

Regarding the Amendment of the 2013 California Building Code of Regulations,
Title 24, Part 2, Chapter 11A, Housing Accessibility,

Section 1109A.8.1 Vertical Clearances.

It makes sense to require higher clearances for handicapped vans, but why do all handicapped vehicles need to have higher clearances than normal cars?

Case in point: A five story underground garage for a residential building: only one level (the highest level) could be given the higher clearance so ALL handicapped parking had to be on that level. This necessitated that the handicapped parking spaces be distributed throughout almost the entire floor, consuming large amounts of space for walkways between parked vehicles and loading and unloading aisles beside handicapped parking spaces. Plus, because of the large number of spaces required, they could not all be close to the elevators making travel distance from some of the handicapped spaces very long. If we could have placed a few handicapped vehicles on each of the 5 levels, they could ALL have been adjacent to the elevator core and the unloading space could have been the corners of the garage where parking is not possible anyway. We could have gained about 12 spaces on the first deck and every handicapped vehicle could have had a much more convenient space than they had when all located on the same level.

I would propose that the CBC lower the clearance for handicapped vehicle parking to 7'-0" leaving van parking at 8'-2" consistent with the ADA to allow more flexibility in the design of garages. Extra height or extra depth is very expensive and the extra height does not benefit a regular car.

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