coincide with the route for the general public.</p> <p>(2) At least one accessible route shall connect accessible buildings, facilities, elements, and spaces that are on the same site.</p> <p>(3) At least one accessible route shall connect accessible building or facility entrances with all accessible spaces and elements and with all accessible dwelling units within the building or facility.</p> <p>(4) An accessible route shall connect at least one accessible entrance of each accessible dwelling unit with those exterior and interior spaces and facilities that serve the accessible dwelling unit.</p>	1114B.1.2	<p>When a building, or portion of a building, is required to be accessible or adaptable, an accessible route of travel shall be provided to all portions of the building, to accessible building entrances and between the building and the public way. Except within an individual dwelling unit, an accessible route of travel shall not pass through kitchens, storage rooms, restrooms, closets or other spaces used for similar purposes. At least one accessible route within the boundary of the site shall be provided from public transportation stops, accessible parking and accessible passenger loading zones, and public streets or sidewalks, to the accessible building entrance they serve. The accessible route shall, to the maximum extent feasible, coincide with the route for the general public. At least one accessible route shall connect accessible buildings, facilities, elements and spaces that are on the same site. At least one accessible route shall connect accessible building or facility entrances with all accessible spaces and elements and with all accessible dwelling units within the building or facility. An accessible route shall connect at least one accessible entrance of each accessible dwelling unit with those exterior and interior spaces and facilities that serve the accessible dwelling unit.</p> <p>Where more than one route of travel is provided, all routes shall be accessible.</p> <p><u>Exception: Where an elevator is provided for vertical access, only one elevator is required. Where more than one elevator is provided, all elevators shall be accessible. See Section 1114B.1.1 for a list of code sections applicable to accessible route of travel.</u></p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Exception added for completeness.

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<p>4.3.3 Width. The minimum clear width of an accessible route shall be 36 in (915 mm) except at doors (see 4.13.5 and 4.13.6). If a person in a wheelchair must make a turn around an obstruction, the minimum clear width of the accessible route shall be as shown in Fig. 7(a) and (b).</p>	<p>1102B</p> <p><u>1133B.3.1</u></p>	<p>ACCESSIBLE ROUTE OF TRAVEL is a continuous unobstructed path connecting all accessible elements and spaces in an accessible building or facility that can be negotiated by a person with a severe disability using a wheelchair, and that is also safe for and usable by persons with other disabilities, and that is consistent with the definition of "path of travel" in Section 217.</p> <p><u>Corridor and hallway widths. Every corridor and hallway serving an occupant load of 10 or more shall not be less than 44 inches (1118 mm) in width. Corridors and hallways serving an occupant load of less than 10 shall not be less than 36 inches (914 mm) in width.</u></p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 requires different widths for accessible routes depending upon the element or spaces served. However the minimum width for an access is never less than 36". Adopt ADAAG language as follows.</p>	<p>ACCESSIBLE ROUTE OF TRAVEL is a continuous unobstructed path connecting all accessible elements and spaces in an accessible building or facility that can be negotiated by a person with a severe disability using a wheelchair, and that is also safe for and usable by persons with other disabilities, and that is consistent with the definition of "path of travel" in Section 217. <u>The minimum clear width of an accessible route shall be sized in accordance with this code but in no event less than 36 in (915 mm) except at doors (see figure 11B-10). If a person in a wheelchair must make a turn around an obstruction, the minimum clear width of the accessible route shall be as shown in figure 11B-5E(a) and (b).</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Added 1133B.3.1 for completeness.</p> <p>DSA's proposed revision meets the ADA. However, the amended language contains technical requirements that should be located in section 1114B.1.2, and not in the definitional section 1102B. Also, added the reference "(a) and (b)" for accuracy.</p>
<p>Figure 7 of the ADA Standards. Accessible Route.</p> <p>7(a) 90 degree turn. A 90 degree turn can be made from a 36 in (915 mm) wide passage into another 36 in (915 mm) passage if the depth of each leg is a minimum of 48 in (1220 mm) on the inside dimensions of the turn.</p> <p>7(b) Turns around an Obstruction. A U-turn around an obstruction less than 48 in (1220 mm) wide may be made if the width of the passages approaching and exiting the turn is a minimum of 42 in (1065 mm) and the base of the U-turn space is a minimum of 48 in (1220 mm) wide.</p>	<p>Figure 11B-5E(a) and (b)</p>	<p>Refer to code.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Added the reference "(a) and (b)" for accuracy.</p>

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4.3.4 Passing Space. If an accessible route has less than 60 in (1525 mm) clear width, then passing spaces at least 60 in by 60 in (1525 mm by 1525 mm) shall be located at reasonable intervals not to exceed 200 ft (61 m). A T-intersection of two corridors or walks is an acceptable passing place.	1133B.7.1	Continuous surface. Walks and sidewalks subject to these regulations shall have a continuous common surface, not interrupted by steps or by abrupt changes in level exceeding 1/2 inch (12.7 mm) (see Section 1133B.7.3), and shall be a minimum of 48 inches (1219 mm) in width.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not contain a requirement for passing spaces. Adopt ADAAG language as follows.	Continuous surface. Walks and sidewalks subject to these regulations shall have a continuous common surface, not interrupted by steps or by abrupt changes in level exceeding 1/2 inch (12.7 mm) (see Section 1133B.7.3), and shall be a minimum of 48 inches (1219 mm) in width. <u>If a walk or sidewalk has less than 60 in (1525 mm) clear width, then passing spaces at least 60 in by 60 in (1525 mm by 1525 mm) shall be located at reasonable intervals not to exceed 200 ft (61 m). A T-intersection is an acceptable passing place.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1133B.3.2	Corridors and hallways over 200 feet (60 960 mm). Corridors and hallways that are located on an accessible route and exceed 200 feet (60 960 mm) in length shall have a minimum clear width of 60 inches (1524 mm) clear width, then passing spaces at least 60 inches by 60 inches (1524 mm by 1524 mm) shall be located at reasonable intervals not to exceed 200 feet (60 960 mm). A "T" intersection of two corridors or walks is an acceptable passing place.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.3.5 Head Room. Accessible routes shall comply with 4.4.2.	1133B.8.6.2	Head Room. Walks, halls, corridors, passageways, aisles or other circulation spaces shall have 80 inches (2032 mm) minimum clear head room. See Figure 11B-7A.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.3.6 Surface Textures. The surface of an accessible route shall comply with 4.5.	1124B.1	General. Ground and floor surfaces along accessible routes and in accessible rooms and spaces, including floors, walks, ramps, stairs and curb ramps, shall be stable, firm, slip-resistant, and shall comply with this section.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.3.7 Slope. An accessible route with a running slope greater than 1:20 is a ramp and shall comply with 4.8. Nowhere shall the cross slope of an accessible route exceed 1:50.	1133B.5.1	General. Ramps used as exits shall conform to the provisions of this section. Any path of travel shall be considered a ramp if its slope is greater than 1 foot (305 mm) rise in 20 feet (6096 mm) of horizontal run (5% gradient). The least possible slope shall be used for any ramp.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1133B.5.3.1	The cross slope of ramp surfaces shall be no greater than 1 unit vertical in 50 units horizontal (2% slope).	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

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	1133B.7.3	Five percent gradient. When the slope in the direction of travel of any walk exceeds 1 unit vertical to 20 units horizontal (5% gradient), it shall comply with the provisions of Section 1133B.5.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1133B.7.1.3	Surface cross slopes. Surface cross slopes shall not exceed 1/4 inch (6 mm) per foot except when the enforcing agency finds that due to local conditions it creates an unreasonable hardship, the cross slope shall be increased to a maximum of 1/2 inch (12.7 mm) per foot for distances not to exceed 20 feet (6096 mm) (2.5% gradient).	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 allows an exception to increase the cross slope of an accessible route to 2.5%. Delete Title 24 language to conform to ADAAG.	Surface cross slopes. Surface cross slopes shall not exceed 1/4 inch (6 mm) per foot. except when the enforcing agency finds that due to local conditions it creates an unreasonable hardship, the cross slope shall be increased to a maximum of 1/2 inch (12.7 mm) per foot for distances not to exceed 20 feet (6096 mm) (2.5% gradient).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	<u>1128B</u>	<u>PEDESTRIAN GRADE SEPARATIONS (OVERPASSES AND UNDERPASSES)</u> <u>Pedestrian ramps on pedestrian grade separations shall comply with the requirements of Section 1133B.5 for ramps.</u> <u>Cross slopes of walking surfaces shall be the minimum possible and shall not exceed ¼ inch (6 mm) per foot (2.083% gradient). The slope of any appreciably warped walking surface shall not exceed 1 unit vertical in 12 units horizontal (8.33% slope) in any direction. Where pedestrian grade separations cross streets or other vehicular traffic ways, and where a street level crossing can reasonably and safely be used by persons with physical disabilities, there shall be provided conforming curb ramps and a usable pathway.</u>			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.3.8 Changes in Levels. Changes in levels along an accessible route shall comply with 4.5.2. If an accessible route has changes in level greater than 1/2 in (13 mm), then a curb ramp, ramp, elevator, or platform lift (as permitted in 4.1.3 and 4.1.6) shall be provided that complies with 4.7, 4.8, 4.10, or 4.11, respectively. An accessible route does not include stairs, steps, or escalators. See definition of "egress, means of" in 3.5.</p>	1102B	<p>ACCESSIBLE ROUTE OF TRAVEL is a continuous unobstructed path connecting all accessible elements and spaces in an accessible building or facility that can be negotiated by a person with a severe disability using a wheelchair, and that is also safe for and usable by persons with other disabilities, and that is consistent with the definition of "path of travel" in Section 217.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 language does not state that stairs, steps or escalators cannot be part of an accessible route. Adopt ADAAG language as follows.</p>	<p>ACCESSIBLE ROUTE OF TRAVEL is a continuous unobstructed path connecting all accessible elements and spaces in an accessible building or facility that can be negotiated by a person with a severe disability using a wheelchair, and that is also safe for and usable by persons with other disabilities, and that is consistent with the definition of "path of travel" in Section 217. <u>An accessible route does not include stairs, steps, or escalators.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
	1124B.2	<p>Changes in Level. Changes in level up to 1/4 inch (6 mm) vertical and without edge treatment [see Figure 11B-5E (c) and (d)]. Changes in level between 1/4 inch (6 mm) and 1/2 inch (12.7 mm) shall be accomplished by means of a ramp that complies with Figure 11B-5E (d).</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not include various options for addressing changes in level. Adopt ADAAG language as follows.</p>	<p>Changes in Level. Changes in level up to 1/4 inch (6 mm) vertical and without edge treatment [see Figure 11B-5E (c) and (d)]. Changes in level between 1/4 inch (6 mm) and 1/2 inch (12.7 mm) shall be accomplished by means of a <u>curb ramp, elevator, platform lift, or</u> ramp that complies with Figure 11B-5E (d).</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>DSA's proposed revision is unclear regarding changes in level greater than 1/2 inch. Also, the amended language creates some confusion as it relates to Figure 11B-5E(d).</p>
<p>4.3.9 Doors. Doors along an accessible route shall comply with 4.13.</p>	1114B.1.1	<p>General. When accessibility is required by this chapter, it shall be designed and constructed to meet the minimum requirements of the following sections: Chapter 11B, Accessibility; Division I, New Buildings; Division II, Site Accessibility; Division III, Accessibility for Entrances, Exits and Paths of Travel; and Division IV, Accessibility for Existing Buildings Doors — [for HCD 1/AC] Section 1120A.2; [for DSA/AC] Section 1133B.2</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Reference to section 1133B.2 meets the ADA.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.3.10* Egress. Accessible routes serving any accessible space or element shall also serve as a means of egress for emergencies or connect to an accessible area of rescue assistance.	1114B.2.1	General. In buildings or portions of buildings required to be accessible, accessible means of egress shall be provided in the same number as required for exits by Chapter 10. When an exit required by Chapter 10 is not accessible, an area for evacuation assistance shall be provided. Areas for evacuation assistance shall comply with the requirements of this code and shall adjoin an accessible route of travel complying with this code.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 terminology is not consistent with ADAAG. Adopt ADAAG language as follows.	General. In buildings or portions of buildings required to be accessible, accessible means of egress shall be provided in the same number as required for exits by Chapter 10. When an exit required by Chapter 10 is not accessible, an area for <u>rescue</u> /evacuation assistance shall be provided. Areas for rescue/evacuation assistance shall comply with the requirements of this code and shall adjoin an accessible route of travel complying with this code.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	DSA's proposed revision does not meet the ADA. Section 1114B.2.1 does not require that all accessible routes must serve as a means of egress for emergencies.
4.3.11 Areas of Rescue Assistance.	1114B.2.2	Areas for Evacuation Assistance.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 terminology is not consistent with ADAAG. Adopt ADAAG language as follows.	Areas for <u>Rescue</u> /Evacuation Assistance.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	As mentioned previously, DSA can use the term area for evacuation assistance. DSA only needs to ensure that the definition and requirements for an area for evacuation assistance is equivalent to the ADA.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.3.11.1 Location and Construction. An area of rescue assistance shall be one of the following:</p> <p>(1) A portion of a stairway landing within a smokeproof enclosure (complying with local requirements).</p> <p>(2) A portion of an exterior exit balcony located immediately adjacent to an exit stairway when the balcony complies with local requirements for exterior exit balconies. Openings to the interior of the building located within 20 feet (6 m) of the area of rescue assistance shall be protected with fire assemblies having a three-fourths hour fire protection rating.</p> <p>(3) A portion of a one-hour fire-resistive corridor (complying with local requirements for fire-resistive construction and for openings) located immediately adjacent to an exit enclosure.</p>	1114B.2.2.1	<p>Location and construction. An area for evacuation assistance shall be one of the following:</p> <p>1.[For SFM] A portion of a stairway landing within a smokeproof enclosure, complying with Section 1005.3.3.</p> <p>2.[For SFM] A portion of an exterior exit balcony located immediately adjacent to an exit stairway when the exterior exit balcony complies with Section 1006.3. Openings to the exterior of the building located within 20 feet (6096 mm) of the area for evacuation assistance shall be protected with fire assemblies having a three-fourths-hour fire-protection rating.</p> <p>3.[For SFM] A portion of a one-hour fire-resistive corridor complying with Section 1004.3.4 located immediately adjacent to an exit enclosure.</p> <p>4.[For SFM] A vestibule located immediately adjacent to an exit enclosure and constructed to the same fire-resistive standards as required by Section 1004.3.4.</p> <p>5.[For SFM] A portion of a stairway landing within an exit enclosure which is vented to the exterior and is separated from the interior of the building by not less than one-hour fire-resistive door assemblies.</p> <p>6.[For SFM] When approved by the building official, an area or room which is separated from other portions of the building by a smoke barrier. Smoke barriers shall have a fire-resistive rating of not less than one hour and shall completely enclose the area or room. Doors in the smoke barrier shall be tight fitting smoke- and draft-control assemblies having a fire-protection rating of not less than 20 minutes and shall be self-closing or automatic closing. The area or room shall be provided with an exit directly to an exit enclosure. When the room or area exits into an exit enclosure which is required</p>	<p><input type="checkbox"/> Meets ADA</p> <p><input checked="" type="checkbox"/> Does not meet ADA</p> <p><input checked="" type="checkbox"/> Comment</p> <p>Title 24 terminology is not consistent with ADAAG. Adopt ADAAG language as follows.</p>	<p>Location and construction. An area for <u>rescue</u>/evacuation assistance shall be one of the following:</p> <p>1.[For SFM] A portion of a stairway landing within a smokeproof enclosure, complying with Section 1005.3.3.</p> <p>2.[For SFM] A portion of an exterior exit balcony located immediately adjacent to an exit stairway when the exterior exit balcony complies with Section 1006.3. Openings to the exterior of the building located within 20 feet (6096 mm) of the area for rescue/evacuation assistance shall be protected with fire assemblies having a three-fourths-hour fire-protection rating.</p> <p>3.[For SFM] A portion of a one-hour fire-resistive corridor complying with Section 1004.3.4 located immediately adjacent to an exit enclosure.</p> <p>4.[For SFM] A vestibule located immediately adjacent to an exit enclosure and constructed to the same fire-resistive standards as required by Section 1004.3.4.</p> <p>5.[For SFM] A portion of a stairway landing within an exit enclosure which is vented to the exterior and is separated from the interior of the building by not less than one-hour fire-resistive door assemblies.</p> <p>6.[For SFM] When approved by the building official, an area or room which is separated from other portions of the building by a smoke barrier. Smoke barriers shall have a fire-resistive rating of not less than one hour and shall completely enclose the area or room.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>(4) A vestibule located immediately adjacent to an exit enclosure and constructed to the same fire-resistive standards as required (5) A portion of a stairway landing within an exit enclosure which is vented to the exterior and is separated from the interior of the building with not less than one-hour fire-resistive doors.</p> <p>(6) When approved by the appropriate local authority, an area or a room which is separated from other portions of the building by a smoke barrier. Smoke barriers shall have a fire-resistive rating of not less than one hour and shall completely enclose the area or room. Doors in the smoke barrier shall be tight-fitting smoke- and draft-control assemblies having a fire-protection rating of not less than 20 minutes and shall be self-closing or automatic closing. The area or room shall be provided with an exit directly to an exit enclosure. Where the room or one-hour fire-resistive construction, the room or area shall have the same fire-resistive construction, including the same opening protection, as required for the adjacent exit enclosure.</p> <p>(7) An elevator lobby when elevator shafts and adjacent lobbies are pressurized as required for smokeproof enclosures by local regulations and when complying with requirements herein for size, communication, and signage. Such pressurization system shall be activated by smoke detectors on each floor located in a manner approved by the appropriate local authority. Pressurization equipment and its duct work within the building shall be separated from other portions of the building by a minimum two-hour fire-resistive construction.</p>		<p>to be of more than one-hour fire-resistive construction, the room or area shall have the same fire-resistive construction, including the same opening protection, as required for the adjacent exit enclosure. 7.[For SFM] An elevator lobby complying with Section 1114B.2.3.</p>		<p>Doors in the smoke barrier shall be tight fitting smoke- and draft-control assemblies having a fire-protection rating of not less than 20 minutes and shall be self-closing or automatic closing. The area or room shall be provided with an exit directly to an exit enclosure. When the room or area exits into an exit enclosure which is required to be of more than one-hour fire-resistive construction, the room or area shall have the same fire-resistive construction, including the same opening protection, as required for the adjacent exit enclosure. 7.[For SFM] An elevator lobby complying with Section 1114B.2.3.</p>		

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.3.11.2 Size. Each area of rescue assistance shall provide at least two accessible areas each being not less than 30 inches by 48 inches (760 mm by 1220 mm). The area of rescue assistance shall not encroach on any required exit width. The total number of such 30-inch by 48-inch (760 mm by 1220 mm) areas per story shall be not less than one for every 200 persons of calculated occupant load served by the area of rescue assistance.</p> <p>EXCEPTION: The appropriate local authority may reduce the minimum number of 30-inch by 48-inch (760 mm by 1220 mm) areas to one for each area of rescue assistance on floors where the occupant load is less than 200.</p>	1114B.2.2.2	<p>Size. Each area for evacuation assistance shall provide at least two accessible areas that are not less than 30 inches by 48 inches (762 mm by 1219 mm). The area for evacuation assistance shall not encroach on any required exit width. The total number of such 30-inch by 48-inch (762 mm by 1219 mm) areas per story shall not be less than one for every 200 persons of calculated occupant load served by the area for evacuation assistance.</p> <p>EXCEPTION: The building official may reduce the minimum number of 30-inch by 48-inch (762 mm by 1219 mm) areas to one for each area for evacuation assistance on floors where the occupant load is less than 200.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 terminology is not consistent with ADAAG. Adopt ADAAG language as follows.</p>	<p>Size. Each area for <u>rescue</u>/evacuation assistance shall provide at least two accessible areas that are not less than 30 inches by 48 inches (762 mm by 1219 mm). The area for <u>rescue</u>/evacuation assistance shall not encroach on any required exit width. The total number of such 30-inch by 48-inch (762 mm by 1219 mm) areas per story shall not be less than one for every 200 persons of calculated occupant load served by the area for <u>rescue</u>/evacuation assistance.</p> <p>EXCEPTION: The building official may reduce the minimum number of 30-inch by 48-inch (762 mm by 1219 mm) areas to one for each area for <u>rescue</u>/evacuation assistance on floors where the occupant load is less than 200.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>4.3.11.3* Stairway Width. Each stairway adjacent to an area of rescue assistance shall have a minimum clear width of 48 inches between handrails.</p>	1114B.2.2.3	<p>Adjacent stairway width. Each stairway adjacent to an area for evacuation assistance shall have a minimum clear width of 48 inches (1219 mm) between handrails.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 terminology is not consistent with ADAAG. Adopt ADAAG language as follows.</p>	<p>Adjacent stairway width. Each stairway adjacent to an area for <u>rescue</u>/evacuation assistance shall have a minimum clear width of 48 inches (1219 mm) between handrails.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.3.11.4* Two-way Communication. A method of two-way communication, with both visible and audible signals, shall be provided between each area of rescue assistance and the primary entry. The fire department or appropriate local authority may approve a location other than the primary entry.</p>	<p>1114B.2.2.4.2</p> <p><u>1114B.2.2.4</u> <u>1114B2.2.4.1</u></p>	<p>A method of two-way communication with both visible and audible communication shall be provided between each area of evacuation assistance and the primary entry. A button in the area of rescue assistance shall activate both a light in the area of rescue assistance indicating that rescue has been requested and a light at the primary entry indicating that rescue is being requested. A button at the primary entry shall activate both a light at the primary entry and a light in the area of rescue assistance indicating that the request has been received.</p> <p>A telephone with controlled access to a public telephone system or another method of two-way communication shall be provided between each area of refuge and the primary entry. The fire department may approve a location other than the primary entry.</p> <p><u>Two-way communication.</u> <u>A telephone with controlled access to a public telephone system or another method of two-way communication shall be provided between each area of refuge and the primary entry. The fire department may approve a location other than the primary entry.</u></p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 terminology is not consistent with ADAAG. Adopt ADAAG language as follows.</p>	<p>A method of two-way communication with both visible and audible communication shall be provided between each area of <u>rescue</u>/evacuation assistance and the primary entry. A button in the area of rescue assistance shall activate both a light in the area of rescue assistance indicating that rescue has been requested and a light at the primary entry indicating that rescue is being requested. A button at the primary entry shall activate both a light at the primary entry and a light in the area of rescue assistance indicating that the request has been received.</p> <p>A telephone with controlled access to a public telephone system or another method of two-way communication shall be provided between each area of refuge <u>rescue assistance</u> and the primary entry. The fire department may approve a location other than the primary entry.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Again, DSA does not need to change its terminology to ADA's terminology. The substantive requirements in section 1114B2.2.4.2 meets the ADA's requirement.</p> <p>Added sections 1114B.2.2.4 and 1114B.2.2.4.1.</p>
<p>4.3.11.5 Identification. Each area of rescue assistance shall be identified by a sign which states "AREA OF RESCUE ASSISTANCE" and displays the international symbol of accessibility. The sign shall be illuminated when exit sign illumination is required. Signage shall also be installed at all inaccessible exits and where otherwise necessary to clearly indicate the direction to areas of rescue assistance. In each area of rescue assistance, instructions on the use of the area under emergency conditions shall be posted adjoining the two-way communication system.</p>	<p>1114B.2.2.5</p>	<p>Identification. Each area for evacuation assistance shall be identified by a sign which states AREA FOR EVACUATION ASSISTANCE and the international symbol of accessibility. The sign shall be illuminated when exit sign illumination is required. In each area for evacuation assistance, instructions on the use of the area under emergency conditions shall be posted adjoining the two-way communication system.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 terminology is not consistent with ADAAG. Adopt ADAAG language as follows.</p>	<p>Identification. Each area for rescue/evacuation assistance shall be identified by a sign which states AREA FOR <u>RESCUE</u>/EVACUATION ASSISTANCE and the international symbol of accessibility. The sign shall be illuminated when exit sign illumination is required. In each area for rescue/evacuation assistance, instructions on the use of the area under emergency conditions shall be posted adjoining the two-way communication system.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>DSA's proposed revision does not meet the ADA. Section 4.3.11.5 of the ADA Standards requires signage at all inaccessible exits. DSA needs to adopt a similar provision.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.4 Protruding Objects.</p> <p>4.4.1* General. Objects projecting from walls (for example, telephones) with their leading edges between 27 in and 80 in (685 mm and 2030 mm) above the finished floor shall protrude no more than 4 in (100 mm) into walks, halls, corridors, passageways, or aisles (see Fig. 8(a)). Objects mounted with their leading edges at or below 27 in (685 mm) above the finished floor may protrude any amount (see Fig. 8(a) and (b)). Free-standing objects mounted on posts or pylons may overhang 12 in (305 mm) maximum from 27 in to 80 in (685 mm to 2030 mm) above the ground or finished floor (see Fig. 8(c) and (d)). Protruding objects shall not reduce the clear width of an accessible route or maneuvering space (see Fig. 8(e)).</p>	<p>1133B.8.6</p> <p>1133B.8.6.1</p> <p>1133B.8.6.3</p>	<p>Protruding objects.</p> <p>General. Objects projecting from walls (for example, telephones) with their leading edges between 27 inches (686 mm) and 80 inches (2032 mm) above the finished floor shall protrude no more than 4 inches (102 mm) into walks, halls, corridors, passageways or aisles. Objects mounted with their leading edges at or below 27 inches (686 mm) above the finished floor may protrude any amount. Free-standing objects mounted on posts or pylons may overhang 12 inches (305 mm) maximum from 27 inches (686 mm) to 80 inches (2032 mm) above the ground or finished floor. Protruding objects shall not reduce the clear width of an accessible route or maneuvering space. See Figure 11B-7A.</p> <p><u>Free-standing signs. Wherever signs mounted on posts or pylons protrude from the posts or pylons and the bottom edge of the sign is at less than 80 inches (2032 mm) above the finished floor or ground level, the edges of such signs shall be rounded or eased and the corners shall have a minimum radius of 0.125 inches.</u></p>	<p><input checked="" type="checkbox"/> Meets ADA</p> <p><input type="checkbox"/> Does not meet ADA</p> <p><input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>	<p>Added section 1133B.8.6.3 for completeness.</p>
<p>Figure 8 of the ADA Standards. Protruding Objects.</p> <p>8(d) Objects Mounted on Posts or Pylons. The diagram illustrates an area where an overhang can be greater than 12 in (305 mm) where the object cannot be approached on the side of the overhang.</p> <p>8(e) Example of Protection around Wall-Mounted Objects and Measurements of Clear Widths. The minimum clear width for continuous passage is 36 in (915 mm). 32 in (815 mm) is the minimum clear width for a maximum distance of 24 in (610 mm). The maximum distance an object can protrude beyond a wing wall is 4 in (100 mm).</p>	<p>Figure 11B-7A.</p>	<p>Refer to code.</p>	<p><input type="checkbox"/> Meets ADA</p> <p><input checked="" type="checkbox"/> Does not meet ADA</p> <p><input checked="" type="checkbox"/> Comment</p> <p>Title 24 figure 11B-7A does not include several of the graphics in figure 8. Adopt graphics from ADAAG.</p>	<p>Refer to attachment.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>	
<p>4.4.2 Head Room. Walks, halls, corridors, passageways, aisles, or other circulation spaces shall have 80 in (2030 mm) minimum clear head room (see Fig. 8(a)). If vertical clearance of an area adjoining an accessible route is reduced to less than 80 in (nominal</p>	<p>1133B.8.6.2</p>	<p>Head Room. Walks, halls, corridors, passageways, aisles or other circulation spaces shall have 80 inches (2032 mm) minimum clear head room. See Figure 11B-7A.</p>	<p><input checked="" type="checkbox"/> Meets ADA</p> <p><input type="checkbox"/> Does not meet ADA</p> <p><input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p>Section 4.4.2 of the ADA Standards contains requirements for an area adjoining an accessible route with a vertical clearance less than 80 inches. Section 1133B.8.6.2 needs to have a similar requirement.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
dimension), a barrier to warn blind or visually-impaired persons shall be provided (see Fig. 8(c-1)).	1133B.8.2	<p><u>Overhanging obstructions. Any obstruction that overhangs a pedestrian's way shall be a minimum of 80 inches (2032 mm) above the walking surface as measured from the bottom of the obstruction. Where a guy support is used parallel to a path of travel, including, but not limited to, sidewalks, a guy brace, sidewalk guy or similar device shall be used to prevent an overhanging obstruction as defined (see Figure 11B-28).</u></p> <p><u>Hazards such as drop-offs adjacent to walk ways or overhanging obstructions can be dangerous to persons with sight problems. This section addresses these situations.</u></p>			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1133B.8.2.
Figure 8 of the ADA Standards. Protruding Objects. 8(c-1) Overhead Hazards. As an example, the diagram illustrates a stair whose underside descends across a pathway. Where the headroom is less than 80 in (2030 mm), protection is offered by a railing which can be no higher than 27 in (685 mm) to ensure detectability.	Figure 11B-7A.	Refer to code.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 figure 11B-7A does not include several of the graphics in figure 8. Adopt graphics from ADAAG.	Refer to attachment.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.5 Ground and Floor Surfaces. 4.5.1* General. Ground and floor surfaces along accessible routes and in accessible rooms and spaces including floors, walks, ramps, stairs, and curb ramps, shall be stable, firm, slip-resistant, and shall comply with 4.5.	1124B.1 1120B.2 1133B.1.1.1.3 1133B.7.1.1 1133B.7.1.2	General. Ground and floor surfaces along accessible routes and in accessible rooms and spaces, including floors, walks, ramps, stairs and curb ramps, shall be stable, firm, slip-resistant, and shall comply with this section. <u>Floor Surface. The surface of floors shall be slip-resistant and shall comply with Section 1124B.</u> <u>Recessed doormats. Recessed doormats shall be adequately anchored to prevent interference with wheelchair traffic.</u> <u>Slopes less than 6 percent. Surfaces with a slope of less than 6 percent gradient shall be at least as slip-resistant as that described as a medium salted finish.</u> <u>Slopes 6 percent or greater. Surfaces with a slope of 6 percent gradient shall be slip-resistant.</u>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1120B.2, 1133B.1.1.1.3, 1133B.7.1.1, and 1133B.7.1.2.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.5.2 Changes in Level. Changes in level up to 1/4 in (6 mm) may be vertical and without edge treatment (see Fig. 7(c)). Changes in level between 1/4 in and 1/2 in (6 mm and 13 mm) shall be beveled with a slope no greater than 1:2 (see Fig. 7(d)). Changes in level greater than 1/2 in (13 mm) shall be accomplished by means of a ramp that complies with 4.7 or 4.8.</p>	<p>1124B.2</p> <p>1133B.7.4</p>	<p>Changes in Level. Changes in level up to 1/4 inch (6 mm) vertical and without edge treatment [see Figure 11B-5E (c) and (d)]. Changes in level between 1/4 inch (6 mm) and 1/2 inch (12.7 mm) shall be accomplished by means of a ramp that complies with Figure 11B-5E (d).</p> <p><u>Changes in level. Abrupt changes in level along any accessible route shall not exceed 1/2 inch (12.7 mm). When changes in level do occur, they shall be beveled with a slope no greater than 1 unit vertical to 2 units horizontal (50%), except that level changes not exceeding 1/4 inch (6 mm) may be vertical.</u></p> <p><u>When changes in levels greater than 1/2 inch (12.7 mm) are necessary, they shall comply with the requirements for curb ramps.</u></p> <p><u>NOTE: See Section 1127B.5.</u></p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Added section 1133B.7.4.</p> <p>Section 1124B.2 is unclear regarding changes in level greater than 1/2 inch. Also, the requirement for 1/4 inch change in level is somewhat confusing.</p>
<p>4.5.3* Carpet. If carpet or carpet tile is used on a ground or floor surface, then it shall be securely attached; have a firm cushion, pad, or backing, or no cushion or pad; and have a level loop, textured loop, level cut pile, or level cut/uncut pile texture. The maximum pile thickness shall be 1/2 in (13 mm) (see Fig. 8(f)). Exposed edges of carpet shall be fastened to floor surfaces and have trim along the entire length of the exposed edge. Carpet edge trim shall comply with 4.5.2.</p>	<p>1124B.3</p>	<p>Carpet. If carpet or carpet tile is used on a ground or floor surface, then it shall be securely attached; have a firm cushion, pad or backing or no cushion or pad; and have a level loop, textured loop; level-cut pile, or level-cut/uncut pile texture. The maximum pile height shall be 1/2 inch (12.7 mm). Exposed edges of carpet shall be fastened to floor surfaces and have trim along the entire length of the exposed edge. Carpet edge trim shall comply with Section 1124B.2.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Section 1124B.3 should reference carpet pile thickness Figure 11B-7B(b).</p>
<p>4.5.4 Gratings. If gratings are located in walking surfaces, then they shall have spaces no greater than 1/2 in (13 mm) wide in one direction (see Fig. 8(g)). If gratings have elongated openings, then they shall be placed so that the long dimension is perpendicular to the dominant direction of travel (see Fig. 8(h)).</p>	<p>1124B.4</p> <p>1133B.7.2</p>	<p>Gratings. If gratings are located in walking surfaces, then they shall have spaces no greater than 1/2 inch (12.7 mm) wide in one direction (see Figure 11B-7B). If gratings have elongated openings, then they shall be placed so that the long dimension is perpendicular to the dominant direction of travel (see Figure 11B-7B).</p> <p><u>Gratings. Walks, sidewalks and pedestrian ways shall be free of gratings whenever possible. For gratings located in the surface of any of these areas, grid openings in gratings shall be limited to 1/2 inch (12.7 mm) in the direction of traffic flow.</u></p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Added 1133B.7.2.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.6 Parking and Passenger Loading Zones.</p> <p>4.6.1 Minimum Number. Parking spaces required to be accessible by 4.1 shall comply with 4.6.2 through 4.6.5. Passenger loading zones required to be accessible by 4.1 shall comply with 4.6.5 and 4.6.6.</p>	1131B.1	Location. When provided, passenger drop-off and loading zones shall be located on accessible route of travel.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1131B.2	<p>Passenger Loading Zones.</p> <p>1. General. Where provided, one passenger drop-off and loading zone shall provide an access aisle at least 60 inches (1524 mm) wide and 20 feet (6096 mm) long adjacent and parallel to the vehicle pull-up space. Such zones shall be located on a surface with a slope not exceeding 1 unit vertical in 50 units horizontal (2% slope). If there are curbs between the access aisle and the vehicle pull-up space, a curb ramp shall be provided.</p> <p>2. Vertical Clearance. Provide minimum vertical clearance of 114 inches (2896 mm) at accessible passenger loading zones and along at least one vehicle access route to such areas from site entrances and exits.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.6.2 Location. Accessible parking spaces serving a particular building shall be located on the shortest accessible route of travel from adjacent parking to an accessible entrance. In parking facilities that do not serve a particular building, accessible parking shall be located on the shortest accessible route of travel to an accessible pedestrian entrance of the parking facility. In buildings with multiple accessible entrances with adjacent parking, accessible parking spaces shall be dispersed and located closest to the accessible entrances.</p>	1129B.1	<p>General. Each lot or parking structure where parking is provided for the public as clients, guests or employees, shall provide accessible parking as required by this section. Accessible parking spaces serving a particular building shall be located on the shortest accessible route of travel from adjacent parking to an accessible entrance. In parking facilities that do not serve a particular building, accessible parking shall be located on the shortest accessible route of travel to an accessible pedestrian entrance of the parking facility. In buildings with multiple accessible entrances with adjacent parking, accessible parking spaces shall be dispersed and located closest to the accessible entrances. Table 11B-6 establishes the number of accessible parking spaces required.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.6.3* Parking Spaces. Accessible parking spaces shall be at least 96 in (2440 mm) wide. Parking access aisles shall be part of an accessible route to the building or facility entrance and shall comply with 4.3. Two accessible parking spaces may share a common access aisle (see Fig. 9). Parked vehicle overhangs shall not reduce the clear width of an accessible route. Parking spaces and access aisles shall be level with surface slopes not exceeding 1:50 (2%) in all directions.</p>	1129B.4	<p>Parking Space Size. Accessible parking spaces shall be located as near as practical to a primary entrance and shall be sized as follows:</p> <p>1. Dimensions. Where single spaces are provided, they shall be 14 feet (4267 mm) wide and outlined to provide a 9-foot (2743 mm) parking area and a 5-foot (1524 mm) loading and unloading access aisle on the passenger side of the vehicle. When more than one space is provided in lieu of providing a 14-foot-wide (4267 mm) space for each parking space, two spaces can be provided within a 23-foot-wide (7010 mm) area lined to provide a 9-foot (2743 mm) parking area on each side of a 5-foot (1524 mm) loading and unloading access aisle in the center. The minimum length of each parking space shall be 18 feet (5486 mm). The words NO PARKING shall be painted on the ground within each five-foot (1524 mm) loading and unloading access aisle. This notice shall be painted in white letters no less than 12-inches (154 mm) high and located so that it is visible to traffic enforcement officials. See Figure 11B-18A.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not contain the statement "Parking access aisles shall be part of an accessible route to the building or facility entrance". Adopt ADAAG language as follows.</p>	<p>Parking Space Size. Accessible parking spaces shall be located as near as practical to a primary entrance and shall be sized as follows:</p> <p>1. Dimensions. Where single spaces are provided, they shall be 14 feet (4267 mm) wide and outlined to provide a 9-foot (2743 mm) parking area and a 5-foot (1524 mm) loading and unloading access aisle on the passenger side of the vehicle. When more than one space is provided in lieu of providing a 14-foot-wide (4267 mm) space for each parking space, two spaces can be provided within a 23-foot-wide (7010 mm) area lined to provide a 9-foot (2743 mm) parking area on each side of a 5-foot (1524 mm) loading and unloading access aisle in the center. <u>See Figure 11B-18A. Parking access aisles shall be part of an accessible route of travel to the building or facility entrance. Parked vehicle overhangs shall not reduce the clear width of an accessible route.</u> The minimum length of each parking space shall be 18 feet (5486 mm). The words NO PARKING shall be painted on the ground within each five-foot (1524 mm) loading and unloading access aisle. This notice shall be painted in white letters no less than 12-inches (154 mm) high and located so that it is visible to traffic enforcement officials. See Figures 11B-18A, 11B-18B, and 11B-18C.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>DSA's proposed revision meets the ADA but it needs to reference all sections concerning accessible routes: 1102B, 1114B, 1124B, 1133B.3., 1133B.5, 1133B.7, 1133B.8.6.</p> <p>Also, added reference to Figures 11B-18A, B, and C for clarity.</p>
	1129B.4	<p>4. Slope of parking space. Surface slopes of accessible parking spaces shall be the minimum possible and shall not exceed 1 unit vertical to 50 units horizontal (2% slope) in any direction.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>The Title 24 language is inconsistent with ADAAG and section 1129B.4.3. Modify section as follows.</p>	<p>Slope of parking space and access aisle. Surface slopes of accessible parking spaces and access aisles shall be the minimum possible and shall not exceed 1 unit vertical to 50 units horizontal (2% slope) in any direction <u>all directions</u>.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Although DSA's proposed language meets the ADA, the original language in section 1129B.4.4 also meets the ADA.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	1129B.4	3. Arrangement of parking space. In each parking area, a bumper or curb shall be provided and located to prevent encroachment of cars over the required width of walkways. Also, the space shall be so located that persons with disabilities are not compelled to wheel or walk behind parked cars other than their own. Pedestrian ways which are accessible to persons with disabilities shall be provided from each such parking space to related facilities, including curb cuts or ramps as needed. Ramps shall not encroach into any accessible parking space or the adjacent access aisle. This maximum cross slope in any direction of an accessible parking space and adjacent access aisle shall not exceed 2%.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment The Title 24 language is inconsistent with ADAAG and section 1129B.4.4. Delete language as follows.	Arrangement of parking space. In each parking area, a bumper or curb shall be provided and located to prevent encroachment of cars over the required width of walkways. Also, the space shall be so located that persons with disabilities are not compelled to wheel or walk behind parked cars other than their own. Pedestrian ways which are accessible to persons with disabilities shall be provided from each such parking space to related facilities, including curb cuts or ramps as needed. Ramps shall not encroach into any accessible parking space or the adjacent access aisle. This maximum cross slope in any direction of an accessible parking space and adjacent access aisle shall not exceed 2%.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Although DSA's proposed language meets the ADA, the original language in section 1129B.4.3 also meets the ADA.
Figure 9 of the ADA Standards. Dimensions of Parking Spaces. The access aisle shall be a minimum of 60 in (1525 mm) wide for cars or a minimum of 96 in (2440 mm) wide for vans. The accessible route connected to the access aisle shall be a minimum of 36 in (915 mm) wide.	Figures 11B-18A, 18B, 18C	Refer to code.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 figure includes the language "pedestrian" rather than "accessible" route. The word accessible should be used to provide consistency with ADAAG.	Refer to attachment.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.6.4* Signage. Accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility (see 4.30.7). Spaces complying with 4.1.2(5)(b) shall have an additional sign "Van-Accessible" mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space.</p>	<p>1129B.5</p>	<p>Identification of Parking Spaces for Off-Street Parking Facilities. Each parking space reserved for persons with disabilities shall be identified by a reflectorized sign permanently posted immediately adjacent to and visible from each stall or space, consisting of a profile view of a wheelchair with occupant in white on dark blue background. The sign shall not be smaller than 70 square inches (4516 mm²) in area and, when in a path of travel, shall be posted at a minimum height of 80 inches (2032 mm) from the bottom of the sign to the parking space finished grade. Signs may also be centered on the wall at the interior end of the parking space at a minimum height of 36 inches (914 mm) from the parking space finished grade, ground or sidewalk. Spaces complying with Section 1129B.4, Item 2 shall have an additional sign stating "Van-Accessible" mounted below the symbol of accessibility.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 allows wall-mounted signs at a minimum height of 36". At 36", this would not be high enough for the sign not to be obscured by a vehicle parked in the space. Modify Title 24 language and adopt ADAAG language as follows.</p>	<p>Identification of Parking Spaces for Off-Street Parking Facilities. Each parking space reserved for persons with disabilities shall be identified by a reflectorized sign permanently posted immediately adjacent to and visible from each stall or space, consisting of a profile view of a wheelchair with occupant in white on dark blue background. The sign shall not be smaller than 70 square inches (4516 mm²) in area and, when in a path of travel, shall be posted at a minimum height of 80 inches (2032 mm) from the bottom of the sign to the parking space finished grade. Signs may also be centered on the wall at the interior end of the parking space at a minimum height of 36 <u>72</u> inches (914 mm) from the parking space finished grade, ground or sidewalk. Spaces complying with Section 1129B.4, Item 2 shall have an additional sign stating "Van-Accessible" mounted below the symbol of accessibility. <u>Such signs shall be located so they cannot be obscured by a vehicle parked in the space.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>4.6.5* Vertical Clearance. Provide minimum vertical clearance of 114 in (2895 mm) at accessible passenger loading zones and along at least one vehicle access route to such areas from site entrance(s) and exit(s). At parking spaces complying with 4.1.2(5)(b), provide minimum vertical clearance of 98 in (2490 mm) at the parking space and along at least one vehicle access route to such</p>	<p>1131B.2</p>	<p>2. Vertical Clearance. Provide minimum vertical clearance of 114 inches (2896 mm) at accessible passenger loading zones and along at least one vehicle access route to such areas from site entrances and exits.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
spaces from site entrance(s) and exit(s).	1130B	Parking Structures. All entrances to and vertical clearances within parking structures shall have a minimum vertical clearance of 8 feet 2 inches (2489 mm) where required for accessibility to accessible parking spaces.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 regulates the height of parking structures, but does not address vertical clearances under trees, signposts, drive-through, etc. Title 24 also does not address the vehicular route to these areas. Adopt ADAAG language as follows.	<u>Vertical Clearance -Parking Structures and Spaces.</u> All entrances to and vertical clearances within parking structures and other accessible parking locations shall have a minimum vertical clearance of 8 feet 2 inches (2489 mm) where required for accessibility to accessible parking spaces. <u>At least one vehicle access route to such areas shall be provided from site entrances and exits.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.6.6 Passenger Loading Zones. Passenger loading zones shall provide an access aisle at least 60 in (1525 mm) wide and 20 ft (240 in)(6100 mm) long adjacent and parallel to the vehicle pull-up space (see Fig. 10). If there are curbs between the access aisle and the vehicle pull-up space, then a curb ramp complying with 4.7 shall be provided. Vehicle standing spaces and access aisles shall be level with surface slopes not exceeding 1:50 (2%) in all directions.	1131B.2 1.	General. Where provided, one passenger drop-off and loading zone shall provide an access aisle at least 60 inches (1524 mm) wide and 20 feet (6096 mm) long adjacent and parallel to the vehicle pull-up space. Such zones shall be located on a surface with a slope not exceeding 1 unit vertical in 50 units horizontal (2% slope). If there are curbs between the access aisle and the vehicle pull-up space, a curb ramp shall be provided.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not include the same level of specificity for the term level. Adopt ADAAG language as follows.	General. Where provided, one passenger drop-off and loading zone shall provide an access aisle at least 60 inches (1524 mm) wide and 20 feet (6096 mm) long adjacent and parallel to the vehicle pull-up space. Such zones shall be located on a surface with a slope not exceeding 1 unit vertical in 50 units horizontal (2% slope). <u>Vehicle standing spaces and access aisles shall be level with surface slopes not exceeding 1:50 (2%) in all directions.</u> If there are curbs between the access aisle and the vehicle pull-up space, a curb ramp shall be provided.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.7 Curb Ramps. 4.7.1 Location. Curb ramps complying with 4.7 shall be provided wherever an accessible route crosses a curb.	1127B.5 1.	Curb Ramps General. Curb ramps shall be constructed at each corner of street intersections and where a pedestrian way crosses a curb. <u>The preferred and recommended location for curb ramps is in the center of the crosswalk of each street corner. Where it is necessary to locate a curb ramp in the center of the curb return and the street surfaces are marked to identify pedestrian crosswalks, the lower end of the curb ramp shall terminate within such crosswalk areas. See Figure 11B-20C, Case E.</u>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added additional language for completeness.
4.7.2 Slope. Slopes of curb ramps shall comply with 4.8.2. The slope shall be measured as shown in Fig. 11. Transitions from ramps to walks, gutters, or streets shall be flush and free of abrupt changes. Maximum slopes of adjoining gutters, road surface immediately adjacent to the curb ramp, or accessible route shall not exceed 1:20.	1127B.5 3.	Slope of curb ramps. The slope of curb ramps shall not exceed 1 unit vertical to 12 units horizontal (8.33% slope). Transitions from ramps to walks, gutters, or streets shall be flush and free of abrupt changes, except that curb ramps shall comply with Item 5 below. Maximum slopes of adjoining gutters, road surface immediately adjacent to the curb ramp, or accessible route shall not exceed 1 unit vertical to 20 units horizontal (5% slope) within 4 feet (1219 mm) of the top and bottom of the curb ramp. The slope of the fanned or flared sides of curb ramps shall not exceed 1 unit vertical to 10 units horizontal (10% slope).	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not include specificity on how curb ramps are to be measured or a graphic equivalent or reference to figure ADAAG figure 11. Adopt ADAAG language as follows.	Slope of curb ramps. The slope of curb ramps shall not exceed 1 unit vertical to 12 units horizontal (8.33% slope). <u>The slope shall be measured as shown in Fig [to be determined].</u> Transitions from ramps to walks, gutters, or streets shall be flush and free of abrupt changes, except that curb ramps shall comply with Item 5 below. Maximum slopes of adjoining gutters, road surface immediately adjacent to the curb ramp, or accessible route shall not exceed 1 unit vertical to 20 units horizontal (5% slope) within 4 feet (1219 mm) of the top and bottom of the curb ramp. The slope of the fanned or flared sides of curb ramps shall not exceed 1 unit vertical to 10 units horizontal (10% slope).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	<u>1127B.5.5</u>	<u>Beveled lip. The lower end of each curb ramp shall have a ½ inch (13 mm) lip beveled at 45 degrees as a detectable way-finding edge for persons with visual impairment.</u>			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Added section 1127B.5.5. This section does not meet section 4.7.2 of the ADA Standards because the ADA requires transitions from curb ramps to walks, gutters, or streets to be flush and without abrupt changes.
Figure 11 of the ADA Standards. Measurement of Curb Ramp Slopes. The ramp slope is a ratio expressed as the vertical rise divided by the horizontal run. The adjoining slope at walk or street shall not exceed 1:20.	None	None	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG Figure 11.	See attached detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision to adopt Figure 11 of the ADA Standards in Figure 11B-19C meets the ADA.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.7.3 Width. The minimum width of a curb ramp shall be 36 in (915 mm), exclusive of flared sides.	1127B.5 2.	Width of curb ramps. Curb ramps shall be a minimum of 4 feet (1219 mm) in width and shall lie, generally, in a single sloped plane, with a minimum of surface warping and cross slope.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.7.4 Surface. Surfaces of curb ramps shall comply with 4.5.	1127B.5 6.	Finish. The surface of each curb ramp and its flared sides shall be stable, firm and slip-resistant and shall be of contrasting finish from that of the adjacent sidewalk.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Section 4.5 of ADAAG incorporates a number of elements not referenced by title 24. Adopt ADAAG references as follows.	Finish. The surface of each curb ramp and its flared sides shall be stable, firm and slip-resistant <u>comply with section 1124B Ground and Floor Surfaces</u> and shall be of contrasting finish from that of the adjacent sidewalk.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.7.5 Sides of Curb Ramps. If a curb ramp is located where pedestrians must walk across the ramp, or where it is not protected by handrails or guardrail, it shall have flared sides; the maximum slope of the flare shall be 1:10 (see Fig. 12(a)). Curb ramps with returned curbs may be used where pedestrians would not normally walk across the ramp (see Fig. 12(b)).	1127B.5 3.	Slope of curb ramps. The slope of curb ramps shall not exceed 1 unit vertical to 12 units horizontal (8.33% slope). Transitions from ramps to walks, gutters, or streets shall be flush and free of abrupt changes, except that curb ramps shall comply with Item 5 below. Maximum slopes of adjoining gutters, road surface immediately adjacent to the curb ramp, or accessible route shall not exceed 1 unit vertical to 20 units horizontal (5% slope) within 4 feet (1219 mm) of the top and bottom of the curb ramp. The slope of the fanned or flared sides of curb ramps shall not exceed 1 unit vertical to 10 units horizontal (10% slope).	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Figure 12 of the ADA Standards. Sides of Curb Ramps. 12(a) Flared Sides. If the landing depth at the top of a curb ramp is less than 48 in (1220 mm), then the slope of the flared side shall not be steeper than 1:12.	1127B.5 4.	Level landing. A level landing 4 feet (1219 mm) deep shall be provided at the upper end of each curb ramp over its full width to permit safe egress from the ramp surface, or the slope of the fanned or flared sides of the curb ramp shall not exceed 1 unit vertical to 12 units horizontal (8.33% slope).	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.7.6 Built-up Curb Ramps. Built-up curb ramps shall be located so that they do not project into vehicular traffic lanes (see Fig. 13).	1127B.5 1.	Curb Ramps General. Curb ramps shall be constructed at each corner of street intersections and where a pedestrian way crosses a curb. <u>The preferred and recommended location for curb ramps is in the center of the crosswalk of each street corner. Where it is necessary to locate a curb ramp in the center of the curb return and the street surfaces are marked to identify pedestrian crosswalks, the lower end of the curb ramp shall terminate within such crosswalk areas. See Figure 11B-20C, Case E.</u>	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not address the projection of built up curb ramps into vehicular ways. Adopt ADAAG language as follows.	Curb Ramps General. Curb ramps shall be constructed at each corner of street intersections and where a pedestrian way crosses a curb. <u>Built-up curb ramps shall be located so that they do not project into vehicular traffic lanes.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added additional language for completeness.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.7.7 Detectable Warnings. A curb ramp shall have a detectable warning complying with 4.29.2. The detectable warning shall extend the full width and depth of the curb ramp. [Suspended until July 26, 2001. 28 C.F.R. § 36.407.]</p>	<p>1127B.5 8.</p>	<p>Detectable warnings. A curb ramp shall have a detectable warning that extends the full width and depth of the curb ramp inside the grooved border when the ramp slope is less than 1 unit vertical to 15 units horizontal (6.7% slope). Detectable warnings shall consist of raised truncated domes with a diameter of nominal 0.9 inch (22.9 mm) at the base tapering to 0.45 inch (11.4 mm) at the top, a height of nominal 0.2 inch (5.08 mm) and a center-to-center spacing of nominal 2.35 inches (59.7 mm) in compliance with Figure 11B-23A. "Nominal" here shall be in accordance with Section 12-11A and B 201, State Referenced Standards Code. The detectable warning shall contrast visually with adjoining surfaces, either light-on-dark or dark-on-light. The material used to provide contrast shall be an integral part of the walking surface. The domes may be constructed in a variety of methods, including cast in place or stamped, or may be part of a prefabricated surface treatment.</p> <p>Only approved DSA/AC detectable warning products and directional surfaces shall be installed as provided in the California Code of Regulations (CCR), Title 24, Part 1, Articles 2, 3, and 4. Refer to CCR Title 24, Part 12, Chapter 12-11A and B, for building and facility access specifications for product approval for detectable warning products and directional surfaces.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 requires detectable warnings only at curb ramps with slopes less than 1:15 (6.66%). The ADAAG requirement is no longer suspended. Modify this section as follows.</p>	<p>Detectable warnings. A curb ramp shall have a <u>3 foot deep</u> detectable warning that extends the full width and depth of the curb ramp, <u>excluding the flared sides</u>, inside the grooved border <u>when the ramp slope is less than 1 unit vertical to 15 units horizontal (6.7% slope)</u>. Detectable warnings shall consist of raised truncated domes with a diameter of nominal 0.9 inch (22.9 mm) at the base tapering to 0.45 inch (11.4 mm) at the top, a height of nominal 0.2 inch (5.08 mm) and a center-to-center spacing of nominal 2.35 inches (59.7 mm) in compliance with Figure 11B-23A. "Nominal" here shall be in accordance with Section 12-11A and B 201, State Referenced Standards Code. The detectable warning shall contrast visually with adjoining surfaces, either light-on-dark or dark-on-light. The material used to provide contrast shall be an integral part of the walking surface. The domes may be constructed in a variety of methods, including cast in place or stamped, or may be part of a prefabricated surface treatment.</p> <p>Only approved DSA/AC detectable warning products and directional surfaces shall be installed as provided in the California Code of Regulations (CCR), Title 24, Part 1, Articles 2, 3, and 4. Refer to CCR Title 24, Part 12, Chapter 12-11A and B, for building and facility access specifications for product approval for detectable warning products and directional surfaces.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>4.7.8 Obstructions. Curb ramps shall be located or protected to prevent their obstruction by parked vehicles.</p>	<p>1127B.5 9.</p>	<p>Obstructions. Curb ramps shall be located or protected to prevent their obstruction by parked cars.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>ADAAG references parked vehicles. Adopt ADAAG language as follows.</p>	<p>Obstructions. Curb ramps shall be located or protected to prevent their obstruction by parked <u>cars</u> <u>vehicles</u>.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Although DSA's proposed language meets the ADA, the original language in section 1127B.5.9 also meets the ADA.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.7.9 Location at Marked Crossings. Curb ramps at marked crossings shall be wholly contained within the markings, excluding any flared sides (see Fig. 15).	1127B.5 1.	General. Curb ramps shall be constructed at each corner of street intersections and where a pedestrian way crosses a curb. The preferred and recommended location for curb ramps is in the center of the crosswalk of each street corner. Where it is necessary to locate a curb ramp in the center of the curb return and the street surfaces are marked to identify pedestrian crosswalks, the lower end of the curb ramp shall terminate within such crosswalk areas. See Figure 11B–20C, Case E.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment ADAAG Figure 15 is reflected in Title 24 figure 11B-22 which is not referenced in this section. Incorporate ADAAG reference.	General. Curb ramps shall be constructed at each corner of street intersections and where a pedestrian way crosses a curb. The preferred and recommended location for curb ramps is in the center of the crosswalk of each street corner. Where it is necessary to locate a curb ramp in the center of the curb return and the street surfaces are marked to identify pedestrian crosswalks, the lower end of the curb ramp shall terminate within such crosswalk areas. See Figure 11B–20C, Case E and <u>Figure 11B-22.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.7.10 Diagonal Curb Ramps. If diagonal (or corner type) curb ramps have returned curbs or other well-defined edges, such edges shall be parallel to the direction of pedestrian flow. The bottom of diagonal curb ramps shall have 48 in (1220 mm) minimum clear space as shown in Fig. 15(c) and (d). If diagonal curb ramps are provided at marked crossings, the 48 in (1220 mm) clear space shall be within the markings (see Fig. 15(c) and (d)). If diagonal curb ramps have flared sides, they shall also have at least a 24 in (610 mm) long segment of straight curb located on each side of the curb ramp and within the marked crossing (see Fig. 15(c)).	1127B.5 10.	Diagonal curb ramps. If diagonal (or corner-type) curb ramps have returned curbs or other well-defined edges, such edges shall be parallel to the direction of pedestrian flow. The bottom of diagonal curb ramps shall have 48 inches (1219 mm) minimum clear space as shown in Figure 11B–22 (c) and (d). If diagonal curb ramps are provided at marked crossings, the 48-inch (1219 mm) clear space shall be within the markings (see Figure 11B–20B, Cases C and D). If diagonal curb ramps have flared sides, they shall also have at least a 24-inch-long (610 mm) segment of straight curb located on each side of the curb ramp and within the marked crossing [see Figure 11B–22 (c)].	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Section 1127B.5.10 meets the ADA. However, the reference to Figure 11B-20B, Cases C and D should be replaced with Figure 11B-22(c) and (d).
4.7.11 Islands. Any raised islands in crossings shall be cut through level with the street or have curb ramps at both sides and a level area at least 48 in (1220 mm) long between the curb ramps in the part of the island intersected by the crossings (see Fig. 15(a) and (b)).	None	None	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG language into section 1127B.5. Figure 11B-22 does not contain show islands and will be modified.	<u>Islands. Any raised islands in crossings shall be cut through level with the street or have curb ramps at both sides and a level area at least 48 in (1220 mm) long between the curb ramps in the part of the island intersected by the crossings (see Figure 11B-22).</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.8 Ramps.</p> <p>4.8.1* General. Any part of an accessible route with a slope greater than 1:20 shall be considered a ramp and shall comply with 4.8.</p>	1133B.5.1	<p>General. Ramps used as exits shall conform to the provisions of this section. Any path of travel shall be considered a ramp if its slope is greater than 1 foot (305 mm) rise in 20 feet (6096 mm) of horizontal run (5% gradient). The least possible slope shall be used for any ramp.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Section 1133B.5.1 applies to any path of travel whereas ADA applies to any accessible route.
	1133B.7.3	<p>Five percent gradient. When the slope in the direction of travel of any walk exceeds 1 unit vertical to 20 units horizontal (5% gradient), it shall comply with the provisions of Section 1133B.5.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>4.8.2* Slope and Rise. The least possible slope shall be used for any ramp. The maximum slope of a ramp in new construction shall be 1:12. The maximum rise for any run shall be 30 in (760 mm) (see Fig.16). Curb ramps and ramps to be constructed on existing sites or in existing buildings or facilities may have slopes and rises as shown as allowed in 4.1.6(3)(a) if space limitations prohibit the use of a 1:12 slope or less (see 4.1.6).</p>	1133B.5.1	<p>General. Ramps used as exits shall conform to the provisions of this section. Any path of travel shall be considered a ramp if its slope is greater than 1 foot (305 mm) rise in 20 feet (6096 mm) of horizontal run (5% gradient). The least possible slope shall be used for any ramp.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Section 1133B.5.1 applies to any path of travel whereas ADA applies to any accessible route.
	1133B.5.3	<p>Slope. The maximum slope of a ramp that serves any exit way, provides access for persons with physical disabilities or is in the path of travel shall be 1-foot (305 mm) rise in 12 feet (3658 mm) of horizontal run (8.3% gradient).</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Section 1133B.5.3 does not limit the rise to a maximum of 30 inches.
	<p>1133B.5.4</p> <p>1133B.5.4.1</p>	<p>Landings. Level ramp landings shall be installed as follows:</p> <p>Location of landings. Level ramp landings shall be provided at the top and bottom of each ramp. Intermediate landings shall be provided at intervals not exceeding 30 inches (762 mm) of vertical rise and at each change of direction. Landings are not considered in determining the maximum horizontal distance of each ramp. Landing shall be level as specified in the definition of "level area" in Section 202.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments																																							
<p>Figure 16 of the ADA Standards. Components of a Single Ramp Run and Sample Ramp Dimensions.</p> <p>If the slope of a ramp is between 1:12 and 1:16, the maximum rise shall be 30 in (760 mm) and the maximum horizontal run shall be 30 ft (9 m). If the slope of the ramp is between 1:16 and 1:20, the maximum rise shall be 30 in (760 mm) and the maximum horizontal run shall be 40 ft (12 m).</p>	1133B.5.4.1	<p>NOTE: Examples of ramp dimensions are as follows:</p> <table border="1" data-bbox="747 332 1107 576"> <thead> <tr> <th>SLOPE</th> <th>MAXIMUM RISE (inches)</th> <th>MAXIMUM HORIZONTAL PROJECTION (feet)</th> </tr> </thead> <tbody> <tr> <td></td> <td>(25.4 for mm)</td> <td>(304.8 for mm)</td> </tr> <tr> <td>1:12</td> <td>30</td> <td>30</td> </tr> <tr> <td>1:16</td> <td>30</td> <td>40</td> </tr> <tr> <td>1:20</td> <td>30</td> <td>50</td> </tr> <tr> <td>1:15</td> <td>30</td> <td>37.5</td> </tr> </tbody> </table>	SLOPE	MAXIMUM RISE (inches)	MAXIMUM HORIZONTAL PROJECTION (feet)		(25.4 for mm)	(304.8 for mm)	1:12	30	30	1:16	30	40	1:20	30	50	1:15	30	37.5	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 allows a longer maximum projection for ramps between 1:16 and 1:20. Modify section to conform to ADAAG as follows.	<p>NOTE: Examples of ramp dimensions are as follows:</p> <table border="1" data-bbox="1561 332 1921 600"> <thead> <tr> <th>SLOPE</th> <th>MAXIMUM RISE (inches)</th> <th>MAXIMUM HORIZONTAL PROJECTION (feet)</th> </tr> </thead> <tbody> <tr> <td></td> <td>(25.4 for mm)</td> <td>(304.8 for mm)</td> </tr> <tr> <td>1:12</td> <td>30</td> <td>30</td> </tr> <tr> <td>1:15</td> <td>30</td> <td>30</td> </tr> <tr> <td>1:16</td> <td>30</td> <td>40</td> </tr> <tr> <td>1:20</td> <td>30</td> <td>50</td> </tr> <tr> <td>1:15</td> <td>30</td> <td>37.5</td> </tr> </tbody> </table>	SLOPE	MAXIMUM RISE (inches)	MAXIMUM HORIZONTAL PROJECTION (feet)		(25.4 for mm)	(304.8 for mm)	1:12	30	30	1:15	30	30	1:16	30	40	1:20	30	50	1:15	30	37.5	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA. However, this table should be located in section 1133B.5.3 because it seems to better illustrate slope requirements and not location of landings.
SLOPE	MAXIMUM RISE (inches)	MAXIMUM HORIZONTAL PROJECTION (feet)																																											
	(25.4 for mm)	(304.8 for mm)																																											
1:12	30	30																																											
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1:16	30	40																																											
1:20	30	50																																											
1:15	30	37.5																																											
4.8.3 Clear Width. The minimum clear width of a ramp shall be 36 in (915 mm).	1133B.5.2	Width. The width of ramps shall be as required for stairways and exits.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Added section 1133B.5.2 for completeness. Please clarify the width requirements for stairways and exits as it relates to ramps.																																							
	1133B.5.2.1	Widths as for exists. The width of ramps shall be as required for stairways and exits. Pedestrian ramps shall have a minimum width of 48 inches (1219 mm).	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Added section 1133B.5.2.1 for completeness. Again, please clarify the width requirements for stairways and exits as it relates to ramps.																																							
	1133B.5.2.2	Entrance and special occupancy. Pedestrian ramps serving entrances to buildings where the ramp is the only exit discharge path or serves an occupant load of 300 or more shall have a minimum clear width of 60 inches (1524 mm). Ramps serving Group R Occupancies may be 36 inches (914 mm) clear width when the occupant load is 50 or less. All other pedestrian ramps shall have a minimum width of 48 inches (1219 mm).	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The highlighted last sentence is not present in section 1133B.5.2.2. Please clarify.																																							
4.8.4* Landings. Ramps shall have level landings at bottom and top of each ramp and each ramp run. Landings shall have the following features: (1) The landing shall be at least as wide as the ramp run leading to it. (2) The landing length shall be a minimum of 60 in (1525 mm) clear.	1133B.5.4.1	Location of landings. Level ramp landings shall be provided at the top and bottom of each ramp. Intermediate landings shall be provided at intervals not exceeding 30 inches (762 mm) of vertical rise and at each change of direction. Landings are not considered in determining the maximum horizontal distance of each ramp. Landing shall be level as specified in the definition of "level area" in Section 202.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																																								

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>(3) If ramps change direction at landings, the minimum landing size shall be 60 in by 60 in (1525 mm by 1525 mm).</p> <p>(4) If a doorway is located at a landing, then the area in front of the doorway shall comply with 4.13.6.</p>	1133B.5.4.2	Size of top landings. Top landings shall be not less than 60 inches (1524 mm) wide and shall have a length of not less than 60 inches (1524 mm) in the direction of ramp run.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not address the size of bottom landings except at a change of direction. Adopt ADAAG language as follows.	Size of top <u>and bottom</u> landings. Top landings shall be not less than 60 inches (1524 mm) wide and shall have a length of not less than 60 inches (1524 mm) in the direction of ramp run. <u>Landings at the bottom of ramps shall have a dimension in the direction of ramp run of not less than 6 feet (1829 mm).</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1133B.5.4.3	Encroachment of doors. <u>Doors in any position shall not reduce the minimum dimension of the landing to less than 42 inches (1524 mm) and shall not reduce the required width by more than 7 inches (178 mm). See Figure 11B-39.</u>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The highlighted sentence is not present in section 1133B.5.4.3. Please clarify.
	1133B.5.4.4	Strike edge extension. The width of the landing shall extend 24 inches (610 mm) past the strike edge of any door or gate for exterior ramps and 18 inches (457 mm) past the strike edge for interior ramps.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	ADA's maneuvering clearances at doors are dependent on approaches (e.g., front, hinge side, or latch side). See Figure 25 of the ADA Standards. Section 1133B.5.4.4 is unclear regarding hinge side and latch side approaches.
	1133B.5.4.5	Landing width. At bottom and intermediate landings, the width shall be at least the same as required for the ramps.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1133B.5.4.6	Change of direction. Intermediate and bottom landings at a change of direction in excess of 30 degrees shall have a dimension in the direction of ramp run of not less than 72 inches (1829 mm) to accommodate the handrail extension.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment ADAAG requires a minimum landing size of 60" x 60". Adopt ADAAG requirement as follows.	Change of direction. Intermediate and bottom landings at a change of direction in excess of 30 degrees shall have a dimension in the direction of ramp run of not less than <u>60 inches by 72 inches</u> (1829 mm) to accommodate the handrail extension.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Section 4.8.4(3) of the ADA Standards requires all ramps that change direction at landings to be 60 by 60 inches. Section 1133B.5.4.6 requires only ramps that change direction at landings in excess of 30 degrees to be 60 by 72 inches.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	1133B.5.4.7	Other intermediate landings. Other intermediate landings shall have a dimension in the direction of ramp run of not less than 60 inches (1524 mm).	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1133B.5.4.8	For existing ramps or ramps not covered by Section 1133B.5.4.1, landings shall be provided as set forth in Section 1133B.5.4.1.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>4.8.5* Handrails. If a ramp run has a rise greater than 6 in (150 mm) or a horizontal projection greater than 72 in (1830 mm), then it shall have handrails on both sides. Handrails are not required on curb ramps or adjacent to seating in assembly areas. Handrails shall comply with 4.26 and shall have the following features:</p> <p>(1) Handrails shall be provided along both sides of ramp segments. The inside handrail on switchback or dogleg ramps shall always be continuous.</p> <p>(2) If handrails are not continuous, they shall extend at least 12 in (305 mm) beyond the top and bottom of the ramp segment and shall be parallel with the floor or ground surface (see Fig. 17).</p> <p>(3) The clear space between the handrail and the wall shall be 1-1/2 in (38 mm).</p> <p>(4) Gripping surfaces shall be continuous.</p>	1133B.5.5.1	<p>Handrails are required on ramps that provide access if slope exceeds 1 foot (305 mm) rise in 20 feet (6096 mm) of horizontal run (5% gradient), except that at exterior door landings, handrails are not required on ramps less than 6 inches (152 mm) rise or 72 inches (1829 mm) in length. Handrails shall be placed on each side of each ramp, shall be continuous the full length of the ramp, shall be 34 to 38 inches (864 to 965 mm) above the ramp surface, shall extend a minimum of 1 foot (305 mm) beyond the top and bottom of the ramp and the ends shall be returned. Handrails projecting from a wall shall have a space of not less than 1-1/2 inches (38 mm) between the wall and the handrail. Handrails may be located in a recess if the recess is a maximum of 3 inches (76 mm) deep and extends at least 18 inches (457 mm) above the top of the rail. The grip portion shall not be less than 1-1/4 inches (32 mm) nor more than 1-1/2 inches (38 mm), or the shape shall provide an equivalent gripping surface and all surfaces shall be smooth with no sharp corners. Handrails shall not rotate within their fittings. Any wall or other surface adjacent to the handrail shall be free of sharp or abrasive elements. Edges shall have a minimum radius of 1/8 inch (3 mm).</p> <p>EXCEPTIONS:</p> <ol style="list-style-type: none"> 1. Handrails at ramps immediately adjacent to fixed seating in assembly areas are not required. 2. Ramps that require handrails and that serve one individual dwelling unit in Group R, Division 1 or 3 Occupancies may have one handrail except that such ramps open on one or both sides shall have handrails provided on the open side or sides. 3. Curb ramps do not require handrails. 	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment <p>Title 24 does not include the same level of specificity. Adopt ADAAG language as follows.</p>	<p>Handrails are required on ramps that provide access if slope exceeds 1 foot (305 mm) rise in 20 feet (6096 mm) of horizontal run (5% gradient), except that at exterior door landings, handrails are not required on ramps less than 6 inches (152 mm) rise or 72 inches (1829 mm) in length. Handrails shall be placed on each side of each ramp, shall be continuous the full length of the ramp, shall be 34 to 38 inches (864 to 965 mm) above the ramp surface, shall extend a minimum of 1 foot (305 mm) beyond the top and bottom of the ramp <u>and shall be parallel with the floor or ground surface, and the ends shall be returned. The inside handrail on switchback or dogleg ramps shall always be continuous. The ends of handrails shall be either rounded or returned smoothly to floor, wall, or post.</u> Handrails projecting from a wall shall have a space of not less than 1-1/2 inches (38 mm) between the wall and the handrail. Handrails may be located in a recess if the recess is a maximum of 3 inches (76 mm) deep and extends at least 18 inches (457 mm) above the top of the rail. The grip portion shall not be less than 1-1/4 inches (32 mm) nor more than 1-1/2 inches (38 mm), or the shape shall provide an equivalent gripping surface and all surfaces shall be smooth with no sharp corners. Handrails shall not rotate within their fittings. Any wall or other surface adjacent to the handrail shall be free of sharp or abrasive elements. Edges shall have a minimum radius of 1/8 inch (3 mm).</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>DSA's proposed revision meets section 4.8.5 of the ADA Standards. However, the proposed revision should specify that handrails be mounted 34 to 38 inches from above the ramp surface to the top of handrails. Also DSA should eliminate the exception from the handrails requirement for Group R, Division 1 or 3 Occupancies. Section 4.8.5 of the ADA Standards does not provide such an exception.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>(5) Top of handrail gripping surfaces shall be mounted between 34 in and 38 in (865 mm and 965 mm) above ramp surfaces.</p> <p>(6) Ends of handrails shall be either rounded or returned smoothly to floor, wall, or post.</p> <p>(7) Handrails shall not rotate within their fittings.</p>				<p>EXCEPTIONS:</p> <p>1. Handrails at ramps immediately adjacent to fixed seating in assembly areas are not required.</p> <p>2. Ramps that require handrails and that serve one individual dwelling unit in Group R, Division 1 or 3 Occupancies may have one handrail except that such ramps open on one or both sides shall have handrails provided on the open side.</p> <p>3. Curb ramps do not require handrails or sides.</p>		<p>Section 4.8.5 of the ADA Standards does not provide such an exception from the handrails requirement for Group R, Division 1 or Division 3 Occupancies.</p>
<p>4.8.6 Cross Slope and Surfaces. The cross slope of ramp surfaces shall be no greater than 1:50. Ramp surfaces shall comply with 4.5.</p>	1133B.5.3.1	<p>The cross slope of ramp surfaces shall be no greater than 1 unit vertical in 50 units horizontal (2% slope).</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	<p>No action required.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>4.8.7 Edge Protection. Ramps and landings with drop-offs shall have curbs, walls, railings, or projecting surfaces that prevent people from slipping off the ramp. Curbs shall be a minimum of 2 in (50 mm) high (see Fig. 17).</p>	1133B.5.4.9	<p>Hazards. Required ramps shall have a curb at least 2 inches (51 mm) high, or a wheel guide rail 2 to 4 inches (51 to 102 mm) high on each side of the ramp landing that has a vertical drop exceeding 4 inches (102 mm) and that is not bounded by a wall or fence.</p>	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment ADAAG required edge protection at landings. The Title 24 section is unclear and should be modified as follows.	<p><u>Ramp Landing Hazards.</u> Required ramps <u>landings</u> shall have a curb at least 2 inches (51 mm) high, or a wheel guide rail 2 to 4 inches (51 to 102 mm) high on each <u>exposed</u> side of the ramp landing that has a vertical drop exceeding 4 inches (102 mm) and that is not bounded by a wall or fence.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>Section 1133B.5.4.9 does not meet the ADA because it requires edge protection when the vertical drop exceeds 4 inches. Section 4.8.7 of the ADA Standards requires edge protection if a vertical drop exists.</p>
	1133B.5.6	<p>Wheel guides. Where the ramp surface is not bounded by a wall or fence and the ramp exceeds 10 feet (3048 mm) in length, the ramp shall comply with one of the following requirements.</p>	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment ADAAG does not exempt ramps under 10 feet long from the requirement for edge protection.	<p>Wheel guides. Where the ramp surface is not bounded by a wall or fence and the ramp exceeds 40 feet (3048 mm) in length <u>and/or the handrail vertical support members are fastened to the ramp surface</u>, the ramp shall comply with one of the following requirements. <u>1133B.5.6.1 or 1133B.5.6.2.</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1133B.5.6.1	<p>A guide curb a minimum of 2 inches (51 mm) in height shall be provided at each side of the ramp; or</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	<p>No action required.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

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	1133B.5.6.2	A wheel guide rail shall be provided, centered 3 inches (76 mm) plus or minus 1 inch (25 mm) above the surface or the ramp.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.8.8 Outdoor Conditions. Outdoor ramps and their approaches shall be designed so that water will not accumulate on walking surfaces.	1003.3.4.9	Outdoor ramps and their approaches shall be designed so that water will not accumulate on walking surfaces.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment This Title 24 section is not adopted for use in Public Accommodations and Commercial Facilities.	Adopt section for use by DSA/AC.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Identify the section number where this provision would appear.
4.9 Stairs. 4.9.1* Minimum Number. Stairs required to be accessible by 4.1 shall comply with 4.9.	1114B.1.1	General. When accessibility is required by this chapter, it shall be designed and constructed to meet the minimum requirements of the following sections: Chapter 11B. Accessibility; Division I, New Buildings; Division II, Site Accessibility; Division III, Accessibility for Entrances, Exits and Paths of Travel; and Division IV, Accessibility for Existing Buildings Stairways — [for HCD 1/AC] Section 1120A.4; [for DSA/AC] Section 1133B.4	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.9.2 Treads and Risers. On any given flight of stairs, all steps shall have uniform riser heights and uniform tread widths. Stair treads shall be no less than 11 in (280 mm) wide, measured from riser to riser (see Fig. 18(a)). Open risers are not permitted.	1133B.4.5.3	Open risers are not permitted. On any given flight of stairs, all steps shall have uniform riser height and uniform tread widths consistent with Section 1133B.4. Stair treads shall be no less than 11 inches (279 mm) deep, measured from riser to riser. See Figure 11B–35. Risers shall be sloped or the underside of the nosing shall have an angle not less than 60 degrees from the horizontal.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.9.3 Nosing. The undersides of nosing shall not be abrupt. The radius of curvature at the leading edge of the tread shall be no greater than 1/2 in (13 mm). Risers shall be sloped or the underside of the nosing shall have an	1133B.4.5.2	Nosing. Nosing shall not project more than 1-1/2 inch (38 mm) past the face of the riser below.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

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<p>angle not less than 60 degrees from the horizontal. Nosing shall project no more than 1-1/2 in (38 mm) (see Fig. 18).</p>	1133B.4.5.1	Treads. All tread surfaces shall be slip resistant. Weather-exposed stairs and their approaches shall be designed so that water will not accumulate on the walking surfaces. Treads shall have a smooth, rounded or chamfered exposed edges, and no abrupt edges at the nosing (lower front edge).	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG language as follows.	Treads. All tread surfaces shall be slip resistant. Weather-exposed stairs and their approaches shall be designed so that water will not accumulate on the walking surfaces. Treads shall have a smooth, rounded or chamfered exposed edges, and no abrupt edges at the nosing (lower front edge). <u>The radius of curvature at the leading edge of the tread shall be no greater than 1/2 in (13 mm).</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1133B.4.5.3	Open risers are not permitted. On any given flight of stairs, all steps shall have uniform riser height and uniform tread widths consistent with Section 1133B.4. Stair treads shall be no less than 11 inches (279 mm) deep, measured from riser to riser. See Figure 11B-35. Risers shall be sloped or the underside of the nosing shall have an angle not less than 60 degrees from the horizontal.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>4.9.4 Handrails. Stairways shall have handrails at both sides of all stairs. Handrails shall comply with 4.26 and shall have the following features:</p> <p>(1) Handrails shall be continuous along both sides of stairs. The inside handrail on switchback or dogleg stairs shall always be continuous (see Fig. 19(a) and (b)).</p> <p>(2) If handrails are not continuous, they shall extend at least 12 in (305 mm) beyond the top riser and at least 12 in (305 mm) plus the width of one tread beyond the bottom riser. At the top, the extension shall be parallel with the floor or ground surface. At the bottom, the handrail shall continue to slope for a distance of the width of one tread from the bottom riser; the remainder of the extension shall be horizontal (see Fig. 19(c) and (d)). Handrail extensions shall comply with 4.4.</p> <p>(3) The clear space between handrails and wall shall be 1-1/2 in (38 mm).</p> <p>(4) Gripping surfaces shall be uninterrupted by newel posts, other construction elements,</p>	1133B.4.1.1	<p>Required handrails. Stairways shall have handrails on each side, and every stairway required to be more than 88 inches (2235 mm) in width shall be provided with not less than one intermediate handrail for each 88 inches (2235 mm) of required width.</p> <p>Intermediate handrails shall be spaced approximately equally across with the entire width of the stairway.</p> <p>EXCEPTIONS: <u>1. Stairways serving one individual dwelling unit in Group R, Division 1 or 3 Occupancies may have one handrail, except that stairways open on one or both sides shall have handrails on the open side or sides.</u> <u>2. Private stairways 30 inches (762 mm) or less in height may have handrails on one side only.</u></p>	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG language as follows.	<p>Required handrails. Stairways shall have handrails on each side, and every stairway required to be more than 88 inches (2235 mm) in width shall be provided with not less than one intermediate handrail for each 88 inches (2235 mm) of required width.</p> <p>Intermediate handrails shall be spaced approximately equally across with the entire width of the stairway. <u>Handrails shall be continuous along both sides of a stairway.</u></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>Added additional text from section 1133B.4.1.1.</p> <p>The exceptions in section 1133B.4.1.1 does not meet section 4.9.4 of the ADA Standards because the exceptions permit stairways to have handrails on one side of the stairs instead of both sides of the stairs. If, however, the exceptions apply only to residential dwellings, then the exceptions would not conflict with section 4.9.4 of the ADA Standards.</p>
	1133B.4.2.1	Handrails shall be 34 to 38 inches (864 to 965 mm) above the nosing of the treads.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG language as follows.	<p>Handrails <u>The top of handrail gripping surface shall be mounted between 34 to 38 inches (864 to 965 mm) above the nosing of the treads.</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>or obstructions.</p> <p>(5) Top of handrail gripping surface shall be mounted between 34 in and 38 in (865 mm and 965 mm) above stair nosing.</p> <p>(6) Ends of handrails shall be either rounded or returned smoothly to floor, wall or post.</p> <p>(7) Handrails shall not rotate within their fittings.</p>	1133B.4.2.2	Handrails shall extend a minimum of 12 inches (305 mm) beyond the top nosing and 12 inches (305 mm), plus the tread width, beyond the bottom nosing.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG language as follows.	<u>The terminus of</u> handrails shall extend a minimum of 12 inches (305 mm) beyond the top nosing and 12 inches (305 mm), plus the tread width, beyond the bottom nosing. <u>At the top, the extension shall be parallel with the floor or ground surface. At the bottom, the handrail shall continue to slope for a distance of the width of one tread from the bottom riser; the remainder of the extension shall be horizontal. See figure 11B-37</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA, but the revision should also include a reference to figure 11B-35.
	1133B.4.2.3	Ends shall be returned or shall terminate in newel posts or safety terminals.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG language as follows.	Ends shall be returned <u>to the wall</u> , or shall terminate in newel posts or safety terminals.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1133B.4.2.4	Where the extension of the handrail in the direction of the stair run would create a hazard, the termination of the extension shall be made either rounded or returned smoothly to floor, wall or post. Where the stairs are continuous from landing to landing, the inner rail shall be continuous and need not extend out into the landing.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG language as follows.	Where the extension of the handrail in the direction of the stair run would create a hazard, the termination of the extension shall be made either rounded or returned smoothly to floor, wall or post. Where the stairs are continuous from landing to landing, the inner rail shall be continuous and need not extend out into the landing. <u>The inside handrail on switchback or dogleg stairs shall always be continuous.</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The ADA allows an exception to the handrail extension requirement for hazards. But this exception is allowed for alterations only.
	1133B.4.2.5	Handrails projecting from a wall shall have a space of 1-1/2 inches (38 mm) between the wall and the handrail. Handrails may be located in a recess if the recess is a maximum of 3 inches (76 mm) deep and extends at least 18 inches (457 mm) above the top of the rail. Handrails shall not rotate in their fittings.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

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	1133B.4.2.6.1	The handgrip portion of handrails shall be not less than 1-1/4 inches (32 mm) nor more than 1-1/2 inches (38 mm) in cross-sectional nominal dimension or the shape shall provide an equivalent gripping surface. The handgrip portion of handrails shall have a smooth surface with no sharp corners. Gripping surfaces (top or sides) shall be uninterrupted by newel posts, other construction elements or obstructions. Any wall or other surface adjacent to the handrail shall be free of sharp or abrasive elements. Edges shall have a minimum radius of 1/8 inch (3.2 mm).	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1133B.4.2.6.2	The orientation of at least one handrail shall be in the direction of the run of the stair and perpendicular to the direction of the stair nosing, and shall not reduce the minimum required width of the stairs.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Section 1133B.4.2.6.2 can not be compared to section 4.9.4 of the ADA Standards because section 4.9.4 of the ADA Standards does not address the orientation of the handrail in the direction of the run.
4.9.5 Detectable Warnings at Stairs. (Reserved).	None	None	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.9.6 Outdoor Conditions. Outdoor stairs and their approaches shall be designed so that water will not accumulate on walking surfaces.	1133B.4.5.1	Treads. All tread surfaces shall be slip resistant. Weather-exposed stairs and their approaches shall be designed so that water will not accumulate on the walking surfaces. Treads shall have a smooth, rounded or chamfered exposed edges, and no abrupt edges at the nosing (lower front edge).	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.10 Elevators. 4.10.1 General. Accessible elevators shall be on an accessible route and shall comply with 4.10 and with the ASME A17.1-1990, Safety Code for Elevators and Escalators. Freight elevators shall not be considered as meeting the requirements of this section unless the only elevators provided are used as combination passenger and freight elevators for the public and employees.	1116B.1	Elevators. Elevators shall be accessible. Elevators required to be accessible shall be designed and constructed to comply with this section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 has no reference to ASME A17.1-1990 or language covering freight elevators. Adopt ADAAG language as follows.	Elevators. Elevators shall be accessible. Elevators required to be accessible shall be designed and constructed to comply with this section <u>and with the ASME A17.1-1990, Safety Code for Elevators and Escalators. Freight elevators shall comply with the provisions of this section.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	1116B.1.1	General-Size of cab and control locations and requirements for accommodation of people with disabilities. In buildings two or more stories in height, served by an elevator, or a building served by an elevator required by Chapter 11B, or a building served by an elevator required for accessibility by Section 101.17, all elevators provided shall accommodate a wheelchair.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1116B.1.16	Location. Passenger elevators shall be located near a major path of travel and provisions shall be made to ensure that they remain accessible and usable at all times the building is occupied.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG language as follows.	Location. Passenger elevators shall be <u>on an accessible route</u> , near a major path of travel and provisions shall be made to ensure that they remain accessible and usable at all times the building is occupied.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.10.2 Automatic Operation. Elevator operation shall be automatic. Each car shall be equipped with a self-leveling feature that will automatically bring the car to floor landings within a tolerance of 1/2 in (13 mm) under rated loading to zero loading conditions. This self-leveling feature shall be automatic and independent of the operating device and shall correct the overtravel or undertravel.	1116B.1.2	Operation and leveling. The elevator shall be automatic and be provided with a self-leveling feature that will automatically bring the car to the floor landings within a tolerance of plus or minus 1/2 inch (12.7 mm) under normal loading and unloading conditions. This self-leveling shall, within its zone, be entirely automatic and independent of the operating device and shall correct the overtravel or undertravel. The car shall also be maintained approximately level with the landing, irrespective of load. The clearance between the car platform sill and the edge of the hoistway landing shall be no greater than 1-1/4 inches (32 mm).	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.10.3 Hall Call Buttons. Call buttons in elevator lobbies and halls shall be centered at 42 in (1065 mm) above the floor. Such call buttons shall have visual signals to indicate when each call is registered and when each call is answered. Call buttons shall be a minimum of 3/4 in (19 mm) in the smallest dimension. The button designating the up direction shall be on top (see Fig. 20)). Buttons shall be raised or flush. Objects mounted beneath hall call buttons shall not project into the elevator lobby more than 4 in (100 mm).</p>	<p>1116B.1.10</p> <p>1116B.1.13</p>	<p>Car position indicator and signal. The centerline of the hall call button shall be within 42 inches (1067 mm) of the floor. Buttons shall be a minimum of 3/4-inch (19.1 mm) in size and shall be raised 1/8 inch (3.2 mm) plus or minus 1/32 inch (0.8 mm) above the surrounding surface. Visual indication shall be provided to show each call registered and extinguished when answered. Objects adjacent to, and below, hall call buttons shall not project more than 4 inches (102 mm) from the wall.</p> <p><u>Hall buttons. The centerline of the hall call buttons shall be a nominal 42 inches (1067 mm) above the floor. Direction buttons, exclusive of border, shall be a minimum of 3/4 inch (19.1 mm) in size, raised, flush or recessed. Visual indication shall be provided to show each call registered and extinguished when the call is answered. Hall call buttons shall be internally illuminated with a white light over the entire surface of the button. Depth of flush or recessed button when operated shall not exceed 3/8 inch (9.5 mm).</u></p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not contain the same level of specificity as ADAAG. Adopt ADAAG language as follows.</p>	<p>Car position indicator and signal. Hall Call Buttons. The centerline of the hall call button shall be within 42 inches (1067 mm) of the floor. Buttons shall be a minimum of 3/4-inch (19.1 mm) in size and shall be raised 1/8 inch (3.2 mm) plus or minus 1/32 inch (0.8 mm) above the surrounding surface. <u>The button designating the up direction shall be on top.</u> Visual indication shall be provided to show each call registered and extinguished when answered. Objects adjacent to, and below, hall call buttons shall not project more than 4 inches (102 mm) from the wall.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Added section 1116B.1.13 for completeness. Although DSA's proposed revision for section 1116B.1.10 meets the ADA, section 1116B.1.13 does not meet the ADA because it allows recessed buttons. Also, clarify the difference between sections 1116B.1.10 and 1116B.1.13.</p>
<p>4.10.4 Hall Lanterns. A visible and audible signal shall be provided at each hoistway entrance to indicate which car is answering a call. Audible signals shall sound once for the up direction and twice for the down direction or shall have verbal annunciators that say "up" or "down." Visible signals shall have the following features:</p> <p>(1) Hall lantern fixtures shall be mounted so that their centerline is at least 72 in (1830 mm) above the lobby floor (see Fig. 20).</p> <p>(2) Visual elements shall be at least 2-1/2 in (64 mm) in the smallest dimension.</p> <p>(3) Signals shall be visible from the vicinity of the hall call button (see Fig. 20). In-car lanterns located in cars, visible from the vicinity of hall call buttons, and conforming to the above requirements, shall be acceptable.</p>	<p>1116B.1.14</p>	<p>Hall lantern. A visual and audible signal shall be provided at each hoistway entrance indicating to the prospective passenger the car answering the call and its direction of travel as follows:</p> <p>The visual signal for each direction shall be a minimum of 2-1/2 inches (64 mm) high by 2-1/2 inches (64 mm) wide, and visible from the proximity of the hall call button.</p> <p>The audible signal shall sound once for the up direction and twice for the down direction or of a configuration, which distinguishes between up and down elevator travel.</p> <p>The centerline of the fixture shall be located a minimum of 6 feet (1829 mm) in height from the lobby floor.</p> <p>The use of in-car lanterns, located in or on the car doorjamb, visible from the proximity of the hall call buttons and conforming to the above requirements shall or will be acceptable.</p> <p>The use of arrow shapes are preferred for visible signals.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not specifically allow verbal annunciators. Adopt ADAAG language as follows:</p>	<p>Hall lantern. A visual and audible signal shall be provided at each hoistway entrance indicating to the prospective passenger the car answering the call and its direction of travel as follows:</p> <p>The visual signal for each direction shall be a minimum of 2-1/2 inches (64 mm) high by 2-1/2 inches (64 mm) wide, and visible from the proximity of the hall call button.</p> <p>The audible signal shall sound once for the up direction and twice for the down direction or of a configuration, which distinguishes between up and down elevator travel <u>or shall have verbal annunciators that say "up" or "down".</u></p> <p>The centerline of the fixture shall be located a minimum of 6 feet (1829 mm) in height from the lobby floor.</p> <p>The use of in-car lanterns, located in or on the car doorjamb, visible from the proximity of the hall call buttons and conforming to the above requirements shall or will be acceptable.</p> <p>The use of arrow shapes are preferred for visible signals.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

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<p>4.10.5 Raised and Braille Characters on Hoistway Entrances. All elevator hoistway entrances shall have raised and Braille floor designations provided on both jambs. The centerline of the characters shall be 60 in (1525 mm) above finish floor. Such characters shall be 2 in (50 mm) high and shall comply with 4.30.4. Permanently applied plates are acceptable if they are permanently fixed to the jambs (see Fig. 20).</p>	1116B.1.15	<p>Doorjamb marking. Passenger elevator landing jambs on all elevator floors shall have the number of the floor on which the jamb is located designated by raised characters which are a minimum of 2 inches (51 mm) in height and conform to Section 1117B.5.6 Grade 2 Braille which conform to Section 1117B.5.2 located 60-inches on center (1524 mm) above the floor on the jamb panels on both sides of the door so that they are visible from within the elevator. On the grade level, a raised five-pointed star shall be placed to the left of the raised character. The outside diameter of the star shall be 2-inches. Braille shall be placed below the corresponding raised characters.</p> <p>The raised characters shall otherwise comply with Sections 1117B.5.3 1117B.5.4, and 1117B.5.5. See Figure 11B-40B.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not provide the same level of specificity as ADAAG. Adopt ADAAG language as follows.</p>	<p>Doorjamb marking. Passenger elevator landing jambs on all elevator floors shall have the number of the floor on which the jamb is located designated by raised characters which are a minimum of 2 inches (51 mm) in height and conform to Section 1117B.5.6 Grade 2 Braille which conform to Section 1117B.5.2 located 60-inches on center (1524 mm) above the floor on the jamb panels on both sides of the door so that they are visible from within the elevator. On the grade level, a raised five-pointed star shall be placed to the left of the raised character. The outside diameter of the star shall be 2-inches. Braille shall be placed below the corresponding raised characters.</p> <p>The raised characters shall otherwise comply with Sections 1117B.5.3 1117B.5.4, and 1117B.5.5. See Figure 11B-40B. <u>Permanently applied plates are acceptable if they are permanently fixed to the jambs.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>4.10.6* Door Protective and Reopening Device. Elevator doors shall open and close automatically. They shall be provided with a reopening device that will stop and reopen a car door and hoistway door automatically if the door becomes obstructed by an object or person. The device shall be capable of completing these operations without requiring contact for an obstruction passing through the opening at heights of 5 in and 29 in (125 mm and 735 mm) above finish floor (see Fig. 20). Door reopening devices shall remain effective for at least 20 seconds.</p>	1116B.1.3	<p>Door Operation. Power-operated horizontally sliding car and hoistway doors opened and closed by automatic means shall be provided.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

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<p>After such an interval, doors may close in accordance with the requirements of ASME A17.1-1990.</p>	1116B.1.5	<p>Door protective and reopening device. Doors closed by automatic means shall be provided with a door-reopening device that will function to stop and reopen a car door and adjacent hoistway door in case the car door is obstructed while closing.</p> <p>This reopening device shall also be capable of sensing an object or person in the path of a closing door without requiring contact for activation at a nominal 5 inches and 29 inches (127 mm and 737 mm) above the floor.</p> <p>Door-reopening devices shall remain effective for a period of not less than 20 seconds.</p> <p>After such an interval, the doors may close in accordance with the requirements of ANSI 17.1-86, the American Society of Mechanical Engineers (ASME) document ASME 17.1-1990.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>4.10.7* Door and Signal Timing for Hall Calls. The minimum acceptable time from notification that a car is answering a call until the doors of that car start to close shall be calculated from the following equation:</p> <p>$T = D / (1.5 \text{ ft/s})$ or $T = D / (445 \text{ mm/s})$</p> <p>where T total time (in seconds) and D distance (in feet or millimeters) from a point in the lobby or corridor 60 in (1525 mm) directly in front of the farthest call button controlling that car to the centerline of its hoistway door (see Fig. 21). For cars with in-car lanterns, T begins when the lantern is visible from the vicinity of hall call buttons and an audible signal is sounded. The minimum acceptable notification time shall be 5 seconds.</p>	1116B.1.6	<p>Hall call. The minimum acceptable time from notification that a car is answering a call (lantern and audible signal) until the doors of the car start to close shall be calculated by the following equation:</p> <p>$T = D / (1.5 \text{ ft/s})$ or $T = D / (445 \text{ mm/s})$</p> <p>Where T is the total time in seconds and D is the distance from a point in the lobby or landing area 60 inches (1524 mm) directly in front of the farthest call button controlling that car to the centerline of its hoistway door (see Figure 11B-40D). For cars with in-car lanterns, T begins when the lantern is visible from the vicinity of hall call buttons and an audible signal is sounded.</p>	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not provide the same level of specificity as ADAAG. Adopt ADAAG language as follows.	<p>Hall call. The minimum acceptable time from notification that a car is answering a call (lantern and audible signal) until the doors of the car start to close shall be calculated by the following equation:</p> <p>$T = D / (1.5 \text{ ft/s})$ or $T = D / (445 \text{ mm/s})$</p> <p>Where T is the total time in seconds and D is the distance from a point in the lobby or landing area 60 inches (1524 mm) directly in front of the farthest call button controlling that car to the centerline of its hoistway door (see Figure 11B-40D). For cars with in-car lanterns, T begins when the lantern is visible from the vicinity of hall call buttons and an audible signal is sounded. <u>The minimum acceptable notification time shall be 5 seconds.</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA. But the number 445 mm/s should be 455 mm/s. Also, Figure 11B-40D does not seem to exist. Please clarify.
<p>4.10.8 Door Delay for Car Calls. The minimum time for elevator doors to remain fully open in response to a car call shall be 3 seconds.</p>	1116B.1.7	<p>Car call. The minimum acceptable time for doors to remain fully open shall not be less than five seconds.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

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4.10.9 Floor Plan of Elevator Cars. The floor area of elevator cars shall provide space for wheelchair users to enter the car, maneuver within reach of controls, and exit from the car. Acceptable door opening and inside dimensions shall be as shown in Fig. 22. The clearance between the car platform sill and the edge of any hoistway landing shall be no greater than 1-1/4 in (32 mm).	1116B.1.8	Car inside. The car inside shall allow for the turning of a wheelchair. The minimum clear distance between walls or between wall and door, excluding return panels, shall not be less than 80 inches by 54 inches (2032 mm by 1372 mm) for center-opening doors, and 68 inches by 54 inches (1727 mm by 1372 mm) for side-slide opening doors. See Figure 11B-40A. Minimum distance from wall to return panel shall not be less than 51 inches (1295 mm).	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>Figure 22 of the ADA Standards. Minimum Dimensions of Elevator Cars.</p> <p>22(a) Illustrates an elevator with a door providing a 36 in (915 mm) minimum clear width, in the middle of the elevator. The width of the elevator car is a minimum of 80 in (2030 mm). The depth of the elevator car measured from the back wall to the elevator door is a minimum of 54 in (1370 mm). The depth of the elevator car measured from the back wall to the control panel is a minimum of 51 in (1291 mm).</p> <p>22(b) Illustrates an elevator with door providing a minimum 36 in (915 mm) clear width, located to one side of the elevator. The width of the elevator car is a minimum of 68 in (1730 mm). The depth of the elevator car measured from the back wall to the elevator door is a minimum of 54 in (1370 mm). The depth of the elevator car measured from the back wall to the control panel is a minimum of 51 in (1291 mm).</p>	1116B.1.4	Door size. Minimum clear width for elevator doors shall be 36 inches (914 mm). EXCEPTION: When approved by the building official, the minimum door width may be reduced to 32 inches (813 mm) for a car with dimensions as permitted by the exception to Section 1116B.1.6.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24-door width exception is not allowed by ADAAG. The exception will be deleted.	Door size. Minimum clear width for elevator doors shall be 36 inches (914 mm). EXCEPTION: When approved by the building official, the minimum door width may be reduced to 32 inches (813 mm) for a car with dimensions as permitted by the exception to Section 1116B.1.6.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1116B.1.2	The clearance between the car platform sill and the edge of the hoistway landing shall be no greater than 1-1/4 inches (32 mm).	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	Figure 11B-40A	Refer to code.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.10.10 Floor Surfaces. Floor surfaces shall comply with 4.5.	None	None	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG language into section 1116B.	<u>Floor Surfaces. Elevator floor surfaces shall comply with section 1124B Ground and Floor Surfaces.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

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4.10.11 Illumination Levels. The level of illumination at the car controls, platform, and car threshold and landing sill shall be at least 5 footcandles (53.8 lux).	1116B.1.12	Minimum illumination. The minimum illumination at the car controls threshold and the landing when the car and landing doors are open shall not be less than 5 foot-candles (54 lx).	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>4.10.12* Car Controls. Elevator control panels shall have the following features:</p> <p>(1) Buttons. All control buttons shall be at least 3/4 in (19 mm) in their smallest dimension. They shall be raised or flush.</p> <p>(2) Tactile, Braille, and Visual Control Indicators. All control buttons shall be designated by Braille and by raised standard alphabet characters for letters, arabic characters for numerals, or standard symbols as shown in Fig. 23(a), and as required in ASME A17.1-1990. Raised and Braille characters and symbols shall comply with 4.30. The call button for the main entry floor shall be designated by a raised star at the left of the floor designation (see Fig. 23(a)). All raised designations for control buttons shall be placed immediately to the left of the button to which they apply. Applied plates, permanently attached, are an acceptable means to provide raised control designations. Floor buttons shall be provided with visual indicators to show when each call is registered. The visual indicators</p>	1116B.1.9	<p>Car controls. Identification for the visually impaired shall be as follows:</p> <p>Passenger elevator car controls shall have a minimum dimension of 3/4-inch (19.1 mm) and shall be raised 1/8 inch (3.2 mm) plus or minus 1/32 inch (0.8 mm) above the surrounding surface.</p> <p>Control buttons shall be illuminated, shall have square shoulders, and shall be activated by a mechanical motion that is detectable.</p> <p>All control buttons shall be designated by a 5/8-inch-minimum (15.9 mm), characters which conform to Section 1117B.5.6, or standard raised symbol immediately to the left of the control button. Grade 2 Braille which conforms to Section 1117B.5.2 shall be located immediately below the character or symbol. A minimum clear space of 3/8 inch (9.5 mm) or other suitable means of separation shall be provided between rows of control buttons.</p> <p>NOTE: See Figure 11B-40B.</p> <p>The raised characters shall be white on a black background.</p> <p>Controls and emergency equipment identified by raised symbols shall include, but not be limited to, door open, door close, alarm bell, emergency stop and telephone. The call button for the main entry floor shall be designated by a raised star at the left of the floor designation.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>shall be extinguished when each call is answered.</p> <p>(3) Height. All floor buttons shall be no higher than 54 in (1370 mm) above the finish floor for side approach and 48 in (1220 mm) for front approach. Emergency controls, including the emergency alarm and emergency stop, shall be grouped at the bottom of the panel and shall have their centerlines no less than 35 in (890 mm) above the finish floor (see Fig. 23(a) and (b)).</p> <p>(4) Location. Controls shall be located on a front wall if cars have center opening doors, and at the side wall or at the front wall next to the door if cars have side opening doors (see Fig. 23(c) and (d)).</p> <p>Figure 23 of the ADA Standards. Car Controls.</p> <p>23(a) Panel Detail. The diagram illustrates the symbols used for the following control buttons: main entry floor, door closed, door open, emergency alarm, and emergency stop. The diagram further states that the octagon symbol for the emergency stop shall be raised but the X (inside the octagon) is not.</p>	1116B.1.8	<p>Car inside. The centerline of elevator floor buttons shall be no higher than 54 (1372 mm) above the finish floor for side approach and 48 inches (1219 mm) for front approach. Except for photoelectric tube bypass switches, emergency controls, including the emergency stop and alarm, shall be grouped in or adjacent to the bottom of the panel and shall be no lower than 2 feet 11 inches (889 mm) from the floor.</p> <p>For multiple controls only, one set must comply with these height requirements. Floor buttons shall be provided with visual indicators to show when each call is registered. The visual indicators shall be extinguished when each call is answered. NOTE: Where possible, a 48-inch (1219-mm) maximum height for elevator floor buttons is preferred.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 allows an exception for photoelectric tube bypass switches and provides less specificity on the panel location than ADAAG. Adopt ADAAG language as follows.</p>	<p>Car inside. The centerline of elevator floor buttons shall be no higher than 54 (1372 mm) above the finish floor for side approach and 48 inches (1219 mm) for front approach. Except for photoelectric tube bypass switches, Emergency controls, including the emergency stop and alarm, shall be grouped in or adjacent to the bottom of the panel and shall be no lower than 2 feet 11 inches (889 mm) from the floor.</p> <p>For multiple controls only, one set must comply with these height requirements. Floor buttons shall be provided with visual indicators to show when each call is registered. The visual indicators shall be extinguished when each call is answered. NOTE: Where possible, a 48-inch (1219-mm) maximum height for elevator floor buttons is preferred.</p> <p>Location. <u>Controls shall be located on a front wall if cars have center opening doors, and at the side wall or at the front wall next to the door if cars have side opening doors. See Figure.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>DSA's proposed revision meets the ADA. But the revision should reference Figure 11B-40A.</p>
	Figure 11B-40A and 11B-40B	Refer to code.	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	No action required.	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

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<p>4.10.13* Car Position Indicators. In elevator cars, a visual car position indicator shall be provided above the car control panel or over the door to show the position of the elevator in the hoistway. As the car passes or stops at a floor served by the elevators, the corresponding numerals shall illuminate, and an audible signal shall sound. Numerals shall be a minimum of 1/2 in (13 mm) high. The audible signal shall be no less than 20 decibels with a frequency no higher than 1500 Hz. An automatic verbal announcement of the floor number at which a car stops or which a car passes may be substituted for the audible signal.</p>	<p>1116B.1.14</p>	<p>Hall lantern. A visual and audible signal shall be provided at each hoistway entrance indicating to the prospective passenger the car answering the call and its direction of travel as follows:</p> <p>The visual signal for each direction shall be a minimum of 2-1/2 inches (64 mm) high by 2-1/2 inches (64 mm) wide, and visible from the proximity of the hall call button.</p> <p>The audible signal shall sound once for the up direction and twice for the down direction or of a configuration, which distinguishes between up and down elevator travel.</p> <p>The centerline of the fixture shall be located a minimum of 6 feet (1829 mm) in height from the lobby floor.</p> <p>The use of in-car lanterns, located in or on the car doorjamb, visible from the proximity of the hall call buttons and conforming to the above requirements shall or will be acceptable.</p> <p>The use of arrow shapes are preferred for visible signals.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not contain an equivalent section. Adopt ADAAG language as follows.</p>	<p>Hall lantern. A visual and audible signal shall be provided at each hoistway entrance indicating to the prospective passenger the car answering the call and its direction of travel as follows:</p> <p>The visual signal for each direction shall be a minimum of 2-1/2 inches (64 mm) high by 2-1/2 inches (64 mm) wide, and visible from the proximity of the hall call button.</p> <p>The audible signal shall sound once for the up direction and twice for the down direction or of a configuration, which distinguishes between up and down elevator travel.</p> <p>The centerline of the fixture shall be located a minimum of 6 feet (1829 mm) in height from the lobby floor.</p> <p>The use of in-car lanterns, located in or on the car doorjamb, visible from the proximity of the hall call buttons and conforming to the above requirements shall or will be acceptable.</p> <p>The use of arrow shapes are preferred for visible signals.</p> <p><u>In elevator cars, a visual car position indicator shall be provided above the car control panel or over the door to show the position of the elevator in the hoistway. As the car passes or stops at a floor served by the elevators, the corresponding numerals shall illuminate, and an audible signal shall sound. Numerals shall be a minimum of 1/2 in (13 mm) high. The audible signal shall be no less than 20 decibels with a frequency no higher than 1500 Hz. An automatic verbal announcement of the floor number at which a car stops or which a car passes may be substituted for the audible signal.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

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<p>4.10.14* Emergency Communications. If provided, emergency two-way communication systems between the elevator and a point outside the hoistway shall comply with ASME A17.1-1990. The highest operable part of a two-way communication system shall be a maximum of 48 in (1220 mm) from the floor of the car. It shall be identified by a raised symbol and lettering complying with 4.30 and located adjacent to the device. If the system uses a handset then the length of the cord from the panel to the handset shall be at least 29 in (735 mm). If the system is located in a closed compartment the compartment door hardware shall conform to 4.27, Controls and Operating Mechanisms. The emergency intercommunication system shall not require voice communication.</p>	1116B.1.8	<p>The emergency telephone handset shall be positioned no higher than 4 feet (1219 mm) above the floor, and the handset cord shall be a minimum of 2 feet 5 inches (737 mm) in length. If the telephone system is located in a closed compartment, the compartment door hardware shall be lever type conforming to the provisions of Section 1004.3, type of lock or latch. Emergency intercommunication shall not require voice communication.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>The Title 24 section does not address the outside point of contact, the ASME standards or signage. Adopt ADAAG language as follows.</p>	<p><u>Emergency two-way communication systems between the elevator and a point outside the hoistway shall comply with ASME A17.1-1990.</u> The emergency telephone handset shall be positioned no higher than 4 feet (1219 mm) above the floor, and the handset cord shall be a minimum of 2 feet 5 inches (737 mm) in length. <u>It shall be identified by a raised symbol and lettering complying with 1117B.5 [signs and identification] and located adjacent to the device.</u> If the telephone system is located in a closed compartment, the compartment door hardware shall be lever type conforming to the provisions of Section 1004.3, type of lock or latch. Emergency intercommunication shall not require voice communication.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>4.11 Platform Lifts (Wheelchair Lifts). 4.11.1 Location. Platform lifts (wheelchair lifts) permitted by 4.1 shall comply with the requirements of 4.11.</p>	1114B.1.1	<p>General. When accessibility is required by this chapter, it shall be designed and constructed to meet the minimum requirements of the following sections: Chapter 11B. Accessibility; Division I, New Buildings; Division II, Site Accessibility; Division III, Accessibility for Entrances, Exits and Paths of Travel; and Division IV, Accessibility for Existing Buildings Special Wheelchair Lifts — [for HCD 1/AC] Section 1110A.2; [for DSA/AC] Section 1116B.2</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	No action required.	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

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<p>adjacent to the turnstile or revolving door and shall be so designed as to facilitate the same use pattern.</p> <p>4.13.3 Gates. Gates, including ticket gates, shall meet all applicable specifications of 4.13.</p> <p>4.13.4 Double-Leaf Doorways. If doorways have two independently operated door leaves, then at least one leaf shall meet the specifications in 4.13.5 and 4.13.6. That leaf shall be an active leaf.</p>	1133B.2.3.3	Revolving doors. Revolving doors shall not be used as a required entrance for persons with disabilities.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1133B.2.3.4	<p>Turnstiles, rails and pedestrian controls. Where turnstiles and crowd control barriers are utilized in a facility for the purpose of providing fully controlled access, such as where an admission price is charged, a door or gate that is accessible to persons with disabilities shall be provided adjacent to each turnstile exit or entrance. This alternate passageway shall be maintained in an unlocked condition during business hours and the door or gate shall not activate a publicly audible alarm system. The door or gate may be latched where all gates are restricted and controlled by an attendant and a sign is posted stating, "all gates are restricted and controlled by an attendant." The accessible door or gate shall provide the same use pattern. Where posts, rails or other pedestrian controls are utilized to create crowd control aisles or lanes, a minimum of one lane shall be accessible and shall provide a minimum aisle width no less than indicated in Figure 11B-5E (a) and (b) with 32 inches (813 mm) of clear opening.</p> <p>1110B.1.5 <u>Turnstiles. See Section 1133B.2.3.4.</u></p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1133B.1.1.1.4	Gates. All gates, including ticket gates, shall meet all applicable specifications for doors.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1133B.2.3.1	Pairs of doors. Where a pair of doors is utilized, at least one of the doors shall provide a clear, unobstructed opening width of 32 inches (813 mm) with the leaf positioned at an angle of 90 degrees from its closed position.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

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<p>4.13.5 Clear Width. Doorways shall have a minimum clear opening of 32 in (815 mm) with the door open 90 degrees, measured between the face of the door and the opposite stop (see Fig. 24(a), (b), (c), and (d)). Openings more than 24 in (610 mm) in depth shall comply with 4.2.1 and 4.3.3 (see Fig. 24(e)).</p> <p>EXCEPTION: Doors not requiring full user passage, such as shallow closets, may have the clear opening reduced to 20 in (510 mm) minimum.</p>	<p>1133B.1.1.1.1</p> <p>1134B.3</p> <p>1134B.3.1</p>	<p>All entrances and exterior ground-floor exit doors to buildings and facilities shall be made accessible to persons with disabilities. Doorways shall have a minimum clear opening of 32 inches (813 mm) with the door open 90 degrees, measured between the face of the door and the opposite stop. Openings more than 24 inches (610 mm) in depth shall comply with Sections 1118B.1 and 1118B.2.</p> <p><u>General Accessibility for Entrances, Exits and Paths of Travel</u></p> <p><u>Automatic doors. When an automatic door operator is utilized to operate a pair of doors, at least one of the doors shall provide a clear, unobstructed opening width of 32 inches (813 mm) with the door positioned at an angle of 90 degrees from its closed position.</u></p>	<p><input type="checkbox"/> Meets ADA</p> <p><input checked="" type="checkbox"/> Does not meet ADA</p> <p><input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not reference graphics. Revise section as follows.</p>	<p>All entrances and exterior ground-floor exit doors to buildings and facilities shall be made accessible to persons with disabilities. Doorways shall have a minimum clear opening of 32 inches (813 mm) with the door open 90 degrees, measured between the face of the door and the opposite stop <u>(see figure 11B-5B)</u>. Openings more than 24 inches (610 mm) in depth shall comply with Sections 1118B.1 and 1118B.2.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>	<p>Added sections 1134B.3 and 1134B.3.1.</p>
	<p>1133B.2.2</p>	<p>Width and height. Every required exit doorway shall be of a size as to permit the installation of a door not less than 3 feet (914 mm) in width and not less than 6 feet 8 inches (2032 mm) in height.</p> <p>When installed in exit doorways, exit doors shall be capable of opening at least 90 degrees and shall be so mounted that the clear width of the exitway is not less than 32 inches (813 mm). In computing the exit width the net dimension of the exitway shall be used.</p>	<p><input type="checkbox"/> Meets ADA</p> <p><input checked="" type="checkbox"/> Does not meet ADA</p> <p><input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not include ADAAG language for openings more than 24 inches deep, graphics references or doors not requiring full user passage. Revise section as follows.</p>	<p>Width and height. Every required exit doorway shall be of a size as to permit the installation of a door not less than 3 feet (914 mm) in width and not less than 6 feet 8 inches (2032 mm) in height.</p> <p>When installed in exit doorways, exit doors shall be capable of opening at least 90 degrees and shall be so mounted that the clear width of the exitway is not less than 32 inches (813 mm) <u>measured between the face of the door and the opposite stop (see figure 11B-5B)</u>. <u>Openings more than 24 inches (610 mm) in depth shall comply with Sections 1118B.1 and 1118B.2.</u></p> <p>In computing the exit width the net dimension of the exitway shall be used.</p> <p><u>EXCEPTION: Doors not requiring full user passage, such as shallow closets, may have the clear opening reduced to 20 in (510 mm) minimum.</u></p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>	<p>DSA's proposed revision meets the ADA. However, the revision should also reference section 1114B.1.2.</p>
	<p>1133B.2.3</p>	<p>Hinged doors. For hinged doors, the opening width shall be measured with the door positioned at an angle of 90 degrees from its closed position.</p>	<p><input checked="" type="checkbox"/> Meets ADA</p> <p><input type="checkbox"/> Does not meet ADA</p> <p><input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.13.6 Maneuvering Clearances at Doors. Minimum maneuvering clearances at doors that are not automatic or power-assisted shall be as shown in Fig. 25. The floor or ground area within the required clearances shall be level and clear. EXCEPTION: Entry doors to acute care hospital bedrooms for in-patients shall be exempted from the requirement for space at the latch side of the door (see dimension "x" in Fig. 25) if the door is at least 44 in (1120 mm) wide.</p>	1133B.2.4.2	<p>Maneuvering clearances at doors. Minimum maneuvering clearances at doors shall be as shown in Figure 11B-26A and 11B-26B. The floor or ground area within the required clearances shall be level and clear. The level area shall have a length in the direction of door swing of at least 60 inches (1524 mm) and the length opposite the direction of door swing of 48 inches (1219 mm) as measured at right angles to the plane of the door in its closed position. EXCEPTIONS: 1. The length opposite the direction of door swing shall be a minimum of 44 inches (1118 mm) where the door has no closer and approach to the door by a person in a wheelchair can be made from the latch side, or if the door has neither latch nor closer and approach can be made from the hinge side. See Figure 11B-26A and 11B-26B. <u>2. In Group R Occupancies, the level area shall have a length both in the direction of door swing and opposite the direction of door swing of 44 inches (1118 mm) as measured at right angles to the plane of the door in its closed position.</u></p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>Added exception 2 in section 1133B.2.4.2 for completeness.</p> <p>Section 1133B.2.4.2 is not ADA equivalent because exception 2 in section 1133B.2.4.2 allows maneuvering clearances at doors less than required by section 4.13.6 of the ADA Standards.</p>
	1133B.2.4.3	<p>The width of the level area on the side to which the door swings shall extend 24 inches (610 mm) past the strike edge of the door for exterior doors and 18 inches (457 mm) past the strike edge for interior doors. NOTE: Twenty-four inches (610 mm) is preferred for strike-side clearance.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	<u>1133B.7.5</u>	<p><u>Level areas. Walks shall be provided with a level area not less than 60 inches by 60 inches (1524 mm by 1524 mm) at a door or gate that swings toward the walk, and not less than 48 inches wide by 44 inches (1219 mm by 1118 mm) deep at a door or gate that swings away from the walk. Such walks shall extend 24 inches (610 mm) to the side of the strike edge of a door or gate that swings toward the walk. (For example, see Figure 11B-26B.)</u></p>			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1133B.7.5.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>Figure 25 of the ADA Standards. Maneuvering Clearances at Doors. NOTE: All doors in alcoves shall comply with the clearances for front approaches.</p> <p>25(a) Front Approaches -- Swinging Doors. Front approaches to pull side of swinging doors shall have maneuvering space that extends 18 in (455 mm) minimum beyond the latch side of the door and 60 in (1525 mm) minimum perpendicular to the doorway.</p> <p>Front approaches to push side of swinging doors, if equipped with both closer and latch, shall have maneuvering space that extends 12 in (305 mm) minimum beyond the latch side of the door and 48 in (1220 mm) minimum perpendicular to the doorway.</p> <p>Front approaches to push side of swinging doors, if not equipped with latch and closer, shall have maneuvering space that is the same width as door opening and extends 48 in (1220 mm) minimum perpendicular to the doorway.</p>	<p>Figures 11B–26A and 11B–26B.</p>	<p>Refer to code.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 figures do not include ADAAG note. Adopt note from ADAAG.</p>	<p><u>NOTE: All doors in alcoves shall comply with the clearances for front approaches</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>Figure 25 of the ADA Standards.</p> <p>25(b) Hinge Side Approaches. Hinge-side approaches to pull side of swinging doors shall have maneuvering space that extends 36 in (915 mm) minimum beyond the latch side of the door if 60 in (1525 mm) minimum is provided perpendicular to the doorway or maneuvering space that extends 42 in (1065 mm) minimum beyond the latch side of the door if 54 in (1370 mm) minimum is provided perpendicular to the doorway.</p> <p>Hinge-side approaches to push side of swinging doors, if not equipped with both latch and closer, shall have a maneuvering space of 54 in (1370 mm) minimum parallel to the doorway, extending from the latch side to beyond the hinge side, and 42 in (1065 mm) minimum perpendicular to the doorway.</p> <p>Hinge side approaches to push side of swinging doors, if equipped with both latch and closer, shall have maneuvering space of 54 in (1370 mm) minimum parallel to the doorway, extending from the latch side to beyond the hinge side, and 48 in (1220 mm) minimum perpendicular to the doorway.</p>	<p>Figures 11B–26A and 11B–26B.</p>	<p>Refer to code.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>Figure 25 of the ADA Standards.</p> <p>25(c) Latch Side Approaches -- Swinging Doors. Latch-side approaches to pull side of swinging doors that have closers shall have maneuvering space that extends 24 in (610 mm) minimum beyond the latch side of the door and 54 in (1370 mm) minimum perpendicular to the doorway.</p> <p>Latch-side approaches to pull side of swinging doors, if not equipped with closers, shall have maneuvering space that extends 24 in (610 mm) minimum beyond the latch side of the door and 48 in (1220 mm) minimum perpendicular to the doorway.</p> <p>Latch-side approaches to push side of swinging doors that have closers shall have maneuvering space that extends 24 in (610 mm) minimum parallel to the doorway beyond the latch side of the door and 48 in (1220 mm) minimum perpendicular to the doorway.</p> <p>Latch-side approaches to push side of swinging doors, if not equipped with closers, shall have maneuvering space that extends 24 in (610 mm) minimum parallel to the doorway beyond the latch side of the door and 42 in (1065 mm) minimum perpendicular to the doorway.</p>	<p>Figures 11B–26A and 11B–26B.</p>	<p>Refer to code.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>Figure 25 of the ADA Standards.</p> <p>25(d) Front Approach -- Sliding Doors and Folding Doors. Front approaches to sliding doors and folding doors shall have maneuvering space that is the same width as the door opening extending 48 in (1220 mm) minimum perpendicular to the doorway.</p> <p>25(e) Slide-side approaches to sliding doors and folding doors shall have a maneuvering space of 54 in (1370 mm) minimum parallel to the doorway, extending from the latch side to beyond the hinge side, and 42 in (1065 mm) minimum perpendicular to the doorway.</p> <p>25(f) Latch Side Approach - Sliding Doors and Folding Doors. Latch-side approaches to sliding doors and folding doors shall have a maneuvering space that extends 24 in (610 mm) minimum beyond the latch side of the door and extends 42 in (1065 mm) minimum perpendicular to the doorway.</p>	None	None	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not allow the use of manual sliding doors as part of an accessible route.	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If chapter 11B does not allow the use of sliding doors as part of an accessible route, then it meets the ADA. However, please identify the provision in chapter 11B where sliding and folding doors are prohibited as part of an accessible route.
4.13.7 Two Doors in Series. The minimum space between two hinged or pivoted doors in series shall be 48 in (1220 mm) plus the width of any door swinging into the space. Doors in series shall swing either in the same direction or away from the space between the doors (see Fig. 26).	1133B.2.4.4	The space between two consecutive door openings in a vestibule, serving other than a required exit stairway shall provide a minimum of 48 inches (1219 mm) of clear space from any door opening into such vestibule when the door is positioned at an angle of 90 degrees from its closed position. Doors in a series shall swing either in the same direction or away from the space between the doors.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not reference graphics. Revise section as follows.	The space between two consecutive door openings in a vestibule, serving other than a required exit stairway shall provide a minimum of 48 inches (1219 mm) of clear space from any door opening into such vestibule when the door is positioned at an angle of 90 degrees from its closed position. Doors in a series shall swing either in the same direction or away from the space between the doors. <u>See Figures 11B-30 and 11B-31.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.13.8* Thresholds at Doorways. Thresholds at doorways shall not exceed 3/4 in (19 mm) in height for exterior sliding doors or 1/2 in (13 mm) for other types of doors. Raised thresholds and floor level changes at accessible doorways shall be beveled with a slope no greater than 1:2 (see 4.5.2).	1133B.2.4.1	Thresholds. The floor or landing shall not be more than 1/2 inch (12.7 mm) lower than the threshold of the doorway. Change in level between 1/4 inch (6 mm) and 1/2 inch (12.7 mm) shall be beveled with a slope no greater than 1 unit vertical to 2 units horizontal (50% slope). Change in level greater than 1/2 inch (12.7 mm) shall be accomplished by means of a ramp. NOTE: [For DSA/AC] See Section 1133B.5.1.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Section 1133B.2.4.1 meets the ADA only if Title 24 prohibits the use of manual sliding and folding doors as part of an accessible route.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.13.9* Door Hardware. Handles, pulls, latches, locks, and other operating devices on accessible doors shall have a shape that is easy to grasp with one hand and does not require tight grasping, tight pinching, or twisting of the wrist to operate. Lever-operated mechanisms, push-type mechanisms, and U-shaped handles are acceptable designs. When sliding doors are fully open, operating hardware shall be exposed and usable from both sides. Hardware required for accessible door passage shall be mounted no higher than 48 in (1220 mm) above finished floor.</p>	1133B.2.5.2	<p>Hand-activated door opening hardware shall be centered between 30 inches (762 mm) and 44 inches (1118 mm) above the floor. Latching and locking doors that are hand-activated and which are in a path of travel shall be operable with a single effort by lever-type hardware, panic bars, push-pull activating bars or other hardware designed to provide passage without requiring the ability to grasp the opening hardware. Locked exit doors shall operate as above in egress direction. Doors to individual hotel or motel units shall operate similarly, except that when a bolt and unlatching operation is key operated from corridor or exterior side of unit door, large bow keys 2 inches (51 mm) (full bow) or 1-1/4 inches (32 mm) (half bow) shall be provided in lieu of lever-type hardware on the corridor side. Separate dead-lock activation on room side of corridor doors in hotels or motels shall have lever handle or large thumb turn on an easily reached location.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 only addresses latching and locking doors, whereas ADAAG scope applies to all doors intended to provide accessibility. Adopt ADAAG language as follows.</p>	<p>Hand-activated door opening hardware, <u>handles, pulls, latches, locks, and other operating devices on accessible doors shall have a shape that is easy to grasp with one hand and does not require tight grasping, tight pinching, or twisting of the wrist to operate.</u> Hardware shall be centered between 30 inches (762 mm) and 44 inches (1118 mm) above the floor. Latching and locking doors that are hand-activated and which are in a path of travel shall be operable with a single effort by lever-type hardware, panic bars, push-pull activating bars, <u>U-handles</u> or other hardware designed to provide passage without requiring the ability to grasp the opening hardware. Locked exit doors shall operate as above in egress direction. Doors to individual hotel or motel units shall operate similarly, except that when a bolt and unlatching operation is key operated from corridor or exterior side of unit door, large bow keys 2 inches (51 mm) (full bow) or 1-1/4 inches (32 mm) (half bow) shall be provided in lieu of lever-type hardware on the corridor side. Separate dead-lock activation on room side of corridor doors in hotels or motels shall have lever handle or large thumb turn on an easily reached location.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>DSA's proposed revision for section 1133B.2.5.2 meets section 4.13.9 of the ADA Standards. However, the language permitting a large bow key in lieu of a lever-type hardware seems to conflict with the requirement that door opening hardware not require tight grasping, tight pinching, or twisting of the wrist to operate. Please clarify.</p>
<p>4.13.10* Door Closers. If a door has a closer, then the sweep period of the closer shall be adjusted so that from an open position of 70 degrees, the door will take at least 3 seconds to move to a point 3 in (75 mm) from the latch, measured to the leading edge of the door.</p>	1133B.2.5.1	<p>Door Closer. If door has a closer, then the sweep period of the closer shall be adjusted so that from an open position of 70 degrees, the door will take at least 3-seconds to move to a point 3-inches (75 mm) from the latch, measured to the leading edge of the door.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.13.11* Door Opening Force. The maximum force for pushing or pulling open a door shall be as follows:</p> <p>(1) Fire doors shall have the minimum opening force allowable by the appropriate administrative authority.</p> <p>(2) Other doors.</p> <p>(a) exterior hinged doors: (Reserved)</p> <p>(b) interior hinged doors: 5 lbf (22.2N)</p> <p>(c) sliding or folding doors: 5 lbf (22.2N)</p> <p>These forces do not apply to the force required to retract latch bolts or disengage other devices that may hold the door in a closed position.</p>	1133B.2.5	<p>Closer—effort to operate doors. Maximum effort to operate doors shall not exceed 5-pounds (38 N) for exterior and interior doors, such pull or push effort being applied at right angles to hinged doors and at the center plane of sliding or folding doors. Compensating devices or automatic door operators may be utilized to meet the above standards. When fire doors are required, the maximum effort to operate the door may be increased to the minimum allowable by the appropriate administrative authority, not to exceed 15 pounds (66.72 N).</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Section 1133B.2.5 meets the ADA. But this section seems to have a conversion error (i.e., 5 lbf equals 22.2 N and not 38 N).
<p>4.13.12* Automatic Doors and Power-Assisted Doors. If an automatic door is used, then it shall comply with ANSI/BHMA A156.10-1985. Slowly opening, low-powered, automatic doors shall comply with ANSI A156.19-1984. Such doors shall not open to back check faster than 3 seconds and shall require no more than 15 lbf (66.6N) to stop door movement. If a power-assisted door is used, its door-opening force shall comply with 4.13.11 and its closing shall conform to the requirements in ANSI A156.19-1984.</p>	<p>1133B.2.3.2</p> <p>1134B.3</p> <p>1134B.3.1</p>	<p>Automatic doors. When an automatic door operator is utilized to operate a pair of doors, at least one of the doors shall provide a clear, unobstructed opening width of 32 inches (813 mm) with the door positioned at an angle of 90 degrees from its closed position.</p> <p><u>General Accessibility for Entrances, Exits and Paths of Travel</u></p> <p><u>Automatic doors. When an automatic door operator is utilized to operate a pair of doors, at least one of the doors shall provide a clear, unobstructed opening width of 32 inches (813 mm) with the door positioned at an angle of 90 degrees from its closed position.</u></p>	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment	<p>Automatic <u>and power assisted</u> doors. When an automatic door operator is utilized to operate a pair of doors, at least one of the doors shall provide a clear, unobstructed opening width of 32 inches (813 mm) with the door positioned at an angle of 90 degrees from its closed position.</p> <p>If an automatic door is used, then it shall comply with ANSI/BHMA A156.10-1985. Slowly opening, low-powered, automatic doors shall comply with ANSI A156.19-1984. Such doors shall not open to back check faster than 3 seconds and shall require no more than 15 lbf (66.6N) to stop door movement. If a power-assisted door is used, its door-opening force shall comply with 1133B.2.5 and its closing shall conform to the requirements in ANSI A156.19-1984.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>DSA's proposed revision meets the ADA. But section 4.13.12 of the ADA Standards contains a conversion error (i.e., 15 lbf equals 66.72 N and not 66.6 N). Please make the necessary corrections.</p> <p>Added sections 1134B.3 and 1134B.3.1. Section 1134B.3.1 should be revised to be similar to DSA's proposed revision for section 1133B.2.3.2.</p>
<p>4.14 Entrances.</p> <p>4.14.1 Minimum Number. Entrances required to be accessible by 4.1 shall be part of an accessible route complying with 4.3. Such entrances shall be connected by an accessible route to public transportation stops, to accessible parking and passenger loading zones, and to public streets or sidewalks if available (see 4.3.2(1)). They shall also be connected by an accessible route to all accessible spaces or elements within the building or facility.</p>	1133B.1.1.1.1	<p>All entrances and exterior ground-floor exit doors to buildings and facilities shall be made accessible to persons with disabilities. Doorways shall have a minimum clear opening of 32 inches (813 mm) with the door open 90 degrees, measured between the face of the door and the opposite stop. Openings more than 24 inches (610 mm) in depth shall comply with Sections 1118B.1 and 1118B.2.</p>	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment	<p>All entrances and exterior ground-floor exit doors to buildings and facilities shall be made accessible to persons with disabilities. <u>Such entrances shall be connected by an accessible route to public transportation stops, to accessible parking and passenger loading zones, and to public streets or sidewalks if available. Entrances shall be connected by an accessible route to all accessible spaces or elements within the building or facility.</u></p> <p>Doorways shall have a minimum clear opening of 32 inches (813 mm) with the door open 90 degrees, measured between the face of the door and the opposite stop. Openings more than 24 inches (610 mm) in depth shall comply with Sections 1118B.1 and 1118B.2.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>DSA's proposed revision meets the ADA but it needs to reference all sections concerning accessible routes: 1102B, 1114B, 1124B, 1133B.3., 1133B.5, 1133B.7, 1133B.8.6.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.14.2 Service Entrances. A service entrance shall not be the sole accessible entrance unless it is the only entrance to a building or facility (for example, in a factory or garage).	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG language into new Title 24 section as follows.	<u>1133B.1.1.1.5 Service Entrances. A service entrance shall not be the sole accessible entrance unless it is the only entrance to a building or facility (for example, in a factory or garage).</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.15 Drinking Fountains and Water Coolers. 4.15.1 Minimum Number. Drinking fountains or water coolers required to be accessible by 4.1 shall comply with 4.15.	1114B.1.1	General. When accessibility is required by this chapter, it shall be designed and constructed to meet the minimum requirements of the following sections: Chapter 11B. Accessibility; Division I, New Buildings; Division II, Site Accessibility; Division III, Accessibility for Entrances, Exits and Paths of Travel; and Division IV, Accessibility for Existing Buildings Entrances — [for HCD 1/AC] Section 1120A.1; [for DSA/AC] Section 1133B Doors — [for HCD 1/AC] Section 1120A.2; [for DSA/AC] Section 1133B.2 Corridors — [for HCD 1/AC] Section 1120A.3; [for DSA/AC] Section 1133B.3 Stairways — [for HCD 1/AC] Section 1120A.4; [for DSA/AC] Section 1133B.4 Ramps — [for HCD 1/AC] Section 1120A.5; [for DSA/AC] Section 1133B.5 Aisles — [for DSA/AC] Section 1133B.6 Walks and Sidewalks — [for HCD 1/AC] Section 1120A.7; [for DSA/AC] Section 1133B.7 Hazards — [for HCD 1/AC] Section 1120A.7; [for DSA/AC] Section 1133B.8 Elevators — [for HCD 1/AC] Section 3003 Special Wheelchair Lifts — [for HCD 1/AC] Section 1110A.2; [for DSA/AC] Section 1116B.2 Alarms — Chapter 35. See also Part 3, California Electrical Code.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 section 1114B.1.1 does not contain a reference to drinking fountains. Add reference as follows.	General. When accessibility is required by this chapter, it shall be designed and constructed to meet the minimum requirements of the following sections: Chapter 11B. Accessibility; Division I, New Buildings; Division II, Site Accessibility; Division III, Accessibility for Entrances, Exits and Paths of Travel; and Division IV, Accessibility for Existing Buildings Entrances — [for HCD 1/AC] Section 1120A.1; [for DSA/AC] Section 1133B Doors — [for HCD 1/AC] Section 1120A.2; [for DSA/AC] Section 1133B.2 Corridors — [for HCD 1/AC] Section 1120A.3; [for DSA/AC] Section 1133B.3 <u>Other Building Components: [for DSA/AC] Section 1117B</u> Stairways — [for HCD 1/AC] Section 1120A.4; [for DSA/AC] Section 1133B.4 Ramps — [for HCD 1/AC] Section 1120A.5; [for DSA/AC] Section 1133B.5 Aisles — [for DSA/AC] Section 1133B.6 Walks and Sidewalks — [for HCD 1/AC] Section 1120A.7; [for DSA/AC] Section 1133B.7 Hazards — [for HCD 1/AC] Section 1120A.7; [for DSA/AC] Section 1133B.8 Elevators — [for HCD 1/AC] Section 3003 Special Wheelchair Lifts — [for HCD 1/AC] Section 1110A.2; [for DSA/AC] Section 1116B.2 Alarms — Chapter 35. See also Part 3, California Electrical Code.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	1117B.1.1	General. Where water fountains are provided, they shall comply with this section. In new construction, where only one drinking fountain area is provided on a floor, there shall be a drinking fountain that is accessible to individuals who use wheelchairs in accordance with 1115B.2.1.13 and one accessible to those who have difficulty bending or stooping. This can be accommodated by the use of "hi-low" fountains, or by such other means as would achieve the required accessibility for each group on each floor.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment ADAAG does not limit the application of a hi-low fountain to new construction. The referring section is incorrect.	General. Where water fountains are provided, they shall comply with this section. In new construction, Where only one drinking fountain area is provided on a floor, there shall be a drinking fountain that is accessible to individuals who use wheelchairs in accordance with 4415B.2.1.13 1115B.2.1.5 and one accessible to those who have difficulty bending or stooping. This can be accommodated by the use of "hi-low" fountains, or by such other means as would achieve the required accessibility for each group on each floor.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.15.2* Spout Height. Spouts shall be no higher than 36 in (915 mm), measured from the floor or ground surfaces to the spout outlet (see Fig. 27(a)).	1115B.2.1.5.3	The bubbler shall be activated by a manually operated system not requiring a force greater than 5 lbf (22.2 N) that is located within 6 inches (152 mm) of the front edge of the fountain or an electronically controlled device (preferably). The bubbler outlet orifice shall be located within 6 inches (152 mm) of the front edge of the drinking fountain and within 36 inches (914 mm) of the floor. The water steam from the bubbler shall be substantially parallel to the front edge of the drinking fountain.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.15.3 Spout Location. The spouts of drinking fountains and water coolers shall be at the front of the unit and shall direct the water flow in a trajectory that is parallel or nearly parallel to the front of the unit. The spout shall provide a flow of water at least 4 in (100 mm) high so as to allow the insertion of a cup or glass under the flow of water. On an accessible drinking fountain with a round or oval bowl, the spout must be positioned so the flow of water is within 3 in (75 mm) of the front edge of the fountain.	1115B.2.1.5.3	The bubbler shall be activated by a manually operated system not requiring a force greater than 5 lbf (22.2 N) that is located within 6 inches (152 mm) of the front edge of the fountain or an electronically controlled device (preferably). The bubbler outlet orifice shall be located within 6 inches (152 mm) of the front edge of the drinking fountain and within 36 inches (914 mm) of the floor. The water steam from the bubbler shall be substantially parallel to the front edge of the drinking fountain.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	1115B.2.1.5.4	The spout shall provide a flow of water at least 4 inches (102 mm) high so as to allow the insertion of a cup or glass under the flow of water. The force required to activate controls shall be no greater than 5 lbf (22.2 N).	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not provide the same level of specificity as ADAAG. Adopt ADAAG language as follows.	The spout shall provide a flow of water at least 4 inches (102 mm) high so as to allow the insertion of a cup or glass under the flow of water. The force required to activate controls shall be no greater than 5 lbf (22.2 N). <u>On an accessible drinking fountain with a round or oval bowl, the spout must be positioned so the flow of water is within 3 in (75 mm) of the front edge of the fountain.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.15.4 Controls. Controls shall comply with 4.27.4. Unit controls shall be front mounted or side mounted near the front edge.	1115B.2.1.5.3	The bubbler shall be activated by a manually operated system not requiring a force greater than 5 lbf (22.2 N) that is located within 6 inches (152 mm) of the front edge of the fountain or an electronically controlled device (preferably). The bubbler outlet orifice shall be located within 6 inches (152 mm) of the front edge of the drinking fountain and within 36 inches (914 mm) of the floor. The water steam from the bubbler shall be substantially parallel to the front edge of the drinking fountain.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Sections 4.15.4 and 4.27.4 of the ADA Standards require controls to be front mounted or side mounted and that controls will be operable with one hand without tight grasping, pinching or twisting of the wrist.
4.15.5 Clearances. (1) Wall and post-mounted cantilevered units shall have a clear knee space between the bottom of the apron and the floor or ground at least 27 in (685 mm) high, 30 in (760 mm) wide, and 17 in to 19 in (430 mm to 485 mm) deep (see Fig. 27(a) and (b)). Such units shall also have a minimum clear floor space 30 in by 48 in (760 mm by 1220 mm) to allow a person in a wheelchair to approach the unit facing forward. (2) Free-standing or built-in units not having a clear space under them shall have a clear floor space at least 30 in by 48 in (760 mm by 1220 mm) that allows a person in a wheelchair to make a parallel approach to the unit (see Fig. 27(c) and (d)). This clear floor space shall comply with 4.2.4.	1115B.2.1.5.1	The drinking fountain shall be a minimum of 18 inches (457 mm) in depth and there shall be clear and unobstructed knee space under the drinking fountain not less than 27 inches (686 mm) in height and 8 inches (203 mm) in depth, the depth measurements being taken from the front edge of the fountain. Additionally, there shall be toe clearance of 9 inches (229 mm) in height above the floor and 17 inches (432 mm) in height above the floor and 17 inches (432 mm) in depth from the front edge of the fountain. A side approach drinking fountain is not acceptable.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not contain the same level of specificity as ADAAG. Adopt ADAAG language as follows.	The <u>Wall and post-mounted cantilevered drinking fountains shall be a minimum of 18 inches (457 mm) in depth and there shall be clear and unobstructed knee space under the drinking fountain not less than 27 inches (686 mm) in height, 30 inches (760 mm) in width and 8 inches (203 mm) in depth, the depth measurements being taken from the front edge of the fountain. The 27 in (685 mm) high minimum clear knee space must be free of equipment or obstructions for a minimum of 8 in (205 mm) extending from the front edge of the fountain back toward the wall or mounting post.</u> Additionally, there shall be toe clearance of 9 inches (229 mm) in height above the floor and 17 inches (432 mm) in height above the floor and 17 inches (432 mm) in depth from the front edge of the fountain. <u>The toe clearance space must be free of equipment or obstructions.</u> .A side approach drinking fountain is not acceptable.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	DSA's proposed revision does not meet the ADA because it does not include the requirement for 30 in by 48 in clear floor space. Also, the ADA's drinking fountain depth cannot exceed 19 inches. Lastly, the measurements described in Figure 11B-3 must be changed to be consistent with section 1115B.2.1.5.1.

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<p>Figure 27 of the ADA Standards. Drinking Fountains and Water Coolers.</p> <p>27(a) Spout Height and Knee Clearance. The 27 in (685 mm) high minimum clear knee space must be free of equipment or obstructions for a minimum of 8 in (205 mm) extending from the front edge of the fountain back toward the wall. In addition, a minimum 9 in (230 mm) high toe clearance space must be provided extending back toward the wall to a distance no more than 6 in (150 mm) from the back wall. The toe clearance space must be free of equipment or obstructions.</p>	1117B.1.2	<p>Alcoves. Water fountains shall be located completely within alcoves or otherwise positioned so as not to encroach into pedestrian ways. The alcove in which the water fountain is located shall not be less than 32 inches (813 mm) in width and 18 inches (457 mm) in depth. See Figure 11B-3 of this code. Protruding objects located in alcoves or otherwise positioned so as to limit encroachment into pedestrian ways are permitted to project 4 inches into walls, halls, corridors, passageways or aisles.</p> <p>EXCEPTION: When the enforcing agency determines that it would create an unreasonable hardship to locate the water fountain in an alcove, the water fountain may project into the path of travel, and the path of travel shall be identifiable to the blind as follows:</p> <p>1. The surface of the path of travel at the water fountain shall be textured so that it is clearly identifiable by a blind person using a cane. The minimum textured area shall extend from the wall supporting the water fountain to 1 foot (305 mm) beyond the front edge of the water fountain and shall extend 1 foot (305 mm) beyond each side of the water fountain, or</p> <p>2. Wing walls shall be provided on each side of the water fountain. The wing walls shall project out from the supporting wall at least as far as the water fountain to within 6 inches (152 mm) of the surface of the path of travel. There shall also be a minimum of 32 inches (813 mm) clear between the wing walls.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not contain the same level of specificity as ADAAG. Adopt ADAAG language as follows.</p>	<p>Alcoves. Water Wall and post-mounted cantilevered drinking fountains shall be located completely within alcoves or otherwise positioned so as not to encroach into pedestrian ways. The alcove in which the water fountain is located shall not be less than 32 inches (813 mm) in width and 18 inches (457 mm) in depth. See Figure 11B-3 of this code.</p> <p><u>Protruding objects located in alcoves or otherwise positioned so as to limit encroachment into pedestrian ways are permitted to project 4 inches into walls, halls, corridors, passageways or aisles.</u></p> <p>EXCEPTION: When the enforcing agency determines that it would create an unreasonable hardship to locate the water fountain in an alcove, the water fountain may project into the path of travel, and the path of travel shall be identifiable to the blind as follows:</p> <p>1. The surface of the path of travel at the water fountain shall be textured so that it is clearly identifiable by a blind person using a cane. The minimum textured area shall extend from the wall supporting the water fountain to 1 foot (305 mm) beyond the front edge of the water fountain and shall extend 1 foot (305 mm) beyond each side of the water fountain, or</p> <p>2.1. Wing walls shall be provided on each side of the water fountain. The wing walls shall project out from the supporting wall at least as far as the water fountain to within 6 inches (152 mm) of the surface of the path of travel. There shall also be a minimum of 32 inches (813 mm) clear between the wing walls.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Added additional language for completeness. DSA's proposed revision does not meet the ADA because it does not include the requirement for 30 in by 48 in clear floor space. Also, the ADA prohibits protruding objects to reduce the clear width of an accessible route or maneuvering space. Lastly, the measurements described in Figure 11B-3 must be changed to be consistent with section 1117B.1.2.</p>
	Figure 11B-3	Refer to code.	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 graphic does not contain figure 27(a) or 27(b) from ADAAG. Adopt ADAAG figures.</p>	See attached graphic.	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>DSA's proposed revision meets the ADA, but the dimensions in Figure 11B-3 need to be consistent throughout.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.16 Water Closets. 4.16.1 General. Accessible water closets shall comply with 4.16.	1115B.1	General. Sanitary facilities that serve buildings, facilities or portions of buildings or facilities that are required by these standards to be accessible to persons with disabilities, shall conform to the following requirements, except as specifically exempted in other portions of this code.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.16.2 Clear Floor Space. Clear floor space for water closets not in stalls shall comply with Fig. 28. Clear floor space may be arranged to allow either a left-handed or right-handed approach.	1115B.7.2	<p>Single-accommodation toilet facilities. There shall be sufficient space in the toilet room for a wheelchair measuring 30 inches (762 mm) wide by 48 inches (1219 mm) long to enter the room and permit the door to close. There shall be in the room a clear floor space of at least 60 inches (1524 mm) in diameter, or a T-shaped space complying with Figure 11B-12 (a) and (b). No door shall encroach into this space for more than 12 inches (305 mm) except for the panel door to any water closet compartment if there is one. (See Figure 11B-1A). The water closet shall be located in a space which provides a minimum 28-inch-wide (711 mm) clear space from a fixture or a minimum 32-inch-wide (813 mm) clear space from a wall at one side. The other side shall provide 18 inches (457 mm) from the centerline of the water closet to the wall. A minimum 48 inches (1219 mm) of clear space shall be provided in front of the water closet. All doors, fixtures and controls shall be on an accessible route. The minimum clear width of an accessible route shall be 36 inches (914 mm) except at doors (see Section 1133B.2). If a person in a wheelchair must make a turn around an obstruction, the minimum clear width of the accessible route shall be as shown in Figure 11B-5E. (See also Figure 11B-1A.)</p> <p>NOTE: For bathrooms serving residential occupancies, see Section 1111B.4.6 and Chapter 11A.</p> <p>EXCEPTION: In an existing building, a single-accommodation toilet facility may have the water closet fixture located in an area which provides a clear space of not less than 36 inches (914 mm) wide by 48 inches (1219 mm) long in front of the water closet.</p>	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment <p>The Title 24 exception that allows the placement of a water closet in a 36" wide x 48" long space conflicts with the minimum widths allowed in ADAAG Figure 28, which can require a width up to 60" depending upon the approach. Remove Title 24 exception.</p>	<p>Single-accommodation toilet facilities. There shall be sufficient space in the toilet room for a wheelchair measuring 30 inches (762 mm) wide by 48 inches (1219 mm) long to enter the room and permit the door to close. There shall be in the room a clear floor space of at least 60 inches (1524 mm) in diameter, or a T-shaped space complying with Figure 11B-12 (a) and (b). No door shall encroach into this space for more than 12 inches (305 mm) except for the panel door to any water closet compartment if there is one. (See Figure 11B-1A). The water closet shall be located in a space which provides a minimum 28-inch-wide (711 mm) clear space from a fixture or a minimum 32-inch-wide (813 mm) clear space from a wall at one side. The other side shall provide 18 inches (457 mm) from the centerline of the water closet to the wall. A minimum 48 inches (1219 mm) of clear space shall be provided in front of the water closet. All doors, fixtures and controls shall be on an accessible route. The minimum clear width of an accessible route shall be 36 inches (914 mm) except at doors (see Section 1133B.2). If a person in a wheelchair must make a turn around an obstruction, the minimum clear width of the accessible route shall be as shown in Figure 11B-5E. (See also Figure 11B-1A.)</p> <p>NOTE: For bathrooms serving residential occupancies, see Section 1111B.4.6 and Chapter 11A.</p> <p>EXCEPTION: In an existing building, a single-accommodation toilet facility may have the water closet fixture located in an area which provides a clear space of not less than 36 inches (914 mm) wide by 48 inches (1219 mm) long in front of the water closet.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>DSA's proposed revision does not meet the ADA because the revision does not address all of the water closet clear floor space requirements in section 4.16.2 and Figure 28 of the ADA Standards.</p> <p>Also, the proposed revision does not prohibit doors from swinging into the clear floor space required for any fixture, as required by section 4.22.2 of the ADA Standards.</p>

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<p>Figure 28 of the ADA Standards. Clear Floor Space at Water Closets.</p> <p>For a side or front approach, the water closet must be located along the back wall and the centerline of the water closet must be 18 in (455 mm) from the side wall with the side grab bar.</p>	Figure 11B-1A	Refer to code.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>For a front approach/transfer, there must be a clear floor space at the water closet that is a minimum 48 in (1220 mm) in width (parallel to the back wall) and a minimum of 66 in (1675 mm) in length. If there is no stall, an accessible lavatory may overlap the clear floor space at the back wall as long as a minimum 18 in (455 mm) clearance is maintained between the centerline of the water closet and the nearest edge of the lavatory.</p>	Figure 11B-1A	Refer to code.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>For a side approach/transfer, there must be a clear floor space at the water closet that is a minimum of 48 in (1220 mm) in width (parallel to the back wall) and a minimum of 56 in (1420 mm) in length. If there is no stall, an accessible lavatory may overlap the clear floor space at the back wall as long as a minimum 18 in (455 mm) clearance is maintained between the centerline of the water closet and the nearest edge of the lavatory.</p>	Figure 11B-1A	Refer to code.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Not Addressed
<p>For a forward and side approach or for a lateral transfer, there must be a clear floor space at the water closet that is a minimum of 60 in (1525 mm) in width (parallel to the back wall) and a minimum of 56 in (1420 mm) in length. There must be a clear floor space of 42 in (1066 mm) minimum from the centerline of the water closet to the nearest obstruction/wall. A lavatory may not overlap this clear space.</p>	Figure 11B-1A	Refer to code.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Not Addressed

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.16.3* Height. The height of water closets shall be 17 in to 19 in (430 mm to 485 mm), measured to the top of the toilet seat. Seats shall not be sprung to return to a lifted position.	1115B.2.1	<p>Accessible Water Closets</p> <p>1. The height of accessible water closets shall be a minimum of 17-inches (432 mm) and a maximum of 19-inches (483 mm) measured to the top of a maximum 2-inch-high (51 mm) toilet seat.</p> <p>EXCEPTION: A 3-inch (76 mm) high seat shall be permitted only in alterations where the existing fixture is less than 15 inches (381 mm) high.</p> <p>2. Controls shall be operable with one hand, and shall not require tight grasping, pinching or twisting. Controls for the flush valves shall be mounted on the wide side of toilet areas, no more than 44 inches (1118 mm) above the floor. The force required to activate controls shall be no greater than 5 pound-force (lbf) (22.2 N).</p> <p>[For DSA/AC] NOTES: 1. See the California Building Code, Chapter 11A, for additional requirements for water closets in publicly funded housing and all nonresidential occupancies. 2. Automatic "spring to lifted position" seats are not allowed.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Section 1115B.2.1 meets the ADA only if "NOTES" are enforceable provisions.
<p>4.16.4* Grab Bars. Grab bars for water closets not located in stalls shall comply with 4.26 and Fig. 29. The grab bar behind the water closet shall be 36 in (915 mm) minimum.</p> <p>Figure 29 of the ADA Standards. Grab Bars at Water Closets.</p> <p>29(a) Back Wall. A 36 in (915 mm) minimum length grab bar, mounted 33-36 in (840-915 mm) above the finish floor, is required behind the water closet. The grab bar must extend at least 12 in (305) from the centerline of the water closet toward the side wall and at least 24 in (610 mm) from the</p>	1115B.8.1	<p>Location. Grab bars located on each side, or one side and the back of the accessible toilet stall or compartment, shall be securely attached 33 inches (838 mm) above and parallel to the floor, except that where a tank-type toilet is used which obstructs placement at 33 inches (838 mm), the grab bar may be as high as 36 inches (914 mm). Grab bars shall be at least 42 inches (1067 mm) long with the front end positioned 24 inches (610 mm) in front of the water closet stool. Grab bars at the back shall not be less than 36 inches (914 mm) long. See Figures 11B-1A, 11B-1B and 11B-1C.</p>	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment <p>Title 24 does not include scoping language for water closets not located in stalls. Adopt ADAAG language as follows.</p>	<p>Location. Grab bars located on each side, or one side and the back of the accessible toilet stall or compartment, shall be securely attached 33 inches (838 mm) above and parallel to the floor, except that where a tank-type toilet is used which obstructs placement at 33 inches (838 mm), the grab bar may be as high as 36 inches (914 mm). Grab bars shall be at least 42 inches (1067 mm) long with the front end positioned 24 inches (610 mm) in front of the water closet stool. Grab bars at the back shall not be less than 36 inches (914 mm) long. See Figures 11B-1A, 11B-1B and 11B-1C.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>DSA's proposed revision does not meet the ADA because it does not limit the use of parallel grab bars (i.e., grab bars located on each side). The ADA permits parallel grab bars only for the 36 inch wide alternate stall design. DSA should delete the reference to grab bars located on each side.</p> <p>Also, section 1115B.8.1 should delete the reference to Figure 11B-1C because DSA has proposed to delete this figure.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>centerline of the water closet toward the open side.</p> <p>29(b) Side Wall. A 42 in (1065 mm) minimum length grab bar is required on the side wall, spaced a maximum of 12 in (305 mm) from the back wall and extending a minimum of 54 in (1370 mm) from the back wall at a height of 33-36 in (840-915 mm).</p>	<p>Figures 11B-1A, 11B-1B and 11B-1C</p>	<p>Refer to code.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 graphics do not include specific ADAAG dimensions. Revise graphics to include dimensions in ADAAG figure 29.</p>	<p>See attached graphic.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>DSA deleted Figure 11B-1C.</p> <p>DSA's proposed revision does not meet the ADA because the side elevation illustration in figure 11B-1A should include the 12 inch maximum dimension between the side grab bar and the back wall</p>
<p>4.16.5* Flush Controls. Flush controls shall be hand operated or automatic and shall comply with 4.27.4. Controls for flush valves shall be mounted on the wide side of toilet areas no more than 44 in (1120 mm) above the floor.</p>	<p>1115B.2.1</p>	<p>Accessible Water Closets (b) Controls shall be operable with one hand, and shall not require tight grasping, pinching or twisting. Controls for the flush valves shall be mounted on the wide side of toilet areas, no more than 44 inches (1118 mm) above the floor. The force required to activate controls shall be no greater than 5 pound-force (lbf) (22.2 N).</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>4.16.6 Dispensers. Toilet paper dispensers shall be installed within reach, as shown in Fig. 29(b). Dispensers that control delivery, or that do not permit continuous paper flow, shall not be used.</p> <p>Fig. 29(b) . . The toilet paper dispenser shall be mounted below the grab bar, at a minimum height of 19 in (485 mm).</p>	<p>1115B.9.3</p>	<p>Toilet tissue dispensers. Toilet tissue dispensers shall be located on the wall within 12 inches (305 mm) of the front edge of the toilet seat. Dispensers that control delivery or that do not permit continuous paper flow shall not be used. See Figure 11B-1A.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not include the same level of specificity as ADAAG. Adopt ADAAG language as follows.</p>	<p>Toilet tissue dispensers. Toilet tissue dispensers shall be located on the wall within 12 inches (305 mm) of the front edge of the toilet seat, <u>mounted below the grab bar, at a minimum height of 19 in (485 mm), and 36 inches maximum to the far edge from the rear wall.</u> Dispensers that control delivery or that do not permit continuous paper flow shall not be used. See Figure 11B-1A.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
	<p>Figure 11B-1A</p>	<p>Refer to code.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

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<p>4.17 Toilet Stalls.</p> <p>4.17.1 Location. Accessible toilet stalls shall be on an accessible route and shall meet the requirements of 4.17.</p> <p>4.17.2 Water Closets. Water closets in accessible stalls shall comply with 4.16.</p>	1114B.1.1	<p>General. When accessibility is required by this chapter, it shall be designed and constructed to meet the minimum requirements of the following sections:</p> <p>Chapter 11B. Accessibility; Division I, New Buildings; Division II, Site Accessibility; Division III, Accessibility for Entrances, Exits and Paths of Travel; and Division IV, Accessibility for Existing Buildings</p> <p>Entrances — [for HCD 1/AC] Section 1120A.1; [for DSA/AC] Section 1133B</p> <p>Doors — [for HCD 1/AC] Section 1120A.2; [for DSA/AC] Section 1133B.2</p> <p>Corridors — [for HCD 1/AC] Section 1120A.3; [for DSA/AC] Section 1133B.3</p> <p>Stairways — [for HCD 1/AC] Section 1120A.4; [for DSA/AC] Section 1133B.4</p> <p>Ramps — [for HCD 1/AC] Section 1120A.5; [for DSA/AC] Section 1133B.5</p> <p>Aisles — [for DSA/AC] Section 1133B.6</p> <p>Walks and Sidewalks — [for HCD 1/AC] Section 1120A.7; [for DSA/AC] Section 1133B.7</p> <p>Hazards — [for HCD 1/AC] Section 1120A.7; [for DSA/AC] Section 1133B.8</p> <p>Elevators — [for HCD 1/AC] Section 3003</p> <p>Special Wheelchair Lifts — [for HCD 1/AC] Section 1110A.2; [for DSA/AC] Section 1116B.2</p> <p>Alarms — Chapter 35.</p> <p>See also Part 3, California Electrical Code.</p>	<p><input type="checkbox"/> Meets ADA</p> <p><input checked="" type="checkbox"/> Does not meet ADA</p> <p><input checked="" type="checkbox"/> Comment</p> <p>Title 24 section 1114B.1.1 does not contain a reference to Toilet Rooms. Add reference as follows.</p>	<p>General. When accessibility is required by this chapter, it shall be designed and constructed to meet the minimum requirements of the following sections:</p> <p>Chapter 11B. Accessibility; Division I, New Buildings; Division II, Site Accessibility; Division III, Accessibility for Entrances, Exits and Paths of Travel; and Division IV, Accessibility for Existing Buildings</p> <p>Entrances — [for HCD 1/AC] Section 1120A.1; [for DSA/AC] Section 1133B</p> <p>Doors — [for HCD 1/AC] Section 1120A.2; [for DSA/AC] Section 1133B.2</p> <p>Corridors — [for HCD 1/AC] Section 1120A.3; [for DSA/AC] Section 1133B.3</p> <p><u>Bathing and Toilet Facilities – [for DSA/AC] Section 1115B</u></p> <p>Stairways — [for HCD 1/AC] Section 1120A.4; [for DSA/AC] Section 1133B.4</p> <p>Ramps — [for HCD 1/AC] Section 1120A.5; [for DSA/AC] Section 1133B.5</p> <p>Aisles — [for DSA/AC] Section 1133B.6</p> <p>Walks and Sidewalks — [for HCD 1/AC] Section 1120A.7; [for DSA/AC] Section 1133B.7</p> <p>Hazards — [for HCD 1/AC] Section 1120A.7; [for DSA/AC] Section 1133B.8</p> <p>Elevators — [for HCD 1/AC] Section 3003</p> <p>Special Wheelchair Lifts — [for HCD 1/AC] Section 1110A.2; [for DSA/AC] Section 1116B.2</p> <p>Alarms — Chapter 35.</p> <p>See also Part 3, California Electrical Code.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.17.3* Size and Arrangement. The size and arrangement of the standard toilet stall shall comply with Fig. 30(a), Standard Stall. Standard toilet stalls with a minimum depth of 56 in (1420 mm) (see Fig. 30(a)) shall have wall-mounted water closets. If the depth of a standard toilet stall is increased at least 3 in (75 mm), then a floor-mounted water closet may be used. Arrangements shown for standard toilet stalls may be reversed to allow either a left- or right-hand approach. Additional stalls shall be provided in conformance with 4.22.4.</p> <p>EXCEPTION: In instances of alteration work where provision of a standard stall (Fig. 30(a)) is technically infeasible or where plumbing code requirements prevent combining existing stalls to provide space, either alternate stall (Fig. 30(b)) may be provided in lieu of the standard stall.</p>	<p>1115B.7.1 3.</p> <p><u>1115B.7.1 5.</u></p>	<p>Accessible water closet compartment. A water closet fixture located in a compartment shall provide a minimum 28 inch-wide (711 mm) clear space from a fixture or a minimum 32 inch-wide (813 mm) clear space from a wall at one side of the water closet. The other side of the water closet shall provide 18 inches (457 mm) from the centerline of the water closet to the wall. The stall shall be a minimum of 60-inches (1524 mm) wide. A minimum 48-inch-long (1219 mm) clear space shall be provided in front of the water closet if the compartment has an end-opening door (facing the water closet). A minimum 60-inch-long (1524 mm) clear space shall be provided in a compartment with the door located at the side. Grab bars shall not project more than 3 inches (76 mm) into the clear spaces as specified above.</p> <p><u>Large toilet rooms. Where six or more stalls are provided within a multiple-accommodation toilet room, at least one stall shall comply with Items 2 and 3, and at least one additional stall shall be 36 inches (914 mm) wide with an outward swinging self-closing door and parallel grab bars complying with Sections 1115B.8.2, 1115B.8.3 and 1115B.8.4.</u></p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not provide the same level of specificity as ADAAG. Adopt ADAAG language as follows:</p>	<p>Accessible water closet compartment. A water closet fixture located in a compartment shall provide a minimum 28 inch-wide (711 mm) clear space from a fixture or a minimum 32 inch-wide (813 mm) clear space from a wall at one side of the water closet. The other side of the water closet shall provide 18 inches (457 mm) from the centerline of the water closet to the wall. The stall shall be a minimum of 60-inches (1524 mm) wide. A minimum 48-inch-long (1219 mm) clear space shall be provided in front of the water closet if the compartment has an end-opening door (facing the water closet). <u>The door shall be located in front of the clear space and diagonal to the water closet, with a maximum stile width of 4 in (100 mm).</u> A minimum 60 67 inch-long (1524 mm) clear space shall be provided in a compartment with the door located at the side. Grab bars shall not project more than 3 inches (76 mm) into the clear spaces as specified above.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Added section 1115B.7.1.5 for completeness.</p> <p>DSA's proposed revision meets the ADA. However, the required width and depth of a toilet stall needs to be clearer. For example, the requirement for a 28 inch or a 32 inch wide clear space does not specify a depth for the required clearance. The depth of the clearance can be obstructed if the toilet compartment is an irregular shape or had a column in a corner. Similarly, the requirement for a 48 inch and a 67 inch long clear space should specify a width for the required clearance.</p> <p>Also, for clarity the revision should specify that the 67 inch long clear space is in front of the water closet. Also, section 1115B.7.1.3 should reference Figures Figure 11B-1A, 11B-1B.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>Figure 30 of the ADA Standards. Toilet Stalls.</p> <p>30(a) Standard Stall. The minimum width of the stall is 60 in (1525 mm). The centerline of the water closet is 18 in (455 mm) from the side wall. The location of the door is in front of the clear space and diagonal to the water closet, with a maximum stile width of 4 in (100 mm). An alternate door location is permitted to be on the adjacent side of the stall also diagonal to the water closet with a maximum stile width of 4 in (100 mm). The minimum width of the standard stall shall be 60 in (1525 mm). If a wall mounted water closet is used, the depth of the stall is required to be a minimum of 56 in (1420 mm). If a floor mounted water closet is used, the depth of the stall is required to be a minimum of 59 in (1500 mm). A grab bar at least 36 in (965 mm) long shall be located behind the water closet, with one end no further than 6 in (150 mm) from the inside corner of the stall. Another grab bar shall extend at least 52 in (1320 mm) along the side wall, with one end no more than 12 in (305 mm) from the back wall.</p> <p>30(a-1) Standard Stall (end of row). If a standard stall is provided at the end of a row of stalls, and if the length of the stall is extended at least a minimum of 36 in (915 mm) beyond the required minimum length, the door (if located on the side of the stall) may swing into the stall. Two grab bars are located in the rear and the side of the water closet.</p>	Figure 11B-1A 11B-1B	Refer to code.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Figures do not include some of the graphic elements in ADAAG Figure 30. Revise graphic per attachment.	See attached graphic.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	DSA's proposed revision does not meet the ADA because Figure 11B-1B needs to include the new revised dimension of 67 inch, not 60 inch, long clear space in front of the water closet.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>Figure 30 of the ADA Standards.</p> <p>30(b) Alternate Stalls. Two alternate stalls are permitted; one alternate stall is required to be 36 in (915 mm) wide. The other alternate stall is required to be a minimum of 48 in (1220 mm) wide. In either alternate stall, if a wall mounted water closet is used, the depth of the stall is required to be a minimum of 66 in (1675 mm). If a floor mounted water closet is used, the depth of the stall is required to be a minimum of 69 in (1745 mm). The 36 in (915 mm) wide stall shall have parallel grab bars on the side walls. The 48 in (1220 mm) minimum stall shall have a grab bar behind the water closet and one on the side wall next to the water closet. Grab bars are mounted 33-36 in (840-915 mm) above the finish floor. In both alternate stalls, the centerline of the water closet is 18 in (455 mm) from a side wall. In both alternate stalls, the grab bars along the sides of the water closets shall extend at least 54 in (1370 mm) from the back wall and shall have one end no further than 12 in (305 mm) from the back wall.</p>	Figure 11B-1A 11B-1B	Refer to code.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment Title 24 does not allow use of the ADAAG alternate stalls.	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Not Addressed, but DOJ agrees with DSA that no action is required.
<p>30(c) Rear Wall of Standard Stall. Grab bars located behind the water closet shall be at least 36 in (915 mm) in length. All grab bars shall be located 33-36 in (840-915 mm) above the finish floor.</p>	Figure 11B-1A	Refer to code.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 contains no equivalent graphic. Adopt rear wall elevation.	See attached graphic.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>30(d) Side Walls. Side grab bars shall be located 33-36 in (840-915 mm) above the finish floor and shall be no more than 12 in (305 mm) from the rear wall. Grab bars shall be at least 40 in (1015 mm) long or at least 42 in (1065 mm) long for alternate stalls. Water closet seat heights shall be between 17 in (430 mm) and 19 in (485 mm). Toilet paper dispensers shall be below the grab bar and at least 19 in (485 mm) above the floor and no further than 36 in (915 mm) from the rear wall.</p>	Figure 11B-1A	Refer to code.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 graphics do not include specific ADAAG dimensions. Revise graphics to include dimensions in ADAAG figure 30 (d).	See attached graphic.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>4.17.4 Toe Clearances. In standard stalls, the front partition and at least one side partition shall provide a toe clearance of at least 9 in (230 mm) above the floor. If the depth of the stall is greater than 60 in (1525 mm), then the toe clearance is not required.</p>	1115B.7.1 3.	<p>Accessible water closet compartment. A water closet fixture located in a compartment shall provide a minimum 28 inch-wide (711 mm) clear space from a fixture or a minimum 32 inch-wide (813 mm) clear space from a wall at one side of the water closet. The other side of the water closet shall provide 18 inches (457 mm) from the centerline of the water closet to the wall. The stall shall be a minimum of 60-inches (1524 mm) wide.</p> <p>A minimum 48-inch-long (1219 mm) clear space shall be provided in front of the water closet if the compartment has an end-opening door (facing the water closet). A minimum 60-inch-long (1524 mm) clear space shall be provided in a compartment with the door located at the side. Grab bars shall not project more than 3 inches (76 mm) into the clear spaces as specified above.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment California standard stalls provide a minimum of 60" depth; therefore 9 inch toe clearance not required.	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.17.5* Doors. Toilet stall doors, including door hardware, shall comply with 4.13. If toilet stall approach is from the latch side of the stall door, clearance between the door side of the stall and any obstruction may be reduced to a minimum of 42 in (1065 mm) (Fig. 30).	1115B.7.1 4.	<p>Compartment doors. Water closet compartment shall be equipped with a door that has an automatic-closing device, and shall have a clear, unobstructed opening width of 32 inches (813 mm) when located at the end and 34 inches (864 mm) when located at the side with the door positioned at an angle of 90 degrees from its closed position. When standard compartment doors are used, with a minimum 9-inch (229 mm) clearance for footrests underneath and a self-closing device, clearance at the strike edge as specified in Section 1133B.2.4.3 is not required.</p> <p>The inside and outside of the compartment door shall be equipped with a loop or U-shaped handle immediately below the latch. The latch shall be flip-over style, sliding, or other hardware not requiring the user to grasp or twist. Except for door-opening widths and door swings, a clear, unobstructed access of not less than 44 inches (1118 mm) shall be provided to water closet compartments designed for use by persons with disabilities and the space immediately in front of a water closet compartment shall not be less than 48 inches (1219 mm) as measured at right angles to compartment door in its closed position.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.17.6 Grab Bars. Grab bars complying with the length and positioning shown in Fig. 30(a), (b), (c), and (d) shall be provided. Grab bars may be mounted with any desired method as long as they have a gripping surface at the locations shown and do not obstruct the required clear floor area. Grab bars shall comply with 4.26.	1115B.8.1	<p>Location. Grab bars located on each side, or one side and the back of the accessible toilet stall or compartment, shall be securely attached 33 inches (838 mm) above and parallel to the floor, except that where a tank-type toilet is used which obstructs placement at 33 inches (838 mm), the grab bar may be as high as 36 inches (914 mm). Grab bars shall be at least 42 inches (1067 mm) long with the front end positioned 24 inches (610 mm) in front of the water closet stool. Grab bars at the back shall not be less than 36 inches (914 mm) long. See Figures 11B-1A, 11B-1B and 11B-1C.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Section 1115B.8.1 does not meet the ADA because it needs to specify that 1 and 1/2 inch of space is required between the grab bar and the top of tank. Also, section 1115B.8.1 should delete the reference to Figure 11B-1C because DSA has proposed to delete this figure.
4.18 Urinals. 4.18.1 General. Accessible urinals shall comply with 4.18.	1115B.9.4	<p>Urinals. Where urinals are provided, at least one shall have a clear floor space 30 inches by 48 inches (762 mm by 1219 mm) in front of the urinal to allow forward approach. This clear space shall comply with Section 1118B.4.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.18.2 Height. Urinals shall be stall-type or wall-hung with an elongated rim at a maximum of 17 in (430 mm) above the finish floor.	1115B.2.1.1.1	Urinals shall be floor mounted or wall hung. Where one or more wall hung urinals are provided, at least one with a rim projecting a minimum of 14 inches (356 mm) from the wall and at a maximum of 17 inches (432 mm) from the wall and at a maximum of 17 inches (432 mm) above the floor shall be provided.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment ADAAG does not allow floor-mounted urinals. Title 24 does not include the term elongated when describing the projection requirement. Adopt ADAAG language as follows.	Urinals shall be floor mounted stall-type or wall hung. Where one or more wall hung urinals are provided, at least one with an <u>elongated</u> rim projecting a minimum of 14 inches (356 mm) from the wall and at a maximum of 17 inches (432 mm) from the wall and at a maximum of 17 inches (432 mm) above the floor shall be provided.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision to delete the phrase "floor mounted" is not necessary because ADA's stall-type urinals refers to floor mounted urinals.
4.18.3 Clear Floor Space. A clear floor space 30 in by 48 in (760 mm by 1220 mm) shall be provided in front of urinals to allow forward approach. This clear space shall adjoin or overlap an accessible route and shall comply with 4.2.4. Urinal shields that do not extend beyond the front edge of the urinal rim may be provided with 29 in (735 mm) clearance between them.	1115B.9.4	Where urinals are provided, at least one shall have a clear floor space 30 inches by 48 inches (762 mm by 1219 mm) in front of the urinal to allow forward approach. This clear space shall comply with Section 1118B.4.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 requires 30 inches clear in front of urinal whether or not shields are present.	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	1118B.4	<p>Clear Floor or Ground Space for Wheelchairs.</p> <p>1. Size and approach. The minimum clear floor or ground space required to accommodate a single, stationary wheelchair and occupant is 30 inches by 48 inches (762 mm by 1219 mm). The minimum clear floor or ground space for wheelchairs may be positioned for forward or parallel approach to an object. Clear floor or ground space for wheelchairs may be part of the knee space required under some objects. See Figure 11B-5A</p> <p>2. Relationship of maneuvering clearances to wheelchair spaces. One full unobstructed side of the clear floor or ground space for a wheelchair shall adjoin or overlap an accessible route or adjoin another wheelchair clear floor space. If a clear floor space is located in an alcove or otherwise confined on all or a part of three sides, additional maneuvering clearances shall be provided as shown in Figure 11B-5A (b). See Figure 11B-5A.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.		
4.18.4 Flush Controls. Flush controls shall be hand operated or automatic, and shall comply with 4.27.4, and shall be mounted no more than 44 in (1120 mm) above the finish floor.	1115.2.1.1.2	Flush controls shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist and shall be mounted no more than 44 inches (1118 mm) above the floor. The force required to activate controls shall be no greater than 5 lbf (22.2 N). Electronic automatic flushing controls are acceptable and preferable.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.19 Lavatories and Mirrors. 4.19.1 General. The requirements of 4.19 shall apply to lavatory fixtures, vanities, and built-in lavatories.	None	None	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment For reference only.	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Not Addressed, but DOJ agrees with DSA that no action is required.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.19.2 Height and Clearances. Lavatories shall be mounted with the rim or counter surface no higher than 34 in (865 mm) above the finish floor. Provide a clearance of at least 29 in (735 mm) above the finish floor to the bottom of the apron. Knee and toe clearance shall comply with Fig. 31.</p> <p>Figure 31 of the ADA Standards. Lavatory Clearances The minimum knee clearance must be free of equipment or obstructions for a minimum of 8 in (205 mm) extending from the front edge of the lavatory back toward the wall. This knee clearance must be 29 in (735 mm) high at the front of the lavatory and no less than 27 in (685 mm) high at a point 8 in (205 mm) back. In addition, a minimum 9 in (230 mm) high toe clearance must be provided extending back toward the wall to a distance no more than 6 in (150 mm) from the back wall. The toe clearance space must be free of equipment or obstructions.</p>	<p>1115B.2.1.2 1115B.2.1.2.1</p>	<p><u>Accessible lavatories.</u></p> <p><u>Faucet controls and operating mechanisms shall be operable with one hand in accordance with Chapter 11B of the California Building Code and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5lbf (22.2N). Lever-operated, push-type and electronically controlled mechanisms (preferable) are examples of acceptable designs. Self-closing valves are allowed if the faucet remains open for at least 10 seconds.</u></p> <p>Lavatories, when located adjacent to a side wall or partition, shall be a minimum of 18 inches (457 mm) to the center line of the fixture. All lavatories that are designated to be accessible shall be mounted with the rim or counter edge no higher than 34 inches (864 mm) above the finished floor and with vertical clearance measured from the bottom of the apron or the outside bottom edge of the lavatory of 29 inches (737 mm) reducing to 27 inches (686 mm) at a point located 8 inches (203 mm) back from the front edge.</p> <p>Knee clearance below the lavatory shall extend a minimum of 30 inches (762 mm) in width by 17 inches (432 mm) in depth. See Figure 11B –1D - Knee Clearance.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not cover toe clearances or the maximum depth of required knee clearances. Adopt ADAAG language as follows.</p>	<p>Lavatories, when located adjacent to a side wall or partition, shall be a minimum of 18 inches (457 mm) to the center line of the fixture. All lavatories that are designated to be accessible shall be mounted with the rim or counter edge no higher than 34 inches (864 mm) above the finished floor and with vertical clearance measured from the bottom of the apron or the outside bottom edge of the lavatory of 29 inches (737 mm) reducing to 27 inches (686 mm) at a point located 8 inches (203 mm) back from the front edge. <u>In addition, a minimum 9 in (230 mm) high toe clearance must be provided extending back toward the wall to a distance no more than 6 in (150 mm) from the back wall. The toe clearance space must be free of equipment or obstructions.</u></p> <p>Knee clearance below the lavatory shall extend a minimum of 30 inches (762 mm) in width by 17 inches (432 mm) <u>and 19 in (485 mm) maximum</u> in depth. See Figure 11B –1D - Knee Clearance.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Added additional text for completeness.</p> <p>DSA's revision meets the ADA, but for clarity it needs additional language about the clear floor space at lavatories. Also, Figure 11B-1D needs to change 34 inch min to 34 inch max.</p>
<p>4.19.3 Clear Floor Space. A clear floor space 30 in by 48 in (760 mm by 1220 mm) complying with 4.2.4 shall be provided in front of a lavatory to allow forward approach. Such clear floor space shall adjoin or overlap an accessible route and shall extend a maximum of 19 in (485 mm) underneath the lavatory (see Fig. 32).</p> <p>Figure 32 of the ADA Standards. Clear Floor Space at Lavatories.</p>	<p>1115B.9.1</p>	<p>Lavatory fixtures. The requirements of this subsection shall apply to lavatory fixtures, vanities and built-in lavatories.</p> <p>1. A clear floor space 30 inches by 48 inches (762 mm by 1219 mm) complying with Section 1118B.4 shall be provided in front of a lavatory to allow a forward approach. Such clear floor space shall adjoin or overlap an accessible route and shall extend into knee and toe space underneath the lavatory.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 language does not include 19" maximum. Adopt ADAAG language.</p>	<p>Lavatory fixtures. The requirements of this subsection shall apply to lavatory fixtures, vanities and built-in lavatories.</p> <p>1. A clear floor space 30 inches by 48 inches (762 mm by 1219 mm) complying with Section 1118B.4 shall be provided in front of a lavatory to allow a forward approach. Such clear floor space shall adjoin or overlap an accessible route and shall <u>extend a maximum of 19 in (485 mm)</u> into knee and toe space underneath the lavatory.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>DSA's proposed revision meets the ADA, but it needs to reference Figure 11B-1D.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
The minimum depth of the lavatory is 17 in (430 mm).	1115B.2.1.2.1	Knee clearance below the lavatory shall extend a minimum of 30 inches in width by 17 inches in depth. See Figure 11B-1D.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 language does not include 19" maximum. Adopt ADAAG language.	Knee clearance below the lavatory shall extend a minimum of 30 inches (762 mm) in width by 17 inches (432 mm) <u>and 19 inches maximum</u> in depth. See Figure 11B –1D - Knee Clearance	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Refer to comments above in section 4.19.2 of the ADA Standards.
	Figure 11B-1D	Refer to code.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 plan view shows 19" minimum, where ADAAG requires 19" maximum. Revise graphic to conform to ADAAG.	See attached graphic.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Figure 11B-1D meets ADA but the dimension 34 inch min needs to be 34 inch max.
4.19.4 Exposed Pipes and Surfaces. Hot water and drain pipes under lavatories shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories.	1115B.2.1.2.2	Hot water and drainpipes accessible under lavatories shall be insulated or otherwise covered. There shall be no sharp or abrasive surfaces under lavatories.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.19.5 Faucets. Faucets shall comply with 4.27.4. Lever-operated, push-type, and electronically controlled mechanisms are examples of acceptable designs. If self-closing valves are used the faucet shall remain open for at least 10 seconds.	1115B.2.1.2.1	<p>Faucet controls and operating mechanisms shall be operable with one hand in accordance with Chapter 11B of the California Building Code and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2 N). Lever-operated, push-type and electronically controlled mechanisms (preferable) are examples of acceptable designs. Self-closing valves are allowed if the faucet remains open for at least 10 seconds.</p> <p><u>Lavatories, when located adjacent to a side wall or partition, shall be a minimum of 18 inches (457 mm) to the center line of the fixture. All lavatories that are designated to be accessible shall be mounted with the rim or counter edge no higher than 34 inches (864 mm) above the finished floor and with vertical clearance measured from the bottom of the apron or the outside bottom edge of the lavatory of 29 inches (737 mm) reducing to 27 inches (686 mm) at a point located 8 inches (203 mm) back from the front edge.</u></p> <p><u>Knee clearance below the lavatory shall extend a minimum of 30 inches (762 mm) in width by 17 inches (432 mm) in depth. See Figure 11B –1D - Knee Clearance.</u></p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added additional language for completeness
4.19.6* Mirrors. Mirrors shall be mounted with the bottom edge of the reflecting surface no higher than 40 in (1015 mm) above the finish floor (see Fig. 31).	1115B.9 1115B.9.1.2	<p>Toilet Room Fixtures and Accessories.</p> <p>Mirrors shall be mounted with the bottom edge no higher than 40 inches (1016 mm) from the floor.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Section 1115B.9.1.2 meets the ADA, but it needs to specify that the 40 inch dimension is measured from the bottom edge of the reflecting surface.
4.20 Bathtubs. 4.20.1 General. Accessible bathtubs shall comply with 4.20.	1115B.6.1	Bathtubs. Bathtubs required to be accessible shall comply with this section.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.20.2 Floor Space. Clear floor space in front of bathtubs shall be as shown in Fig. 33.	1115B.6.1.1	Floor space. Clear floor space at bathtubs shall be as shown in Figure 11B-8.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>Figure 33 of the ADA Standards. Clear Floor Space at Bathtubs.</p> <p>33(a) With Seat in Tub. If the approach is parallel to the bathtub, a 30 in (760 mm) minimum width by 60 in (1525 mm) minimum length clear space is required alongside the bathtub. If the approach is perpendicular to the bathtub, a 48 in (1220 mm) minimum width by 60 in (1525 mm) minimum length clear space is required. An accessible lavatory is permitted within the clear space at the foot end of the tub.</p> <p>33(b) With Seat at Head of Tub. If the approach is parallel to the bathtub, a 30 in (760 mm) minimum width by 75 in (1905 mm) minimum length clear space is required alongside the bathtub. The seat width shall be 15 in (380 mm), measured from the back wall to the front of the seat, and shall extend the full width of the tub. An accessible lavatory is permitted within the clear space at the foot end of the tub.</p>	Figure 11B-8	Refer to Code.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.20.3 Seat. An in-tub seat or a seat at the head end of the tub shall be provided as shown in Fig. 33 and 34. The structural strength of seats and their attachments shall comply with 4.26.3. Seats shall be mounted securely and shall not slip during use.	1115B.6.1 2.	Seat. An in-tub seat or a seat at the head end of the tub shall be provided as shown in Figures 11B-8 and 11B-9B. The structural strength of seats and their attachments shall comply with Section 1115B.8.3. Seats shall be mounted securely and shall not slip during use.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	Figure 11B-9B	Refer to code.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Figure (b) does not include a seat. Revise graphic to conform to ADAAG.	See attached graphic.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.20.4 Grab Bars. Grab bars complying with 4.26 shall be provided as shown in Fig. 33 and 34.	1115B.6.1 3.	Grab bars. Grab bars complying with Sections 1115B.8.2, 1115B.8.3 and 1115B.8.4 shall be provided as shown in Figures 11B-9A and 11B-9B.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>Figure 34 of the ADA Standards. Grab Bars at Bathtubs.</p> <p>34(a) With Seat in Tub. At the foot of the tub, the grab bar shall be 24 in (610 mm) minimum in length measured from the outer edge of the tub. On the back wall, two grab bars are required. The grab bars mounted on the back (long) wall shall be a minimum 24 in (610 mm) in length located 12 in (305 mm) maximum from the foot of the tub and 24 in (610 mm) maximum from the head of the tub. One grab bar on the back wall shall be located 9 in (230 mm) above the rim of the tub. The other shall be 33 to 36 in (840 mm to 915 mm) above the bathroom floor. At the head of the tub, the grab bar shall be a minimum of 12 in (305 mm) in length measured from the outer edge of the tub.</p> <p>34(b) With Seat at Head of Tub. At the foot of the tub, the grab bar shall be a minimum of 24 in (610 mm) in length measured from the outer edge of the tub. On the back wall, two grab bars are required. The grab bars mounted on the back wall shall be a minimum of 48 in (1220 mm) in length located a maximum of 12 in (305 mm) from the foot of the tub and a maximum of 15 in (380 mm) from the head of the tub. Heights of grab bars are as described above. No horizontal grab bar should be placed at the head of the tub.</p>	<p>Figures 11B-9A and 11B-9B.</p>	<p>Refer to code</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Figure 11B-9B does not include dimension for grab bars mounted 9" above the tub rim. The length of the grab bar at the head of the tub should read 12" minimum, not maximum. Revise graphic to conform to ADAAG.</p>	<p>See attached graphic.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>4.20.5 Controls. Faucets and other controls complying with 4.27.4 shall be located as shown in Fig. 34.</p> <p>Figure 34 of the ADA Standards. Grab Bars at Bathtubs.</p> <p>Controls are required to be located in an area between the open edge and the midpoint of the tub ("offset") and to be located at the foot of the tub.</p>	<p>1115B.6.1 4.</p>	<p>Controls. Faucets and other controls shall be located as shown in Figure 11B-9B. They shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 pounds (22.2 N).</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
	<p>Figure 11B-9B</p>	<p>Refer to code.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.20.6 Shower Unit. A shower spray unit with a hose at least 60 in (1525 mm) long that can be used both as a fixed showerhead and as a hand-held shower shall be provided.	1115B.6.1 5. 1115B.2.1.4	Shower unit. A shower spray unit with a hose at least 60 inches (1524 mm) long that can be used both as a fixed shower head and as a hand-held shower shall be provided. <u>Accessible bathtubs. Bathtubs shall be provided with a shower spray unit having a hose at least 60 inches (1524 mm) long that can be used as a shower. Bathtub enclosures, if provided, shall not obstruct controls or transfer from wheelchair onto bathtub seats or into tubs. Enclosures on bathtubs shall not have tracks mounted on their rims.</u> <u>NOTE: See the California Building Code, Chapter 11B, for bathtubs in living accommodations.</u>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1115B.2.1.4. The note in section 1115B.2.1.4 is unclear. Please clarify the meaning and application of this note.
4.20.7 Bathtub Enclosures. If provided, enclosures for bathtubs shall not obstruct controls or transfer from wheelchairs onto bathtub seats or into tubs. Enclosures on bathtubs shall not have tracks mounted on their rims.	1115B.6.1 6.	Bathtub enclosures. If provided, enclosures for bathtubs shall not obstruct controls or transfer from wheelchairs onto bathtub seats or into tubs. Enclosures on bathtubs shall not have tracks mounted on their rims.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.21 Shower Stalls. 4.21.1* General. Accessible shower stalls shall comply with 4.21.	1115B.6.2	Showers. Showers shall conform to the following requirements.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.21.2 Size and Clearances. Except as specified in 9.1.2, shower stall size and clear floor space shall comply with Fig. 35(a) or (b). The shower stall in Fig. 35(a) shall be 36 in by 36 in (915 mm by 915 mm). Shower stalls required by 9.1.2 shall comply with Fig. 57(a) or (b). The shower stall in Fig. 35(b) will fit into the space required for a bathtub. Figure 35 of the ADA Standards. Shower Size and Clearances. 35(a) 36 in by 36 in (915 mm by 915 mm) Stall (Transfer Shower). The clear floor space shall be a minimum of 48 in (1220 mm) in length by a minimum of 36 in (915 mm) in width and allow for a parallel approach. The clear floor space shall extend 12 in (305 mm) beyond the shower wall on which the seat is mounted. 35(b) 30 in by 60 in (760 mm by 1525 mm)	1115B.6.2.1	Size. Showers shall be 60 inches (1524 mm) minimum in width between wall surfaces and 30 inches (762 mm) minimum in depth with a full opening width on the long side, or 42 inches (1067 mm) in width between wall surfaces and 48 inches (1219 mm) minimum in depth with an entrance opening of 42 inches (1067 mm). As an alternative, showers 60 inches (1524 mm) minimum in width may be 36 inches (914 mm) minimum in depth as long as the entrance opening width is a minimum 36 inches (914 mm).	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not reference clearances and clear floor space at showers. Title 24 does not include references to graphics in code. Revise section as follows.	<u>Size and Clearances.</u> Showers shall be 60 inches (1524 mm) minimum in width between wall surfaces and 30 inches (762 mm) minimum in depth with a full opening width on the long side, or 42 inches (1067 mm) in width between wall surfaces and 48 inches (1219 mm) minimum in depth with an entrance opening of 42 inches (1067 mm). As an alternative, showers 60 inches (1524 mm) minimum in width may be 36 inches (914 mm) minimum in depth as long as the entrance opening width is a minimum 36 inches (914 mm). <u>Showers shall comply with figures 11B-2A and 11B-2B</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	DSA's proposed revision does not meet the ADA because Figures 11B-2A and 11B-2B do not include proper clear floor space requirements.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>Stall (Roll-in Shower). The clear floor space alongside the shower shall be a minimum of 60 in (1220 mm) in length by a minimum of 36 in (915 mm) in width. If the controls are located on the back (long) wall, they must be a maximum of 27 in (685 mm) from a side wall. An accessible lavatory may be located in the clear floor space at the end of the shower.</p>	<p>1115B.6.3</p> <p>Figure 11B-2C</p>	<p><u>Open showers. When no separate shower compartments are provided, the shower for persons with disabilities shall be located in a corner with L-shaped grab bars extending along two adjacent walls with a folding seat adjacent to the shower controls. See Figures 11B-2A, 11B-2B, 11B-2C and 11B-2D.</u></p> <p><u>Refer to code.</u></p>	<p><input type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>		<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Added section 1115B.6.3 and Figure 11B-2C for completeness.</p> <p>Section 1115B.6.3 and Figure 11B-2C should not be compared to section 4.21.2 of the ADA Standards because section 4.21.2 of the ADA Standards addresses transfer and roll-in showers and not open showers. But Figure 11B-2C should include the 38 inch maximum dimension for the control area similar to Figure 37 of the ADA Standards.</p>
	<p>Figure 11B-2A</p>	<p>Refer to code.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 Roll in shower "A" does not include 36" x 60" clear space in front. Include on graphic.</p>	<p>See attached graphic</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>4.21.3 Seat. A seat shall be provided in shower stalls 36 in by 36 in (915 mm by 915 mm) and shall be as shown in Fig. 36. The seat shall be mounted 17 in to 19 in (430 mm to 485 mm) from the bathroom floor and shall extend the full depth of the stall. In a 36 in by 36 in (915 mm by 915 mm) shower stall, the seat shall be on the wall opposite the controls. Where a fixed seat is provided in a 30 in by 60 in minimum (760 mm by 1525 mm) shower stall, it shall be a folding type and shall be mounted on the wall adjacent to the controls as shown in Fig. 57. The structural strength of seats and their attachments shall comply with 4.26.3.</p> <p>Figure 36 of the ADA Standards. Shower Seat Design. An L-shaped shower seat shall be provided, extending the full depth of the stall. The seat</p>	<p>1115B.6.2.4.5</p>	<p>Shower fixtures. Shower accessories shall include:</p> <p>1. A folding seat located within 27 inches (686 mm) of the controls mounted 18 inches (457 mm) above the floor, and with a minimum space of 1 inch (25 mm) and maximum space of 1-1/2 inches (38 mm) allowed between the edge of the seat and any wall. When folded, the seat shall not extend more than 6 inches (152 mm) from the mounting wall. See Figures 11B-2A, 11B-2B, 11B-2C and 11B-2D.</p> <p><u>2. Grab bars located on walls adjacent to and opposite the seat. Grab bars also comply with the diameter, loading and projection requirements of Sections 1115B.8.2, 1115B.8.3 and 1115B.8.4. Grab bars shall be mounted between a minimum of 33 inches (838 mm) and a maximum of 36 inches (914 mm) above the shower floor with an L-shaped grab bar mounted on walls opposite and adjacent to the front edge of the seat, but not extended to include that portion of wall over the seat. See Figure 11B-2A or 11B-2B.</u></p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p> <p>Title 24 does not provide the same level of specificity as ADAAG. Adopt ADAAG language as follows:</p>	<p>Shower fixtures. Shower accessories shall include:</p> <p>1. A folding seat located within 27 inches (686 mm) of the controls mounted 18 inches (457 mm) above the floor, and with a minimum space of 1 inch (25 mm) and maximum space of 1-1/2 inches (38 mm) allowed between the edge of the seat and any wall. When folded, the seat shall not extend more than 6 inches (152 mm) from the mounting wall. <u>See The seat dimensions and mounting positions shall comply with Figures 11B-2A, 11B-2B, 11B-2C and 11B-2D. The structural strength of seats and their attachments shall comply with 1115B.8.3.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Added item 2 in section 1115B.6.2.4.5 for completeness.</p> <p>DSA's proposed revision meets the ADA but the referenced figures need to include the 38 inch maximum dimension for the control area similar to Figure 37 of the ADA Standards. Also, the referenced figures require that controls be located within 24 inches of the folding seat and section 1115B.6.2.4.5 requires controls to be located within 27 inches of the folding seat. Please clarify.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>shall be located 1-1/2 in (38 mm) maximum from the wall. The front of the seat (nearest to the opening) shall extend a maximum 16 in (330 mm) from the wall. The back of the seat (against the back wall) shall extend a maximum of 23 in (582 mm) from the side wall and shall be a maximum of 15 in (305 mm) deep.</p>	Figure 11B-2A	Refer to code.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Graphic depicting shower seat should include the language "full width of stall", rather than 36" minimum. Revise graphic.	See attached graphic.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	Figure 11B-2B	Refer to code.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Graphic depicting shower seat does not include seat dimensions. Revise graphic.	See attached graphic.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Refer to comments above in section 4.21.2 of the ADA Standards.
4.21.4 Grab Bars. Grab bars complying with 4.26 shall be provided as shown in Fig. 37.	1115B.6.2.4.5	<p>Shower fixtures. Shower accessories shall include:</p> <p><u>1. A folding seat located within 27 inches (686 mm) of the controls mounted 18 inches (457 mm) above the floor, and with a minimum space of 1 inch (25 mm) and maximum space of 1-1/2 inches (38 mm) allowed between the edge of the seat and any wall. When folded, the seat shall not extend more than 6 inches (152 mm) from the mounting wall. See Figures 11B-2A, 11B-2B, 11B-2C and 11B-2D.</u></p> <p>2. Grab bars located on walls adjacent to and opposite the seat. Grab bars also comply with the diameter, loading and projection requirements of Sections 1115B.8.2, 1115B.8.3 and 1115B.8.4. Grab bars shall be mounted between a minimum of 33 inches (838 mm) and a maximum of 36 inches (914 mm) above the shower floor with an L-shaped grab bar mounted on walls opposite and adjacent to the front edge of the seat, but not extended to include that portion of wall over the seat. See Figure 11B-2A or 11B-2B.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>Added item 1 in section 1115B.6.2.4.5 for completeness.</p> <p>Refer to comments above in section 4.21.2 of the ADA Standards.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>Figure 37 of the ADA Standards. Grab Bars at Shower Stalls.</p> <p>37(a) 36 in by 36 in (915 mm by 915 mm) Transfer Stall. An L-shaped grab bar shall be provided, located along the full depth of the control wall (opposite the seat) and halfway (18 in (455 mm)) along the back wall. The grab bar shall be mounted 33-36 in (840-915 mm) above the shower floor.</p> <p>37(b) 30 in by 60 in (760 mm by 1525 mm) Roll-in Stall. A U-shaped grab bar that wraps around the stall shall be provided. The grab bar shall be 33-36 in (840-915 mm) high.</p>	Figure 11B-2A	Refer to code.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Refer to comments above in section 4.21.2 of the ADA Standards.
	Figure 11B-2B	Refer to code.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Graphic depicting grab bar does not include 18" minimum dimension on L-bar return. Revise to include ADAAG dimension.	See attached graphic.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Refer to comments above in section 4.21.2 of the ADA Standards.
4.21.5 Controls. Faucets and other controls complying with 4.27.4 shall be located as shown in Fig. 37. In shower stalls 36 in by 36 in (915 mm by 915 mm), all controls, faucets, and the shower unit shall be mounted on the side wall opposite the seat.	1115B.2.1.3.1 <u>1115B.6.2.4</u> <u>1115B.6.2.4.1</u>	Water controls of a single-lever design shall be located on the sidewall opposite the seat and operable with a maximum force of 5-lbf (22.2 N). The controls shall be located 40 inches (1016 mm) [plus or minus 1-inch (25-mm) tolerance] above the shower floor. <u>Accessories. Shower accessories shall include: Water controls. Water controls of a single-lever design shall be located on the side wall of the compartment adjacent to the seat and operable with a maximum force of 5 lb (22.2N) mounted at 40 inches (1016 mm) [plus or minus 1 inch (25 mm) tolerance] above the shower floor, and the centerline of the controls shall be within a reach range of no less than 18 inches (457 mm) and no more than 24 inches (610 mm) from the rear edge of the seat.</u>	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not reference a specific location for the controls. Revise section as follows.	Water controls of a single-lever design shall be located on the sidewall opposite the seat and operable with a maximum force of 5-lbf (22.2 N). The controls shall be located 40 inches (1016 mm) [plus or minus 1-inch (25-mm) tolerance] above the shower floor <u>and placed as shown in Figures 11B-2A and 11B-2B.</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Added section 1115B.6.2.4.1 for completeness. Section 1115B.6.2.4.1 should also reference Figures 11B-2A and 11B-2B. Also, sections 1115B.2.1.3.1 and 1115B.6.2.4 and Figures 11B-2A and 11B-2B should include requirements that are consistent with each other and section 4.21.5 of the ADA.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>Figure 37 of the ADA Standards. Grab Bars at Shower Stalls.</p> <p>37(a) 36 in by 36 in (915 mm by 915 mm) Transfer Stall. The controls shall be placed in an area between 38-48 in (965-1220 mm) above the floor. The controls and spray unit shall be within 18 in (455 mm) of the front of the shower.</p> <p>37(b) 30 in by 60 in (760 mm by 1525 mm) Roll-in Stall. The controls shall be placed in an area between 38-48 in (965-1220 mm) above the floor. Controls shall be located on the back (long) wall 27 in (685 mm) from the side wall. The shower head and control area may be located on the back wall or on either side wall.</p>	Figure 11B-2B	Refer to code.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 requires position of the controls at 46" maximum at the sidewall of the shower, which provides equivalent or greater access. There is no minimum height specified. Revise figure to include 38" minimum dimension.	See attached graphic.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Refer to comments above in section 4.21.5 of the ADA Standards.
	Figure 11B-2A		<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 specifies no minimum height specified. Revise figure to include 38" minimum dimension.	See attached graphic.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Refer to comments above in section 4.21.5 of the ADA Standards.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.21.6 Shower Unit. A shower spray unit with a hose at least 60 in (1525 mm) long that can be used both as a fixed shower head and as a hand-held shower shall be provided.</p> <p>EXCEPTION: In unmonitored facilities where vandalism is a consideration, a fixed shower head mounted at 48 in (1220 mm) above the shower floor may be used in lieu of a hand-held shower head.</p>	<p>1115B.6.2.4.2</p> <p><u>1115B.2.1.3.2</u></p>	<p>Hand-held sprayer unit. A flexible hand-held sprayer unit with a hose at least 60 inches (1524 mm) long shall be provided within reach range of the seat at a distance not to exceed 27 inches (686 mm) horizontally measured from the rear seat edge to the centerline of the mounting bracket. This unit shall be mounted at a maximum height of 48 inches (1219 mm) [plus or minus 1 inch (25 mm) tolerance] above the shower floor.</p> <p><u>A flexible handheld shower unit with a hose at least 60 inches (1524 mm) long shall be provided with head mounting height of 48 inches (1219 mm) [plus or minus 1 inch (25 mm) tolerance] maximum above the shower floor.</u></p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not include language stating spray unit can be used as a fixed shower head. Adopt ADAAG language as follows.</p>	<p>Hand-held sprayer unit. A flexible hand-held sprayer unit with a hose at least 60 inches (1524 mm) long <u>that can be used both as a fixed shower head and as a hand-held shower</u> shall be provided within reach range of the seat at a distance not to exceed 27 inches (686 mm) horizontally measured from the rear seat edge to the centerline of the mounting bracket. This unit shall be mounted at a maximum height of 48 inches (1219 mm) [plus or minus 1 inch (25 mm) tolerance] above the shower floor.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Added sections 1115B.2.1.3.2 for completeness.</p>
	<p>1115B.6.2.4.3</p> <p><u>1115B.2.1.3.3</u></p>	<p>Sprayer unit alternative. Except within guest rooms and suites in hotels, motels and similar transient lodging establishments where accessible shower facilities are provided in areas subject to excessive vandalism, in lieu of providing the fixed flexible hose, two wall-mounted shower heads shall be installed. Each shower head shall be installed so that it can be operated independently of the other and shall have swivel angle adjustments, both vertically and horizontally. One shower head shall be located at a height of 48 inches (1219 mm) [plus or minus 1 inch (25 mm) tolerance] above the floor.</p> <p><u>Where shower facilities for persons with disabilities are provided in areas subject to excessive vandalism, in lieu of providing the fixed flexible hose and handheld showerhead required above two wall-mounted showerheads shall be installed. Each showerhead shall be controlled so that it can be operated independently of the other and shall have swivel angle adjustment, both vertically and horizontally. One showerhead shall be located at a height of 40 inches (1016 mm) [plus or minus 1 inch (25 mm) tolerance] above the floor</u></p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>ADAAG does not specify a tolerance of plus or minus one inch. Delete Title 24 language.</p>	<p>Sprayer unit alternative. Except within guest rooms and suites in hotels, motels and similar transient lodging establishments where accessible shower facilities are provided in areas subject to excessive vandalism, in lieu of providing the fixed flexible hose, two wall-mounted shower heads shall be installed. Each shower head shall be installed so that it can be operated independently of the other and shall have swivel angle adjustments, both vertically and horizontally. One shower head shall be located at a height of 48 inches (1219 mm) [plus or minus 1 inch (25 mm) tolerance] above the floor.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Added section 1115B.2.1.3.3 for completeness.</p> <p>DSA's proposed revision meets the ADA. Section 1115B.2.1.3.3 also contains alternative sprayer unit requirements. DSA should delete the 1 inch tolerance language from section 1115B.2.1.3.3. Also, the mounting height in section 1115B.2.1.3.3 should be 48 inches above the floor.</p>
<p>4.21.7 Curbs. If provided, curbs in shower stalls 36 in by 36 in (915 mm by 915 mm) shall be no higher than 1/2 in (13 mm). Shower stalls that are 30 in by 60 in (760 mm by 1525 mm) minimum shall not have curbs.</p>	<p>1115B.6.2.2</p>	<p>Thresholds. When a threshold or recessed drop is permitted, it shall be a maximum of 1/2 inch (13 mm) in height and shall be beveled or sloped at an angle not exceeding 45 degrees (100 percent gradient) from the horizontal.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.21.8 Shower Enclosures. If provided, enclosures for shower stalls shall not obstruct controls or obstruct transfer from wheelchairs onto shower seats.	1115B.6.2.5	Enclosures. Enclosures, when provided for shower stalls, shall not obstruct transfer from wheelchairs onto shower seats. NOTE: See Figures 11B-2A, 11B-2B, 11B-2C and 11B-2D.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not reference controls. Adopt ADAAG language as follows.	Enclosures. Enclosures, when provided for shower stalls, <u>shall not obstruct controls or</u> obstruct transfer from wheelchairs onto shower seats. NOTE: See Figures 11B-2A, 11B-2B, 11B-2C and 11B-2D.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.22 Toilet Rooms. 4.22.1 Minimum Number. Toilet facilities required to be accessible by 4.1 shall comply with 4.22. Accessible toilet rooms shall be on an accessible route.	1115B.1	General. Sanitary facilities that serve buildings, facilities or portions of buildings or facilities that are required by these standards to be accessible to persons with disabilities, shall conform to the following requirements, except as specifically exempted in other portions of this code.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not specify that sanitary facilities must be located on an accessible route. Adopt ADAAG language/ delete Title 24 language as follows.	General. Sanitary facilities that serve buildings, facilities or portions of buildings or facilities that are required by these standards to be accessible to persons with disabilities, <u>shall be on an accessible route and</u> shall conform to the following requirements, except as specifically exempted in other portions of this code.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.22.2 Doors. All doors to accessible toilet rooms shall comply with 4.13. Doors shall not swing into the clear floor space required for any fixture.	1115B.4	Passageways. Passageways leading to sanitary facilities shall have a clear access. All doorways leading to such sanitary facilities shall have:	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not pick up all the ADAAG requirements for doors. Adopt language as follows.	Passageways. Passageways leading to sanitary facilities shall have a clear access. All doorways leading to such sanitary facilities shall have; comply with section 1133B.2 Doors. Doors shall not swing into the clear floor space required for any fixture.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	1115B.4.1	Clear opening. A clear unobstructed opening width of 32 inches (813 mm).	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Delete Title 24 section.	Clear opening. A clear unobstructed opening width of 32 inches (813 mm).	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	1115B.4.2	Level area. A level and clear area for a minimum depth of 60 inches (1524 mm) in the direction of the door swing as measured at right angles to the plane of the door in its closed position, and 44 inches (1118 mm) where the door swings away from the level and clear area. The width of the level area on the side to which the door swings shall extend 24 inches (610 mm) past the strike edge of the door for exterior doors and 18 inches (457 mm) past the strike edge for interior doors.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Delete Title 24 section.	Level area. A level and clear area for a minimum depth of 60 inches (1524 mm) in the direction of the door swing as measured at right angles to the plane of the door in its closed position, and 44 inches (1118 mm) where the door swings away from the level and clear area. The width of the level area on the side to which the door swings shall extend 24 inches (610 mm) past the strike edge of the door for exterior doors and 18 inches (457 mm) past the strike edge for interior doors.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	1115B.7.1 2.	Clear space at fixtures. Doors shall not swing into the floor space required for any fixture.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.22.3* Clear Floor Space. The accessible fixtures and controls required in 4.22.4, 4.22.5, 4.22.6, and 4.22.7 shall be on an accessible route. An unobstructed turning space complying with 4.2.3 shall be provided within an accessible toilet room. The clear floor space at fixtures and controls, the accessible route, and the turning space may overlap.	1115B.4	Passageways. Passageways leading to sanitary facilities shall have a clear access. All doorways leading to such sanitary facilities shall have:	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not pick up all the ADAAG requirement that fixtures and controls be located on an accessible route. Adopt language as follows.	Passageways. Passageways leading to sanitary facilities shall have a clear access. All doorways leading to such sanitary facilities shall have; comply with section 1133B.2 Doors. Doors shall not swing into the clear floor space required for any fixture. <u>Accessible fixtures and controls shall be on an accessible route.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	1115B.7.1 1.	Wheelchair clearance. A clear space measured from the floor to a height of 27 inches (686 mm) above the floor, within the sanitary facility room, of sufficient size to inscribe a circle with a diameter not less than 60 inches (1524 mm), or a clear space 56 inches by 63 inches (1422 mm by 1600 mm) in size. Other than the door to the accessible water closet compartment, a door in any position, may encroach into this space by not more than 12 inches (305 mm).	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment ADAAG does not allow an encroachment into the clear space. Revise Title 24 language as follows.	Wheelchair clearance. A clear space measured from the floor to a height of 27 inches (686 mm) above the floor, within the sanitary facility room, of sufficient size to inscribe a circle with a diameter not less than 60 inches (1524 mm), or a clear space 56 inches by 63 inches (1422 mm by 1600 mm) in size. Other than the door to the accessible water closet compartment, a door in any position, may <u>not</u> encroach into this space by not more than 12 inches (305 mm).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Section 4.22.3 of the ADA Standards requires a turning space of 60 inches in diameter or a T-shaped space (refer to Figure 3 of the ADA Standards). Section 1115B.7.1 1 should not allow a turning space of 56 by 63 inches.
	1115B.7.2	Single-accommodation toilet facilities. There shall be sufficient space in the toilet room for a wheelchair measuring 30 inches (762 mm) wide by 48 inches (1219 mm) long to enter the room and permit the door to close. There shall be in the room a clear floor space of at least 60 inches (1524 mm) in diameter, or a T-shaped space complying with Figure 11B-12 (a) and (b). No door shall encroach into this space for more than 12 inches (305 mm) except for the panel door to any water closet compartment if there is one. (See Figure 11B-1A). The water closet shall be located in a space which provides a minimum 28-inch-wide (711 mm) clear space from a fixture or a minimum 32-inch-wide (813 mm) clear space from a wall at one side. The other side shall provide 18 inches (457 mm) from the centerline of the water closet to the wall. A minimum 48 inches (1219 mm) of clear space shall be provided in front of the water closet. All doors, fixtures and controls shall be on an accessible route. The minimum clear width of an accessible route shall be 36 inches (914 mm) except at doors (see Section 1133B.2). If a person in a wheelchair must make a turn around an obstruction, the minimum clear width of the accessible route shall be as shown in Figure 11B-5E. (See also Figure 11B-1A.)	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment ADAAG does not allow an encroachment into the clear space. Revise Title 24 language as follows.	Single-accommodation toilet facilities. There shall be sufficient space in the toilet room for a wheelchair measuring 30 inches (762 mm) wide by 48 inches (1219 mm) long to enter the room and permit the door to close. There shall be in the room a clear floor space of at least 60 inches (1524 mm) in diameter, or a T-shaped space complying with Figure 11B-12 (a) and (b). No door shall encroach into this space for more than 12 inches (305 mm) except for the panel door to any water closet compartment if there is one. (See Figure 11B-1A). The water closet shall be located in a space which provides a minimum 28-inch-wide (711 mm) clear space from a fixture or a minimum 32-inch-wide (813 mm) clear space from a wall at one side. The other side shall provide 18 inches (457 mm) from the centerline of the water closet to the wall. A minimum 48 inches (1219 mm) of clear space shall be provided in front of the water closet. All doors, fixtures and controls shall be on an accessible route. The minimum clear width of an accessible route shall be 36 inches (914 mm) except at doors (see Section 1133B.2). If a person in a wheelchair must make a turn around an obstruction, the minimum clear width of the accessible route shall be as shown in Figure 11B-5E. (See also Figure 11B-1A.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	DSA's proposed revision does not meet the ADA because section 1115B.7.2 does not prohibit all doors in toilet rooms from swinging into the clear floor space at fixtures.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.22.4 Water Closets. If toilet stalls are provided, then at least one shall be a standard toilet stall complying with 4.17; where 6 or more stalls are provided, in addition to the stall complying with 4.17.3, at least one stall 36 in (915 mm) wide with an outward swinging, self-closing door and parallel grab bars complying with Fig. 30(d) and 4.26 shall be provided. Water closets in such stalls shall comply with 4.16. If water closets are not in stalls, then at least one shall comply with 4.16.</p>	1115B.7.1	<p>Multiple-accommodation toilet facilities. Multiple-accommodation toilet facilities shall have the following: NOTE: See definition in Chapter 2.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1115B.7.1 3.	<p>Accessible water closet compartment. A water closet fixture located in a compartment shall provide a minimum 28 inch-wide (711 mm) clear space from a fixture or a minimum 32 inch-wide (813 mm) clear space from a wall at one side of the water closet. The other side of the water closet shall provide 18 inches (457 mm) from the centerline of the water closet to the wall. The stall shall be a minimum of 60-inches (1524 mm) wide. <u>A minimum 48-inch-long (1219 mm) clear space shall be provided in front of the water closet if the compartment has an end-opening door (facing the water closet). A minimum 60-inch-long (1524 mm) clear space shall be provided in a compartment with the door located at the side. Grab bars shall not project more than 3 inches (76 mm) into the clear spaces as specified above.</u></p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Added additional text from section 1115B.7.1.3 for completeness.</p> <p>Refer to comments above in section 4.17.3 of the ADA Standards.</p>
	1115B.7.1 5.	<p>Large toilet rooms. Where six or more stalls are provided within a multiple-accommodation toilet room, at least one stall shall comply with Items 2 and 3, and at least one additional stall shall be 36 inches (914 mm) wide with an outward swinging self-closing door and parallel grab bars complying with Sections 1115B.8.2, 1115B.8.3 and 1115B.8.4.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.22.5 Urinals. If urinals are provided, then at least one shall comply with 4.18.	1115B.2.1.1.1 1115B.2.1.1.2 1115B.9.4	Urinals shall be floor mounted or wall hung. Where one or more wall hung urinals are provided, at least one with a rim projecting a minimum of 14 inches (356 mm) from the wall and at a maximum of 17 inches (432 mm) from the wall and at a maximum of 17 inches (432 mm) above the floor shall be provided. <u>Flush controls shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist and shall be mounted no more than 44 inches (1118 mm) above the floor. The force required to activate controls shall be no greater than 5 lbf (22.2 N). Electronic automatic flushing controls are acceptable and preferable.</u> <u>Where urinals are provided, at least one shall have a clear floor space 30 inches by 48 inches (762 mm by 1219 mm) in front of the urinal to allow forward approach. This clear space shall comply with Section 1118B.4.</u>	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment ADAAG does not allow a floor-mounted urinal. Delete Title 24 language as follows.	Urinals shall be floor mounted or wall hung. Where one or more wall hung urinals are provided, at least one with a rim projecting a minimum of 14 inches (356 mm) from the wall and at a maximum of 17 inches (432 mm) from the wall and at a maximum of 17 inches (432 mm) above the floor shall be provided.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added sections 1115B.2.1.1.2 and 1115B.9.4 for completeness. DSA's proposed revision to delete the phrase "floor mounted" is not necessary because section 4.18.2 of the ADA Standards' reference to stall-type urinals refers to floor mounted urinals.
4.22.6 Lavatories and Mirrors. If lavatories and mirrors are provided, then at least one of each shall comply with 4.19.	None	No equivalent section	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Although contained in chapter 11B. Adopt new section as follows.	<u>Lavatories, Mirrors and Towel Fixtures. At least one accessible lavatory shall be provided within any toilet facility. Where mirrors and towel fixtures are provided at least one of each shall be accessible.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA but this new section should reference sections 1115B.2.1.2 and 1115B.9.
4.22.7 Controls and Dispensers. If controls, dispensers, receptacles, or other equipment are provided, then at least one of each shall be on an accessible route and shall comply with 4.27.	1117B.6.1	General. Controls and operating mechanisms required to be accessible by Section 101.17.11 shall comply with the requirements of this section.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1115B.9.2	Towel, sanitary napkins, waste receptacles. Where towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type shall be located with all operable parts, including coin slots, within 40 inches (1016 mm) from the finished floor.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Section 1115B.9.2 should reference section 1117B.6.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.23 Bathrooms, Bathing Facilities, and Shower Rooms.</p> <p>4.23.1 Minimum Number. Bathrooms, bathing facilities, or shower rooms required to be accessible by 4.1 shall comply with 4.23 and shall be on an accessible route.</p>	1115B.1	General. Sanitary facilities that serve buildings, facilities or portions of buildings or facilities that are required by these standards to be accessible to persons with disabilities, shall conform to the following requirements, except as specifically exempted in other portions of this code.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Modify section to conform to Title 24 chapter heading "Bathing and Toilet Facilities".	General. Sanitary <u>Bathing and Toilet</u> facilities that serve buildings, facilities or portions of buildings or facilities that are required by these standards to be accessible to persons with disabilities, shall conform to the following requirements, except as specifically exempted in other portions of this code.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	<u>1104B.4.5</u>	<u>Sanitary and locker facilities. Where spectator and/or participant sanitary and/or locker facilities are provided, they shall conform with the requirements in Section 1115B and 1116B.</u>			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1104B.4.5.
	<u>1104B.5.7</u>	<u>Restrooms. Restrooms and powder rooms shall conform to requirements in Section 1115B.</u>			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1104B.5.7.
4.23.2 Doors. Doors to accessible bathrooms shall comply with 4.13. Doors shall not swing into the floor space required for any fixture.	See 4.22.2	See 4.22.2	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	Modify per recommendations.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Refer to comments above in section 4.22.2 of the ADA Standards.
4.23.3* Clear Floor Space. The accessible fixtures and controls required in 4.23.4, 4.23.5, 4.23.6, 4.23.7, 4.23.8, and 4.23.9 shall be on an accessible route. An unobstructed turning space complying with 4.2.3 shall be provided within an accessible bathroom. The clear floor spaces at fixtures and controls, the accessible route, and the turning space may overlap.	1115B.1	General. Sanitary facilities that serve buildings, facilities or portions of buildings or facilities that are required by these standards to be accessible to persons with disabilities, shall conform to the following requirements, except as specifically exempted in other portions of this code.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG language into new Title 24 section as follows.	General. Sanitary <u>Bathing and Toilet</u> facilities that serve buildings, facilities or portions of buildings or facilities that are required by these standards to be accessible to persons with disabilities, shall conform to the following requirements, except as specifically exempted in other portions of this code. <u>The accessible fixtures and controls required in this chapter shall be on an accessible route. An unobstructed turning space complying with sections 1115B.7.1.1 or 1115B.7.2 shall be provided within an accessible toilet facility. The clear floor spaces at fixtures and controls, the accessible route, and the turning space may overlap.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.23.4 Water Closets. If toilet stalls are provided, then at least one shall be a standard toilet stall complying with 4.17; where 6 or more stalls are provided, in addition to the stall complying with 4.17.3, at least one stall 36 in (915 mm) wide with an outward swinging, self-closing door and parallel grab bars complying with Fig. 30(d) and 4.26 shall be provided. Water closets in such stalls shall comply with 4.16. If water closets are not in stalls, then at least one shall comply with 4.16.</p>	<p>1115B.7.1</p> <p>1115B.7.1 3.</p>	<p>Multiple-accommodation toilet facilities. Multiple-accommodation toilet facilities shall have the following:</p> <p>Accessible water closet compartment. A water closet fixture located in a compartment shall provide a minimum 28 inch-wide (711 mm) clear space from a fixture or a minimum 32 inch-wide (813 mm) clear space from a wall at one side of the water closet. The other side of the water closet shall provide 18 inches (457 mm) from the centerline of the water closet to the wall. The stall shall be a minimum of 60-inches (1524 mm) wide. A minimum 48-inch-long (1219 mm) clear space shall be provided in front of the water closet if the compartment has an end-opening door (facing the water closet). A minimum 60 inch-long (1524 mm) clear space shall be provided in a compartment with the door located at the side. Grab bars shall not project more than 3 inches (76 mm) into the clear spaces as specified above.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Refer to comments above in section 4.17.3 of the ADA Standards.</p>
	<p>1115B.7.1 5.</p>	<p>Large toilet rooms. Where six or more stalls are provided within a multiple-accommodation toilet room, at least one stall shall comply with Items 2 and 3, and at least one additional stall shall be 36 inches (914 mm) wide with an outward swinging self-closing door and parallel grab bars complying with Sections 1115B.8.2, 1115B.8.3 and 1115B.8.4.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>4.23.5 Urinals. If urinals are provided, then at least one shall comply with 4.18.</p>	<p><u>1115B.2.1.1.1</u></p> <p><u>1115B.2.1.1.2</u></p> <p>1115B.9.4</p>	<p><u>Urinals shall be floor mounted or wall hung. Where one or more wall hung urinals are provided, at least one with a rim projecting a minimum of 14 inches (356 mm) from the wall and at a maximum of 17 inches (432 mm) from the wall and at a maximum of 17 inches (432 mm) above the floor shall be provided.</u></p> <p><u>Flush controls shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist and shall be mounted no more than 44 inches (1118 mm) above the floor. The force required to activate controls shall be no greater than 5 lbf (22.2 N). Electronic automatic flushing controls are acceptable and preferable.</u></p> <p>Where urinals are provided, at least one shall have a clear floor space 30 inches by 48 inches (762 mm by 1219 mm) in front of the urinal to allow forward approach. This clear space shall comply with Section 1118B.4.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Added sections 1115B.2.1.1.1 and 1115B.2.1.1.2 for completeness.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.23.6 Lavatories and Mirrors. If lavatories and mirrors are provided, then at least one of each shall comply with 4.19.	1115B.9.1 1.	Lavatory fixtures. The requirements of this subsection shall apply to lavatory fixtures, vanities and built-in lavatories. A clear floor space 30 inches by 48 inches (762 mm by 1219 mm) complying with Section 1118B.4 shall be provided in front of a lavatory to allow a forward approach. Such clear floor space shall adjoin or overlap an accessible route and shall extend into knee and toe space underneath the lavatory.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Refer to comments above in section 4.19.3 of the ADA Standards.
	1115B.9.1 2.	Mirrors shall be mounted with the bottom edge no higher than 40 inches (1016 mm) from the floor.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Refer to comments above in section 4.19.6 of the ADA Standards.
4.23.7 Controls and Dispensers. If controls, dispensers, receptacles, or other equipment are provided, then at least one of each shall be on an accessible route and shall comply with 4.27.	1115B.9.2	Towel, sanitary napkins, waste receptacles. Where towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type shall be located with all operable parts, including coin slots, within 40 inches (1016 mm) from the finished floor.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment ADAAG provides more specificity regarding controls and dispensers. Adopt ADAAG language as follows.	Towel, sanitary napkins, waste receptacles, <u>controls and dispensers</u> . Where towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type shall be located with all operable parts, including coin slots, within 40 inches (1016 mm) from the finished floor. <u>If controls, dispensers, receptacles, or other equipment are provided, then at least one of each shall be on an accessible route and shall comply with Controls and Operating Mechanisms shall comply with section 1117B.6.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA but the added sentence should be rewritten to avoid any confusion about the 40 inch height requirement and the section 1117B.6 requirement.
4.23.8 Bathing and Shower Facilities. If tubs or showers are provided, then at least one accessible tub that complies with 4.20 or at least one accessible shower that complies with 4.21 shall be provided.	1115B.6	Bathing Facilities. Where facilities for bathing are provided for the public, clients or employees, including showers, bathtubs or lockers, at least one such facility, and not less than 1 percent of all facilities, shall conform to the following standards unless specifically exempted by other portions of these regulations.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not provide the same level of specificity as ADAAG. Adopt ADAAG language as follows.	Bathing <u>and Shower</u> Facilities. Where facilities for bathing are provided for the public, clients or employees, including showers, bathtubs or lockers , at least one <u>accessible tub or accessible shower and support facilities such as lockers such facility</u> , and not less than 1 percent of all facilities, shall conform to the following standards unless specifically exempted by other portions of these regulations .	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA but we recommend another version of the revision. Refer to the technical assistance letter.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.23.9* Medicine Cabinets. If medicine cabinets are provided, at least one shall be located with a usable shelf no higher than 44 in (1120 mm) above the floor space. The floor space shall comply with 4.2.4.	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG language into Title section 1115B.9.1 2. as follows.	<u>Medicine Cabinets. If medicine cabinets are provided, at least one shall be located with a usable shelf no higher than 44 in (1120 mm) above the floor space.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA but the new provision should be included as section 1115B.9.1.3 and include a reference to section 1118B.4 for clear floor space requirements.
4.24 Sinks. 4.24.1 General. Sinks required to be accessible by 4.1 shall comply with 4.24.	1114B.1.1	General. When accessibility is required by this chapter, it shall be designed and constructed to meet the minimum requirements of the following sections: Chapter 11B. Accessibility; Division I, New Buildings; Division II, Site Accessibility; Division III, Accessibility for Entrances, Exits and Paths of Travel; and Division IV, Accessibility for Existing Buildings Entrances — [for HCD 1/AC] Section 1120A.1; [for DSA/AC] Section 1133B Doors — [for HCD 1/AC] Section 1120A.2; [for DSA/AC] Section 1133B.2 Corridors — [for HCD 1/AC] Section 1120A.3; [for DSA/AC] Section 1133B.3 Stairways — [for HCD 1/AC] Section 1120A.4; [for DSA/AC] Section 1133B.4 Ramps — [for HCD 1/AC] Section 1120A.5; [for DSA/AC] Section 1133B.5 Aisles — [for DSA/AC] Section 1133B.6 Walks and Sidewalks — [for HCD 1/AC] Section 1120A.7; [for DSA/AC] Section 1133B.7 Hazards — [for HCD 1/AC] Section 1120A.7; [for DSA/AC] Section 1133B.8 Elevators — [for HCD 1/AC] Section 3003 Special Wheelchair Lifts — [for HCD 1/AC] Section 1110A.2; [for DSA/AC] Section 1116B.2 Alarms — Chapter 35. See also Part 3, California Electrical Code.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 section 1114B.1.1 does not contain a reference sinks covered under Bathing and Toilet Facilities Add reference as follows.	General. When accessibility is required by this chapter, it shall be designed and constructed to meet the minimum requirements of the following sections: Chapter 11B. Accessibility; Division I, New Buildings; Division II, Site Accessibility; Division III, Accessibility for Entrances, Exits and Paths of Travel; and Division IV, Accessibility for Existing Buildings Entrances — [for HCD 1/AC] Section 1120A.1; [for DSA/AC] Section 1133B Doors — [for HCD 1/AC] Section 1120A.2; [for DSA/AC] Section 1133B.2 Corridors — [for HCD 1/AC] Section 1120A.3; [for DSA/AC] Section 1133B.3 <u>Bathing and Toilet Facilities – [for DSA/AC] section 1115B</u> Stairways — [for HCD 1/AC] Section 1120A.4; [for DSA/AC] Section 1133B.4 Ramps — [for HCD 1/AC] Section 1120A.5; [for DSA/AC] Section 1133B.5 Aisles — [for DSA/AC] Section 1133B.6 Walks and Sidewalks — [for HCD 1/AC] Section 1120A.7; [for DSA/AC] Section 1133B.7 Hazards — [for HCD 1/AC] Section 1120A.7; [for DSA/AC] Section 1133B.8 Elevators — [for HCD 1/AC] Section 3003 Special Wheelchair Lifts — [for HCD 1/AC] Section 1110A.2; [for DSA/AC] Section 1116B.2 Alarms — Chapter 35. See also Part 3, California Electrical Code.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.24.2 Height. Sinks shall be mounted with the counter or rim no higher than 34 in (865 mm) above the finish floor.	1115B.2.1.6 1115B.2.1.6.1	Accessible sinks. Accessible Kitchen Sinks. Faucet controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be not greater than 5 lbf (22.2 N). Lever-operated controls shall be greater than 5 pound-force (lbf) (22.2 N) Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs. Self-closing valves are allowed if the faucet remains open for at least 10 seconds.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not specify heights for kitchen sinks in public accommodations and commercial facilities. Adopt ADAAG language as follows.	Accessible Kitchen Sinks. <u>Sinks shall be mounted with the counter or rim no higher than 34 in (865 mm) above the finish floor.</u> Faucet controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be not greater than 5 lbf (22.2 N). Lever-operated controls shall be greater than 5 pound-force (lbf) (22.2 N) Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs. Self-closing valves are allowed if the faucet remains open for at least 10 seconds.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA but section 1115B.2.1.6.1 allows the force needed to activate a "lever-operated" control to be greater than 5 lbf. DSA should prohibit the allowance of force amounts greater than 5 lbf.
	1115B.2.1.6.2	Noncommercial Kitchen and Counter Bar Sinks. Kitchen and counter bar sinks located in common use areas shall have faucet controls and operating mechanisms operable with one hand in accordance with Chapter 11B of the California Building Code and shall not require grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2 N). Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs. NOTE: See the California Building Code, Chapter 11B. This Diagram illustrates the specific requirements of the regulations and is intended only as an aid for building and construction.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not specify heights for Noncommercial Kitchen and Counter Bar Sinks in public accommodations and commercial facilities. Adopt ADAAG language as follows.	Noncommercial Kitchen and Counter Bar Sinks. <u>Sinks shall be mounted with the counter or rim no higher than 34 in (865 mm) above the finish floor.</u> Kitchen and counter bar sinks located in common use areas shall have faucet controls and operating mechanisms operable with one hand in accordance with Chapter 11B of the California Building Code and shall not require grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2 N). Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs. NOTE: See the California Building Code, Chapter 11B. This Diagram illustrates the specific requirements of the regulations and is intended only as an aid for building and construction.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.24.3 Knee Clearance. Knee clearance that is at least 27 in (685 mm) high, 30 in (760 mm) wide, and 19 in (485 mm) deep shall be provided underneath sinks.	1115B.2.1.6.1	Accessible Kitchen Sinks. Faucet controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be not greater than 5 lbf (22.2 N). Lever-operated controls shall be greater than 5 pound-force (lbf) (22.2 N) Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs. Self-closing valves are allowed if the faucet remains open for at least 10 seconds.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not specify knee clearance for kitchen sinks in public accommodations and commercial facilities. Adopt ADAAG language as follows.	Accessible Kitchen Sinks. <u>Knee clearance that is at least 27 in (685 mm) high, 30 in (760 mm) wide, and 19 in (485 mm) deep shall be provided underneath sinks.</u> Faucet controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be not greater than 5 pound-force (lbf) (22.2 N). Lever-operated controls shall be greater than 5 lbs (22.2 N) Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs. Self-closing valves are allowed if the faucet remains open for at least 10 seconds.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1115B.2.1.6.2	Noncommercial Kitchen and Counter Bar Sinks. Kitchen and counter bar sinks located in common use areas shall have faucet controls and operating mechanisms operable with one hand in accordance with Chapter 11B of the California Building Code and shall not require grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2 N). Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs. NOTE: See the California Building Code, Chapter 11B. This Diagram illustrates the specific requirements of the regulations and is intended only as an aid for building and construction.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not specify knee clearance for Noncommercial Kitchen and Counter Bar Sinks in public accommodations and commercial facilities. Adopt ADAAG language as follows.	Noncommercial Kitchen and Counter Bar Sinks. <u>Knee clearance that is at least 27 in (685 mm) high, 30 in (760 mm) wide, and 19 in (485 mm) deep shall be provided underneath sinks.</u> Kitchen and counter bar sinks located in common use areas shall have faucet controls and operating mechanisms operable with one hand in accordance with Chapter 11B of the California Building Code and shall not require grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2 N). Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs. NOTE: See the California Building Code, Chapter 11B. This Diagram illustrates the specific requirements of the regulations and is intended only as an aid for building and construction.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.24.4 Depth. Each sink shall be a maximum of 6-1/2 in (165 mm) deep.	1115B.2.1.2.1	Lavatories, when located adjacent to a side wall or partition, shall be a minimum of 18 inches (457 mm) to the center line of the fixture. All lavatories that are designated to be accessible shall be mounted with the rim or counter edge no higher than 34 inches (864 mm) above the finished floor and with vertical clearance measured from the bottom of the apron or the outside bottom edge of the lavatory of 29 inches (737 mm) reducing to 27 inches (686 mm) at a point located 8 inches (203 mm) back from the front edge. Knee clearance below the lavatory shall extend a minimum of 30 inches (762 mm) in width by 17 inches (432 mm) in depth. See Figure 11B –1D - Knee Clearance	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does specify a maximum depth of lavatories. Adopt ADAAG language as follows.	Lavatories, when located adjacent to a side wall or partition, shall be a minimum of 18 inches (457 mm) to the center line of the fixture. All lavatories that are designated to be accessible shall be mounted with the rim or counter edge no higher than 34 inches (864 mm) above the finished floor and with vertical clearance measured from the bottom of the apron or the outside bottom edge of the lavatory of 29 inches (737 mm) reducing to 27 inches (686 mm) at a point located 8 inches (203 mm) back from the front edge. <u>Each accessible lavatory shall be a maximum of 6-1/2 in (165 mm) deep.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1115B.2.1.6.1	Accessible Kitchen Sinks. Faucet controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be not greater than 5 lbf (22.2 N). Lever-operated controls shall be greater than 5 pound-force (lbf) (22.2 N) Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs. Self-closing valves are allowed if the faucet remains open for at least 10 seconds.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not specify the depth of kitchen sinks in public accommodations and commercial facilities. Adopt ADAAG language as follows.	Accessible Kitchen Sinks. <u>Each accessible sink shall be a maximum of 6-1/2 in (165 mm) deep.</u> Faucet controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be not greater than 5 lbf (22.2 N). Lever-operated controls shall be greater than 5 pound-force (lbf) (22.2 N) Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs. Self-closing valves are allowed if the faucet remains open for at least 10 seconds.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	1115B.2.1.6.2	<p>Noncommercial Kitchen and Counter Bar Sinks. Kitchen and counter bar sinks located in common use areas shall have faucet controls and operating mechanisms operable with one hand in accordance with Chapter 11B of the California Building Code and shall not require grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2 N). Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs.</p> <p>NOTE: See the California Building Code, Chapter 11B. This Diagram illustrates the specific requirements of the regulations and is intended only as an aid for building and construction.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not specify the depth of Noncommercial Kitchen and Counter Bar Sinks in public accommodations and commercial facilities. Adopt ADAAG language as follows.</p>	<p>Noncommercial Kitchen and Counter Bar Sinks. <u>Each accessible sink shall be a maximum of 6-1/2 in (165 mm) deep.</u> Kitchen and counter bar sinks located in common use areas shall have faucet controls and operating mechanisms operable with one hand in accordance with Chapter 11B of the California Building Code and shall not require grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2 N). Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs.</p> <p>NOTE: See the California Building Code, Chapter 11B. This Diagram illustrates the specific requirements of the regulations and is intended only as an aid for building and construction.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>4.24.5 Clear Floor Space. A clear floor space at least 30 in by 48 in (760 mm by 1220 mm) complying with 4.2.4 shall be provided in front of a sink to allow forward approach. The clear floor space shall be on an accessible route and shall extend a maximum of 19 in (485 mm) underneath the sink (see Fig. 32).</p>	1115B.2.1.6.1	<p>Accessible Kitchen Sinks. Faucet controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be not greater than 5 lbf (22.2 N). Lever-operated controls shall be greater than 5 pound-force (lbf) (22.2 N) Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs. Self-closing valves are allowed if the faucet remains open for at least 10 seconds.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not specify the clearance under sinks in public accommodations and commercial facilities. Adopt ADAAG language as follows.</p>	<p>Accessible Kitchen Sinks. <u>A clear floor space at least 30 in by 48 in (760 mm by 1220 mm) complying with 1118B.4 shall be provided in front of a sink to allow forward approach. The clear floor space shall be on an accessible route and shall extend a minimum of 17 inches and a maximum of 19 in (485 mm) underneath the sink (see Figure 11B-1D).</u> Faucet controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be not greater than 5 lbf (22.2 N). Lever-operated controls shall be greater than 5 pound-force (lbf) (22.2 N) Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs. Self-closing valves are allowed if the faucet remains open for at least 10 seconds.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>DSA's proposed revision meets the ADA but for clarity we recommend another version of the revision. Refer to the technical assistance letter.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	1115B.2.1.6.2	<p>Noncommercial Kitchen and Counter Bar Sinks. Kitchen and counter bar sinks located in common use areas shall have faucet controls and operating mechanisms operable with one hand in accordance with Chapter 11B of the California Building Code and shall not require grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2 N). Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs.</p> <p>NOTE: See the California Building Code, Chapter 11B. This Diagram illustrates the specific requirements of the regulations and is intended only as an aid for building and construction.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not specify the clearance under Noncommercial Kitchen and Counter Bar Sinks in public accommodations and commercial facilities. Adopt ADAAG language as follows.</p>	<p>Noncommercial Kitchen and Counter Bar Sinks. <u>A clear floor space at least 30 in by 48 in (760 mm by 1220 mm) complying with 1118B.4 shall be provided in front of a sink to allow forward approach. The clear floor space shall be on an accessible route and shall extend a minimum of 17 inches and a maximum of 19 in (485 mm) underneath the sink (see Figure 11B-1D).</u></p> <p>Kitchen and counter bar sinks located in common use areas shall have faucet controls and operating mechanisms operable with one hand in accordance with Chapter 11B of the California Building Code and shall not require grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2 N). Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs.</p> <p>NOTE: See the California Building Code, Chapter 11B. This Diagram illustrates the specific requirements of the regulations and is intended only as an aid for building and construction.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>DSA's proposed revision meets the ADA but for clarity we recommend another version of the revision. Refer to the technical assistance letter.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.24.6 Exposed Pipes and Surfaces. Hot water and drain pipes exposed under sinks shall be insulated or otherwise configured so as to protect against contact. There shall be no sharp or abrasive surfaces under sinks.	1115B.2.1.6.1	Accessible Kitchen Sinks. Faucet controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be not greater than 5 lbf (22.2 N). Lever-operated controls shall be greater than 5 pound-force (lbf) (22.2 N) Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs. Self-closing valves are allowed if the faucet remains open for at least 10 seconds.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not specify the insulation or covering of hot water and drain pipes under sinks in public accommodations and commercial facilities. Adopt ADAAG language as follows.	Accessible Kitchen Sinks. <u>Hot water and drain pipes exposed under sinks shall be insulated or otherwise configured so as to protect against contact. There shall be no sharp or abrasive surfaces under sinks.</u> Faucet controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be not greater than 5 lbf (22.2 N). Lever-operated controls shall be greater than 5 pound-force (lbf) (22.2 N) Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs. Self-closing valves are allowed if the faucet remains open for at least 10 seconds.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1115B.2.1.6.2	Noncommercial Kitchen and Counter Bar Sinks. Kitchen and counter bar sinks located in common use areas shall have faucet controls and operating mechanisms operable with one hand in accordance with Chapter 11B of the California Building Code and shall not require grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2 N). Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs. NOTE: See the California Building Code, Chapter 11B. This Diagram illustrates the specific requirements of the regulations and is intended only as an aid for building and construction.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not specify the insulation or covering of hot water and drain pipes under sinks Noncommercial Kitchen and Counter Bar Sinks in public accommodations and commercial facilities. Adopt ADAAG language as follows.	Noncommercial Kitchen and Counter Bar Sinks. <u>Hot water and drain pipes exposed under sinks shall be insulated or otherwise configured so as to protect against contact. There shall be no sharp or abrasive surfaces under sinks.</u> Kitchen and counter bar sinks located in common use areas shall have faucet controls and operating mechanisms operable with one hand in accordance with Chapter 11B of the California Building Code and shall not require grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2 N). Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs. NOTE: See the California Building Code, Chapter 11B. This Diagram illustrates the specific requirements of the regulations and is intended only as an aid for building and construction.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.24.7 Faucets. Faucets shall comply with 4.27.4. Lever-operated, push-type, touch-type, or electronically controlled mechanisms are acceptable designs.	1115B.2.1.6.1	Accessible Kitchen Sinks. Faucet controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be not greater than 5 lbf (22.2 N). Lever-operated controls shall be greater than 5 pound-force (lbf) (22.2 N) Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs. Self-closing valves are allowed if the faucet remains open for at least 10 seconds.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Section 1115B.2.1.6.1 does not meet the ADA because it allows lever-operated controls to have a force greater than 5 lbf.
	1115B.2.1.6.2	Noncommercial Kitchen and Counter Bar Sinks. Kitchen and counter bar sinks located in common use areas shall have faucet controls and operating mechanisms operable with one hand in accordance with Chapter 11B of the California Building Code and shall not require grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2 N). Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs. NOTE: See the California Building Code, Chapter 11B. This Diagram illustrates the specific requirements of the regulations and is intended only as an aid for building and construction.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.25 Storage. 4.25.1 General. Fixed storage facilities such as cabinets, shelves, closets, and drawers required to be accessible by 4.1 shall comply with 4.25.	1125B.1 <u>1110B.2.2</u>	General. If fixed storage facilities such as cabinets, shelves, closets or drawers are provided where access is required by Section 101.17.11, at least one of each type shall comply with this section. Additional storage may be provided outside of the reach ranges shown in Figure 11B-5D. <u>Storage areas. The doorway providing access to all such areas shall not be less than 32 inches (813 mm) in clear width. Storage areas shall be made accessible in the number and dimensions provided in Section 1125B.</u>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1110B.2.2.
4.25.2 Clear Floor Space. A clear floor space at least 30 in by 48 in (760 mm by 1220 mm) complying with 4.2.4 that allows either a forward or parallel approach by a person using a wheelchair shall be provided at accessible storage facilities.	1125B.2	Clear Floor Space. A clear floor space at least 30 inches by 48 inches (762 mm by 1219 mm) complying with Section 1118B.4 that allows either a forward or parallel approach by a person using a wheelchair shall be provided at accessible storage facilities.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.25.3 Height. Accessible storage spaces shall be within at least one of the reach ranges specified in 4.2.5 and 4.2.6 (see Fig. 5 and Fig. 6). Clothes rods or shelves shall be a maximum of 54 in (1370 mm) above the finish floor for a side approach. Where the distance from the wheelchair to the clothes rod or shelf exceeds 10 in (255 mm) (as in closets without accessible doors) the height and depth to the rod or shelf shall comply with Fig. 38(a) and Fig. 38(b).</p> <p>Figure 38 of the ADA Standards. Storage Shelves and Closets.</p> <p>38(a) Shelves. If the clear floor space allows a parallel approach by a person in a wheelchair and the distance between the wheelchair and the shelf exceeds 10 in (255 mm), the maximum high side reach shall be 48 in (1220 mm) above the floor and the low side reach shall be a minimum of 9 in (230 mm) above the floor. The shelves can be adjustable. The maximum distance from the user to the middle of the shelf shall be 21 in (535 mm).</p> <p>38(b) Closets. If the clear floor space allows a parallel approach by a person in a wheelchair and the distance between the wheelchair and the clothes rod exceeds 10 in (255 mm), the maximum high side reach shall be 48 in (1220 mm). The maximum distance from the user to the clothes rod</p>	1125B.3	Height. Accessible storage spaces shall be within at least one of the reach ranges specified in Sections 1118B.5 and 1118B.6. Clothes rods shall be a maximum of 54 inches (1372 mm) from the floor for a side approach (See Figure 11B-5D). Where the distance from the wheelchair to the clothes rod or shelf exceeds 10 inches (254 mm), as in closets without accessible doors, the height and depth to the rod or shelf shall comply with Figure 11B-5D.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	Figure 11B-5D (a)	Refer to code.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 graphic does not include ADAAG information. Modify to include ADAAG information.	See attached graphic.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
shall be 21 in (535 mm).	Figure 11B-5D (b)	Refer to code.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 graphic does not include ADAAG information. Modify to include ADAAG information.	See attached graphic.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.25.4 Hardware. Hardware for accessible storage facilities shall comply with 4.27.4. Touch latches and U-shaped pulls are acceptable.	1125B.4	Hardware. Hardware for accessible storage facilities shall comply with Section 1117B.6. Touch latches and U-shaped pulls are acceptable.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.26 Handrails, Grab Bars, and Tub and Shower Seats. 4.26.1* General. All handrails, grab bars, and tub and shower seats required to be accessible by 4.1, 4.8, 4.9, 4.16, 4.17, 4.20 or 4.21 shall comply with 4.26.	1115B.8	Grab Bars	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Modify Title 24 section to include reference to tub and shower seats.	<u>Grab Bars, Tub and Shower Seats. All grab bars, tub and shower seats shall comply with this section.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1133B.4.1 <u>1133B.5.5</u>	Handrail. <u>Handrails for ramps.</u>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added heading for section 1133B.5.5 for completeness.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.26.2* Size and Spacing of Grab Bars and Handrails. The diameter or width of the gripping surfaces of a handrail or grab bar shall be 1-1/4 in to 1-1/2 in (32 mm to 38 mm), or the shape shall provide an equivalent gripping surface. If handrails or grab bars are mounted adjacent to a wall, the space between the wall and the grab bar shall be 1-1/2 in (38 mm) (see Fig. 39(a), (b), (c), and (e)). Handrails may be located in a recess if the recess is a maximum of 3 in (75 mm) deep and extends at least 18 in (455 mm) above the top of the rail (see Fig. 39(d)).	1133B.4.2.6.1	The handgrip portion of handrails shall be not less than 1-1/4 inches (32 mm) nor more than 1-1/2 inches (38 mm) in cross-sectional nominal dimension or the shape shall provide an equivalent gripping surface. The handgrip portion of handrails shall have a smooth surface with no sharp corners. Gripping surfaces (top or sides) shall be uninterrupted by newel posts, other construction elements or obstructions. Any wall or other surface adjacent to the handrail shall be free of sharp or abrasive elements. Edges shall have a minimum radius of 1/8 inch (3.2 mm).	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1133B.4.2.5 <u>1133B.5.5.1</u>	<p>Handrails projecting from a wall shall have a space of 1-1/2 inches (38 mm) between the wall and the handrail. Handrails may be located in a recess if the recess is a maximum of 3 inches (76 mm) deep and extends at least 18 inches (457 mm) above the top of the rail. Handrails shall not rotate in their fittings.</p> <p><u>... Handrails projecting from a wall shall have a space of not less than 1-1/2 inches (38 mm) between the wall and the handrail. Handrails may be located in a recess if the recess is a maximum of 3 inches (76 mm) deep and extends at least 18 inches (457 mm) above the top of the rail. The grip portion shall not be less than 1-1/4 inches (32 mm) nor more than 1-1/2 inches (38 mm), or the shape shall provide an equivalent gripping surface and all surfaces shall be smooth with no sharp corners. Handrails shall not rotate within their fittings. Any wall or other surface adjacent to the handrail shall be free of sharp or abrasive elements. Edges shall have a minimum radius of 1/8 inch (3 mm)....</u></p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1133B.5.5.1 for completeness.
	1115B.8.2	Diameter or width. The diameter or width of the gripping surfaces of a grab bar shall be 1-1/4 inches to 1-1/2 inches (32 mm to 38 mm) or the shape shall provide an equivalent gripping surface. If grab bars are mounted adjacent to a wall, the space between the wall and the grab bars shall be 1 1/2 inches (38 mm). See Figure 11B-1C.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Section 1115B.8.2 meets the ADA but it references Figure 11B-C, which is entitled "Equivalent Facilitation for Existing Buildings Only." Please clarify.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.26.3 Structural Strength. The structural strength of grab bars, tub and shower seats, fasteners, and mounting devices shall meet the following specification:</p> <p>(1) Bending stress in a grab bar or seat induced by the maximum bending moment from the application of 250 lbf (1112N) shall be less than the allowable stress for the material of the grab bar or seat.</p> <p>(2) Shear stress induced in a grab bar or seat by the application of 250 lbf (1112N) shall be less than the allowable shear stress for the material of the grab bar or seat. If the connection between the grab bar or seat and its mounting bracket or other support is considered to be fully restrained, then direct and torsional shear stresses shall be totaled for the combined shear stress, which shall not exceed the allowable shear stress.</p> <p>(3) Shear force induced in a fastener or mounting device from the application of 250 lbf (1112N) shall be less than the allowable lateral load of either the fastener or mounting device or the supporting structure, whichever is the smaller allowable load.</p> <p>(4) Tensile force induced in a fastener by a direct tension force of 250 lbf (1112N) plus the maximum moment from the application of 250 lbf (1112N) shall be less than the allowable withdrawal load between the fastener and the supporting structure.</p> <p>(5) Grab bars shall not rotate within their fittings.</p>	1115B.8.3	<p>Structural strength. The structural strength of grab bars, tub and shower seats, fasteners, and mounting devices shall meet the following specifications:</p> <p>1. Bending stress in a grab bar or seat induced by the maximum bending moment from the application of a 250–pound (1112 N) point load shall be less than the allowable stress for the material of the grab bar or seat.</p> <p>2. Shear stress induced in a grab bar or seat by the application of a 250–pound (1112 N) point load shall be less than the allowable shear stress for the material of the grab bar or seat, and its mounting bracket or other support is considered to be fully restrained, then direct and torsional shear stresses shall not exceed the allowable shear stress.</p> <p>3. Shear force induced in fastener or mounting device from the application of a 250–pound (1112 N) point load shall be less than the allowable lateral load of either the fastener or mounting device or the supporting structure, whichever is the smaller allowable load.</p> <p>4. Tensile force induced in a fastener by a direct tension force of a 250–pound (1112 N) point load, plus the maximum moment from the application of a 250–pound (1112 N) point load, shall be less than the allowable withdrawal load between the fastener and supporting structure.</p> <p>5. Grab bars shall not rotate within their fittings.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.26.4 Eliminating Hazards. A handrail or grab bar and any wall or other surface adjacent to it shall be free of any sharp or abrasive elements. Edges shall have a minimum radius of 1/8 in (3.2 mm).	1133B.4.2.6.1 1133B.5.5.1	The handgrip portion of handrails shall be not less than 1-1/4 inches (32 mm) nor more than 1-1/2 inches (38 mm) in cross-sectional nominal dimension or the shape shall provide an equivalent gripping surface. The handgrip portion of handrails shall have a smooth surface with no sharp corners. Gripping surfaces (top or sides) shall be uninterrupted by newel posts, other construction elements or obstructions. Any wall or other surface adjacent to the handrail shall be free of sharp or abrasive elements. Edges shall have a minimum radius of 1/8 inch (3.2 mm). ... The grip portion shall not be less than 1-1/4 inches (32 mm) nor more than 1-1/2 inches (38 mm), or the shape shall provide an equivalent gripping surface and all surfaces shall be smooth with no sharp corners. Handrails shall not rotate within their fittings. Any wall or other surface adjacent to the handrail shall be free of sharp or abrasive elements. Edges shall have a minimum radius of 1/8 inch (3 mm)....	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1133B.5.5.1 for completeness.
	1115B.8.4	Surface. A grab bar and any wall or other surface adjacent to it shall be free of any sharp or abrasive elements. Edges shall have a minimum radius of 1/8 inch (3.2 mm).	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.27 Controls and Operating Mechanisms. 4.27.1 General. Controls and operating mechanisms required to be accessible by 4.1 shall comply with 4.27.	1117B.6.1	General. Controls and operating mechanisms required to be accessible by Section 101.17.11 shall comply with the requirements of this section.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1117B.7.2	<u>Exception 1. In grocery stores and other retail outlets with point-of-sale machines located at individual checkstands, machines that are located at accessible checkstands must be made accessible. Where machines are located away from individual checkstands, they must all be made accessible.</u>			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added exception 1 from section 1117B.7.2 for completeness.
	1117B.7.2	<u>Exception 5. Card reading devices located on fuel pump islands at gasoline service stations and motor-vehicle fuel facilities are not required to comply with Sections 1114B through 1126B and all subsections thereunder.</u>			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Added exception 5 from section 1117B.7.2 for completeness. Exception 5 from section 1117B.7.2 is not ADA equivalent. Refer to the technical assistance letter.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.27.2 Clear Floor Space. Clear floor space complying with 4.2.4 that allows a forward or a parallel approach by a person using a wheelchair shall be provided at controls, dispensers, receptacles, and other operable equipment.	1117B.6.2	Clear floor space. Clear floor space complying with Section 1118B.4 that allows a forward or parallel approach by a person using a wheelchair shall be provided at controls, dispensers, receptacles and other operable equipment.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.27.3* Height. The highest operable part of controls, dispensers, receptacles, and other operable equipment shall be placed within at least one of the reach ranges specified in 4.2.5 and 4.2.6. Electrical and communications system receptacles on walls shall be mounted no less than 15 in (380 mm) above the floor. EXCEPTION: These requirements do not apply where the use of special equipment dictates otherwise or where electrical and communications systems receptacles are not normally intended for use by building occupants.	1117B.6.3	Height. The highest operable part of all controls, dispensers, receptacles and other operable equipment shall be placed within at least one of the reach ranges specified in Sections 1118B.5 and 1118B.6. Electrical and communication system receptacles on walls shall be mounted no less than 15 inches (381 mm) above the floor. EXCEPTION: These requirements do not apply where the use of special equipment dictates otherwise or where electrical and communications systems receptacles are not normally intended for use by building occupants.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.27.4 Operation. Controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinning, or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2 N).	1117B.6.4	Operation. Controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 pounds (22.2 N) of force.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.28 Alarms. 4.28.1 General. Alarm systems required to be accessible by 4.1 shall comply with 4.28. At a minimum, visual signal appliances shall be provided in buildings and facilities in each of the following areas: restrooms and any other general usage areas (e.g., meeting rooms), hallways, lobbies, and any other area for common use.</p>	<p>Chapter 35 6-4.5</p> <p><u>Chapter 35 4-4.5</u></p>	<p>Approved notification appliances for the hearing impaired shall be installed in accordance with the provisions of NFPA 72G in the following areas: restrooms, corridors, music practice rooms, band rooms, gymnasiums, multipurpose rooms, occupational shops, occupied rooms where ambient noise impairs hearing of the fire alarm, lobbies, meeting rooms, any other area for common use.</p> <p><u>Notification Appliances for the hearing Impaired.</u> <u>Approved notification appliances for the hearing impaired shall be installed in the following areas:</u></p> <ol style="list-style-type: none"> 1. <u>Restrooms</u> 2. <u>Corridors</u> 3. <u>Music practice rooms</u> 4. <u>Band rooms</u> 5. <u>Gymnasiums</u> 6. <u>Multipurpose rooms</u> 7. <u>Occupational shops</u> 8. <u>Occupied rooms where ambient noise impairs hearing of the fire alarm</u> 9. <u>Lobbies,</u> 10. <u>Meeting rooms</u> 11. <u>Any other area for common use</u> 	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Deleted chapter 35, section 6-4.5 and added chapter 35, section 4-4.5.</p>
<p>4.28.2* Audible Alarms. If provided, audible emergency alarms shall produce a sound that exceeds the prevailing equivalent sound level in the room or space by at least 15 dbA or exceeds any maximum sound level with a duration of 60 seconds by 5 dbA, whichever is louder. Sound levels for alarm signals shall not exceed 120 dbA.</p>	<p>6-3.2.4</p> <p><u>4-3.2.1</u></p>	<p>Audible signal appliances intended for operation in the public mode shall have a sound level of not less than 75 dBA or more than 120 dBA at the minimum hearing distance from the audible appliance.</p> <p>Audible signal appliances intended for operation in the public mode shall have a sound level of not less than 75 dBA at 10 feet (3048 mm) or more than 110 dBA at the minimum hearing distance from the audible appliance.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Deleted chapter 35, section 6-3.2.1 and added chapter 35, section 4-3.2.1.</p>
	<p>6-3.2.2 <u>4-3.2.2</u></p>	<p>To ensure that audible public mode signals are clearly heard, they shall have a sound level a sound level at least 15 dBA above the average ambient sound level or 5 dBA above the maximum sound level having a duration of at least 60 seconds, whichever is greater, measured 5 ft (1.5 m) above the floor in the occupiable area.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Deleted section reference 6-3.2.2 and added section reference 4-3.2.2 from NFPA 72, 1999 edition.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.28.3* Visual Alarms. Visual alarm signal appliances shall be integrated into the building or facility alarm system. If single station audible alarms are provided then single station visual alarm signals shall be provided. Visual alarm signals shall have the following minimum photometric and location features:	TBD	Information to follow.	<input type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment		<input type="checkbox"/> Yes <input type="checkbox"/> No	Not Addressed
(1) The lamp shall be a xenon strobe type or equivalent.	TBD 4-4.3.1	Information to follow. <u>Visible notification appliances used in the public mode shall be located and shall be of a type, size, intensity, and number so that the operating effect of the appliance is seen by the intended viewers regardless of the viewer's orientation.</u>	<input type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Deleted TBD and added NFPA 72, 1999 edition, section 4-4.3.1.
(2) The color shall be clear or nominal white (i.e., unfiltered or clear filtered white light).	TBD 4-4.2.2	Information to follow. <u>The light source color shall be clear or nominal white and shall not exceed 1000 cd (effective intensity).</u>	<input type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Deleted TBD and added NFPA 72, 1999 edition, section 4-4.2.2.
(3) The maximum pulse duration shall be two-tenths of one second (0.2 sec) with a maximum duty cycle of 40 percent. The pulse duration is defined as the time interval between initial and final points of 10 percent of maximum signal.	TBD 4-4.2.2	Information to follow. <u>A maximum pulse duration shall be 0.2 seconds with a maximum duty cycle of 40 percent. The pulse duration shall be defined as the time interval between initial and final points of 10 percent of maximum signal.</u>	<input type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Deleted TBD and added NFPA 72, 1999 edition, section 4-4.2.1.
(4) The intensity shall be a minimum of 75 candela.	TBD 4-4.2.2 4-4.3.1 4-4.3.2	Information to follow. <u>The light source color shall be clear or nominal white and shall not exceed 1000 cd (effective intensity).</u> <u>Visible notification appliances used in the public mode shall be located and shall be of a type, size, intensity, and number so that the operating effect of the appliance is seen by the intended viewers regardless of the viewer's orientation.</u> <u>The light output shall comply with the polar dispersion requirements of UL 1971, Standard for Safety Signaling Devices for the Hearing Impaired, or equivalent.</u>	<input type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Deleted TBD and added NFPA 72, 1999 edition, section 4-4.2.2, 4-4.3.1, 4-4.3.2.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	<p><u>4-4.4.1.4</u></p> <p><u>4-4.4.1.5</u></p>	<p><u>allows the room to be subdivided into multiple squares shall be used.</u></p> <p><u>If ceiling heights exceed 30 ft (9.14 m), visible notification appliances shall be suspended at or below 30 ft (9.14 m) or wall-mounted in accordance with Table 4-4.4.1.1(a).</u></p> <p><u>Table 4-4.4.1.1(b) shall be used if the visible notification appliance is at the center of the room. If the visible notification appliance is not located at the center of the room, the effective intensity (cd) shall be determined by doubling the distance from the appliance to the farthest wall to obtain the maximum room size.</u></p>				
<p>(8) No place in common corridors or hallways in which visual alarm signaling appliances are required shall be more than 50 ft (15 m) from the signal.</p>	<p>TBD</p> <p><u>4-4.4.2</u></p> <p><u>4-4.4.2.1</u></p> <p><u>4-4.4.2.2</u></p> <p><u>4-4.4.2.3</u></p>	<p>Information to follow.</p> <p><u>Spacing in Corridors.</u></p> <p><u>Table 4-4.4.2.1 shall apply to corridors not exceeding 20 ft (6.1 m) in width. For corridors greater than 20 ft (6.1 m) wide, Figure 4-4.4.1.1 and Tables 4-4.4.1.1(a) and (b) shall apply. In a corridor application, visible appliances shall be rated not less than 15 cd.</u></p> <p><u>Visible notification appliances shall be located not more than 15 ft (4.57 m) from the end of the corridor with a separation not greater than 100 ft (30.4 m) between appliances. If there is an interruption of the concentrated viewing path, such as a fire door, an elevation change, or any other obstruction, the area shall be treated as a separate corridor.</u></p> <p><u>In corridors where there are more than two visible notification appliances in any field of view, they shall be spaced a minimum of 55 ft (16.76 m) from each other or they shall flash in synchronization.</u></p>	<p><input type="checkbox"/> Meets ADA</p> <p><input type="checkbox"/> Does not meet ADA</p> <p><input type="checkbox"/> Comment</p>		<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>	<p>Deleted TBD and added sections from NFPA 72, 1999 edition.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.28.4* Auxiliary Alarms. Units and sleeping accommodations shall have a visual alarm connected to the building emergency alarm system or shall have a standard 110-volt electrical receptacle into which such an alarm can be connected and a means by which a signal from the building emergency alarm system can trigger such an auxiliary alarm. When visual alarms are in place the signal shall be visible in all areas of the unit or room. Instructions for use of the auxiliary alarm or receptacle shall be provided.</p>	1111B.4.5	<p>Visual alarms, notification devices and telephones for persons with hearing impairments. In addition to those accessible sleeping rooms and suites required by Section 1111B.4.2 to comply with this section, additional sleeping rooms and suites shall be provided with the following features in conformance with Table 11B-4 and as follows:</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1111B.4.5.1	<p>Visual alarms. Auxiliary visual alarms shall be provided and shall comply with Section 1114B.2.4.</p>	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	<p>Visual alarms. Auxiliary visual alarms shall be provided and shall comply with Section 1114B.2.4. <u>Guest rooms shall have a standard 110-volt electrical receptacle into which such an alarm can be connected and a means by which a signal from the building emergency alarm system can trigger such an auxiliary alarm. When visual alarms are in place the signal shall be visible in all areas of the unit or room. Instructions for use of the auxiliary alarm or receptacle shall be provided.</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.29 Detectable Warnings. 4.29.1 General. Detectable warnings required by 4.1 and 4.7 shall comply with 4.29.</p>	<p>1114B.1.1</p>	<p>General. When accessibility is required by this chapter, it shall be designed and constructed to meet the minimum requirements of the following sections: Chapter 11B. Accessibility; Division I, New Buildings; Division II, Site Accessibility; Division III, Accessibility for Entrances, Exits and Paths of Travel; and Division IV, Accessibility for Existing Buildings Entrances — [for HCD 1/AC] Section 1120A.1; [for DSA/AC] Section 1133B Doors — [for HCD 1/AC] Section 1120A.2; [for DSA/AC] Section 1133B.2 Corridors — [for HCD 1/AC] Section 1120A.3; [for DSA/AC] Section 1133B.3 Stairways — [for HCD 1/AC] Section 1120A.4; [for DSA/AC] Section 1133B.4 Ramps — [for HCD 1/AC] Section 1120A.5; [for DSA/AC] Section 1133B.5 Aisles — [for DSA/AC] Section 1133B.6 Walks and Sidewalks — [for HCD 1/AC] Section 1120A.7; [for DSA/AC] Section 1133B.7 Hazards — [for HCD 1/AC] Section 1120A.7; [for DSA/AC] Section 1133B.8 Elevators — [for HCD 1/AC] Section 3003 Special Wheelchair Lifts — [for HCD 1/AC] Section 1110A.2; [for DSA/AC] Section 1116B.2 Alarms — Chapter 35. See also Part 3, California Electrical Code.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p> <p>Adopt reference to detectable warnings as follows.</p>	<p>General. When accessibility is required by this chapter, it shall be designed and constructed to meet the minimum requirements of the following sections: Chapter 11B. Accessibility; Division I, New Buildings; Division II, Site Accessibility; Division III, Accessibility for Entrances, Exits and Paths of Travel; and Division IV, Accessibility for Existing Buildings... <u>Detectable Warnings [for DSA/AC] Section 1127B.5.8, 1133B.8.3, 1133B.8.5, 12-31-102.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>DSA's proposed revision meets the ADA but the reference to section 12-31-102 must be clarified.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.29.2* Detectable Warnings on Walking Surfaces. Detectable warnings shall consist of raised truncated domes with a diameter of nominal 0.9 in (23 mm), a height of nominal 0.2 in (5 mm) and a center-to-center spacing of nominal 2.35 in (60 mm) and shall contrast visually with adjoining surfaces, either light-on-dark, or dark-on-light.</p> <p>The material used to provide contrast shall be an integral part of the walking surface. Detectable warnings used on interior surfaces shall differ from adjoining walking surfaces in resiliency or sound-on-cane contact.</p>	1133B.8.3	<p>Detectable warnings at transit boarding platforms. Transit boarding platforms shall have a detectable warning texture extending the full length of the loading area. This detectable warning texture shall have the following features: Width 24 to 36 inches (610 mm to 914 mm) placed at the edge of the drop-off or safe area. Durable, slip-resistant material having a surface texture composed of raised, truncated domes in a staggered pattern with a diameter of nominal 0.9 inch (22.9 mm) at the base tapering to 0.45 inch (11.4 mm) at the top, a height of nominal 0.2 inch (5.08 mm), and a center-to-center spacing of nominal 2.35 inches (59.7 mm) in compliance with Figure 11B-23A. "Nominal" as used here shall be in accordance with California State Referenced Standards Code Section 12-11 A and B 201. The detectable warning shall contrast visually with adjoining surfaces, either light on dark or dark on light. The material used to provide contrast shall be an integral part of the walking surface. Warning surfaces shall differ from adjoining walking surfaces in resiliency or sound on cane contact. This surface shall be reserved for warning. Color yellow conforming to Federal Color No. 33538, as shown in Table IV of Standard No. 595B. Where the color value contrast between the yellow warning and the main walking surface is less than 70 percent, a 1 inch-wide (25 mm) black strip shall separate the yellow warning from the main walking surface. Contrast shall be determined by: $Contrast = [(B1-B2/B1)] \ 100$ percent where B1 = light reflectance value (LRV) of the lighter area and B2 = light reflectance value (LRV) of the darker area. <u>Only approved DSA/AC detectable warning products and directional surfaces shall be installed as provided in the California Code of Regulations (CCR), Title 24, Part 1, Articles 2, 3 and 4. Refer to CCR Title 24, Part 12, Chapter 12-11A and B, for building and facility access specifications for product approval for detectable warning products and directional surfaces.</u> <u>NOTE: Detectable warning products and directional surfaces installed after January 1, 2001, shall be evaluated by an independent entity, selected by the Department of General Services, Division of the State Architect-Access Compliance, for all occupancies, including transportation and other outdoor environments, except that when products and surfaces are for use in residential housing evaluation shall be in consultation with the Department of Housing and Community Development. See Government Code Section 4460.</u></p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>This Title 24 section is cross-referenced in other section but the heading is limited to transit boarding platforms. Adopt language from ADAAG as follows.</p>	<p>Detectable warnings <u>on Walking Surfaces and at</u> transit boarding platforms. Transit boarding platforms shall have a detectable warning texture extending the full length of the loading area. This detectable warning texture shall have the following features: Width 24 to 36 inches (610 mm to 914 mm) placed at the edge of the drop-off or safe area. <u>Detectable warnings shall consist of</u> durable, slip-resistant material having a surface texture composed of raised, truncated domes in a staggered pattern with a diameter of nominal 0.9 inch (22.9 mm) at the base tapering to 0.45 inch (11.4 mm) at the top, a height of nominal 0.2 inch (5.08 mm), and a center-to-center spacing of nominal 2.35 inches (59.7 mm) in compliance with Figure 11B-23A. "Nominal" as used here shall be in accordance with California State Referenced Standards Code Section 12-11 A and B 201. The detectable warning shall contrast visually with adjoining surfaces, either light on dark or dark on light. The material used to provide contrast shall be an integral part of the walking surface. Warning surfaces shall differ from adjoining walking surfaces in resiliency or sound on cane contact. This surface shall be reserved for warning. Color yellow conforming to Federal Color No. 33538, as shown in Table IV of Standard No. 595B. Where the color value contrast between the yellow warning and the main walking surface is less than 70 percent, a 1 inch-wide (25 mm) black strip shall separate the yellow warning from the main walking surface. Contrast shall be determined by: $Contrast = [(B1-B2/B1)] \ 100$ percent where B1 = light reflectance value (LRV) of the lighter area and B2 = light reflectance value (LRV) of the darker area.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Added additional text from section 1133B.8.3 for completeness.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.29.3 Detectable Warnings on Doors To Hazardous Areas. (Reserved).	None	For reference only.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
4.29.4 Detectable Warnings at Stairs. (Reserved).	None	For reference only.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
4.29.5 Detectable Warnings at Hazardous Vehicular Areas. If a walk crosses or adjoins a vehicular way, and the walking surfaces are not separated by curbs, railings, or other elements between the pedestrian areas and vehicular areas, the boundary between the areas shall be defined by a continuous detectable warning which is 36 in (915 mm) wide, complying with 4.29.2. [Suspended until July 26, 2001. 28 C.F.R. § 36.407.]	1133B.8.5	Detectable warnings at hazardous vehicular areas. If a walk crosses or adjoins a vehicular way, and the walking surfaces are not separated by curbs, railings or other elements between the pedestrian areas and vehicular areas, the boundary between the areas shall be defined by a continuous detectable warning which is 36 inches (914 mm) wide, complying with Sections 1133B.8.3 through 1133B.8.5.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.29.6 Detectable Warnings at Reflecting Pools. The edges of reflecting pools shall be protected by railings, walls, curbs, or detectable warnings complying with 4.29.2. [Suspended until July 26, 2001. 28 C.F.R. § 36.407.]	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG language into new Title 24 section.	<u>Detectable Warnings at Reflecting Pools. The edges of reflecting pools shall be protected by railings, walls, curbs, or detectable warnings complying with section 1133B.8.3.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.29.7 Standardization. (Reserved).	None	For reference only.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
4.30 Signage. 4.30.1* General. Signage required to be accessible by 4.1 shall comply with the applicable provisions of 4.30.	<u>1117B.5.1.1</u>	<u>General. When new or additional signs and/or identification devices are provided, or when existing signs and/or identification devices are replaced or altered, the new or altered signs and/or identification devices shall comply with 1117B.5. The addition of or replacement of signs and/or identification devices shall not trigger any additional path of travel requirements.</u>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1117B.5.1.1.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.30.5* Finish and Contrast. The characters and background of signs shall be eggshell, matte, or other non-glare finish. Characters and symbols shall contrast with their background -- either light characters on a dark background or dark characters on a light background.	1117B.5.2	Finish and Contrast. Characters, symbols and their background shall have a non-glare finish. Characters and symbols shall contrast with their background, either light characters on a dark background or dark characters on a light background.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.30.6 Mounting Location and Height. Where permanent identification is provided for rooms and spaces, signs shall be installed on the wall adjacent to the latch side of the door. Where there is no wall space to the latch side of the door, including at double leaf doors, signs shall be placed on the nearest adjacent wall. Mounting height shall be 60 in (1525 mm) above the finish floor to the centerline of the sign. Mounting location for such signage shall be so that a person may approach within 3 in (76 mm) of signage without encountering protruding objects or standing within the swing of a door.	1117B.5.7	Mounting location and height. Where permanent identification is provided for rooms and spaces, signs shall be installed on the wall adjacent to the latch outside of the door. Where there is no wall space on the latch side, including at double leaf doors, signs shall be placed on the nearest adjacent wall, preferably on the right. Mounting height shall be 60-inches (1524 mm) above the finish floor to the centerline of the sign. Mounting location shall be determined so that a person may approach within 3-inches (76 mm) of signage without encountering protruding objects or standing within the swing of a door. NOTE: See also Section 1115B.5 for additional signage requirements applicable to sanitary facilities.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.30.7* Symbols of Accessibility. (1) Facilities and elements required to be identified as accessible by 4.1 shall use the international symbol of accessibility. The symbol shall be displayed as shown in Fig. 43(a) and (b). Figure 43 of the ADA Standards. International Symbols.	1117B.5.8.1	Symbols of accessibility. The International Symbol of Accessibility shall be the standard used to identify facilities that are accessible to and usable by physically disabled persons as set forth in these building standards and as specifically required in this section. See Figure 11B-6. <u>EXCEPTION: Signs need not be provided for facilities within an adaptable dwelling unit, or within an accessible patient or guest room.</u>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added additional text for section 1117B.5.8.1.
43(a) Proportions, International Symbol of Accessibility. The diagram illustrates the International Symbol of Accessibility on a grid background.	Figure 11B-6	Refer to code.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
43(b) Display Conditions, International Symbol of Accessibility. The symbol contrast shall be light on dark or dark on light.	1117B.5.8.1.1	Color of symbol. The symbol specified above shall consist of a white figure on a blue background. The blue shall be equal to Color No. 15090 in Federal Standard 595B. EXCEPTION: The appropriate enforcement agency may approve special signs and identification necessary to complement decor or unique design when it is determined that such signs and identification provide adequate direction to persons with disabilities.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment ADAAG specifies that the ISA must be a specific finish. Adopt ADAAG language as follows.	Color of symbol. The symbol specified above shall consist of a white figure on a blue background. The blue shall be equal to Color No. 15090 in Federal Standard 595B. EXCEPTION: The appropriate enforcement agency may approve special signs and identification necessary other colors to complement decor or unique designs. when it is determined that such signs and identification provide adequate direction to persons with disabilities. The symbol contrast shall be light on dark or dark on light.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
(2) Volume Control Telephones. Telephones required to have a volume control by 4.1.3(17)(b) shall be identified by a sign containing a depiction of a telephone handset with radiating sound waves.	1117B.2.8	Telephone equipment for hearing impaired persons. Telephones shall be equipped with a receiver that generates a magnetic field in the area of the receiver cap. If banks of public telephones are provided, at least one in each bank and a total of at least 25 percent of the total number of public telephones, including closed-circuit telephones in a building or facility, shall be equipped with a volume control. Such telephones shall be capable of a minimum of 12 dBA and a maximum of 18 dBA above normal. If an automatic reset is provided, 18 dBA may be exceeded. Public telephones with volume control shall be hearing aid compatible and shall be identified by a sign containing a depiction of a telephone handset with radiating sound waves.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1117B.5.8.3	Volume Control Telephones. Where telephones with volume controls are required to be identified, the identification symbol shall be a telephone hand set with radiating sound waves, such as shown in Figure 11B-14B.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
(3) Text Telephones. Text telephones required by 4.1.3(17)(c) shall be identified by the international TDD symbol (Fig. 43(c)). In addition, if a facility has a public text telephone, directional signage indicating the location of the nearest text telephone shall be placed adjacent to all banks of telephones which do not contain a text telephone. Such directional signage shall include the international TDD symbol. If a facility has no banks of telephones, the directional signage shall be provided at the entrance (e.g., in a building directory).	1117B.2.9.3	Signage. Text telephones shall be identified by the International TTY symbol (see Figure 11B-14A). If a facility has a public text telephone, directional signage indicating the location of the nearest such telephone shall be placed adjacent to all banks of telephones that do not contain a text telephone. Such directional signage shall include the International TTY symbol. If a facility has no banks of telephones, the directional signage shall be provided at the entrance or in a building directory.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 uses the term TTY rather than TDD. This change was made at the request of the deaf/hearing impaired community.	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	1117B.5.8.2	International Symbol of TTY. Where the International Symbol of TTY is required, it shall comply with Figure 11B-14A.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
(4) Assistive Listening Systems. In assembly areas where permanently installed assistive listening systems are required by 4.1.3(19)(b) the availability of such systems shall be identified with signage that includes the international symbol of access for hearing loss (Fig. 43(d)).	1104B.2 4.	Signage. A sign shall be posted in a prominent place indicating the availability of assistive-listening devices. The sign shall include the international symbol of access for hearing loss and wording that states "Assistive-listening System Available." See Figure 11B-14.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1117B.5.8.4	Assistive Listening Systems. Where assistive listening systems are required to be identified by the International Symbol of Access for Hearing Loss, it shall comply with Figure 11B-14C.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.30.8* Illumination Levels. (Reserved).	None	For reference only.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
4.31 Telephones. 4.31.1 General. Public telephones required to be accessible by 4.1 shall comply with 4.31.	1117B.2.1	General. If public telephones are provided, they shall comply with this section to the extent required by the following table. See Figure 11B-4.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.31.2 Clear Floor or Ground Space. A clear floor or ground space at least 30 in by 48 in (760 mm by 1220 mm) that allows either a forward or parallel approach by a person using a wheelchair shall be provided at telephones (see Fig. 44). The clear floor or ground space shall comply with 4.2.4. Bases, enclosures, and fixed seats shall not impede approaches to telephones by people	1117B.2.2	Clear floor ground space. A clear floor or ground space at least 30 inches by 48 inches (762 mm by 1219 mm) that allows either a forward or parallel approach by a person using a wheelchair shall be provided at telephones.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
who use wheelchairs.	1117B.2.3	Size and approach. The minimum clear floor ground space required to accommodate a single, stationary wheelchair and occupant is 30 inches by 48 inches (762 mm by 1219 mm). The minimum clear floor or ground space for wheelchairs may be positioned for forward or parallel approach to an object. Clear floor or ground space for wheelchairs may be part of the knee space required under some objects. See Figure 11B-5A.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1117B.2.4	Relationship of maneuvering clearances to wheelchair spaces. One full unobstructed side of the clear floor or ground space for a wheelchair shall adjoin another wheelchair clear floor space. If a clear floor space is located in an alcove or otherwise confined on all or part of three sides, additional maneuvering clearances shall be provided. See Figure 11B-5A.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1117B.2.5	Floor surfaces of wheelchair spaces. Floor surfaces of wheelchair spaces shall conform to Section 1124B. Bases, enclosures and fixed seats shall not impede approaches to telephones by people who use wheelchairs.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Figure 44 of the ADA Standards. Mounting Heights and Clearances for Telephones.	Figure 11B-4	Refer to code.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment The Title 24 graphic does not conform to ADAAG. Revise graphic to conform to ADAAG.	See attached graphic.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
44(a) Side Reach Possible. If a parallel approach is provided at a telephone in an enclosure, the wing walls and shelf may extend beyond the face of the telephone a maximum of 10 in (255 mm). The wing walls and shelf may not overlap the required clear space. The controls shall be located no higher than 54 in (1370 mm) above the floor and the wing walls shall extend downward to 27 in (685 mm) or less above the floor.	Figure 11B-4	Refer to code.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment The Title 24 graphic does not conform to ADAAG. Revise graphic to conform to ADAAG.	See attached graphic.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
44(b) Forward Reach Required. If a front approach is provided at a telephone with an enclosure, the shelf may extend beyond the face of the telephone a maximum of 20 in (510 mm) into the required clear floor space. Wing walls may extend beyond the face of the telephone a maximum of 24 in (610 mm). If wing walls extend more than 24 in (610 mm) beyond the face of the telephone, an additional 6 in (150 mm) in width of clear floor space shall be provided, creating a clear floor space of 36 in by 48 in (910 mm by 1220 mm). Wing walls shall extend downward to 27 in (685 mm) or less above the floor. The highest operable part shall be located no higher than 48 in (1220 mm) above the floor.	Figure 11B-4	Refer to code.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment The Title 24 graphic does not conform to ADAAG. Revise graphic to conform to ADAAG.	See attached graphic.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.31.3* Mounting Height. The highest operable part of the telephone shall be within the reach ranges specified in 4.2.5 or 4.2.6.	1117B.2.6	Mounting height. The highest operable part of the telephone shall be within the reach ranges specified in Sections 1118B.5 and 1118B.6. Telephones mounted diagonally in a corner that require wheelchair users to reach diagonally shall have the highest operable part no higher than 54 inches (1372 mm) above the floor. See Figure 11B-4.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Section 1117B.2.6 meets the ADA but the reach range provided for phones mounted diagonally in a corner conflicts with the ADA. Revise or delete this requirement.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	1117B.2.7	<p><u>Enclosures. If telephone enclosures are provided, they may overhang the clear floor space required in Sections 1117B.2.2, 1117B.2.3 and 1117B.2.4 within the following limits:</u></p> <p><u>1. Side reach possible. The overhang shall be no greater than 19 inches (483 mm). The height of the lowest overhanging part shall be equal to or greater than 27 inches (686 mm). See Figure 11B-4(a).</u></p> <p><u>2. Full-height enclosures. Entrances to full-height enclosures shall be 30 inches (762 mm) minimum. See Figure 11B-4(b).</u></p> <p><u>3. Forward reach required. If the overhang is greater than 12 inches (305 mm), then the clear width of the enclosure shall be 30 inches (762 mm) minimum; if the clear width of the enclosure is less than 30 inches (762 mm), then the height of the lowest overhanging part shall be equal to or greater than 27 inches (686 mm). See figure 11B-4(c).</u></p>			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>Added section 1117B.2.7. Section 1117B.2.7 does not meet the ADA because the specified dimensions conflicts with section 4.31.3 and figure 44 of the ADA Standards. Also, section 1117B.2.7 conflicts with DSA's revision for figure 11B-4. The Department recommends that either DSA delete this section or revise to be compatible with section 4.31.3 and figure 44 of the ADA Standards.</p>
4.31.4 Protruding Objects. Telephones shall comply with 4.4.	1117B.2.7 4.	Protruding telephone enclosures. Where telephone enclosures protrude into walls, halls, corridors or aisles, they shall also comply with Section 1133B.8.6.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.31.5 Hearing Aid Compatible and Volume Control Telephones Required by 4.1. (1) Telephones shall be hearing aid compatible. (2) Volume controls, capable of a minimum of 12 dbA and a maximum of 18 dbA above normal, shall be provided in accordance with 4.1.3. If an automatic reset is provided then 18 dbA may be exceeded.	1117B.2.8	Telephone equipment for hearing impaired persons. Telephones shall be equipped with a receiver that generates a magnetic field in the area of the receiver cap. If banks of public telephones are provided, at least one in each bank and a total of at least 25 percent of the total number of public telephones, including closed-circuit telephones in a building or facility, shall be equipped with a volume control. Such telephones shall be capable of a minimum of 12 dBA and a maximum of 18 dBA above normal. If an automatic reset is provided, 18 dBA may be exceeded. Public telephones with volume control shall be hearing aid compatible and shall be identified by a sign containing a depiction of a telephone handset with radiating sound waves.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.31.6 Controls. Telephones shall have pushbutton controls where service for such equipment is available.	1117B.2.10	Controls. Telephones shall have push-button controls where service for such equipment is available.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.31.7 Telephone Books. Telephone books, if provided, shall be located in a position that complies with the reach ranges specified in 4.2.5 and 4.2.6.	1117B.2.12	Telephone books. If telephone books are provided, they shall be located in a position that complies with the reach ranges in Sections 1118B.5 and 1118B.6.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.31.8 Cord Length. The cord from the telephone to the handset shall be at least 29 in (735 mm) long.	1117B.2.11	Cord length. The cord from the telephone to the handset shall be at least 29 inches (737 mm) long.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.31.9* Text Telephones Required by 4.1. (1) Text telephones used with a pay telephone shall be permanently affixed within, or adjacent to, the telephone enclosure. If an acoustic coupler is used, the telephone cord shall be sufficiently long to allow connection of the text telephone and the telephone receiver.	1117B.2.9.2 1.	Text telephones used with a pay telephone shall be permanently affixed within or adjacent to the telephone enclosure. If an acoustic coupler is used, the telephone cord shall be sufficiently long to allow connection of the text telephone and the telephone receiver.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
(2) Pay telephones designed to accommodate a portable text telephone shall be equipped with a shelf and an electrical outlet within or adjacent to the telephone enclosure. The telephone handset shall be capable of being placed flush on the surface of the shelf. The shelf shall be capable of accommodating a text telephone and shall have 6 in (152 mm) minimum vertical clearance in the area where the text telephone is to be placed.	1117B.2.9.2 2.	Pay telephones designed to accommodate a portable text telephone shall be equipped with a shelf and an electrical outlet within or adjacent to the telephone enclosure. The telephone handset shall be capable of being placed flush on the surface of the shelf. The shelf shall be capable of accommodating a text telephone and shall have 6 inches (152 mm) minimum vertical clearance in the area where the text telephone is to be placed.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
(3) Equivalent facilitation may be provided. For example, a portable text telephone may be made available in a hotel at the registration desk if it is available on a 24-hour basis for use with nearby public pay telephones. In this instance, at least one pay telephone shall comply with paragraph 2 of this section. In addition, if an acoustic coupler is used, the telephone handset cord shall be sufficiently long so as to allow connection of the text telephone and the telephone receiver. Directional signage shall be provided and shall comply with 4.30.7.	1117B.2.9.2 3.	Equivalent facilitation may be substituted for the requirements of this section. For example, a portable text telephone may be made available in a hotel at a registration desk if it is available on a 24-hour basis for use with nearby public pay phones. In this instance, at least one pay phone shall comply with Item 2. In addition, if an acoustic coupler is used, the telephone handset cord shall be sufficiently long to allow connection of the text telephone and the telephone receiver. Directional signage shall comply with Section 1117B.5.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.32 Fixed or Built-in Seating and Tables. 4.32.1 Minimum Number. Fixed or built-in seating or tables required to be accessible by 4.1 shall comply with 4.32.	4114B.1.4 1122B.1	See above cell. <u>Minimum Number. Where fixed or built-in seating, tables or counters are provided for the public, and in general employee areas, 5 percent, but never less than one, must be accessible as provided in this section.</u>	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment Adopt reference to accessible seating as follows.	General. When accessibility is required by this chapter, it shall be designed and constructed to meet the minimum requirements of the following sections: Chapter 11B. Accessibility; Division I, New Buildings; Division II, Site Accessibility; Division III, Accessibility for Entrances, Exits and Paths of Travel; and Division IV, Accessibility for Existing Buildings Accessible seating [for DSA/AC] Sections 1104B, 1122B.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Deleted section 1114B.1.1 and added section 1122B.1.
4.32.2 Seating. If seating spaces for people in wheelchairs are provided at fixed tables or counters, clear floor space complying with 4.2.4 shall be provided. Such clear floor space shall not overlap knee space by more than 19 in (485 mm) (see Fig. 45). Figure 45 of the ADA Standards. Minimum Clearances for Seating and Tables. If wheelchair seating is beside fixed seats, clear floor space 30 in by 48 in (760 mm by 1220 mm) minimum must be provided. If wheelchair seating is across the front of fixed seating, the minimum required clear floor space is 42 in by 48 in (1065 mm by 1220 mm). An accessible route to wheelchair seating must be provided.	1122B.2	Seating. If seating spaces for persons in wheelchairs are provided at fixed tables or counters, clear floor space complying with Section 1118B.4 shall be provided. Such clear floor space shall not overlap knee space by more than 19 inches (483 mm) (see Figure 11B-13).	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	Figure 11B-13	Refer to code.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment The Title 24 graphic does not conform to ADAAG. Revise graphic to conform to ADAAG.	See attached graphic.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.32.3 Knee Clearances. If seating for people in wheelchairs is provided at tables or counters, knee spaces at least 27 in (685 mm) high, 30 in (760 mm) wide, and 19 in (485 mm) deep shall be provided (see Fig. 45).	1122B.3	Knee Clearance. If seating for persons in wheelchairs is provided at fixed tables or counters, knee spaces at least 27 inches (686 mm) high, 30 inches (762 mm) wide and 19 inches (483 mm) deep shall be provided (see Figure 11B-13). EXCEPTION: Knee clearance is not required at checkout counters or service counters.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.32.4* Height of Tables or Counters. The tops of accessible tables and counters shall be from 28 in to 34 in (710 mm to 865 mm) above the finish floor or ground.	1122B.4	Height of Work Surfaces. The tops of tables and counters shall be 28 inches to 34 inches (711 mm to 864 mm) from the floor or ground. Where a single counter contains more than one transaction station, such as (but not limited to) a bank counter with multiple teller windows or a retail sales counter with multiple cash register stations, at least 5 percent, but never less than one, of each type of station shall be located at a section of counter that is at least 36 inches (914 mm) long and no more than 28 to 34 inches (711 to 864 mm) high.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.33 Assembly Areas. 4.33.1 Minimum Number. Assembly and associated areas required to be accessible by 4.1 shall comply with 4.33.	1104B.1	General. All Group A Occupancies shall be accessible as provided in this chapter. See also the general requirements listed in Section 1114B.1.1.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.33.2* Size of Wheelchair Locations. Each wheelchair location shall provide minimum clear ground or floor spaces as shown in Fig. 46. Figure 46 of the ADA Standards. Space Requirements for Wheelchair Seating Spaces in Series. 46(a) Forward or Rear Access. If seating space for two wheelchair users is accessed from the front or rear, the minimum space required is 48 in (1220 mm) deep by 66 in (1675 mm) wide. 46(b) Side Access. If seating space for two wheelchair users is accessed from the side, the minimum space required is 60 in (1525 mm) deep by 66 in (1675 mm) wide.	1104B.3.6	Size of wheelchair location. Each wheelchair location shall provide minimum clear floor or ground space as shown in Figure 11B-15, and shall adjoin an egress aisle on at least one side.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	Figure 11B-15	Refer to code.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.33.3* Placement of Wheelchair Locations. Wheelchair areas shall be an integral part of any fixed seating plan and shall be provided so as to provide people with physical disabilities a choice of admission prices and lines of sight comparable to those for members of the general public. They shall adjoin an accessible route that also serves as a means of egress in case of emergency. At least one companion fixed seat shall be provided next to each wheelchair seating area. When the seating capacity exceeds 300, wheelchair spaces shall be provided in more than one location. Readily removable seats may be installed in wheelchair spaces when the spaces are not required to accommodate wheelchair users. EXCEPTION: Accessible viewing positions may be clustered for bleachers, balconies, and other areas having sight lines that require slopes of greater than 5 percent. Equivalent accessible viewing positions may be located on levels having accessible egress.</p>	1104B.3.5	<p>Placement of Wheelchair Locations. Wheelchair areas shall be an integral part of any fixed seating plan, and shall be arranged so as to provide persons with disabilities a choice of admission prices and lines of sight comparable to those for members of the general public. Each wheelchair area shall adjoin an accessible route which shall also serve as a means of egress in case of emergency. At least one companion fixed seat shall be provided next to each wheelchair seating area. When the seating capacity exceeds 300, wheelchair spaces shall be provided in more than one location in addition to complying with Section 1104B.3.3</p> <p>EXCEPTION: Accessible viewing positions may be clustered for bleachers, balconies, and other areas having sight lines that require slopes of greater than 5 percent. Equivalent accessible viewing positions may be located on levels having accessible egress.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1104B.3.7	Removable seats. Readily removable seats may be installed in these wheelchair spaces when such spaces are not required to accommodate wheelchair users.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	<u>1104B.3.3</u>	<u>Variety of locations. Accessible seating or accommodations in places of public amusement and resort, including theaters, concert halls and stadiums, but not including hotels and motels, shall be provided in a variety of locations so as to provide persons with disabilities a choice of admission prices otherwise available to members of the general public.</u>			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Added section 1104B.3.3. Section 1104B.3.3 does not meet section 4.33.3 of the ADA Standards because hotels and motels are excluded from the variety of location requirement.
	<u>1104B.3.9</u>	<u>Life Safety. In determining the location of seating for persons with disabilities, life safety shall be considered, and all seating provided must comply with the fire and panic safety requirements of the state fire marshal.</u>			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	<u>1104B.4</u>	<u>Stadiums, Grandstands, Bleachers, Athletic Pavilions, Gymnasiums and Miscellaneous Sports-related Facilities.</u>			<input checked="" type="checkbox"/> Yes	Added section 1104B.4 and 1104B.4.1.
	<u>1104B.4.1</u>	<u>Spectator seating. Spectator seating shall comply with Section 1104B.3.</u>			<input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.33.4 Surfaces. The ground or floor at wheelchair locations shall be level and shall comply with 4.5.	1104B.3.4 3.	Wheelchair Spaces. The ground or floor at spaces shall be level and shall comply with Section 1124B.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.33.5 Access to Performing Areas. An accessible route shall connect wheelchair seating locations with performing areas, including stages, arena floors, dressing rooms, locker rooms, and other spaces used by performers.	1104B.3.10	Access to performing areas. An accessible route shall connect wheelchair seating locations with performing areas, including stages, arena floors, dressing rooms, locker rooms and other spaces used by performers.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	<u>1104B.3.11</u>	<u>Stages, enclosed and unenclosed platforms, and orchestra pits. Stages, enclosed and unenclosed platforms, and orchestra pits shall be made accessible to persons with disabilities.</u>			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1104B.3.11.
4.33.6* Placement of Listening Systems. If the listening system provided serves individual fixed seats, then such seats shall be located within a 50 ft (15 m) viewing distance of the stage or playing area and shall have a complete view of the stage or playing area.	1104B.2 3.	Location. If the assistive-listening system provided is limited to specific areas or seats, then such areas or seats shall be within a 50-foot (15240 mm) viewing distance of the performing area.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not limit this requirement to individual fixed seats. Adopt ADAAG language as follows.	Location. If the assistive-listening system provided is limited to specific areas or serves individual fixed seats, then such areas or seats shall be within a 50-foot (15240 mm) viewing distance of the performing area.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	DSA's proposed revision does not meet the ADA because it does not include ADA's language "shall have a complete view of the stage or playing area."

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
4.33.7* Types of Listening Systems. Assistive listening systems (ALS) are intended to augment standard public address and audio systems by providing signals which can be received directly by persons with special receivers or their own hearing aids and which eliminate or filter background noise. The type of assistive listening system appropriate for a particular application depends on the characteristics of the setting, the nature of the program, and the intended audience. Magnetic induction loops, infrared and radio frequency systems are types of listening systems which are appropriate for various applications.	1104B.2 2.	Types of listening systems. Types of assistive-listening systems include, but are not limited to, audio-induction loops, radio frequency systems (AM or FM) and infrared transmission.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.34 Automated Teller Machines. 4.34.1 General. Each automated teller machine required to be accessible by 4.1.3 shall be on an accessible route and shall comply with 4.34.	1105B.3.3.3 <u>1117B.7</u> <u>1110B.1.4</u>	Personal and public service facilities. Areas to be made accessible include the following: Automated teller machines used by a financial institution and its customers for the primary purposes of executing financial transactions. See Section 1117B.7. <u>Automated Teller Machines and Point of Sale Machines.</u> <u>Point-of-sale machines. All point-of-sale machines used by customers for the primary purpose of executing transactions between the business entity and the customer shall comply with Section 1117B.7.</u>	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not specifically state ATM's must be located on an accessible route. Adopt ADAAG language as follows.	Personal and public service facilities. Areas to be made accessible include the following: Automated teller machines used by a financial institution and its customers for the primary purposes of executing financial transactions <u>shall be located on an accessible route of travel and shall comply with</u> —See Section 1117B.7.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1117B.7 and 1110B.1.4 for completeness.
4.34.2 Clear Floor Space. The automated teller machine shall be located so that clear floor space complying with 4.2.4 is provided to allow a person using a wheelchair to make a forward approach, a parallel approach, or both, to the machine.	<u>1117B.7.4</u> <u>1117B.7.4.1</u> 1117B.7.4.1 1.	<u>Clearances and reach range. Free-standing or built-in units not having a clear space under them shall comply with the following as to clearance and reach range.</u> <u>Where one ATM is provided. Where one ATM is provided at a location it shall meet the specifications of Section 4.34 of the Americans with Disabilities Act Accessibility Guidelines (ADAAG) as follows:</u> The ATM shall be located so that clear floor space complying with Section 1118B.4 is provided to allow a person using a wheelchair to make a forward approach, a parallel approach, or both, to the machine.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added sections 1117B.7.4 and 1117B.7.4.1 for completeness.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>4.34.3 Reach Ranges.</p> <p>(1) Forward Approach Only. If only a forward approach is possible, operable parts of all controls shall be placed within the forward reach range specified in 4.2.5.</p> <p>(2) Parallel Approach Only. If only a parallel approach is possible, operable parts of controls shall be placed as follows:</p> <p>(a) Reach Depth Not More Than 10 in (255 mm). Where the reach depth to the operable parts of all controls as measured from the vertical plane perpendicular to the edge of the unobstructed clear floor space at the farthest protrusion of the automated teller machine or surround is not more than 10 in (255 mm), the maximum height above the finished floor or grade shall be 54 in (1370 mm).</p>	1117B.7.4.1 2.	Forward approach only. If only a forward approach is possible, operable parts of all controls shall be placed within the forward reach range specified in Section 1118B.5	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1117B.7.4.1 3.	Parallel approach only. If only a parallel approach is possible, operable parts of controls shall be placed as follows:	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1117B.7.4.1 3.1	Reach depth not more than 10 inches (254 mm). Where the reach depth to the operable parts of all controls as measured from the vertical plane perpendicular to the edge of the unobstructed clear floor space at the farthest protrusion of the automated teller machine or surround is not more than 10 inches (254 mm), the maximum height from the floor shall be 54 inches (1372 mm).	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
(b) Reach Depth More Than 10 in (255 mm). Where the reach depth to the operable parts of any control as measured from the vertical plane perpendicular to the edge of the unobstructed clear floor space at the farthest protrusion of the automated teller machine or surround is more than 10	1117B.7.4.1 3.2	Reach depth more than 10 inches (254 mm). Where the reach depth to the operable parts of any control as measured from the vertical plane perpendicular to the edge of the unobstructed clear floor space at the farthest protrusion of the ATM or surround is more than 10 inches (254 mm), the maximum height from the floor shall be as shown in Table 11B-5.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments																																																																																																		
<p>in (255 mm), the maximum height above the finished floor or grade shall be as follows:</p> <table border="1" data-bbox="102 365 443 909"> <thead> <tr> <th>Reach Depth In</th> <th>Maximum Height Mm</th> <th>Reach Depth In</th> <th>Maximum Height Mm</th> </tr> </thead> <tbody> <tr><td>10</td><td>255</td><td>54</td><td>1370</td></tr> <tr><td>11</td><td>280</td><td>53 ½</td><td>1360</td></tr> <tr><td>12</td><td>305</td><td>53</td><td>1345</td></tr> <tr><td>13</td><td>330</td><td>52 ½</td><td>1335</td></tr> <tr><td>14</td><td>355</td><td>51 ½</td><td>1310</td></tr> <tr><td>15</td><td>380</td><td>51</td><td>1295</td></tr> <tr><td>16</td><td>405</td><td>50 ½</td><td>1285</td></tr> <tr><td>17</td><td>430</td><td>50</td><td>1270</td></tr> <tr><td>18</td><td>455</td><td>49 ½</td><td>1255</td></tr> <tr><td>19</td><td>485</td><td>49</td><td>1245</td></tr> <tr><td>20</td><td>510</td><td>48 ½</td><td>1230</td></tr> <tr><td>21</td><td>535</td><td>47 ½</td><td>1205</td></tr> <tr><td>22</td><td>560</td><td>47</td><td>1195</td></tr> <tr><td>23</td><td>585</td><td>46 ½</td><td>1180</td></tr> <tr><td>24</td><td>610</td><td>46</td><td>1170</td></tr> </tbody> </table>	Reach Depth In	Maximum Height Mm	Reach Depth In	Maximum Height Mm	10	255	54	1370	11	280	53 ½	1360	12	305	53	1345	13	330	52 ½	1335	14	355	51 ½	1310	15	380	51	1295	16	405	50 ½	1285	17	430	50	1270	18	455	49 ½	1255	19	485	49	1245	20	510	48 ½	1230	21	535	47 ½	1205	22	560	47	1195	23	585	46 ½	1180	24	610	46	1170	Table 11B-5	<p>TABLE 11B-5—MAXIMUM REACH DEPTH FOR AUTOMATED TELLER MACHINES</p> <table border="1" data-bbox="755 349 970 868"> <thead> <tr> <th>REACH DEPTH (X) (Inches)</th> <th>MAXIMUM HEIGHT (Y) (Inches)</th> </tr> </thead> <tbody> <tr><td colspan="2">X 25.4 for mm</td></tr> <tr><td>10</td><td>54</td></tr> <tr><td>11</td><td>53.5</td></tr> <tr><td>12</td><td>53</td></tr> <tr><td>13</td><td>52.5</td></tr> <tr><td>14</td><td>51.5</td></tr> <tr><td>15</td><td>51</td></tr> <tr><td>16</td><td>50.5</td></tr> <tr><td>17</td><td>50</td></tr> <tr><td>18</td><td>49.5</td></tr> <tr><td>19</td><td>49</td></tr> <tr><td>20</td><td>48.5</td></tr> <tr><td>21</td><td>47.5</td></tr> <tr><td>22</td><td>47</td></tr> <tr><td>23</td><td>46.5</td></tr> <tr><td>24</td><td>46</td></tr> </tbody> </table> <p>Note: See Figure 11B-5D (d).</p>	REACH DEPTH (X) (Inches)	MAXIMUM HEIGHT (Y) (Inches)	X 25.4 for mm		10	54	11	53.5	12	53	13	52.5	14	51.5	15	51	16	50.5	17	50	18	49.5	19	49	20	48.5	21	47.5	22	47	23	46.5	24	46	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Table 11B-5 incorrectly references Figure 11B-5D(d). The correct reference is Figure 11B-5F.
Reach Depth In	Maximum Height Mm	Reach Depth In	Maximum Height Mm																																																																																																					
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4.34.3 (3) Forward and Parallel Approach. If both a forward and parallel approach are possible, operable parts of controls shall be placed within at least one of the reach	1117B.7.4.1 4.	Forward and parallel approach. If both a forward and parallel approach are possible, operable parts of controls shall be placed within at least one of the reach ranges in Item 2 or 3.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																																																																																																			

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>ranges in paragraphs (1) or (2) of this section.</p> <p>4.34.3 (4) Bins. Where bins are provided, for envelopes, waste paper, or other purposes, at least one of each type provided shall comply with the applicable reach ranges in paragraph (1), (2), or (3) of this section.</p> <p>4.34.3 EXCEPTION: Where a function can be performed in a substantially equivalent manner by using an alternate control, only one of the controls needed to perform that function is required to comply with this section. If the controls are identified by tactile markings, such markings shall be provided on both controls.</p>	1117B.7.4.1 5.	<p>Where bins are provided for envelopes, waste paper, or other purposes, at least one of each type provided shall comply with the applicable reach ranges in Item 2, 3, or 4.</p> <p>EXCEPTION: Where a function can be performed in a substantially equivalent manner by using an alternate control, only one of the controls needed to perform that function is required to comply with this section., If the controls are identified by tactile markings, such markings shall be provided on both controls.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.34.4 Controls. Controls for user activation shall comply with 4.27.4.	1117B.7.3	Controls. Controls for user activation shall comply with the requirements of Section 1117B.6, Item 4, which states that controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 pounds (22.2 N) of force.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.34.5 Equipment for Persons with Vision Impairments. Instructions and all information for use shall be made accessible to and independently usable by persons with vision impairments.	1117B.7.6	ATM equipment for persons with vision impairments. Instructions and all information for use shall be made accessible to and independently usable by persons with vision impairments.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.35 Dressing and Fitting Rooms. 4.35.1 General. Dressing and fitting rooms required to be accessible by 4.1 shall comply with 4.35 and shall be on an accessible route.	1110B.1.7	Fitting and dressing rooms. Where fitting or dressing rooms are provided for male or female customers, patients, employees, or the general public, 5 percent, but never less than one, of dressing rooms for each type of use in each cluster of dressing rooms shall be accessible.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Section 1110B.1.7 meets the ADA but it needs to include language that dressing and fitting rooms be on an accessible route.

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4.35.2 Clear Floor Space. A clear floor space allowing a person using a wheelchair to make a 180-degree turn shall be provided in every accessible dressing room entered through a swinging or sliding door. No door shall swing into any part of the turning space. Turning space shall not be required in a private dressing room entered through a curtained opening at least 32 in (815 mm) wide if clear floor space complying with section 4.2 renders the dressing room usable by a person using a wheelchair.	1110B.1.7	Every accessible dressing room shall have a 24-inch by 48-inch (610 mm by 1219 mm) bench fixed to the wall along the longer dimension. The bench shall be mounted 17 to 19 inches (432 to 483 mm) above the finish floor. Clear floor space shall be provided alongside the bench to allow a person using a wheelchair to make a parallel transfer onto the bench. The structural strength of the bench and attachments shall comply with Section 1115B.8. The minimum clear space within the room shall be 60 inches (1524 mm) in width and length. No door shall encroach into the required space.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.35.3 Doors. All doors to accessible dressing rooms shall be in compliance with section 4.13.	1110B.1.7	Entry doors shall conform to the requirements of Section 1133B.2 and aisles leading to such doors shall conform to Sections 1133B.6.1 and 1133B.6.2.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.35.4 Bench. Every accessible dressing room shall have a 24 in by 48 in (610 mm by 1220 mm) bench fixed to the wall along the longer dimension. The bench shall be mounted 17 in to 19 in (430 mm to 485 mm) above the finish floor. Clear floor space shall be provided alongside the bench to allow a person using a wheelchair to make a parallel transfer onto the bench. The structural strength of the bench and attachments shall comply with 4.26.3.	1110B.1.7	Every accessible dressing room shall have a 24-inch by 48-inch (610 mm by 1219 mm) bench fixed to the wall along the longer dimension. The bench shall be mounted 17 to 19 inches (432 to 483 mm) above the finish floor. Clear floor space shall be provided alongside the bench to allow a person using a wheelchair to make a parallel transfer onto the bench. The structural strength of the bench and attachments shall comply with Section 1115B.8. The minimum clear space within the room shall be 60 inches (1524 mm) in width and length. No door shall encroach into the required space.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
Where installed in conjunction with showers, swimming pools, or other wet locations, water shall not accumulate upon the surface of the bench and the bench shall have a slip-resistant surface.	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 has no equivalent section. Adopt ADAAG language into 1110B.1.7	Every accessible dressing room shall have a 24–inch by 48–inch (610 mm by 1219 mm) bench fixed to the wall along the longer dimension. The bench shall be mounted 17 to 19 inches (432 to 483 mm) above the finish floor. Clear floor space shall be provided alongside the bench to allow a person using a wheelchair to make a parallel transfer onto the bench. The structural strength of the bench and attachments shall comply with Section 1115B.8. <u>Where installed in conjunction with showers, swimming pools, or other wet locations, water shall not accumulate upon the surface of the bench and the bench shall have a slip-resistant surface.</u> The minimum clear space within the room shall be 60 inches (1524 mm) in width and length. No door shall encroach into the required space.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
4.35.5 Mirror. Where mirrors are provided in dressing rooms of the same use, then in an accessible dressing room, a full-length mirror, measuring at least 18 in wide by 54 in high (460 mm by 1370 mm), shall be mounted in a position affording a view to a person on the bench as well as to a person in a standing position.	1110B.1.7	The bottom of mirrors provided for use by persons with disabilities shall not be greater than 20 inches (508 mm) from the floor. Mirrors to be used by persons with disabilities shall be full–length, measuring at least 18 inches (457 mm) wide by 54 inches (1372 mm) high, and shall be mounted in a position affording a view to a person on the bench as well as to a person in a standing position.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5 RESTAURANTS AND CAFETERIAS 5.1* General. Except as specified or modified in this section, restaurants and cafeterias shall comply with the requirements of 4.1 to 4.35. Where fixed tables (or dining counters where food is consumed but there is no service) are provided, at least 5	1104B.5 1104B.5.1 <u>1104B.5.2</u>	Dining, Banquet and Bar Facilities. General. Dining, banquet, and bar facilities shall be made accessible to persons with disabilities as provided in this section. <u>Entrance. Access to these facilities shall be provided at entrances and exits as required by Section 1133B.1.1.</u>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1104B.5.2.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>percent, but not less than one, of the fixed tables (or a portion of the dining counter) shall be accessible and shall comply with 4.32 as required in 4.1.3(18). In establishments where separate areas are designated for smoking and non-smoking patrons, the required number of accessible fixed tables (or counters) shall be proportionally distributed between the smoking and non-smoking areas. In new construction, and where practicable in alterations, accessible fixed tables (or counters) shall be distributed throughout the space or facility.</p>	<p>1104B.5 4.</p>	<p>Seating. Each dining, banquet and bar area shall have one wheelchair seating space for each 20 seats, with at least one minimum wheelchair seating space per functional area. Such seating shall be designed and arranged to permit use by wheelchair occupants, and shall comply with Section 1122B, "Fixed or Built-in Seating, Tables, and Counters." Access to such seating spaces shall be provided with main aisles not less than 36 inches (914 mm) clear width. Accessible seating spaces shall be integrated with general seating to allow a reasonable selection of seating area and to avoid having one area specifically highlighted as the area for persons with disabilities. The ratio of accessible seating is based on the total number of seats provided.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not address seating in smoking and non-smoking areas. Adopt ADAAG language as follows.</p>	<p>Seating. Each dining, banquet and bar area shall have one wheelchair seating space for each 20 seats, with at least one minimum wheelchair seating space per functional area. Such seating shall be designed and arranged to permit use by wheelchair occupants, and shall comply with Section 1122B, "Fixed or Built-in Seating, Tables, and Counters." Access to such seating spaces shall be provided with main aisles not less than 36 inches (914 mm) clear width. <u>In establishments where separate areas are designated for smoking and non-smoking patrons, the required number of accessible fixed tables (or counters) shall be proportionally distributed between the smoking and non-smoking areas.</u> Accessible seating spaces shall be integrated with general seating to allow a reasonable selection of seating area and to avoid having one area specifically highlighted as the area for persons with disabilities. The ratio of accessible seating is based on the total number of seats provided.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>5.2 Counters and Bars. Where food or drink is served at counters exceeding 34 in (865 mm) in height for consumption by customers seated on stools or standing at the counter, a portion of the main counter which is 60 in (1525 mm) in length minimum shall be provided in compliance with 4.32 or service shall be available at accessible tables within the same area.</p>	<p>None</p>	<p>No equivalent section.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 requires access to each "functional area" which includes seating at bars and eating counters, but does not include specific width requirements beyond 36". Adopt ADAAG language into 1104B.5 4. as follows.</p>	<p>Seating. Each dining, banquet and bar area shall have one wheelchair seating space for each 20 seats, with at least one minimum wheelchair seating space per functional area. Such seating shall be designed and arranged to permit use by wheelchair occupants, and shall comply with Section 1122B, "Fixed or Built-in Seating, Tables, and Counters." Access to such seating spaces shall be provided with main aisles not less than 36 inches (914 mm) clear width. Accessible seating spaces shall be integrated with general seating to allow a reasonable selection of seating area and to avoid having one area specifically highlighted as the area for persons with disabilities. The ratio of accessible seating is based on the total number of seats provided. <u>Where food or drink is served at counters exceeding 34 in (865 mm) in height for consumption by customers seated on stools or standing at the counter, a portion of the main counter which is 60 in (1525 mm) in length minimum shall be provided in compliance with 1122B.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
5.3 Access Aisles. All accessible fixed tables shall be accessible by means of an access aisle at least 36 in (915 mm) clear between parallel edges of tables or between a wall and the table edges.	1104B.5 4.	Seating. Each dining, banquet and bar area shall have one wheelchair seating space for each 20 seats, with at least one minimum wheelchair seating space per functional area. Such seating shall be designed and arranged to permit use by wheelchair occupants, and shall comply with Section 1122B, "Fixed or Built-in Seating, Tables, and Counters." Access to such seating spaces shall be provided with main aisles not less than 36 inches (914 mm) clear width. Accessible seating spaces shall be integrated with general seating to allow a reasonable selection of seating area and to avoid having one area specifically highlighted as the area for persons with disabilities. The ratio of accessible seating is based on the total number of seats provided.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not contain the same level of specificity as ADAAG for aisle widths between tables. Adopt ADAAG language as follows.	Seating. Each dining, banquet and bar area shall have one wheelchair seating space for each 20 seats, with at least one minimum wheelchair seating space per functional area. Such seating shall be designed and arranged to permit use by wheelchair occupants, and shall comply with Section 1122B, "Fixed or Built-in Seating, Tables, and Counters." Access to such seating spaces shall be provided with main aisles not less than 36 inches (914 mm) clear width <u>between parallel edges of tables or between a wall and the table edges</u> . Accessible seating spaces shall be integrated with general seating to allow a reasonable selection of seating area and to avoid having one area specifically highlighted as the area for persons with disabilities. The ratio of accessible seating is based on the total number of seats provided.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5.4 Dining Areas. In new construction, all dining areas, including raised or sunken dining areas, loggias, and outdoor seating areas, shall be accessible. In non-elevator buildings, an accessible means of vertical access to the mezzanine is not required under the following conditions: 1) the area of mezzanine seating measures no more than 33 percent of the area of the total accessible seating area; 2) the same services and decor are provided in an accessible space usable by the general public; and, 3) the accessible areas are not restricted to use by people with disabilities. In alterations, accessibility to raised or sunken dining areas, or to all parts of outdoor seating areas is not required	1104B.5 3.	Functional activity. Wheelchair access shall be provided to all areas where each type of functional activity occurs.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not contain the same level of specificity as ADAAG for access to different dining areas. Adopt ADAAG language as follows.	Functional activity. Wheelchair access shall be provided to all areas where each type of functional activity occurs. <u>In new construction, all dining areas, including raised or sunken dining areas, loggias, and outdoor seating areas, shall be accessible. Note: for existing buildings see Section 1120B – Floors and Levels.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>provided that the same services and decor are provided in an accessible space usable by the general public and are not restricted to use by people with disabilities.</p> <p>Figure 53 of the ADA Standards. Food Service Lines. The clear width of the food service line shall be measured from the leading edge of the tray slide.</p>	1120B.1 2.	<p>Floors Within Each Story. In buildings and facilities, floors of a given story shall be a common level throughout, or shall be connected by pedestrian ramps, passenger elevators or special access lifts. Exceptions: In existing dining, banquet and bar facilities, when the enforcing agency determines that compliance with this section would create an unreasonable hardship, an exception shall be granted provided that a minimum of 75 percent of the dining, banquet and bar area shall be a common level throughout or shall be connected by pedestrian ramps, passenger elevators or special lifts. See Section 101.17.11, Item 1.4, for new buildings only.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not contain the same level of specificity as ADAAG for access to services and decor. Adopt ADAAG language as follows.</p>	<p>Floors Within Each Story. In buildings and facilities, floors of a given story shall be a common level throughout, or shall be connected by pedestrian ramps, passenger elevators or special access lifts. Exceptions: In existing dining, banquet and bar facilities, when the enforcing agency determines that compliance with this section would create an unreasonable hardship, an exception shall be granted provided that a minimum of 75 percent of the dining, banquet and bar area shall be a common level throughout or shall be connected by pedestrian ramps, passenger elevators or special lifts <u>and provided that the same services and decor are provided in an accessible space usable by the general public and are not restricted to use by people with disabilities.</u> See Section 101.17.11, Item 1.4, for new buildings only.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
	Figure 11B-16	Refer to code.	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	No action required.	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
5.5 Food Service Lines. Food service lines shall have a minimum clear width of 36 in (915 mm), with a preferred clear width of 42 in (1065 mm) to allow passage around a person using a wheelchair. Tray slides shall be mounted no higher than 34 in (865 mm) above the floor (see Fig. 53). If self-service shelves are provided, at least 50 percent of each type must be within reach ranges specified in 4.2.5 and 4.2.6.	1104B.5 5.	<p>Food service aisles. Food service aisles shall be a minimum of 36 inches (914 mm) of clear width with a preferred width of 42 inches (1067 mm) where passage of stopped wheelchairs by pedestrians is desired. Tray slides shall be mounted no higher than 34 inches (864 mm) above the floor. If self-service shelves are provided, a reasonable portion must be within the ranges shown in Figure 11B-16.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 specifies that a reasonable portion of self-service shelves must be accessible where ADAAG specifies that a minimum of 50% of each type. Adopt ADAAG language as follows.</p>	<p>Food service aisles. Food service aisles shall be a minimum of 36 inches (914 mm) of clear width with a preferred width of 42 inches (1067 mm) where passage of stopped wheelchairs by pedestrians is desired. Tray slides shall be mounted no higher than 34 inches (864 mm) above the floor. If self-service shelves are provided, a <u>reasonable portion at least 50 percent of each type</u> must be within the ranges shown in Figure 11B-16.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>DSA's proposed revision does not meet the ADA because it does not include proper reach range requirements.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>5.6 Tableware and Condiment Areas. Self-service shelves and dispensing devices for tableware, dishware, condiments, food and beverages shall be installed to comply with 4.2 (see Fig. 54).</p> <p>Figure 54 of the ADA Standards. Tableware Areas. The maximum height is 54 in (1370 mm).</p>	1104B.5 6.	Tableware areas. Tableware, dishware, condiments, food and beverage display shelves, and dispensing devices shall comply with Section 1122B.4. See Figure 11B-17.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not specify self-service. Adopt ADAAG language as follows.	Tableware <u>and Condiment</u> areas. <u>Self-service</u> tableware, dishware, condiments, food and beverage display shelves, and dispensing devices shall comply with Section 1122B.4. See Figure 11B-17.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA but it also needs a reference to section 1118B.
	Figure 11B-17	Refer to code.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Figure 11B-17 meets the ADA but the vertical 54 inch maximum dimension is measured to the top, and not middle, of the napkin dispenser.
5.7 Raised Platforms. In banquet rooms or spaces where a head table or speaker's lectern is located on a raised platform, the platform shall be accessible in compliance with 4.8 or 4.11. Open edges of a raised platform shall be protected by placement of tables or by a curb.	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 covers raised areas under "Floors and Levels" (1120B), however this specific ADAAG requirement should be included in "Dining, Banquet and Bar Facilities". Adopt ADAAG language into 1104B as follows.	<u>Raised Platforms. In banquet rooms or spaces where a head table or speaker's lectern is located on a raised platform, the platform shall be accessible in compliance with 1133B.5 or 1116B.2. Open edges of a raised platform shall be protected by a curb in compliance with 1133B.5.4.9.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
5.8 Vending Machines and Other Equipment. Spaces for vending machines and other equipment shall comply with 4.2 and shall be located on an accessible route.	1126B	Vending Machines. Install vending machines in compliance with Section 1117B.6, "Controls and Operating Mechanisms."	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 addresses controls and operating mechanisms but not placement of the equipment. Adopt ADAAG language as follows.	Vending Machines and Other Equipment. Spaces for vending machines and other equipment shall comply with Section 1118B and shall be located on an accessible route. <u>Install vending machines in compliance</u> Vending machine controls shall comply with Section 1117B.6, "Controls and Operating Mechanisms."	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5.9 Quiet Areas. (Reserved).	None	For reference only.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
6 MEDICAL CARE FACILITIES 6.1 General. Medical care facilities included in this section are those in which people receive physical or medical treatment or care and where persons may need assistance in responding to an emergency and where the period of stay may exceed twenty-four hours. In addition to the requirements of 4.1 through 4.35, medical care facilities and buildings shall comply with 6.	1109B.1	General. All Group I Occupancies shall be accessible as provided in this chapter. See also the general requirements listed in Section 1114B.1.1.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	<u>1109B.6</u>	<u>Diagnostic and Treatment Areas. Diagnostic and treatment areas and, where applicable, at least one dressing room, sanitary facility, etc., for each unit or suite, shall be made accessible.</u>			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added sections 1109B.6, 1109B.7, and 1109B.8.
	<u>1109B.7</u>	<u>Waiting Areas, Offices and Sanitary Facilities. Waiting areas, offices and sanitary facilities serving them shall be made accessible as covered in other portions of these standards.</u>			<input type="checkbox"/> Yes <input type="checkbox"/> No	
<u>1109B.8</u>	<u>Office and Suites. In buildings that house offices and suites of physicians, dentists, etc., all such offices or suites shall be made accessible, subject to other provisions of these regulations.</u>			<input type="checkbox"/> Yes <input type="checkbox"/> No		

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
(1) Hospitals - general purpose hospitals, psychiatric facilities, detoxification facilities -- At least 10 percent of patient bedrooms and toilets, and all public use and common use areas are required to be designed and constructed to be accessible.	1109B.3 2.	Patient Bedrooms and Toilet Rooms. Patient bedrooms and associated toilet facilities shall be made accessible as follows: General-purpose hospitals, psychiatric facilities, and detoxification facilities shall have at least 10 percent of patient bedrooms and toilets, and all public-use and common-use areas, accessible.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
(2) Hospitals and rehabilitation facilities that specialize in treating conditions that affect mobility, or units within either that specialize in treating conditions that affect mobility -- All patient bedrooms and toilets, and all public use and common use areas are required to be designed and constructed to be accessible.	1109B.3 3.	Hospitals and rehabilitation facilities that specialize in treating conditions that affect mobility, or units within either that specialize in treating conditions that affect mobility, shall have all patient bedrooms and toilets and all public-use and common-use areas accessible.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
(3) Long term care facilities, nursing homes - - At least 50 percent of patient bedrooms and toilets, and all public use and common use areas are required to be designed and constructed to be accessible.	1109B.3 1.	Long-term-care facilities, including skilled nursing facilities, intermediate care facilities, bed and care, and nursing homes shall have at least 50 percent of patient bedrooms and toilet rooms, and all public-use and common-use areas, accessible.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>6.1 (4) Alterations to patient bedrooms. (a) When patient bedrooms are being added or altered as part of a planned renovation of an entire wing, a department, or other discrete area of an existing medical facility, a percentage of the patient bedrooms that are being added or altered shall comply with 6.3. The percentage of accessible rooms provided shall be consistent with the percentage of rooms required to be accessible by the applicable requirements of 6.1(1), 6.1(2), or 6.1(3), until the number of accessible patient bedrooms in the facility equals the overall number that would be required if the facility were newly constructed. (For example, if 20 patient bedrooms are being altered in the obstetrics department of a hospital, 2 of the altered rooms must be made accessible. If, within the same hospital, 20 patient bedrooms are being altered in a unit that specializes in treating mobility impairments, all of the altered rooms must be made accessible.) Where toilet/bathrooms are part of patient bedrooms which are added or altered and required to be accessible, each such patient toilet/bathroom shall comply with 6.4.</p>	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not contain an equivalent section. Adopt ADAAG language into Section 1109B.3 as follows.	<p><u>EXCEPTION 1:</u> <u>Alterations to patient bedrooms. When patient bedrooms are being added or altered as part of a planned renovation of an entire wing, a department, or other discrete area of an existing medical facility, the percentage of accessible rooms provided shall be consistent with the percentage of rooms required to be accessible by 1109B.3, until the number of accessible patient bedrooms in the facility equals the overall number that would be required if the facility were newly constructed. (For example, if 20 patient bedrooms are being altered in the obstetrics department of a hospital, 2 of the altered rooms must be made accessible. If, within the same hospital, 20 patient bedrooms are being altered in a unit that specializes in treating mobility impairments, all of the altered rooms must be made accessible.) Where toilet/bathrooms are part of patient bedrooms which are added or altered and required to be accessible, each such patient toilet/bathroom shall comply with 1109B.5.</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>DSA's proposed revision meets the ADA, but it needs to include a reference to section 1109B.4.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>(b) When patient bedrooms are being added or altered individually, and not as part of an alteration of the entire area, the altered patient bedrooms shall comply with 6.3, unless either: a) the number of accessible rooms provided in the department or area containing the altered patient bedroom equals the number of accessible patient bedrooms that would be required if the percentage requirements of 6.1(1), 6.1(2), or 6.1(3) were applied to that department or area; or b) the number of accessible patient bedrooms in the facility equals the overall number that would be required if the facility were newly constructed. Where toilet/bathrooms are part of patient bedrooms which are added or altered and required to be accessible, each such toilet/bathroom shall comply with 6.4.</p>	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not contain an equivalent section. Adopt ADAAG language into Section 1109B.3 as follows.	<p><u>When patient bedrooms are being added or altered individually, and not as part of an alteration of the entire area, the altered patient bedrooms shall comply with 1109B.3, unless either: a) the number of accessible rooms provided in the department or area containing the altered patient bedroom equals the number of accessible patient bedrooms that would be required if the percentage requirements of 1109B.3 were applied to that department or area; or b) the number of accessible patient bedrooms in the facility equals the overall number that would be required if the facility were newly constructed. Where toilet/bathrooms are part of patient bedrooms which are added or altered and required to be accessible, each such toilet/bathroom shall comply with 1109B.5.</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA, but it needs to include a reference to section 1109B.4.
<p>6.2 Entrances. At least one accessible entrance that complies with 4.14 shall be protected from the weather by canopy or roof overhang. Such entrances shall incorporate a passenger loading zone that complies with 4.6.6.</p>	1109B.2	<p>Entrance. At least one accessible entrance shall be protected from the weather by canopy or roof overhang. Such entrances shall incorporate a passenger loading zone. Passenger loading zones shall provide an access aisle at least 60 inches (1524 mm) wide and 20 feet (6096 mm) long adjacent and parallel to the vehicle pull-up space. If there are curbs between the access aisle and the vehicle pull-up space, then a curb ramp complying with Chapter 11B shall be provided. Vehicle standing spaces and access aisles shall be level with surface slopes not exceeding 1 unit vertical in 50 units horizontal (2% slope) in all directions. Minimum vertical clearance of 114 inches (2896 mm) at accessible passenger loading zones and along vehicle access routes to such areas from site entrances shall be provided.</p> <p>EXCEPTION: Clinics and other medical facilities that are not intended for patient stays of 24 hours or more, and that are located above the first story of a building, and that do not have a dedicated entrance from the exterior of the building at the first story.</p>	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>6.3 Patient Bedrooms. Provide accessible patient bedrooms in compliance with 4.1 through 4.35. Accessible patient bedrooms shall comply with the following: (1) Each bedroom shall have a door that complies with 4.13. EXCEPTION: Entry doors to acute care hospital bedrooms for in-patients shall be exempted from the requirement in 4.13.6 for maneuvering space at the latch side of the door if the door is at least 44 in (1120 mm) wide.</p>	<p>1109B.4 1109B.4.3</p>	<p>Patient Bedroom Areas. Accessible patient bedrooms shall comply with the following requirements: Each bedroom shall have an accessible door that complies with Section 1133B.2.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>(2) Each bedroom shall have adequate space to provide a maneuvering space that complies with 4.2.3. In rooms with 2 beds, it is preferable that this space be located between beds.</p>	<p>1109B.4.1</p>	<p>Each bedroom shall have a turning space measuring 60 inches (1524 mm) clear in diameter, or that is a T-shaped space complying with Figure 11B-12. In rooms with two beds, it is preferable that this space be located between beds.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>(3) Each bedroom shall have adequate space to provide a minimum clear floor space of 36 in (915 mm) along each side of the bed and to provide an accessible route complying with 4.3.3 to each side of each bed.</p>	<p>1109B.4.2</p>	<p>Each bedroom shall have a minimum clear floor space of 36 inches along each side of the bed, and shall provide an accessible route to each side of the bed.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>6.4 Patient Toilet Rooms. Where toilet/bath rooms are provided as a part of a patient bedroom, each patient bedroom that is required to be accessible shall have an accessible toilet/bath room that complies with 4.22 or 4.23 and shall be on an accessible route.</p>	<p>1109B.5</p>	<p>Patient toilet rooms required to be accessible shall comply with Section 1115.B.</p>	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Section 1109B.5 meets the ADA but it should include a reference to bathing facilities.</p>
<p>7 BUSINESS AND MERCANTILE 7.1 General. In addition to the requirements of 4.1 to 4.35, the design of all areas used for business transactions with the public shall comply with 7.</p>	<p><u>1110B.1</u> <u>1110B.1.1</u> <u>1110B.1.2</u> <u>1105B.3</u></p>	<p><u>Sales.</u> <u>General areas. General sales, display and office areas together with related toilet rooms shall be made accessible.</u> <u>Work areas. Sales employee work stations shall be located on accessible levels, and the customer side of sales or check-out stations shall be accessible. Employee work areas shall be sized and arranged to provide access to employees in wheelchairs.</u> <u>Office Buildings and Personal and Public Service</u></p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not reference the requirements for transaction counters in this section. Adopt ADAAG requirement as</p>	<p>Facilities covered. Facilities covered in this section are those that are used by the public as customers, clients, visitors or which are potentially places of employment and shall include, but not be limited to, the following requirements: 1.All types of general and specialized business professional offices, including those related to professional medicine or dentistry, insurance, real estate, attorneys, credit bureaus, consultants, counseling and accounting. 2.All types of sales establishments, including outlets for all general and special merchandise and equipment, including personal and household</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Added sections 1110B.1, 1110B.1.1, 1110B.1.2, 1105B.3, 1105B.3.2, and 1105B.3.3 for completeness. For section 1105B.3.3.2, the words "a minimum of" should be inserted before the measurement "36 inches."</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	<p>1105B.3.1</p> <p>1105B.3.2</p> <p>1105B.3.3</p>	<p><u>Facilities. Office buildings and personal and public service facilities shall conform to the provisions of this section.</u></p> <p>Facilities covered. Facilities covered in this section are those that are used by the public as customers, clients, visitors or which are potentially places of employment and shall include, but not be limited to, the following requirements:</p> <p>1.All types of general and specialized business professional offices, including those related to professional medicine or dentistry, insurance, real estate, attorneys, credit bureaus, consultants, counseling and accounting.</p> <p>2.All types of sales establishments, including outlets for all general and special merchandise and equipment, including personal and household furnishings and supplies, foods, sporting equipment, office supplies, vehicles and related parts and supplies, building materials, and pet shops.</p> <p>3.All personal and public service facilities, including banks, savings and loan companies, credit unions, newspaper and printing establishments, photographic studios, laundermats, cleaning and laundry outlets, veterinarian clinics and hospitals, automobile rental agencies, travel bureaus, public utility facilities, police stations and detention facilities, courtrooms and fire stations.</p> <p><u>Business and professional offices. Areas to be made accessible include the following:</u></p> <p><u>1. Client and visitor areas and office areas, together with related toilet rooms.</u></p> <p><u>2. Conference rooms, counseling rooms or cubicles and similar areas.</u></p> <p><u>3. Employee work areas shall have a minimum of 36 inches (914 mm) wide clear access, except as modified in other portions of these regulations. See Section 1133B.6.1 and 1133B.6.2.</u></p> <p><u>4. Professional medical and dental offices shall be made accessible and shall also comply with Section 1109B.</u></p> <p><u>Personal and public service facilities.</u></p> <p><u>1. Client and visitor areas, office areas, and related toilet rooms shall be made accessible.</u></p> <p><u>2. Employee work areas shall have 36 inches (914 mm) wide clear access, except as modified in other portions of these regulations. See Sections 1133B.6.1 and 1133B.6.2.</u></p>	<p>follows.</p>	<p>furnishings and supplies, foods, sporting equipment, office supplies, vehicles and related parts and supplies, building materials, and pet shops.</p> <p>3.All personal and public service facilities, including banks, savings and loan companies, credit unions, newspaper and printing establishments, photographic studios, laundermats, cleaning and laundry outlets, veterinarian clinics and hospitals, automobile rental agencies, travel bureaus, public utility facilities, police stations and detention facilities, courtrooms and fire stations.</p> <p><u>In addition to the requirements of this section, the design of all areas used for business transactions with the public shall comply with 1110B.1 Sales and 1122B Fixed or Built in Seating, Tables, and Counters.</u></p>		

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>7.2 Sales and Service Counters, Teller Windows, Information Counters.</p> <p>(1) In department stores and miscellaneous retail stores where counters have cash registers and are provided for sales or distribution of goods or services to the public, at least one of each type shall have a portion of the counter which is at least 36 in (915 mm) in length with a maximum height of 36 in (915 mm) above the finish floor. It shall be on an accessible route complying with 4.3. The accessible counters must be dispersed throughout the building or facility. In alterations where it is technically infeasible to provide an accessible counter, an auxiliary counter meeting these requirements may be provided.</p> <p>(2) At ticketing counters, teller stations in a bank, registration counters in hotels and motels, box office ticket counters, and other counters that may not have a cash register but at which goods or services are sold or distributed, either:</p> <p>(i) a portion of the main counter which is a minimum of 36 in (915 mm) in length shall be provided with a maximum height of 36 in (915 mm); or</p> <p>(ii) an auxiliary counter with a maximum height of 36 in (915 mm) in close proximity to the main counter shall be provided; or</p> <p>(iii) equivalent facilitation shall be provided (e.g., at a hotel registration counter, equivalent facilitation might consist of: (1) provision of a folding shelf attached to the main counter on which an individual with disabilities can write, and (2) use of the space on the side of the counter or at the concierge desk, for handing materials back and forth).</p> <p>All accessible sales and service counters shall be on an accessible route complying with 4.3.</p> <p>(3)* Assistive Listening Devices. (Reserved).</p>	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not provide the same level of specificity as ADAAG. Adopt modified ADAAG language as a new section 1122B.5.	<p><u>Sales and Service Counters, Teller Windows, Information Counters.</u> <u>In department stores and miscellaneous retail stores where counters have cash registers and are provided for sales or distribution of goods or services to the public, at least one of each type shall have a portion of the counter which is at least 36 in (915 mm) in length with a maximum height of 34 in (864 mm) above the finish floor and located on an accessible route. The accessible counters must be dispersed throughout the building or facility.</u></p> <p><u>At ticketing counters, teller stations in a bank, registration counters in hotels and motels, box office ticket counters, and other counters that may not have a cash register but at which goods or services are sold or distributed, a portion of the main counter which is a minimum of 36 in (915 mm) in length shall be provided with a maximum height of 34 in (864 mm).</u></p> <p><u>EXCEPTION: In existing buildings where it is determined that providing an accessible counter would create and unreasonable hardship, equivalent facilitation may consist of one of the following:</u></p> <p><u>1. An auxiliary counter meeting these requirements may be provided.</u></p> <p><u>2. Provision of a folding shelf attached to the main counter on which an individual with disabilities can write.</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>DSA's proposed revision meets the ADA but Exception 1 should add that the auxiliary counter shall be in close proximity to the main counter.</p> <p>DSA's proposed revision also needs to reference all sections concerning accessible routes: 1102B, 1114B, 1124B, 1133B.3., 1133B.5, 1133B.7, 1133B.8.6.</p>
	<u>1104B.3.12</u>	<u>Ticket booths. Customer and employee sides of ticket booths and of concession and refreshment sales facilities shall be made accessible to persons with disabilities.</u>			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1104B.3.12.
	<u>1104B.4.2</u>	<u>Ticket booth. The customer side of a ticket booth shall be, and the employee side may be, accessible.</u>			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1104B.4.2.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments																				
<p>7.3* Check-out Aisles.</p> <p>(1) In new construction, accessible check-out aisles shall be provided in conformance with the table below:</p> <table border="0" data-bbox="83 415 518 488"> <tr> <td>Total Check-out Aisles of Each Design</td> <td>Minimum Number of Accessible Check-out Aisles (Of Each Design)</td> </tr> <tr> <td>1 - 4</td> <td>1</td> </tr> <tr> <td>5 - 8</td> <td>2</td> </tr> <tr> <td>8 - 15</td> <td>3</td> </tr> <tr> <td>over 15 aisles</td> <td>3, plus 20% of additional aisles</td> </tr> </table> <p>EXCEPTION: In new construction, where the selling space is under 5000 square feet, only one check-out aisle is required to be accessible.</p> <p>EXCEPTION: In alterations, at least one check-out aisle shall be accessible in facilities under 5000 square feet of selling space. In facilities of 5000 or more square feet of selling space, at least one of each design of check-out aisle shall be made accessible when altered until the number of accessible check-out aisles of each design equals the number required in new construction.</p> <p>Examples of check-out aisles of different "design" include those which are specifically designed to serve different functions. Different "design" includes but is not limited to the following features - length of belt or no belt; or permanent signage designating the aisle as an express lane.</p>	Total Check-out Aisles of Each Design	Minimum Number of Accessible Check-out Aisles (Of Each Design)	1 - 4	1	5 - 8	2	8 - 15	3	over 15 aisles	3, plus 20% of additional aisles	1110B.1.3	<p>Checkstands. In new construction, checkstands, including service counters requiring a surface for transactions, shall be made accessible by providing a 36-inch (914 mm) aisle on the customer side of the checkstand. Where quick checkstands are provided, at least one shall be accessible. Where regular checkstands are provided, the number of checkstands that are accessible shall be as shown in Table 11B-2.</p> <p style="text-align: center;">TABLE 11B-2—CHECKSTANDS</p> <table border="1" data-bbox="768 548 1139 748"> <thead> <tr> <th>NUMBER OF REGULAR CHECKSTANDS</th> <th>NUMBER to be Accessible</th> </tr> </thead> <tbody> <tr> <td>1 to 4</td> <td>1</td> </tr> <tr> <td>5 to 8</td> <td>2</td> </tr> <tr> <td>9 to 15</td> <td>3</td> </tr> <tr> <td>over 15</td> <td>3 plus 20% of additional aisles</td> </tr> </tbody> </table> <p>In existing buildings, at least one checkout aisle shall be accessible in facilities with less than 5,000 square feet (465 m2) of selling space. In facilities of 5,000 square feet (465 m2) or more of selling space, at least one of each design of checkout aisle shall be made accessible when altered until the number of accessible checkout aisles of each design equals the number required in new construction.</p> <p>NOTE: Examples of checkout aisles of different design include those which are specifically designed to serve different functions. Different design includes, but is not limited to, the following features: length of belt or no belt, or permanent signage designating the aisle as an express lane.</p>	NUMBER OF REGULAR CHECKSTANDS	NUMBER to be Accessible	1 to 4	1	5 to 8	2	9 to 15	3	over 15	3 plus 20% of additional aisles	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Section 1110B.1.3 does not meet section 7.3(1) of the ADA Standards because section 1110B.1.3 does not require adequate number of accessible checkstands of each design.
Total Check-out Aisles of Each Design	Minimum Number of Accessible Check-out Aisles (Of Each Design)																									
1 - 4	1																									
5 - 8	2																									
8 - 15	3																									
over 15 aisles	3, plus 20% of additional aisles																									
NUMBER OF REGULAR CHECKSTANDS	NUMBER to be Accessible																									
1 to 4	1																									
5 to 8	2																									
9 to 15	3																									
over 15	3 plus 20% of additional aisles																									
(2) Clear aisle width for accessible check-out aisles shall comply with 4.2.1 and maximum adjoining counter height shall not exceed 38 in (965 mm) above the finish floor. The top of the lip shall not exceed 40 in (1015 mm) above the finish floor.	1110B.1.3	In new and existing construction, accessible checkstands shall provide a clear checkout aisle width of 36 inches (914 mm) with a maximum adjoining counter height not exceeding 38 inches (965 mm) above the finish floor. The top of the counter lip shall not exceed 40 inches (1016 mm) above the finish floor.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Section 1110B.1.3 meets the ADA but the 36 inch aisle width should be a minimum dimension.																				

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
(3) Signage identifying accessible check-out aisles shall comply with 4.30.7 and shall be mounted above the check-out aisle in the same location where the check-out number or type of check-out is displayed.	1110B.1.3	Accessible checkstands shall always be open to customers with disabilities and shall be identified by a sign clearly visible to those in wheelchairs. The sign shall display the international symbol of accessibility in white on a blue background and shall state "This checkstand to be open at all times for customers with disabilities."	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>7.4 Security Bollards. Any device used to prevent the removal of shopping carts from store premises shall not prevent access or egress to people in wheelchairs. An alternate entry that is equally convenient to that provided for the ambulatory population is acceptable.</p>	<p>1110B.1.6</p>	<p>Theft-prevention barriers. Where shopping cart theft prevention barriers are used, they shall conform to the following requirements:</p> <ol style="list-style-type: none"> 1. Each entrance and exit provided for public use shall be accessible to and usable by persons with disabilities. 2. Shopping cart barriers located at a public entrance or exit shall be designed to provide a clear, unobstructed opening at least 32 inches (813 mm) in width for ingress and egress of persons with disabilities. 3. Where gates are used, they shall open in the direction of travel, provide a clear unobstructed opening 32 inches (813 mm) in width and be maintained unlocked during business hours. Gates shall not operate a publicly audible alarm system or require more than 5 foot-pounds of force (22.2 N-m). 4. Where a clear unobstructed opening is provided, a level area is required on both sides of the clear opening or gate which extends a minimum of 44 inches (1118 mm) on each side of the opening and is at least 48 inches (1219 mm) in width. 5. Where a gate is used, the level area on both sides of the clear opening or gate shall be a minimum of 60 inches (1524 mm) in width and extend a minimum of 60 inches (1524 mm) (measured from the gate in a closed position) in the direction of the gate swing. The level area opposite the gate swing shall be a minimum of 48 inches (1219 mm) in width and extend a minimum of 42 inches (1067 mm). 6. Where a gate is used, the bottom of the gate shall be within 3 inches (76 mm) of the surface of the path of travel. The surface of the gate on each side shall be smooth to present no hazard to persons with disabilities using the gate and shall be structurally adequate to allow it to be opened with the wheelchair footpedals. 7. The path of travel to and through the clear opening or gate shall be designed to prevent barriers from obstructing it and shall be continuously maintained unobstructed during business hours. Also, the design shall specifically prevent parked vehicles from obstructing ingress and egress. 8. Interior and exterior pedestrian traffic barriers (posts, rails, turnstiles, etc.) shall allow unobstructed travel for persons with disabilities through a 32-inch (813 mm) clear opening. 	<p><input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment</p>	<p>No action required.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>8 LIBRARIES.</p> <p>8.1 General. In addition to the requirements of 4.1 to 4.35, the design of all public areas of a library shall comply with 8, including reading and study areas, stacks, reference rooms, reserve areas, and special facilities or collections.</p>	1106B.4.1	<p>General. Library general use areas such as those housing card files, book stacks, periodicals, reading and reference areas, information desks, circulation counters, etc., shall be made accessible to persons with disabilities.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not contain the same level of specificity as ADAAG. Adopt ADAAG language as follows.</p>	<p>General. Library general use areas such as those housing card files, book stacks, periodicals, reading and <u>study areas</u>, reference areas, information desks, circulation counters, <u>reserve areas</u>, <u>special facilities or collections</u>, etc., shall be made accessible to persons with disabilities.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>8.2 Reading and Study Areas. At least 5 percent or a minimum of one of each element of fixed seating, tables, or study carrels shall comply with 4.2 and 4.32. Clearances between fixed accessible tables and between study carrels shall comply with 4.3.</p>	None	No equivalent section.	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not contain seating requirements in this specific category. Adopt ADAAG language as follows.</p>	<p><u>Reading and Study Areas. At least 5 percent or a minimum of one of each element of fixed seating, tables, or study carrels shall comply with Section 1118B, "Space Allowance and Reach Ranges", Section 1122B, "Fixed or Built-in Seating, Tables, and Counters" and 1133B.6 "Aisles".</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>DSA's proposed revision meets the ADA but it needs to require reading and study areas to be on an accessible route similar to 4.3 of the ADA Standards.</p> <p>DSA's proposed revision also needs to reference all sections concerning accessible routes: 1102B, 1114B, 1124B, 1133B.3., 1133B.5, 1133B.7, 1133B.8.6</p>
<p>8.3 Check-Out Areas. At least one lane at each check-out area shall comply with 7.2(1). Any traffic control or book security gates or turnstiles shall comply with 4.13.</p>	None	No equivalent section.	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not contain seating requirements in this specific category. Adopt ADAAG language as follows.</p>	<p><u>Check-Out Areas. At least one lane at each check-out area shall be made accessible by providing a 36-inch (914 mm) aisle on the customer side. Any traffic control or book security gates or turnstiles shall comply with 1133B.2.3.4</u></p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>DSA's proposed revision does not meet the ADA because it does not include proper counter length and height requirements similar to section 7.2(1) of the ADA Standards.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
	221-T	TRANSIENT LODGING is a building, facility, or portion thereof, excluding outpatient medical care facilities, that contains one or more dwelling units or sleeping accommodations. Transient lodging may include, but is not limited to, resorts, group homes, hotels, motels and dormitories.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
9.1 Hotels, Motels, Inns, Boarding Houses, Dormitories, Resorts and Other Similar Places of Transient Lodging. 9.1.1 General. All public use and common use areas are required to be designed and constructed to comply with section 4 (Accessible Elements and Spaces: Scope and Technical Requirements).	1111B.2	Public and Common-use Rooms or Areas. Public and common-use rooms and similar areas shall be made accessible to people with disabilities, subject to specific provisions contained in other portions of these regulations. See also general requirements listed in Section 1114B.1.1.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
EXCEPTION: Sections 9.1 through 9.4 do not apply to an establishment located within a building that contains not more than five rooms for rent or hire and that is actually occupied by the proprietor of such establishment as the residence of such proprietor.	217	Public Accommodation.... Examples of public accommodations for purposes of this code shall include but not be limited to, the following private entities: 1. An inn, hotel, motel, or other place of lodging, except for an establishment located within a building that contains not more than five rooms for rent or hire.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Section 217 needs to specify that the establishment is a residence of the proprietor.
9.1.2 Accessible Units, Sleeping Rooms, and Suites. Accessible sleeping rooms or suites that comply with the requirements of 9.2 (Requirements for Accessible Units, Sleeping Rooms, and Suites) shall be provided in conformance with the table below. In addition, in hotels, of 50 or more	1111B.4.2	Guest rooms and suites. Places of transient lodging shall incorporate the accessibility requirements of this code as modified by this chapter in at least one guest room or dormitory room together with their sanitary facilities in conformance with Table 11B-3. All accessible sleeping rooms or suites required by Table 11B-3 shall comply with the requirements of Section 1111B.4 for hearing impaired guests.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Section 1111B.4.2 may contain an error in referencing Table 11B-3, instead of Table 11B-4, regarding guests rooms for people who are deaf or hard-of-hearing.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language			DSA Comment	DSA Proposed Revisions			ADA Equiv.	DOJ Comments																																				
<p>sleeping rooms or suites, additional accessible sleeping rooms or suites that include a roll-in shower shall also be provided in conformance with the table below. Such accommodations shall comply with the requirements of 9.2, 4.21, and Figure 57(a) or (b).</p> <table border="1" data-bbox="67 479 551 901"> <thead> <tr> <th>Number of Room</th> <th>Accessible Rooms</th> <th>Rooms with Roll-in Showers</th> </tr> </thead> <tbody> <tr><td>1 to 25</td><td>1</td><td></td></tr> <tr><td>26 to 50</td><td>2</td><td></td></tr> <tr><td>51 to 75</td><td>3</td><td>1</td></tr> <tr><td>76 to 100</td><td>4</td><td>1</td></tr> <tr><td>101 to 150</td><td>5</td><td>2</td></tr> <tr><td>151 to 200</td><td>6</td><td>2</td></tr> <tr><td>201 to 300</td><td>7</td><td>3</td></tr> <tr><td>301 to 400</td><td>8</td><td>4</td></tr> <tr><td>401 to 500</td><td>9</td><td>4, plus one for each additional 100 over 400</td></tr> <tr><td>501 to 1000</td><td>2% of total</td><td></td></tr> <tr><td>1001 and over</td><td>20 plus 1 for each 100 over 1000</td><td></td></tr> </tbody> </table> <p>Figure 57 of the ADA Standards. Roll-in Shower with Folding Seat. 57(a) Where a fixed seat is provided in a 30 in minimum by 60 in (716 mm by 1220 mm) minimum shower stall, the controls and spray unit on the back (long) wall shall be located a maximum of 27 in (685 mm) from the side wall where the seat is attached. 57(b) An alternate 36 in by 60 in (915 mm by 1220 mm) minimum shower stall is permitted. The width of the stall opening shall be a minimum of 36 in (915 mm) clear located on a long wall at the opposite end of the shower from the controls. The shower seat shall be 24 in (610 mm) minimum in length by 16 in (330 mm) minimum in width and may be rectangular in shape. The seat shall be located next to the opening to the shower and adjacent to the end wall containing the shower head and controls.</p>	Number of Room	Accessible Rooms	Rooms with Roll-in Showers	1 to 25	1		26 to 50	2		51 to 75	3	1	76 to 100	4	1	101 to 150	5	2	151 to 200	6	2	201 to 300	7	3	301 to 400	8	4	401 to 500	9	4, plus one for each additional 100 over 400	501 to 1000	2% of total		1001 and over	20 plus 1 for each 100 over 1000		Table 11B-3	TOTAL NUMBER OF ROOMS	FULLY ACCESSIBLE ROOMS	PLUS ADDITIONAL ACCESSIBLE ROOMS WITH ROLL-IN SHOWERS	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment In the instance where there are exactly 500 rooms, Title 24 does not meet ADAAG because, Title 24 requires 4 roll-ins where ADAAG requires 5. Revise table to conform to ADAAG as follows.	TOTAL NUMBER OF ROOMS	FULLY ACCESSIBLE ROOMS	PLUS ADDITIONAL ACCESSIBLE ROOMS WITH ROLL-IN SHOWERS	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
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ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments																																																
<p>9.1.3 Sleeping Accommodations for Persons with Hearing Impairments. In addition to those accessible sleeping rooms and suites required by 9.1.2, sleeping rooms and suites that comply with 9.3 (Visual Alarms, Notification Devices, and Telephones) shall be provided in conformance with the following table:</p> <table border="1" data-bbox="83 511 405 945"> <thead> <tr> <th>NUMBER OF ELEMENTS</th> <th>ACCESSIBLE ELEMENTS</th> </tr> </thead> <tbody> <tr><td>1 to 25</td><td>1</td></tr> <tr><td>26 to 50</td><td>2</td></tr> <tr><td>51 to 75</td><td>3</td></tr> <tr><td>76 to 100</td><td>4</td></tr> <tr><td>101 to 150</td><td>5</td></tr> <tr><td>151 to 200</td><td>6</td></tr> <tr><td>201 to 300</td><td>7</td></tr> <tr><td>301 to 400</td><td>8</td></tr> <tr><td>401 to 500</td><td>9</td></tr> <tr><td>501 to 1,000</td><td>2% of total</td></tr> <tr><td>1,001 and over</td><td>20 plus 1 for each 100 over 1,000</td></tr> </tbody> </table>	NUMBER OF ELEMENTS	ACCESSIBLE ELEMENTS	1 to 25	1	26 to 50	2	51 to 75	3	76 to 100	4	101 to 150	5	151 to 200	6	201 to 300	7	301 to 400	8	401 to 500	9	501 to 1,000	2% of total	1,001 and over	20 plus 1 for each 100 over 1,000	1111B.4.5 Table 11B-4	<table border="1" data-bbox="733 292 1150 690"> <thead> <tr> <th>TOTAL NUMBER OF ROOMS</th> <th>NUMBER OF ROOMS EQUIPPED FOR HEARING IMPAIRED</th> </tr> </thead> <tbody> <tr><td>1 to 25</td><td>1</td></tr> <tr><td>26 to 50</td><td>2</td></tr> <tr><td>51 to 75</td><td>3</td></tr> <tr><td>76 to 100</td><td>4</td></tr> <tr><td>101 to 150</td><td>5</td></tr> <tr><td>151 to 200</td><td>6</td></tr> <tr><td>201 to 300</td><td>7</td></tr> <tr><td>301 to 400</td><td>8</td></tr> <tr><td>401 to 500</td><td>9</td></tr> <tr><td>501 to 1,000</td><td>2% of total</td></tr> <tr><td>1,001 and over</td><td>20 plus 1 for each 100 over 1,000</td></tr> </tbody> </table>	TOTAL NUMBER OF ROOMS	NUMBER OF ROOMS EQUIPPED FOR HEARING IMPAIRED	1 to 25	1	26 to 50	2	51 to 75	3	76 to 100	4	101 to 150	5	151 to 200	6	201 to 300	7	301 to 400	8	401 to 500	9	501 to 1,000	2% of total	1,001 and over	20 plus 1 for each 100 over 1,000	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
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<p>9.1.4 Classes of Sleeping Accommodations. (1) In order to provide persons with disabilities a range of options equivalent to those available to other persons served by the facility, sleeping rooms and suites required to be accessible by 9.1.2 shall be dispersed among the various classes of sleeping accommodations available to patrons of the place of transient lodging. Factors to be considered include room size, cost, amenities provided, and the number of beds provided.</p>	1111B.4.1	1111B.4.1 Available range of accommodations. Accessible guest rooms or suites shall be dispersed among the various classes of sleeping accommodations to provide a range of options applicable to room sizes, costs, amenities provided, and the number of beds provided.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																																																	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
(2) Equivalent Facilitation. For purposes of this section, it shall be deemed equivalent facilitation if the operator of a facility elects to limit construction of accessible rooms to those intended for multiple occupancy, provided that such rooms are made available at the cost of a single occupancy room to an individual with disabilities who requests a single-occupancy room.	1111B.4.1	1111B.4.1 Available range of accommodations. Accessible guest rooms or suites shall be dispersed among the various classes of sleeping accommodations to provide a range of options applicable to room sizes, costs, amenities provided, and the number of beds provided.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not allow the same equivalency as ADAAG.	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Not Addressed
9.1.5 Alterations to Accessible Units, Sleeping Rooms, and Suites. When sleeping rooms are being altered in an existing facility, or portion thereof, subject to the requirements of this section, at least one sleeping room or suite that complies with the requirements of 9.2 (Requirements for Accessible Units, Sleeping Rooms, and Suites) shall be provided for each 25 sleeping rooms, or fraction thereof, of rooms being altered until the number of such rooms provided equals the number required to be accessible with 9.1.2. In addition, at least one sleeping room or suite that complies with the requirements of 9.3 (Visual Alarms, Notification Devices, and Telephones) shall be provided for each 25 sleeping rooms, or fraction thereof, of rooms being altered until the number of such rooms equals the number required to be accessible by 9.1.3.	1111B.4.2	Exception: When guest rooms are being altered in an existing facility, or portion thereof, subject to the requirements of this section, at least one guest room or suite that complies with the accessibility requirements of this code as modified by this chapter shall be provided for each 25 guest rooms, or fraction thereof, of rooms being altered until the number of such rooms provided equals the number required to be accessible in Table 11B-3. In addition, at least one guest room or suite that complies with the requirements of Section 1111B.4.5 shall be provided for each 25 guest rooms, or fraction thereof, of rooms being altered until the number of such rooms equals the number required to be accessible in Table 11B-4.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
9.2 Requirements for Accessible Units, Sleeping Rooms and Suites. 9.2.1 General. Units, sleeping rooms, and suites required to be accessible by 9.1 shall comply with 9.2.	<u>1111B.1</u>	<u>General. Group R Occupancies shall be accessible or adaptable as provided in this chapter. Public-use and common-use areas serving adaptable guest and/or dwelling units shall be accessible. See also the general accessibility requirements as listed in Sections 1114B.1.1 and 1111B.</u>	<input type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added section 1111B.1.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
9.2.2 (2) An accessible route complying with 4.3 shall connect all accessible spaces and elements, including telephones, within the unit, sleeping room, or suite. This is not intended to require an elevator in multi-story units as long as the spaces identified in 9.2.2(6) and (7) are on accessible levels and the accessible sleeping area is suitable for dual occupancy.	1111B.4.2	Guest rooms and suites. Places of transient lodging shall incorporate the accessibility requirements of this code as modified by this chapter in at least one guest room or dormitory room together with their sanitary facilities in conformance with Table 11B-3.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not articulate that within the subsection as directly as ADAAG does. Adopt the ADAAG language for the purpose of clarity as follows.	Guest rooms and suites. Places of transient lodging shall incorporate the accessibility requirements of this code as modified by this chapter in at least one guest room or dormitory room together with their sanitary facilities in conformance with Table 11B-3. <u>An accessible route shall connect all accessible spaces and elements, including telephones, within the unit, sleeping room, sleeping room or suite.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
9.2.2 (3) Doors and doorways designed to allow passage into and within all sleeping rooms, suites or other covered units shall comply with 4.13.	1111B.4.2	Guest rooms and suites. Places of transient lodging shall incorporate the accessibility requirements of this code as modified by this chapter in at least one guest room or dormitory room together with their sanitary facilities in conformance with Table 11B-3. <u>All accessible sleeping rooms or suites required by Table 11B-3 shall comply with the requirements of Section 1111B.4 for hearing impaired guests.</u>	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not provide the same level of specificity as ADAAG. Adopt ADAAG language as follows	Guest rooms and suites. Places of transient lodging shall incorporate the accessibility requirements of this code as modified by this chapter in at least one guest room or dormitory room together with their sanitary facilities in conformance with Table 11B-3. <u>All accessible sleeping rooms or suites required by Table 11B-3 shall comply with the requirements of Section 1111B.4 for hearing impaired guests.</u> <u>Doors and doorways designed to allow passage into and within all sleeping rooms, suites or other covered units shall comply with 1133B.2, as shall the primary entrance and exit to other sleeping rooms and suites.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Added the additional language from section 1111B.4.2 for completeness. DSA's proposed revision for section 1111B.4.2 meets section 9.2.2(3) of the ADA Standards. However, the proposed revision conflicts with DSA's proposed revision for section 9.4 of the ADA Standards because the proposed revision for section 1111B.4.2 limits the doors and doorways requirement only to primary entrance and exit areas of other sleeping rooms and suites.
9.2.2 (4) If fixed or built-in storage facilities such as cabinets, shelves, closets, and drawers are provided in accessible spaces, at least one of each type provided shall contain storage space complying with 4.25. Additional storage may be provided outside of the dimensions required by 4.25.	1125B.1	General. If fixed storage facilities such as cabinets, shelves, closets or drawers are provided where access is required by Section 101.17.11, at least one of each type shall comply with this section. Additional storage may be provided outside of the reach ranges shown in Figure 11B-5D.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	DSA should create a new section (e.g., 1111B.4.8) and include requirements similar to section 1110B.2.2.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
9.2.2 (5) All controls in accessible units, sleeping rooms, and suites shall comply with 4.27.	1111B.4.2	Guest rooms and suites. Places of transient lodging shall incorporate the accessibility requirements of this code as modified by this chapter in at least one guest room or dormitory room together with their sanitary facilities in conformance with Table 11B-3.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment 1111B.4.2 (transient lodging) references all of the accessibility requirements of the code, which includes 1117B.6 concerning accessible controls.	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
9.2.2 (6) Where provided as part of an accessible unit, sleeping room, or suite, the following spaces shall be accessible and shall be on an accessible route: (a) the living area. (b) the dining area. (c) at least one sleeping area. (d) patios, terraces, or balconies. EXCEPTION: The requirements of 4.13.8 and 4.3.8 do not apply where it is necessary to utilize a higher door threshold or a change in level to protect the integrity of the unit from wind/water damage. Where this exception results in patios, terraces or balconies that are not at an accessible level, equivalent facilitation shall be provided. (E.g., Equivalent facilitation at a hotel patio or balcony might consist of providing raised decking or a ramp to provide accessibility). (e) See Row Below (f) if only half baths are provided, at least one half bath. (g) carports, garages or parking spaces.	1111B.4.2	Guest rooms and suites. Places of transient lodging shall incorporate the accessibility requirements of this code as modified by this chapter in at least one guest room or dormitory room together with their sanitary facilities in conformance with Table 11B-3.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not provide the same level of specificity as ADAAG. Adopt ADAAG language as follows.	Guest rooms and suites. Places of transient lodging shall incorporate the accessibility requirements of this code as modified by this chapter in at least one guest room or dormitory room together with their sanitary facilities in conformance with Table 11B-3. <u>Where provided as part of an accessible unit, sleeping room, or suite, the following spaces shall be accessible and shall be on an accessible route:</u> <u>(a) the living area.</u> <u>(b) the dining area.</u> <u>(c) the sleeping area.</u> <u>(d) patios, terraces, or balconies.</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	DSA's proposed revision does not meet the ADA because it does not address full bathrooms, half baths, or parking areas.
9.2.2 (6) Where provided as part of an accessible unit, sleeping room, or suite, the following spaces shall be accessible and shall be on an accessible route:	1111B.4.6	Bathrooms in hotels, motels, inns, dormitories, resorts, homeless shelters, halfway houses, transient group homes and similar places of transient lodging. Required accessible bathrooms for places of transient lodging shall comply with the	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Added the text for exception 1 and 2. Section 1111B.4.6 does not meet the ADA because it does not require that a

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>(e) at least one full bathroom (i.e., one with a water closet, a lavatory, and a bathtub or shower).</p>		<p>following provisions:</p> <p><u>EXCEPTION: Hotel and motel bathrooms beyond those specified in Section 1111B.4 need not comply with the provisions of this section or other accessibility provision of the California Building, Electrical, and Plumbing Codes if they provide the following features:</u></p> <p><u>1. All bathroom fixtures are in a location that allows a person using a wheelchair measuring 30 inches by 48 inches (762 mm by 1219 mm) to touch the wheelchair to any lavatory, urinal, water closet, tub, sauna, shower stall and any other similar sanitary installation, if provided.</u></p> <p><u>2. All bathroom entrance doors have a clear opening width of 32 inches (813 mm) and shall be either sliding doors or shall be hung to swing in the direction of egress from the bathroom.</u></p> <p>1. Doors. Doors to accessible bathrooms shall comply with Section 1133B.2. Doors shall not swing into the floor space required for any fixture.</p> <p>2. Clear floor space. All fixtures and controls shall be on an accessible route. There must be within the bathroom a clear floor space measuring 30 inches by 60 inches (762 mm by 1524 mm). The clear floor spaces at fixtures and controls, the accessible route, and the turning space may overlap.</p> <p>3. Water closets. If a toilet stall is provided, it shall comply with Section 1115B.7.1 or 1115B.7.2, its water closet shall comply with Section 1115B of this code.</p> <p>4. Lavatory and mirrors. If a lavatory and/or mirror is provided, it shall comply with Section 1115B.9 of this code.</p> <p>5. Controls and dispensers. If controls, dispensers, receptacles, or other types of equipment are provided, then at least one of each shall be on an accessible route and shall comply with Section 1117B.6, "Controls and Operating Mechanisms."</p> <p>6. Bathing and shower facilities . If tubs or showers are provided, then at least one accessible tub that complies with Section 1115B.6.1 or, at least one accessible shower that complies with Section 1115B.6.2 of this code shall be provided.</p>				<p>bathroom contain one water closet, a lavatory, and a bathtub or shower.</p> <p>Refer to comment above in section 9.2.2(6) of the ADA Standards.</p> <p>Also, exception 1 and 2 of section 1111B.4.6 seem to be unclear. For example, exception 1 provides that a wheelchair must be able to touch all bathroom fixtures. Please clarify the meaning and application of exception 1 and 2.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
		<p>7. Toilet facilities. Toilet facilities shall comply with Section 1111B.4.6, as modified for hotel, motel and dormitory accommodations.</p> <p>1111B.4.7 Dormitory rooms. Dormitory rooms beyond those specified herein shall comply with the adaptability requirements of Section 1111B.5.</p>				
<p>9.2.2 (7) Kitchens, Kitchenettes, or Wet Bars. When provided as accessory to a sleeping room or suite, kitchens, kitchenettes, wet bars, or similar amenities shall be accessible.</p> <p>Clear floor space for a front or parallel approach to cabinets, counters, sinks, and appliances shall be provided to comply with 4.2.4.</p> <p>Countertops and sinks shall be mounted at a maximum height of 34 in (865 mm) above the floor.</p> <p>At least fifty percent of shelf space in cabinets or refrigerator/freezers shall be within the reach ranges of 4.2.5 or 4.2.6 and space shall be designed to allow for the operation of cabinet and/or appliance doors</p>	1111B.4.4	<p>Kitchen facilities. When accommodations are provided with kitchen units, accessible kitchens shall be provided to those accommodations required to be accessible in conformance with Table 11B-3, and shall meet the requirements of Section 1112A.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 regulates the number of kitchens that need to be accessible, but does not address wet bars and/or other similar amenities that may be provided. Adopt ADAAG language as follows.</p>	<p>Kitchens, Kitchenettes, or Wet Bar facilities. When accommodations are provided with <u>kitchens, kitchenettes, wet bar units, or similar amenities,</u> accessible kitchens shall be provided to those accommodations required to be accessible in conformance with Table 11B-3, and they shall meet the requirements of Section 1112A. <u>Kitchens shall be provided per the number required to be accessible in conformance with Table 11B-3</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>DSA's proposed revision meets the ADA but we recommend another version of the revision. Refer to the technical assistance letter.</p>

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<p>so that all cabinets and appliances are accessible and usable.</p> <p>Controls and operating mechanisms shall comply with 4.27.</p>	1112A.2	<p>Clear Floor Space. Kitchens in covered multifamily dwelling units that are required to provide access to persons with physical disabilities shall have a clear floor space at least 30 inches by 48 inches (762 mm by 1219 mm) that allows a parallel approach by a person in a wheelchair at the range or cooktop and either a parallel or forward approach at the oven, dishwasher, refrigerator/freezer and trash compactor.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not provide the same level of specificity as ADAAG. Adopt ADAAG language as modified.</p>	<p>Clear Floor Space. Kitchens in covered multifamily dwelling units that are required to provide access to persons with physical disabilities shall have a clear floor space at least 30 inches by 48 inches (762 mm by 1219 mm) that allows a parallel approach by a person in a wheelchair at the range or cooktop and either a parallel or forward approach at the oven, dishwasher, refrigerator/freezer and trash compactor.</p> <p><u>Maneuvering Space shall provide 60" between the face of cabinets in U-shaped kitchens and 48" between cabinets in all other kitchen designs.</u></p> <p><u>Clear floor space complying with 1118B.4 for a parallel approach to a range or cooktop.</u></p> <p><u>Clear floor space complying with 1118B.4 for either a front or parallel approach to all other appliances, cabinets, and counters.</u></p> <p><u>At least fifty percent of shelf space in refrigerator/freezers shall be within the reach ranges of 1118B.5 or 1118B.6</u></p> <p><u>Controls and operating mechanisms shall comply with 1117B.6.</u></p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>	

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	1112A.4	Countertops. A minimum linear length of 30 inches (762 mm) of countertop shall be provided for the kitchen sink, and a minimum linear length of 30 inches (762 mm) of countertop shall be provided for a work surface, both of which shall be designed to enable repositioning to a minimum height of 28 inches (711 mm). The sink and work surface may be a single integral unit, or be separate components. The base cabinets directly under sink and work surface counter areas which are designed for repositioning shall be removable to provide clearance for a wheelchair.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not provide the same level of specificity as ADAAG. Adopt ADAAG language as modified.	Countertops. A minimum linear length of 30 inches (762 mm) of countertop shall be provided for the kitchen sink, and a minimum linear length of 30 inches (762 mm) of countertop shall be provided for a work surface, both of which shall be designed to enable repositioning to a minimum height of 28 inches (711 mm). The sink and work surface may be a single integral unit, or be separate components. The base cabinets directly under sink and work surface counter areas which are designed for repositioning shall be removable to provide clearance for a wheelchair. <u>Countertops and sinks shall be mounted at a maximum height of 34 in. above the floor</u> <u>Clear floor space shall be provided complying with 1118B.4 , for a forward approach to a sink that also provides clear knee space under the fixture that complies with CPC 1504.2.1</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA but the reference to CPC 1504.2.1 should be changed to section 1115B.2.1.6.
	1112A.5	Lower shelving. Lower shelving and/or drawer space shall be provided in the kitchen at a height of no more than 48 inches (1219 mm).	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not provide the same level of specificity as ADAAG. Adopt ADAAG language as modified.	Lower shelving. Lower shelving and/or drawer space shall be provided in the kitchen at a height of no more than 48 inches (1219 mm). <u>At least fifty percent of shelf space in cabinets shall be within the reach ranges of 1118B.5 or 1118B.6</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
9.2.2 (8) Sleeping room accommodations for persons with hearing impairments required by 9.1 and complying with 9.3 shall be provided in the accessible sleeping room or suite.	1111B.4.5	Visual alarms, notification devices and telephones for persons with hearing impairments. In addition to those accessible sleeping rooms and suites required by Section 1111B.4.2 to comply with this section, additional sleeping rooms and suites shall be provided with the following features in conformance with Table 11B-4 and as follows	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
9.3 Visual Alarms, Notification Devices and Telephones. 9.3.1 General. In sleeping rooms required to comply with	1111B.4.5.1	1111B.4.5.1 Visual alarms. Auxiliary visual alarms shall be provided and shall comply with Section 1114B.2.4.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

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<p>this section, auxiliary visual alarms shall be provided and shall comply with 4.28.4. Visual notification devices shall also be provided in units, sleeping rooms and suites to alert room occupants of incoming telephone calls and a door knock or bell. Notification devices shall not be connected to auxiliary visual alarm signal appliances. Permanently installed telephones shall have volume controls complying with 4.31.5; an accessible electrical outlet within 4 ft (1220 mm) of a telephone connection shall be provided to facilitate the use of a text telephone.</p> <p>9.3.2 Equivalent Facilitation. For purposes of this section, equivalent facilitation shall include the installation of electrical outlets (including outlets connected to a facility's central alarm system) and telephone wiring in sleeping rooms and suites to enable persons with hearing impairments to utilize portable visual alarms and communication devices provided by the operator of the facility.</p>	1111B.4.5.2	Visual notification devices. Visual notification devices shall also be provided in units, sleeping rooms and suites to alert room occupants of incoming telephone calls and a door knock or bell. Notification devices shall not be connected to auxiliary visual alarm signal appliances.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	1111B.4.5.3	Telephones. Permanently installed telephones shall have volume controls complying with Section 1117B.2.8; an accessible electrical outlet within 48 inches (1219 mm) of a telephone connection shall be provided to facilitate the use of a text telephone.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
9.4 Other Sleeping Rooms and Suites. Doors and doorways designed to allow passage into and within all sleeping units or other covered units shall comply with 4.13.5.	1111B.4.2	Guest rooms and suites. Places of transient lodging shall incorporate the accessibility requirements of this code as modified by this chapter in at least one guest room or dormitory room together with their sanitary facilities in conformance with Table 11B-3. All accessible sleeping rooms or suites required by Table 11B-3 shall comply with the requirements of Section 1111B.4 for hearing impaired guests.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not provide the same level of specificity as ADAAG. Adopt ADAAG language as follows.	Guest rooms and suites. Places of transient lodging shall incorporate the accessibility requirements of this code as modified by this chapter in at least one guest room or dormitory room together with their sanitary facilities in conformance with Table 11B-3. All accessible sleeping rooms or suites required by Table 11B-3 shall comply with the requirements of Section 1111B.4 for hearing impaired guests. <u>Doors and doorways designed to allow passage into and within all sleeping units or other covered units shall comply with 1133B.2.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Refer to comments above in section 9.2.2(3) of the ADA Standards.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>9.5 Transient Lodging in Homeless Shelters, Halfway Houses, Transient Group Homes, and Other Social Service Establishments.</p> <p>9.5.1 New Construction. In new construction all public use and common use areas are required to be designed and constructed to comply with section 4. At least one of each type of amenity (such as washers, dryers and similar equipment installed for the use of occupants) in each common area shall be accessible and shall be located on an accessible route to any accessible unit or sleeping accommodation.</p> <p>EXCEPTION: Where elevators are not provided as allowed in 4.1.3(5), accessible amenities are not required on inaccessible floors as long as one of each type is provided in common areas on accessible floors.</p>	1111B.2	<p>Public and Common-use Rooms or Areas. Public and common-use rooms and similar areas shall be made accessible to people with disabilities, subject to specific provisions contained in other portions of these regulations. See also general requirements listed in Section 1114B.1.1.</p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 does not provide the same level of specificity as ADAAG. Adopt ADAAG language as follows.</p>	<p>Public and Common-use Rooms or Areas. Public and common-use rooms and similar areas shall be made accessible to people with disabilities, subject to specific provisions contained in other portions of these regulations. See also general requirements listed in Section 1114B.1.1.</p> <p><u>At least one of each type of amenity (such as washers, dryers and similar equipment installed for the use of occupants) in each common area shall be accessible and shall be located on an accessible route to any accessible unit or sleeping accommodation.</u></p> <p><u>EXCEPTION: Where elevators are not required, accessible amenities are not required on inaccessible floors as long as one of each type is provided in common areas on accessible floors.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>9.5.2 Alterations.</p> <p>(1) Social service establishments which are not homeless shelters:</p> <p>(a) The provisions of 9.5.3 and 9.1.5 shall apply to sleeping rooms and beds.</p> <p>(b) Alteration of other areas shall be consistent with the new construction provisions of 9.5.1.</p> <p>(2) Homeless shelters. If the following elements are altered, the following requirements apply:</p> <p>(a) at least one public entrance shall allow a person with mobility impairments to approach, enter and exit including a minimum clear door width of 32 in (815 mm).</p> <p>(b) sleeping space for homeless persons as provided in the scoping provisions of 9.1.2 shall include doors to the sleeping area with a minimum clear width of 32 in (815 mm) and maneuvering space around the beds for persons with mobility impairments complying with 9.2.2(1).</p> <p>(c) at least one toilet room for each gender or one unisex toilet room shall have a minimum clear door width of 32 in (815 mm), minimum turning space complying with 4.2.3, one water closet complying with 4.16, one lavatory complying with 4.19 and the door shall have a privacy latch; and, if provided, at least one tub or shower shall comply with 4.20 or 4.21, respectively.</p> <p>(d) at least one common area which a person with mobility impairments can approach, enter and exit including a minimum clear door width of 32 in (815 mm).</p> <p>(e) at least one route connecting elements (a), (b), (c) and (d) which a person with mobility impairments can use including minimum clear width of 36 in (915 mm), passing space complying with 4.3.4, turning space complying with 4.2.3 and changes in levels complying with 4.3.8.</p> <p>(f) homeless shelters can comply with the provisions of (a)-(e) by providing the above elements on one accessible floor.</p>	1111B.4	Hotels, Motels, Inns, Dormitories, Resorts, Homeless Shelters, Halfway Houses, Transient Group Homes and Similar Places of Transient Lodging. Hotels, motels, inns, dormitories, resorts, and similar places of transient lodging shall provide access for persons with disabilities in accordance with the provisions of the accessibility requirements of this California Building Code, except as herein provided.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not provide the same level of specificity as ADAAG. Adopt ADAAG language as follows.	Hotels, Motels, Inns, Dormitories, Resorts, Homeless Shelters, Halfway Houses, Transient Group Homes and Similar Places of Transient Lodging. Hotels, motels, inns, dormitories, resorts, <u>Homeless Shelters, Halfway Houses, Transient Group Homes</u> and similar places of transient lodging shall provide access for persons with disabilities in accordance with the provisions of the accessibility requirements of this California Building Code, except as herein provided. <u>Note: Group A, B or H occupancies which are not homeless shelters but are being altered to provide shelter accommodations shall meet the requirements of this section.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

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<p>9.5.3 Accessible Sleeping Accommodations in New Construction. Accessible sleeping rooms shall be provided in conformance with the table in 9.1.2 and shall comply with 9.2 Accessible Units, Sleeping Rooms and Suites (where the items are provided). Additional sleeping rooms that comply with 9.3 Sleeping Accommodations for Persons with Hearing Impairments shall be provided in conformance with the table provided in 9.1.3.</p> <p>In facilities with multi-bed rooms or spaces, a percentage of the beds equal to the table provided in 9.1.2 shall comply with 9.2.2(1).</p>	1111B.4	Hotels, Motels, Inns, Dormitories, Resorts, Homeless Shelters, Halfway Houses, Transient Group Homes and Similar Places of Transient Lodging. Hotels, motels, inns, dormitories, resorts, and similar places of transient lodging shall provide access for persons with disabilities in accordance with the provisions of the accessibility requirements of this California Building Code, except as herein provided.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Title 24 does not provide the same level of specificity as ADAAG. Adopt ADAAG language as follows.	Hotels, Motels, Inns, Dormitories, Resorts, Homeless Shelters, Halfway Houses, Transient Group Homes and Similar Places of Transient Lodging. Hotels, motels, inns, dormitories, resorts, and similar places of transient lodging shall provide access for persons with disabilities in accordance with the provisions of the accessibility requirements of this California Building Code, except as herein provided. <u>In facilities with multi-bed rooms or spaces, a percentage of the beds equal to the table provided in 1111B.4.2 shall comply with 1111B.4.3.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>10 TRANSPORTATION FACILITIES</p> <p>10.1 General. Every station, bus stop, bus stop pad, terminal, building or other transportation facility, shall comply with the applicable provisions of 4.1 through 4.35, sections 5 through 9, and the applicable provisions of this section. The exceptions for elevators in 4.1.3(5) exception 1 and 4.1.6(1)(k) do not apply to a terminal, depot, or other station used for specified public transportation, or an airport passenger terminal, or facilities subject to Title II.</p>	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	TRANSPORTATION FACILITIES <u>General. Every station, bus stop, bus stop pad, terminal, building or other transportation facility, shall incorporate the accessibility requirements of this code as modified by this chapter. The exceptions for elevators in 1103B do not apply to a terminal, depot, or other station used for specified public transportation, or an airport passenger terminal, or facilities subject to Title II of the Americans with Disabilities Act.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

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<p>10.2 Bus Stops and Terminals. 10.2.1 New Construction.</p> <p>(1) Where new bus stop pads are constructed at bus stops, bays or other areas where a lift or ramp is to be deployed, they shall have a firm, stable surface; a minimum clear length of 96 inches (measured from the curb or vehicle roadway edge) and a minimum clear width of 60 inches (measured parallel to the vehicle roadway) to the maximum extent allowed by legal or site constraints; and shall be connected to streets, sidewalks or pedestrian paths by an accessible route complying with 4.3 and 4.4. The slope of the pad parallel to the roadway shall, to the extent practicable, be the same as the roadway. For water drainage, a maximum slope of 1:50 (2%) perpendicular to the roadway is allowed.</p> <p>(2) Where provided, new or replaced bus shelters shall be installed or positioned so as to permit a wheelchair or mobility aid user to enter from the public way and to reach a location, having a minimum clear floor area of 30 inches by 48 inches, entirely within the perimeter of the shelter. Such shelters shall be connected by an accessible route to the boarding area provided under paragraph (1) of this section.</p> <p>(3) Where provided, all new bus route identification signs shall comply with 4.30.5. In addition, to the maximum extent practicable, all new bus route identification signs shall comply with 4.30.2 and 4.30.3. Signs that are sized to the maximum dimensions permitted under legitimate local, state or federal regulations or ordinances shall be considered in compliance with 4.30.2 and 4.30.3 for purposes of this section. EXCEPTION: Bus schedules, timetables, or maps that are posted at the bus stop or bus bay are not required to comply with this provision.</p>	1131B.4	<p>Bus Stop Pads and Shelters. Where provided, provide bus stop pads 96 inches (2438 mm) long (measured parallel to curb or road edge) to the maximum extent allowed by legal or site constraints. Bus stop pads shall connect to an accessible route. Newly constructed bus stop pads must provide a square curb surface between the pad and road or other detectable warning in compliance with 1133B.8.5.</p> <p><u>Note: Detectable warning products and directional surfaces installed after January 1, 2001, shall be evaluated by an independent entity, selected by the Department of General Services, Division of the State Architect-Access Compliance, for all occupancies, including transportation and other outdoor environments, except that when products and surfaces are used in residential housing evaluation shall be in consultation with the Department of Housing and Community Development. See Government Code Section 4460.</u></p> <p>Bus stop pads shall be at same slope as roadway in the direction parallel to roadway, and maximum 2 percent slope perpendicular to roadway.</p> <p>Where provided, provide bus stop shelters installed so as to permit a wheelchair user to enter the shelter and access a clear floor area of 30 by 48 inches (762 mm by 1219 mm), completely within the shelter. Bus stop shelters shall connect to an accessible route and to bus stop pads. <u>Only approved DSA/AC detectable warning products and directional surfaces shall be installed as provided in the California Code of Regulations (CCR), Title 24, Part 1, Articles 2, 3, and 4. Refer to CCR Title 24, Part 12, Chapter 12-11A and B, for building and facility access specifications for product approval for detectable warning products and directional surfaces.</u> <u>Note: Detectable warning products and directional surfaces installed after January 1, 2001, shall be evaluated by an independent entity, selected by the Department of General Services, Division of the State Architect-Access Compliance, for all occupancies, including transportation and other outdoor environments, except that when products and surfaces are used in residential housing, evaluation shall be in consultation with the Department of Housing and Community Development. See Government Code Section 4460.</u></p>	<p><input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment</p> <p>Title 24 is missing several sections contained in ADAAG. Adopt ADAAG language as modified.</p>	<p>Bus Stop Pads and Shelters. Where provided, provide bus stop pads <u>shall have a firm, stable surface 96 inches (2438 mm) long (measured parallel to curb or road edge) and a minimum clear width of 60 inches (measured parallel to the vehicle roadway)</u> to the maximum extent allowed by legal or site constraints. Bus stop pads shall connect to <u>streets, sidewalks or pedestrian paths as part of an accessible route</u>. Newly constructed bus stop pads must provide a square curb surface between the pad and road or other detectable warning in compliance with 1133B.8.5.</p> <p>Bus stop pads shall be at same slope as roadway in the direction parallel to roadway, and maximum 2 percent slope perpendicular to roadway.</p> <p>Where provided, provide bus stop shelters installed so as to permit a wheelchair user to enter the shelter and access a clear floor area of 30 by 48 inches (762 mm by 1219 mm), completely within the shelter. Bus stop shelters shall connect to an accessible route and to bus stop pads.</p> <p><u>Each wheelchair location shall provide minimum clear floor or ground space that complies with 1104B.3.6.</u></p> <p><u>Such shelters shall be connected by an accessible route to the boarding area. Where provided, all bus route identification signs shall comply with 1117B.5.2. In addition, all new bus route identification signs shall comply with 1117B.5.3 and 1117B.5.4.</u></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Additional text added for completeness. However, the requirements about detectable warning products in section 1131B.4 can not be compared to section 10.2.1 of the ADA Standards.</p> <p>DSA's proposed revision meets the ADA but we recommend another version of the revision. Refer to the technical assistance letter.</p>

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<p>10.2.2 Bus Stop Siting and Alterations.</p> <p>(1) Bus stop sites shall be chosen such that, to the maximum extent practicable, the areas where lifts or ramps are to be deployed comply with section 10.2.1(1) and (2).</p> <p>(2) When new bus route identification signs are installed or old signs are replaced, they shall comply with the requirements of 10.2.1(3).</p>	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<p><u>Bus Stop Siting and Alterations.</u></p> <p><u>(1) Bus stop sites shall be chosen such that the areas where lifts or ramps are to be deployed comply with section 1131B.</u></p> <p><u>(2) When new bus route identification signs are installed or old signs are replaced, they shall comply with the requirements of Fixed Facilities and Stations.</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA but we recommend another version of the revision. Refer to the technical assistance letter.
<p>10.3 Fixed Facilities and Stations.</p> <p>10.3.1 New Construction. New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (e.g., automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable.</p> <p>(1) Elements such as ramps, elevators or other circulation devices, fare vending or other ticketing areas, and fare collection areas shall be placed to minimize the distance which wheelchair users and other persons who cannot negotiate steps may have to travel compared to the general public. The circulation path, including an accessible entrance and an accessible route, for persons with disabilities shall, to the maximum extent practicable, coincide with the circulation path for the general public. Where the circulation path is different, signage complying with 4.30.1, 4.30.2, 4.30.3, 4.30.5, and 4.30.7(1) shall be provided to indicate direction to and identify the accessible entrance and accessible route.</p>	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<p><u>10.3 Fixed Facilities and Stations</u></p> <p><u>10.3.1 New Construction. New stations in rapid rail, light rail, commuter rail, intercity bus, intercity rail, high speed rail, and other fixed guideway systems (e.g., automated guideway transit, monorails, etc.) shall comply with the following provisions, as applicable. (1) Elements such as ramps, elevators or other circulation devices, fare vending or other ticketing areas, and fare collection areas shall be placed to minimize the distance which wheelchair users and other persons who cannot negotiate steps may have to travel compared to the general public. The circulation path, including an accessible entrance and an accessible route, for persons with disabilities shall coincide with the circulation path for the general public. Signage complying with 1117B.5.3, 1117B.5.4, 1117B.5.2, 1117B.5.8.1, shall be provided to indicate direction to and identify the accessible entrance and accessible route.</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA needs to create a new section and replace ADA Standards section numbers 10.3 and 10.3.1.

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<p>10.3.1 (2) In lieu of compliance with 4.1.3(8), at least one entrance to each station shall comply with 4.14, Entrances. If different entrances to a station serve different transportation fixed routes or groups of fixed routes, at least one entrance serving each group or route shall comply with 4.14, Entrances. All accessible entrance shall, to the maximum extent practicable, coincide with those used by the majority of the general public.</p>	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<p><u>If different entrances to a station serve different transportation fixed routes or groups of fixed routes, at least one entrance serving each group or route shall comply shall comply with 1133B.1</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>10.3.1 (3) Direct connections to commercial, retail, or residential facilities shall have an accessible route complying with 4.3 from the point of connection to boarding platforms and all transportation system elements used by the public. Any elements provided to facilitate future direct connections shall be on an accessible route connecting boarding platforms and all transportation system elements used by the public.</p>	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<p><u>Direct connections to commercial, retail, or residential facilities shall have an accessible route complying with 1102B from the point of connection to boarding platforms and all transportation system elements used by the public. Any elements provided to facilitate future direct connections shall be on an accessible route connecting boarding platforms and all transportation system elements used by the public.</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>DSA's proposed revision meets the ADA but it needs to reference all sections concerning accessible routes: 1102B, 1114B, 1124B, 1133B.3., 1133B.5, 1133B.7, 1133B.8.6.</p>
<p>10.3.1 (4) Where signs are provided at entrances to stations identifying the station or the entrance, or both, at least one sign at each entrance shall comply with 4.30.4 and 4.30.6. Such signs shall be placed in uniform locations at entrances within the transit system to the maximum extent practicable. EXCEPTION: Where the station has no defined entrance, but signage is provided, then the accessible signage shall be placed in a central location.</p>	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<p><u>Where signs are provided at entrances to stations identifying the station or the entrance, or both, at least one sign at each entrance shall comply with 1117B.5.5 and 1117B.5.7. Such signs shall be placed in uniform locations at entrances within the transit system.</u> <u>EXCEPTION: Where the station has no defined entrance, but signage is provided, then the accessible signage shall be placed in a central location</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>10.3.1 (5) Stations covered by this section shall have identification signs complying with 4.30.1, 4.30.2, 4.30.3, and 4.30.5. Signs shall be placed at frequent intervals and shall be clearly visible from within the vehicle on both sides when not obstructed by another train. When station identification signs are placed close to vehicle windows (i.e., on the side opposite from boarding) each shall have the top of the highest letter or symbol below the top of the vehicle window and the bottom of the lowest letter or symbol above the horizontal mid-line of the vehicle window.</p>	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<p>Stations covered by this section shall have identification signs complying with 1117B.5.3, 1117B.5.4, 1117B.5.2. Signs shall be placed at frequent intervals and shall be clearly visible from within the vehicle on both sides when not obstructed by another train. When station identification signs are placed close to vehicle windows (i.e., on the side opposite from boarding) each shall have the top of the highest letter or symbol below the top of the vehicle window and the bottom of the lowest letter or symbol above the horizontal mid-line of the vehicle window.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>10.3.1 (6) Lists of stations, routes, or destinations served by the station and located on boarding areas, platforms, or mezzanines shall comply with 4.30.1, 4.30.2, 4.30.3, and 4.30.5. A minimum of one sign identifying the specific station and complying with 4.30.4 and 4.30.6 shall be provided on each platform or boarding area. All signs referenced in this paragraph shall, to the maximum extent practicable, be placed in uniform locations within the transit system.</p>	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<p>Lists of stations, routes, or destinations served by the station and located on boarding areas, platforms, or mezzanines shall comply with 1117B.5.2, 1117B.5.3, and 1117B.5.4. A minimum of one sign identifying the specific station and complying with 1117B.5.5 and 1117B.5.7 shall be provided on each platform or boarding area. All signs referenced in this paragraph shall be placed in uniform locations within the transit system.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>10.3.1 (7)* Automatic fare vending, collection and adjustment (e.g., add-fare) systems shall comply with 4.34.2, 4.34.3, 4.34.4, and 4.34.5. At each accessible entrance such devices shall be located on an accessible route.</p> <p>If self-service fare collection devices are provided for the use of the general public, at least one accessible device for entering, and at least one for exiting, unless one device serves both functions, shall be provided at each accessible point of entry or exit.</p> <p>Accessible fare collection devices shall have a minimum clear opening width of 32 in; shall permit passage of a wheelchair; and, where provided, coin or card slots and controls necessary for operation shall comply with 4.27.</p> <p>Gates which must be pushed open by wheelchair or mobility aid users shall have a smooth continuous surface extending from 2 inches above the floor to 27 inches above the floor and shall comply with 4.13. Where the circulation path does not coincide with that used by the general public, accessible fare collection systems shall be located at or adjacent to the accessible point of entry or exit.</p>	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<p><u>Automatic fare vending, collection and adjustment (e.g., add-fare) systems shall comply with 1118B (space allowance and reach range), 1117B.6 (Controls and operating mechanisms). Such devices shall be located on an accessible route.</u></p> <p><u>If self-service fare collection devices are provided for the use of the general public, at least one accessible device for entering, and at least one for exiting, unless one device serves both functions, shall be provided at each accessible point of entry or exit. If self-service fare collection devices are provided for the use of the general public, a minimum of 5% but not less than one accessible device for entering, and at least one for exiting, unless one device serves both functions, shall be provided at each location where such devices are provided.</u></p> <p><u>Accessible fare collection devices shall have a minimum clear opening width of 32 in; shall permit passage of a wheelchair; and, where provided, coin or card slots and controls necessary for operation shall comply with 4.27.</u></p> <p><u>Accessible fare collection devices shall have a minimum clear opening width of 32 in. and shall comply with the applicable requirements of 1133B.2 and 1117B.6</u></p> <p><u>Gates which must be pushed open by wheelchair or mobility aid users shall have a smooth continuous surface extending from 2 inches above the floor to 27 inches above the floor and shall comply with 1133B.1.1.1.4.</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>DSA's proposed revision meets the ADA but it needs to reference the proper sections concerning automatic teller machines, accessible routes, controls, and doors. Refer to the technical assistance letter.</p> <p>The second and third paragraphs each contain two versions of the same requirements. The Department is assuming that the second version of the requirements is the correct proposed revision.</p>
<p>10.3.1 (8) Platform edges bordering a drop-off and not protected by platform screens or guard rails shall have a detectable warning. Such detectable warnings shall comply with 4.29.2 and shall be 24 inches wide running the full length of the platform drop-off.</p>	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<p><u>Platform edges bordering a drop-off and not protected by platform screens or guard rails shall have a detectable warning. Such detectable warnings shall comply with 1133B.8.4 and shall be 24 inches wide running the full length of the platform drop-off.</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>DSA's proposed revision meets the ADA but it needs to include a reference to section 1133B.8.3.</p>

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>10.3.1 (9) In stations covered by this section, rail-to-platform height in new stations shall be coordinated with the floor height of new vehicles so that the vertical difference, measured when the vehicle is at rest, is within plus or minus 5/8 inch under normal passenger load conditions.</p> <p>For rapid rail, light rail, commuter rail, high speed rail, and intercity rail systems in new stations, the horizontal gap, measured when the new vehicle is at rest, shall be no greater than 3 in.</p> <p>For slow moving automated guideway "people mover" transit systems, the horizontal gap in new stations shall be no greater than 1 in.</p> <p>EXCEPTION 1: Existing vehicles operating in new stations may have a vertical difference with respect to the new platform within plus or minus 1-1/2 in.</p> <p>EXCEPTION 2: In light rail, commuter rail and intercity rail systems where it is not operationally or structurally feasible to meet the horizontal gap or vertical difference requirements, mini-high platforms, car-borne or platform-mounted lifts, ramps or bridge plates, or similar manually deployed devices, meeting the applicable requirements of 36 C.F.R. part 1192, or 49 C.F.R. part 38 shall suffice.</p>	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<p><u>In stations covered by this section, rail-to-platform height in new stations shall be coordinated with the floor height of new vehicles so that the vertical difference, measured when the vehicle is at rest, complies with 1124B.2 under normal passenger load conditions.</u></p> <p><u>For rapid rail, light rail, commuter rail, high speed rail, and intercity rail systems in new stations, the horizontal gap, measured when the new vehicle is at rest, shall be bridged when the opening exceeds that allowed by 1124B.4</u></p> <p><u>For slow moving automated guideway "people mover" transit systems, the horizontal gap in new stations shall be no greater than 1 in.</u></p> <p><u>EXCEPTION 1: Existing vehicles operating in new stations may have a vertical difference with respect to the new platform within plus or minus 1-1/2 in.</u></p> <p><u>Exception 2: In light rail, commuter rail and intercity rail systems where it is not operationally or structurally feasible to meet the horizontal gap or vertical difference requirements, mini-high platforms, car-borne or platform-mounted lifts, ramps or bridge plates, or similar manually deployed devices, meeting the applicable requirements of 36 CFR Part 1192, or 49 CFR, Part 38 shall suffice.</u></p> <p><u>EXCEPTION : In light rail, commuter rail and intercity rail systems where it is not operationally or structurally feasible to meet the horizontal gap or vertical difference requirements, mini-high platforms, car-borne or platform-mounted lifts, ramps or bridge plates, or similar manually deployed devices, meeting the applicable requirements of this code shall be provided.</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA but the last two paragraphs contain two versions of the same requirement. Only the first version meets the ADA.
<p>10.3.1 (10) Stations shall not be designed or constructed so as to require persons with disabilities to board or alight from a vehicle at a location other than one used by the general public.</p>	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<p><u>Stations shall not be designed or constructed so as to require persons with disabilities to board or alight from a vehicle at a location other than one used by the general public.</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
10.3.1 (11) Illumination levels in the areas where signage is located shall be uniform and shall minimize glare on signs. Lighting along circulation routes shall be of a type and configuration to provide uniform illumination.	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<u>Illumination levels in the areas where signage is located shall be uniform and shall minimize glare on signs. Lighting along circulation routes shall be of a type and configuration to provide uniform illumination.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
10.3.1 (12) Text Telephones: The following shall be provided in accordance with 4.31.9: (a) If an interior public pay telephone is provided in a transit facility (as defined by the Department of Transportation) at least one interior public text telephone shall be provided in the station. (b) Where four or more public pay telephones serve a particular entrance to a rail station and at least one is in an interior location, at least one interior public text telephone shall be provided to serve that entrance. Compliance with this section constitutes compliance with section 4.1.3(17)(c).	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<u>Text Telephones: The following shall be provided in accordance with 1117B.2.9.2 and 1117B.2.9.3:</u> <u>(a) If an interior public pay telephone is provided in a transit facility (as defined by the Department of Transportation) at least one interior public text telephone shall be provided in the station.</u> <u>(b) Where four or more public pay telephones serve a particular entrance to a rail station and at least one is in an interior location, at least one interior public text telephone complying with 1117B.2.9.2 and 1117B.2.9.3 shall be provided to serve that entrance.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
10.3.1 (13) Where it is necessary to cross tracks to reach boarding platforms, the route surface shall be level and flush with the rail top at the outer edge and between rails, except for a maximum 2-1/2 inch gap on the inner edge of each rail to permit passage of wheel flanges. Such crossings shall comply with 4.29.5. Where gap reduction is not practicable, an above-grade or below-grade accessible route shall be provided.	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<u>Where it is necessary to cross tracks to reach boarding platforms, the route surface shall be level and flush with the rail top at the outer edge and between rails, except for a maximum 2-1/2 inch gap on the inner edge of each rail to permit passage of wheel flanges. Such crossings shall comply with 1133B.8.5. Where gap reduction is not practicable, an above-grade or below-grade accessible route shall be provided.</u> <u>All routes that require crossing tracks to reach boarding platforms shall comply with 1133B.8.5. Where the route that is used by the general public to reach boarding platforms requires crossing tracks, and that route does not comply with 1124B, an above-grade or below-grade accessible route shall be provided.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
10.3.1 (14) Where public address systems are provided to convey information to the public in terminals, stations, or other fixed facilities, a means of conveying the same or equivalent information to persons with hearing loss or who are deaf shall be provided.	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<u>Where public address systems are provided to convey information to the public in terminals, stations, or other fixed facilities, a means of conveying the same or equivalent information to persons with hearing loss or who are deaf shall be provided.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
10.3.1 (15) Where clocks are provided for use by the general public, the clock face shall be uncluttered so that its elements are clearly visible. Hands, numerals, and/or digits shall contrast with the background either light-on-dark or dark-on-light. Where clocks are mounted overhead, numerals and/or digits shall comply with 4.30.3. Clocks shall be placed in uniform locations throughout the facility and system to the maximum extent practicable.	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<u>Where clocks are provided for use by the general public, the clock face shall be uncluttered so that its elements are clearly visible. Hands, numerals, and/or digits shall contrast with the background either light-on-dark or dark-on-light. Where clocks are mounted overhead, numerals and/or digits shall comply with 1117B.5.4. Clocks shall be placed in uniform locations throughout the facility and system.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
10.3.1 (16) Where provided in below grade stations, escalators shall have a minimum clear width of 32 inches. At the top and bottom of each escalator run, at least two contiguous treads shall be level beyond the comb plate before the risers begin to form. All escalator treads shall be marked by a strip of clearly contrasting color, 2 inches in width, placed parallel to and on the nose of each step. The strip shall be of a material that is at least as slip resistant as the remainder of the tread. The edge of the tread shall be apparent from both ascending and descending directions.	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	Where provided in below grade stations, escalators shall have a minimum clear width of 32 inches. At the top and bottom of each escalator run, at least two contiguous treads shall be level beyond the comb plate before the risers begin to form. All escalator treads shall be marked by a strip of clearly contrasting color, 2 inches in width, placed parallel to and on the nose of each step. The strip shall be of a material that is at least as slip resistant as the remainder of the tread. The edge of the tread shall be apparent from both ascending and descending directions.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
10.3.1 (17) Where provided, elevators shall be glazed or have transparent panels to allow an unobstructed view both in to and out of the car. Elevators shall comply with 4.10. EXCEPTION: Elevator cars with a clear floor area in which a 60-inch diameter circle can be inscribed may be substituted for the minimum car dimensions of 4.10, Fig. 22.	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<u>10.3.1(17) Where provided, elevators shall be glazed or have transparent panels to allow an unobstructed view both in to and out of the car. Elevators shall comply with Chapter 30. EXCEPTION: Elevator cars with a clear floor area in which a 60 inch diameter circle can be inscribed may be substituted for the minimum car dimensions of 3003.4.7b.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA needs to create a new section and replace ADA Standards section numbers 10.3.1(17). DSA's proposed revision meets the ADA but delete the reference to Chapter 30 and insert reference to section 1116B.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
10.3.1 (18) Where provided, ticketing areas shall permit persons with disabilities to obtain a ticket and check baggage and shall comply with 7.2.	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<u>Where provided, ticketing areas shall comply with 1122B.3 and 1122B.4, and the customer side of the baggage check-in area shall be accessible.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA but delete the reference to sections 1122B.3 and 1122B.4 and include a reference to the proposed new section 1122B.5.
10.3.1 (19) Where provided, baggage check-in and retrieval systems shall be on an accessible route complying with 4.3, and shall have space immediately adjacent complying with 4.2. If unattended security barriers are provided, at least one gate shall comply with 4.13. Gates which must be pushed open by wheelchair or mobility aid users shall have a smooth continuous surface extending from 2 inches above the floor to 27 inches above the floor.	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<u>Where provided, baggage check-in and retrieval systems shall be on an accessible route and shall have space immediately adjacent complying with 1118B.4.</u> <u>If unattended security barriers are provided, at least one gate shall comply with 4.13. Passageways containing security barriers shall comply with 1133B.2.3.4.</u> <u>Gates which must be pushed open by wheelchair or mobility aid users shall have a smooth continuous surface extending from 2 inches above the floor to 27 inches above the floor.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DSA's proposed revision meets the ADA but it needs to reference the proper sections concerning accessible routes, reach ranges, and doors. Refer to the technical assistance letter.
10.3.2 Existing Facilities: Key Stations. [Not reproduced because key stations are covered by title II of the ADA only and, therefore, section 10.3.2 is inapplicable to title III entities.]	None	No equivalent section.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Not Applicable
10.3.3 Existing Facilities: Alterations. (1) For the purpose of complying with 4.1.6(2) Alterations to an Area Containing a Primary Function, an area of primary function shall be as defined by applicable provisions of 49 C.F.R. 37.43(c) (Department of Transportation's ADA Rule) or 28 C.F.R. 36.403 (Department of Justice's ADA Rule).	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<u>Existing Facilities: Alterations. Alterations of transportation facilities shall comply with 1134B Accessibility for Existing Buildings.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>10.4 Airports. 10.4.1 New Construction. (1) Elements such as ramps, elevators or other vertical circulation devices, ticketing areas, security checkpoints, or passenger waiting areas shall be placed to minimize the distance which wheelchair users and other persons who cannot negotiate steps may have to travel compared to the general public.</p>	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<u>Airports. New Construction. Elements such as ramps, elevators or other vertical circulation devices, ticketing areas, security checkpoints, or passenger waiting areas shall be placed to equivalent distance which wheelchair users and other persons who cannot negotiate steps may have to travel compared to the general public.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>10.4.1 (2) The circulation path, including an accessible entrance and an accessible route, for persons with disabilities shall, to the maximum extent practicable, coincide with the circulation path for the general public. Where the circulation path is different, directional signage complying with 4.30.1, 4.30.2, 4.30.3 and 4.30.5 shall be provided which indicates the location of the nearest accessible entrance and its accessible route.</p>	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<u>The circulation path, including an accessible entrance and an accessible route, for persons with disabilities shall coincide with the circulation path for the general public.</u> <u>EXCEPTION: Where it is determined that it would create an unreasonable hardship to make the accessible route coincide with the circulation path for the general public directional signage complying with 1117B.5 shall be provided which indicates the location of the nearest accessible entrance and its accessible route.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>10.4.1 (3) Ticketing areas shall permit persons with disabilities to obtain a ticket and check baggage and shall comply with 7.2.</p>	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<u>Where provided, ticketing areas shall comply with 1122B.3 and 1122B.4, and the customer side of the baggage check-in area shall be accessible.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Refer to comments above for section 10.3.1(18) of the ADA Standards.

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
<p>10.4.1 (4) Where public pay telephones are provided, and at least one is at an interior location, a public text telephone shall be provided in compliance with 4.31.9. Additionally, if four or more public pay telephones are located in any of the following locations, at least one public text telephone shall also be provided in that location:</p> <p>(a) a main terminal outside the security areas;</p> <p>(b) a concourse within the security areas; or</p> <p>(c) a baggage claim area in a terminal.</p> <p>Compliance with this section constitutes compliance with section 4.1.3(17)(c).</p>	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<p><u>Where public pay telephones are provided, and at least one is at an interior location, a public text telephone shall be provided in compliance with 1117B.2.9.2 and 1117B.2.9.3. Additionally, if four or more public pay telephones are located in any of the following locations, at least one public text telephone shall also be provided in that location:</u></p> <p><u>(a) a main terminal outside the security areas;</u></p> <p><u>(b) a concourse within the security areas; or</u></p> <p><u>(c) a baggage claim area in a terminal.</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>10.4.1 (5) Baggage check-in and retrieval systems shall be on an accessible route complying with 4.3, and shall have space immediately adjacent complying with 4.2.4.</p> <p>If unattended security barriers are provided, at least one gate shall comply with 4.13.</p> <p>Gates which must be pushed open by wheelchair or mobility aid users shall have a smooth continuous surface extending from 2 inches above the floor to 27 inches above the floor.</p>	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<p><u>Where provided, baggage check-in and retrieval systems shall be on an accessible route and shall have space immediately adjacent complying with 1118B.4.</u></p> <p><u>If unattended security barriers are provided, at least one gate shall comply with 4.13. Passageways containing security barriers shall comply with 1133B.2.3.4</u></p> <p><u>Gates which must be pushed open by wheelchair or mobility aid users shall have a smooth continuous surface extending from 2 inches above the floor to 27 inches above the floor.</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Refer to comments above for section 10.3.1(19) of the ADA Standards.
<p>10.4.1 (6) Terminal information systems which broadcast information to the general public through a public address system shall provide a means to provide the same or equivalent information to persons with a hearing loss or who are deaf. Such methods may include, but are not limited to, visual paging systems using video monitors and computer technology. For persons with certain types of hearing loss such methods may include, but are not limited to, an assistive listening system complying with 4.33.7.</p>	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<p><u>Terminal information systems which broadcast information to the general public through a public address system shall provide a means to provide the same or equivalent information to persons with a hearing loss or who are deaf. Such methods may include, but are not limited to, visual paging systems using video monitors and computer technology. For persons with certain types of hearing loss such methods may include, but are not limited to, an assistive listening system complying with 1104B.2.</u></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

ADA Title III Requirements for New Construction and Alterations	Equivalent California Code	California Code Language	DSA Comment	DSA Proposed Revisions	ADA Equiv.	DOJ Comments
10.4.1 (7) Where clocks are provided for use by the general public the clock face shall be uncluttered so that its elements are clearly visible. Hands, numerals, and/or digits shall contrast with their background either light-on-dark or dark-on-light. Where clocks are mounted overhead, numerals and/or digits shall comply with 4.30.3. Clocks shall be placed in uniform locations throughout the facility to the maximum extent practicable.	None	No equivalent section.	<input type="checkbox"/> Meets ADA <input checked="" type="checkbox"/> Does not meet ADA <input checked="" type="checkbox"/> Comment Adopt ADAAG section as modified.	<u>Where clocks are provided for use by the general public the clock face shall be uncluttered so that its elements are clearly visible. Hands, numerals, and/or digits shall contrast with their background either light-on-dark or dark-on-light. Where clocks are mounted overhead, numerals and/or digits shall comply with 1117B.5.4. Clocks shall be placed in uniform locations throughout the facility.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
10.4.1 (8) Security Systems. (Reserved).	None	No equivalent section.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Not Applicable
10.4.1 (8) Security Systems. (Reserved).	None	No equivalent section.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Not Applicable
10.5 Boat and Ferry Docks. (Reserved).	None	No equivalent section.	<input checked="" type="checkbox"/> Meets ADA <input type="checkbox"/> Does not meet ADA <input type="checkbox"/> Comment	No action required.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Not Applicable