



Development Services Department

PRJ-1165197 – Alternatives to Maneuvering Space Requirements through Equivalent Facilitation

Board of Building Appeals and Advisors – 9/10/2026
Meeting

Ali Fattah, Assistant Deputy Director, DSD

Purpose

1. A recommendation as to whether the equivalent facilitation proposed as a part of an Alternative Methods, Materials and Design (AMM) application submitted for consideration by the Building Official complies with HSC Sections 17920.5, 17925, and 2019 CBC Sections 1.8.7.1, 1.8.7.2, and 1.8.7.2.1 #4.
2. A recommendation as to whether the Building Official should grant approval, disapproval or approval with a modification of the proposed equivalent facilitation.

PRJ-1165197

Requested Deviation

CBC Section 1126A.3.2.2

- Permit maneuvering spaces at entry doors to be less than 44 inches based on a side approach when measured in the direction of travel through the door.

A second deviation was determined not necessary since the occupant load served by the corridor is less than 10 each side of corridor so fire rated doors and closers are not required.

Deviation Approval process

Review process

Three step process

1. Review of alternative methods and materials application.
2. Based on initial determination seek advice of Board regarding initial determination
3. Complete process of alternative methods and materials application based on input from hearing.

Basis of Approval

Authorizing Code Sections

2019 CBC Section 1.8.7.2.1 Approval of alternates

The consideration and approval of alternates by a local building department shall comply with the following procedures and limitations:

4. If the proposed alternate is related to accessibility in covered multifamily dwellings or in facilities serving covered multifamily dwellings as defined in Chapter 2, the proposed alternate must also meet the threshold set for equivalent facilitation as defined in Chapter 2.

Basis of Approval

Authorizing Code Sections

2019 CBC Section 202

EQUIVALENT FACILITATION. The use of designs, products or technologies as alternatives to those prescribed, resulting in substantially equivalent or greater accessibility and usability.

Basis of Approval

Authorizing Code Sections

Government Code Section 4551"(f)

(f) Administrative authorities, as designated under Section 4453, may grant exceptions from the literal requirements of the building standards published in the California Building Standards Code relating to access for persons with disabilities, or the other regulations adopted pursuant to this section, or permit the use of other methods or materials, but only when it is clearly evident that equivalent facilitation and protection that meets or exceeds the requirements under federal law are thereby secured."

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Project Description

- 5 story MDU building served by elevator with 6 dwelling units per story.
- One Trash room per story.
- # unit entry doors and one trash room door landing less than 48 inch.
- Corridor widths range 42.375" to 43.75" except at two inset doors that are compliant and south side.

Code Requirement

CBC 1126A.3 Maneuvering clearances.

1126A.3.2.2 Hinge side approach.

The following provisions shall apply to swinging doors or gates with hinge side approach:

2. Push side approach. Doors or gates with push side approach shall have a level floor or landing not less than 44 inches (1118 mm) in depth, and shall be provided with a clear and level area extending a minimum of 54 inches (1372 mm) from the strike edge of the door or gate jamb past the hinge side of the door or gate. Doors or gates with a latch and closer shall have a level floor or landing not less than 48 inches (1219 mm) depth at the push side of the door or gate. (See Figure 11A-8A(b).)

Code Requirement

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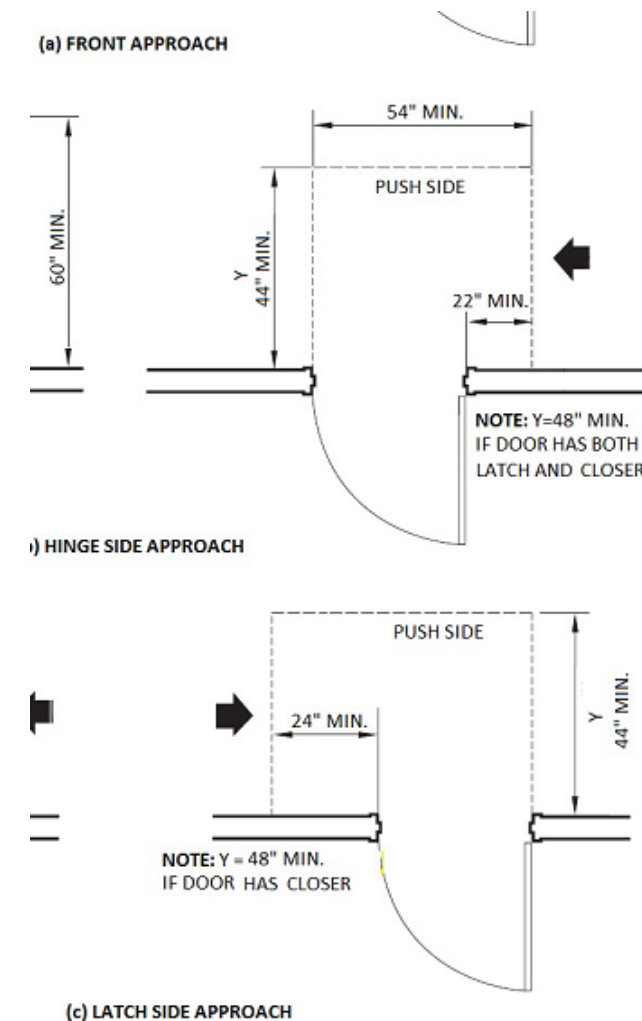
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48-inch-deep landing is not required since a closer is not required on doors accessing zero hour rated corridors.

Code Requirement

Figure 11A-8A Maneuvering Clearance - Doors

- Fair Housing Act (FHA) and CBC Ch 11A intend for dimensions to be measured from face of wall.
- 44 inch landing depth requirement unique to California
- FHA and ADA require 42 inches.



Code Requirement

Closer vs Spring Hinge

2019 California Referenced Standards Code Part 12

- [Section 12-10-102 \(c\)](#)

(c) Closing mechanism. Normal closing of doors shall be by spring action, pressure-operated mechanism or electrically driven mechanism. The closing force measured at the closing stile shall not exceed 40 pounds at any point in the closing arc. The final 10 degrees of closing shall be not less than 1½ seconds.

Code Requirement

Closer vs Spring Hinge

ADA – US Access Board [Interpretation](#)

Are spring hinges and gravity hinges considered “closers” in determining the size of maneuvering clearances?

No. Some approaches require additional maneuvering clearances when a door or gate is equipped with a closer because of the additional force that must be counteracted in proceeding through doors. Since spring and gravity hinges do not significantly impact the opening force of doors, they are not considered “closers” for purposes of specifying door maneuvering clearance.

Code Requirement

Closer vs Spring Hinge

- California SFM considers all three types of closers interchangeable
- Since a 20 min rated door is not required BO would prefer maintaining the required protection.
 - May consider requiring a recorded document clarifying that as an adaptability feature closers are removed when a resident requires accommodation.
 - If spring hinges are proposed, they will be required to comply with CBC Section 716.2.1.1 and tested in accordance with NFPA 252 or UL 10C. For tests conducted in accordance with NFPA 252, the fire test shall be conducted using the positive pressure method specified in the standard.

Basis of Approval

Construction Tolerance

- CBC Ch 11A requirements applicable to covered multifamily dwellings do not adopt construction tolerance provisions.
- CBC Section 11B-104.1.1 Construction and manufacturing tolerances. States “All dimensions are subject to conventional industry tolerances except where the requirement is stated as a range with specific minimum and maximum end points.”
 - ADA Section V104.1.1 has similar language to CBC Ch 11B.
- DSD determines that up to 1” is a reasonable construction tolerance for the fixed dimensions under consideration.

Field Measurements

Level/Level Access ¹²³⁴	Segment Each Side of Horizontal Exit			
	North Segment ⁵	N-Middle Segment ⁵	S- Middle Segment ⁵	South Segment ⁵
Stair	Stair #1 & Elevator			Stair #2
Level 1	Story at level of exit discharge; same-level access to street			
Level 2	43.25"	43.75"	43.00"	43.75"
Level 3	43.00"	42.50"	42.375"	42.00"
Level 4	43.25"	42.375"	42.375"	42.25"
Level 5	42.50"	42.75"	42.75"	42.75"

Footnotes

1. CBC Section 1020.3 – Minimum corridor widths: 36" for OL<50, otherwise 44". *Compliant since occupant load per story is 15 or 16 occ and the story is divided with a horizontal exit.*
2. CBC Section 1119A.3 – Accessible route widths: 44" for OL≥10; 36" for OL<10. *Compliant since occupant load per story is 15 or 16 occ and the story is divided with a horizontal exit.*
3. CBC Section 1126A.3.2.2 Hinge side approach non-compliant (L2 to L4 three door landings per story, L5 two door landings per story)
4. CBC Section 126A.3.2.3 Latch side approach non-compliant (L2 to L4 three door landings per story, L5 three door landings per story)
5. Least compliant segments where non-compliance exceeds 1 inch.

Basis of Approval

Equivalent Facilitation

- The use of designs, products or technologies as alternatives to those prescribed, resulting in substantially equivalent or greater accessibility and usability.
 - Replace conventional pressure actuated closers with spring hinges at non-complying doors.
 - ADA permits 42 inches in lieu of 44 inches.

Staff Recommendation

Approval of proposed deviation when the applicant demonstrates that equivalent facilitation will be provided and design results in substantially equivalent or greater accessibility and usability.