



B-002 – BUILDING DIVISION DIRECTIVE

December 5, 2023

Accessibility Requirements for Construction Offices/Trailers

REFERENCE

California Building Code (CBC)

Section 11B-201.4 and 11B-203.2

Directive Issued Date:
12/05/2023

Revision Date:

City of Santa Clara
Building Division
1500 Warburton Drive
Santa Clara, CA 95050

Purpose

Direction for contractors, engineers and architects regarding the accessibility requirements for construction offices/trailers

Background

California Section 11B-203.2 include the exemption from accessibility requirements for construction job-site trailers and portable toilets. But the exemption revolves around the phrase "**directly associated with the actual processes of construction.**"

A section 11B-201.4 was added to the California Building Code which specifically does require accessibility for **Construction Support Facilities**.

Code References

11B-203.2 Construction Sites: Structures and sites directly associated with the actual processes of construction, including but not limited to, scaffolding, bridging, materials hoists, materials storage and construction trailers shall not be required to comply with these requirements or to be on an accessible route. Portable toilet units provided for use exclusively by construction personnel on a construction site shall not be required to comply with Section 11B-213 or to be on an accessible route.

11B-201.4 Construction Support Facilities: These requirements shall apply to temporary or permanent construction support facilities for uses and activities not directly associated with the actual processes of construction, including but not limited to offices, meeting rooms, plan rooms, other administrative or support functions. When provided, toilet and bathing facilities serving construction support facilities shall comply with Section 11B-213. When toilet and bathing facilities serving construction support facilities are provided by portable units, at least one of each type shall be accessible and connected to the construction support facilities it serves by an accessible route.

Building Official's Interpretations

The focus is on the phrase "**directly associated with the actual processes of construction.**" If there is a construction trailer that is used or occupied **ONLY** by construction workers who are "directly" involved in the actual construction of the project, then the construction trailer is exempt from accessibility requirements. However, if a construction office/trailer is used for general meetings on site or occupied by anyone; including but not limited to, construction workers, manufacturer's representatives, administrative staff or other office workers, architects, engineers, inspection staff, etc., then the construction office/trailer and the associated toilet facilities are required to be accessible and comply with CBC 11B-201.4.