

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

Section 1138.3.2 Side Reach:

The exception for kitchen countertops in dwellings and washing machines and clothes dryers which allows the obstruction to be 36" high rather than the 34" stipulated in the current code, should also include an exception for the depth of these obstructions.

Kitchen countertops are usually at least 25-1/2" inches deep, 24" for base cabinets, 1-1/2" for countertop projections over the face of the cabinet. If countertops are still limited to 24" deep, base cabinets will have to be reduced to allow for the overhanging countertops making 24" deep appliances such as dishwashers not fit in the decreased depth of the base cabinet. Please add the exception for a 25-1/2" depth to the countertop exception.

You should also be aware that washers and dryers are not made to the dimensions allowed in the exception. Even the front loading variety are generally higher than 36" and deeper than 28" plus they require space behind them for hook-ups. Some small capacity washers and dryers may fit the requirements even with the exception but normal capacity units will not. Even with this exception, this reach requirement limits the washers and dryers available for use in covered multifamily dwelling units.

Section 1133A.4 Countertops:

For the combination sink and work surface, please clarify if the sink can be placed anywhere in the overall 60 inch work surface or if it must be moved aside to insure the continuity of the 30" work surface. .

Section 1133A.4.1 Repositionable Countertops:

The concept of a repositionable sink counter is impractical unless the project has an unlimited budget. Why don't you drop the pretense that such a contrivance is allowed in covered multifamily, privately funded dwelling units and concentrate on stone, cultured stone and tiled countertops meeting the requirements. A project that can't afford these materials for their countertops could not afford the increased plumbing costs and cabinet construction for repositionable plastic laminate countertops either. How does the use of those more expensive countertop materials mitigate the need for repositioning countertops for the disabled? It is hard to design low-income housing when we are limited to the choice between two expensive alternatives.

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