JMS Group
Accessibility Consulting ■ *ADA – FHA – IBC – CBC Compliance*
Jim Safranek, RA, CBO, CBCO, Principal

May 3, 2014

California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, California 95833

CBSC@dgs.ca.gov

Attention: Jim McGowan, Executive Director

Re: Notice of Proposed Action to Building Standards of the Department of Housing and Community Development Regarding the 2013 California Building Code California Code of Regulations, Title 24, Part 2, Chapter 11 "Housing Accessibility"

Subj: Public Comment Period

Dear Mr. McGowan,

As a consultant who routinely performs accessibility reviews of multi-family residential projects in California for both Building Code and FHA compliance, I have reviewed the proposed changes to Chapter 11A and based on my extensive experience using Chapter 11A, I would like to offer the following comments and suggestions.

6. HCD proposes to amend Section 1110A "Exterior Accessible Routes", as follows:

SECTION 1110A
[DELETE:~~***EXTERIOR ROUTES OF TRAVEL***~~]
[ADD:***EXTERIOR ACCESSIBLE ROUTES***]

1110A.1 [DELETE:~~***Exterior accessible route***~~] [ADD:***General.***] *When a building or portion of a building is required to be accessible or adaptable, an accessible route shall be provided to all portions of the building, accessible building entrances and between the building and the public way. The accessible route shall be the most practical direct route and to the maximum extent feasible, coincide with the route for the general public and building residents.*

Exterior accessible routes shall be provided as follows:

[DELETE:~~*1. Where more than one route of travel is provided, all routes shall be accessible.*~~]
[DELETE:~~*2.*~~] [ADD:*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 and unloading zones, and public streets or sidewalks to the accessible building entrance they serve.* [ADD:*Where more than one route of travel is provided, all routes shall be accessible.*]
[DELETE:~~*3.*~~][ADD: *2.*] *At least one accessible route shall connect accessible buildings, facilities, elements and spaces that are on the same site. Accessible routes shall be provided between accessible buildings and accessible site facilities when more than one building or facility is located on a site.*
[DELETE:~~*4.*~~][ADD: *3.*] *At least one accessible route shall connect accessible building or facility entrances with all accessible spaces, elements, and covered multifamily dwelling units.*
[DELETE:~~*5.*~~][ADD: *4.*] *An accessible route shall connect at least one accessible entrance of each covered multifamily dwelling unit with exterior spaces and facilities that serve the dwelling unit.*
[DELETE:~~*6.*~~][ADD: *5.*] *Where elevators are provided for vertical access, all elevators shall be accessible. See Section 1124A.*

Note: *If the slope of the finished grade between covered multifamily dwellings and site arrival points, ~~a~~ public use or common use* [DELETE:~~*facility*~~][ADD: *facilities*] *(including parking) exceeds 1 unit vertical in 12 units horizontal (8.33-percent slope), or where other physical barriers (natural or artificial) or legal restrictions, all of which are outside the control of the owner, prevent the installation of an accessible route, an acceptable alternative is to provide access by a vehicular route, provided:*

1. There is accessible parking on an accessible route for at least 2 percent of the covered multifamily dwelling units, and

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2. Necessary site provisions such as parking spaces and curb ramps are provided at the public use or common use facility.

Recommendation: Add the following subsection:

> *1110A.1.1Exterior accessible routes over 200 feet. Exterior accessible routes that exceed 200 feet (60 960 mm) in length shall comply with Section 1138A.1.2 (See Figure 11A-1L).*

As currently written, the section on exterior accessible routes does not include provisions for passing/turning spaces, every 200 feet. The proposed subsection has been created to establish language that is parallel to that found for interior accessible routes, as in the HCD proposed amendment 12. Section 1119A "Interior Accessible Routes", section 1119A.4. The proposed subsection is also parallel to that found in section 11B 403.5.3 of the 2013 California Building Code as well as in section 403.5.3 of the 2010 ADA Standards for Accessible Design.

10. HCD proposes to amend Section 1116A "Hazards on Accessible Routes", as follows:

[ADD:***1116A.5 Detectable warnings at vehicular areas****. When a walk crosses or adjoins a vehicular way, the walking surface shall be separated from the vehicular area by curbs, railings or other elements, or the boundary between the pedestrian areas and the vehicular areas shall be defined by a continuous detectable warning 36 inches (914 mm) wide minimum, complying with Chapter 11B, Section 11B-705.*]

Recommendation: Please clarify the definition of pedestrian area, vehicular way or vehicular area, to aid in identifying the specific location where detectable warnings will be required. As an alternative, please provide language clarifying the intent as to exactly where detectable warnings will be required. Listed below are several examples where the language of 1116A.5 as presently written could be interpreted and applied by the Authority Having Jurisdiction (AHJ) in a variety of ways:

- Example 1: Does the term vehicular way include parking areas? If so, the access aisle to an accessible stall would be required to have detectable warnings along the length of the access aisle, at both sides, where the aisle abutted the parking areas. This conceivably may be necessary to prevent blind or low vision individuals from wandering through an empty parking stall into the drive aisle, beyond.

- Example 2: Where the access aisle for accessible parking abuts the vehicular drive aisle for parking, it would appear that per the language identified in 1116A.5, detectable warnings would be required at the end of the access aisle to prevent individuals from inadvertently stepping into the drive aisle.

- Example 3: Within parking garages (and sometimes at exterior sites), where the accessible route from the accessible parking access aisle to the accessible building entrance traverses parallel to the vehicular drive aisle (and there is not a curb or barrier between the accessible route and drive aisle), per the language identified in 1116A.5, detectable warnings would be required along the entire length of the side of the accessible route where it abuts the vehicular drive aisle. Again, this would be provided to prevent individuals from inadvertently stepping into the drive aisle.

- Example 4: Within parking garages (and sometimes at exterior sites), where crosswalks cross vehicular drive aisles, per the language identified in 1116A.5, the portion of the "walking surface" of the cross walk would be required to be separated from the vehicular way by providing detectable warnings along the entire length of the crosswalk. This would prevent individuals from inadvertently crossing into the drive aisle and assist them in maintaining their direction of travel at the crosswalk.

It should be noted that the language chosen for section 1116A.5 emulates that found in the accessibility standard ANSI A117.1-1986 Edition, however, section 1116A.5 deleted a critical word found in the ANSI. ANSI clarified

the vehicular way as being "frequently used". Section 1116A.5 does not use this language therefore, it must be assumed that the provisions of 1116A.5 would be applicable at all vehicular ways, irrespective of the frequency of use. If use of section 1116A.5 for all vehicular ways was not the intent, then please provide language identifying the specific scope of application.

18. HCD proposes to amend Section 1126A "Doors and Windows", as follows:

1126A.3.1 General. [DELETE:~~*The level floor or landing of an exit door shall have a length in the direction of the door swing of at least 60 inches (1524 mm) and a length opposite the direction of the door swing of at least 44 inches (1118 mm) measured at right angles to the plane of the door in its closed position. (See Figures 11A-8D, 11A-8E and 11A-8F for maneuvering spaces at sliding doors).*~~]
[ADD:*The minimum maneuvering clearance at doors shall comply with Sections 1126A.3.2, 1126A.3.3, and 1126A.3.4. The floor or landing area within the required maneuvering clearance shall be level and clear. The required length shall be measured at right angles to the plane of the door in its closed position. Maneuvering clearances shall extend the full width of the doorway and the required latch side or hinge side clearances (strike edge maneuvering clearances).*]

1126A.3.2.1 Front approach. *The following provisions shall apply to swinging doors or gates with front approach:*

1. [ADD:***Pull side approach.***] [DELETE:~~*For pull side approach, the*~~] [ADD:*The*] *level floor or landing shall extend in the direction of the door or gate swing at least 60 inches (1524 mm). (See Figure 11A-8A).*

2. [ADD:***Push side approach.***] [DELETE: ~~*For push side approach, the*~~] [ADD: *The*] *level floor or landing shall extend opposite the direction of the door or gate swing at least 48 inches (1219 mm). (See Figure 11A-8A).*

3. [ADD:***Doors and gates with push side approach having both a closer and a latch.***] *Doors or gates with push side approach having both a closer and a latch shall be provided with a clear and level area extending a minimum of 12 inches (305 mm) past the strike edge on the approach side of the door or gate. (See Figure 11A-8A).*

4. [ADD:***Strike edge maneuvering space.*** *The width of the level area on the side to which the door or gates swings shall extend at least 24 inches (610 mm) past the strike edge of the door for exterior doors or gates and at least 18 inches (457 mm) past the strike edge for interior doors or gates.*

Recommendation: Replace the word "level" with the technical criteria for achieving a "level" condition, namely "running slope and cross slopes, each, not exceeding 1:48", or provide a definition for "level" that provides the technical criteria. Identifying the specific slopes (both running and cross) required at door maneuvering clearances would be consistent with the requirements found in section 11B 404.2.4.4 of the 2013 California Building Code as well as in section 404.2.4.4 of the 2010 ADA Standards for Accessible Design.

18. HCD proposes to amend Section 1126A "Doors and Windows", as follows:

1126A.4 Closer-effort to operate doors or gates. *Maximum effort to operate doors or gates shall not exceed 8½ pounds (38 N) for exterior doors or gates and 5 pounds (22 N) for interior doors or gates, such pull or push effort being applied at right angles to hinged doors or gates and at the center plane of sliding or folding doors. Compensating devices or automatic door or gate operators may be utilized to meet these standards. When fire doors are required, the maximum effort to operate the door may be increased to the minimum allowable by the appropriate enforcement agency, not to exceed 15 pounds (66.7 N).*

Recommendation: Replace the phrase "closer-effort" with the phrase "opening force" and replace the word "effort" with "force" to reflect the intent and to be consistent with section 11B 404.2.9 of the 2013 California Building Code as well as in section 404.2.9 of the 2010 ADA Standards for Accessible Design. Use of the term "closer" implies that the effort to open the door or gate is specifically linked to the use of a door closer (a mechanical device) and section 1126A.4 may be interpreted by an individuals and AHJs to only be applicable where door closers are used. The term "opening force" is more appropriate to reflect the intent which is the amount of force (a quantitative, scientific term) required to open the door, irrespective of any specific door

hardware. This is critical, where the weight of the door, weather-stripping/seals, or a spring hinge may be used and these devices could limit the ability to easily open a door.

18. HCD proposes to amend Section 1126A "Doors and Windows", as follows:

1126A.6 Hand-activated door [ADD:***or gate***] ***hardware.*** *Hand-activated door* [ADD:*or gate*] *latching, locking and opening hardware shall be centered between 30 inches (762 mm) and 44 inches (1118 mm) above the floor. Latching and locking doors* [ADD:*or gates*] *that are hand-activated and on an accessible route 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 or gates shall operate consistent with Section 1126A.4, in the direction of egress.* [ADD:*When sliding doors are in the fully open position, operating hardware shall be exposed and usable from both sides.*

Recommendation: Clarify the description of the door operation, relative to the terms "hand-activated" and "single effort" to identify the intent. As currently written, section 1126A.6 does not clearly identify that activation of hardware must be performed by one hand. Revise language to emulate that found in sections 11B-404.2.7 and 11B-309.4 of the 2013 California Building Code, as well as in sections 404.2.7 and 309.4 of the 2010 ADA Standards for Accessible Design. Suggested revision to text would be as follows:

> ***1126A.6 Hand-activated door or gate hardware.*** *Hand-activated door or gate latching, locking and opening hardware shall be centered between 30 inches (762 mm) and 44 inches 9 (1118 mm) above the floor. Latching and locking doors or gates that are hand-activated and on an accessible route shall be operable* [ADD: with one hand employing] ~~*with*~~ *a single effort* [ADD: at] ~~*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 or gates shall operate consistent with Section 1126A.4, in the direction of egress. When sliding doors are in the fully open position, operating hardware shall be exposed and usable from both sides.*

18. HCD proposes to amend Section 1126A "Doors and Windows", as follows:

SECTION 1126A
***DOORS* [ADD:*, GATES AND WINDOWS*]**

[ADD:***1126A.3.2 Swinging doors and gates.***]

1126A.3.2.1 Front approach. *The following provisions shall apply to swinging doors or gates with front approach:*

5. [ADD:***Pull side approach.***] [DELETE:~~*For pull side approach, the*~~] [ADD:*The*] *level floor or landing shall extend in the direction of the door or gate swing at least 60 inches (1524 mm). (See Figure 11A-8A).*

6. [ADD:***Push side approach.***] [DELETE: ~~*For push side approach, the*~~] [ADD: *The*] *level floor or landing shall extend opposite the direction of the door or gate swing at least 48 inches (1219 mm). (See Figure 11A-8A).*

7. [ADD:***Doors and gates with push side approach having both a closer and a latch.***] *Doors or gates with push side approach having both a closer and a latch shall be provided with a clear and level area extending a minimum of 12 inches (305 mm) past the strike edge on the approach side of the door or gate. (See Figure 11A-8A).*

8. [ADD:***Strike edge maneuvering space.*** *The width of the level area on the side to which the door or gates swings shall extend at least 24 inches (610 mm) past the strike edge of the door for exterior doors or gates and at least 18 inches (457 mm) past the strike edge for interior doors or gates.*

   Note: *See Section 1132A.5 for maneuvering clearances at primary entry doors and all required exit doors to covered multifamily dwellings.*]

Recommendation: Notably in California, doors and gates for common use areas are often located within breezeways that are covered, but still open to the exterior environment at either end of the breezeway. It is recommended that item 8 be amended to address these types of conditions. One suggestion for clarifying this

would be to state that any door or gate, "exposed to the exterior, unconditioned atmosphere" must be provided with a strike edge maneuvering space of 24" minimum. If this is not the intent at breezeways, then modify the language appropriately to distinguish the strike requirements for doors located within covered breezeways (indirect, exterior exposure) as opposed to doors located with direct, exterior exposure.

19. HCD proposes to amend Section 1127A "Common Use Facilities", as follows:

SECTION 1127A
COMMON USE FACILITIES

1127A.12 Fixed or built-in seating, tables and counters.

1127A.12.1 Minimum seating. **… (No change to text)**

Recommendation: As section 1127A.12.1 is currently written (see directly below), it would appear that built-in seating (such as benches or banquettes) as well as built-in tables or counters would be required to be accessible. For built-in seating, Chapter 11A, unlike Chapter 11B, does not include any technical requirements for accessible benches, therefore there are no applicable requirements for an accessible bench or banquette. It seems that the intent of section 1127A.12.1 as well as the following sections (1127A.12.2 and 1127A.12.3) is that wherever fixed tables and counters are provided, that the accessible counter/dining/work surfaces must have as specific height and depth and that knee and toe clearances be provided at them.

> ***1127A.12.1 Minimum seating****. Where fixed or built-in seating, tables, or counters are provided for residents or guests, 5 percent, but not less than one, shall be accessible as provided in this section.*

To clarify the intent, namely to ensure that compliant surfaces with knee and toe clearances below them be provided at accessible tables and counters, the following revision to section 1127A.12.1 is proposed:

> ***1127A.12.1 Minimum seating.*** *Where fixed ~~or built-in seating~~, tables, or counters are provided for residents or guests, 5 percent, but not less than one, shall be accessible as provided in this section.*

19. HCD proposes to amend Section 1127A "Common Use Facilities", as follows:

SECTION 1127A
COMMON USE FACILITIES

[ADD:***1127A.13 Electric vehicle charging stations. (Reserved)***]

Recommendation: Although this section has been reserved by HCD. I would like to offer some ideas for consideration when addressing this matter in the future. Listed below is a JMS Group assessment on this matter when performing plan reviews addressing Electric Vehicle (EV) stall compliance with both the CBC and FHA requirements.

> JMS Assessment: Where a charging station and their accompanying stall are NOT associated with long term parking at the stall, it is JMS's assessment that the charging station and its stall are a common use amenity and NOT associated with parking. However, if long term parking for an Electric Vehicle (EV) occurs at the stall, it is JMS's assessment that per the Fair Housing Act Design Manual (FHADM), page 2.23, EV parking is a "type" of parking and a min. of one EV stall/charging station is required to be accessible. Regardless of whether the EV charging station/stall is used as a common use amenity or long term parking, an accessible route to the charging station & stall is required, as well as accessible controls

and operation at the charging station. JMS recommends that a min. 5' wide access aisle be provided adjacent to the stall. JMS also recommends; 1.) that where the stall/charging station is a common use amenity, signage be provided, identifying the stall/charging station as being an "accessible charging station". 2.) that where the stall/charging station is associated with long term parking, signage be provided, identifying the stall/charging station as being "accessible parking".

20. HCD proposes to amend Section 1131A "Changes in Level on Accessible Routes", as follows:

SECTION 1131A
CHANGES IN LEVEL ON ACCESSIBLE ROUTES

1131A.1 Changes in level not exceeding ½ inch. **… (No change to text)**

1131A.2 Changes greater than ½ inch. *Changes in level greater than ½ inch (12.7 mm) shall be made by means of a* [ADD:*sloped surface not greater than 1 unit vertical in 20 units horizontal (5-percent slope), or a*] *ramp, elevator or platform (wheelchair) lift. See Section 1122A for ramps and Section 1124A.11 for platform (wheelchair) lifts.*

Recommendation: Section 1132A.4 includes a number of exceptions to the requirement cited in 1131A.2. It is recommended to revise section1131A.2 as follows:

> ***1131A.2 Changes greater than 1/2 inch.*** *Changes in level greater than ½ inch (12.7 mm) shall be made by means of a sloped surface not greater than 1 unit vertical in 20 units horizontal (5-percent slope) or a ramp, elevator or platform (wheelchair) lift. See Section 1122A for ramps and Section 1124A.11 for platform (wheelchair) lifts.*
>
> [ADD: **Exception:** As allowed by requirements found in section 1131A.4.]

21. HCD proposes to amend Section 1132A "Doors", as follows:

SECTION 1132A
DOORS

1132A.3 Width and height of interior doors and secondary exterior doors. *Doors shall comply with the following:*

1. Doors shall not be less than 6 feet 8 inches (2032 mm) in height.
2. Swinging doors shall provide a net clear opening width of not less than 32 inches (813 mm), measured with the door or doors positioned at an angle of 90 degrees from the closed position. *[DELETE:* ~~A 34-inch (864 mm) door is acceptable.~~*]*
3. Swinging doors shall be capable of opening at least 90 degrees.
4. A nominal 32-inch (813 mm) clear opening provided by a standard 6-foot wide (1829 mm) sliding patio door assembly is acceptable.
5. A pair of doors, manual or automatic, must have at least one leaf which provides a clear width of not less than 32 inches (813 mm), measured with the door positioned at an angle of 90 degrees from its closed position.
6. The width of any component in the means of egress system shall not be less than the minimum width required by Section 1005.

Recommendation: For item 4, sliding doors, revise the language to be consistent with that shown in item 2, namely, that a "nominal 32-inch" opening is not acceptable and that the technical requirement is to provide a minimum of 32 inches of clear width or "32 inches of net clear opening width".

It should be noted that after reviewing 32 models of 6 foot wide sliding door assembly types from 19 national and regional window/door manufacturers, it appeared that only 2 specific door assemblies were found to provide a clear opening width of 32 inches or greater. In addition to having less than the minimum required clear width, door pulls at the door in the open position, often protruded into the clear opening. Based on the research, for sliding doors, to achieve a minimum, clear opening width of either 32 inches or even a nominal 32 inches (31-5/8" actual), the size of the sliding door assembly must typically be increased from 6-feet to 6-feet 6-inches. For this reason, it may be best to revise item 4 as follows and identify the relevant technical criteria, in lieu of associating it with a specific door width:

> 4. *Sliding patio door assemblies shall provide a net clear opening width of not less than 32 inches (813 mm), measured with the operable door portion, including any operable screen portion, in the fully open position.*

For item 5, utilize language that is consistent with that found in item 2 and also proposed for item 4 regarding clear width. Instead of using the term "clear width", use the term "net clear opening width".

23. HCD proposes to amend Section 1134A "Bathing and Toilet Facilities", as follows:

SECTION 1134A
BATHING AND TOILET FACILITIES

1134A.7 Water closets. *Water closets in bathrooms or powder rooms required to be accessible shall comply with this section.*

1. ***Floor space and location.*** *The minimum floor space provided at a water closet shall be 48 inches (1219 mm) in clear width. The clear floor space shall extend past the front edge of the water closet at least 36 inches (914 mm). See Figure 11A-9M.*

   Exception*: The 48-inch (1219 mm) minimum clear width may be reduced to 36 inches (914 mm) for lavatories, cabinets, wing walls, or privacy walls located immediately adjacent to a water closet which extend no more than 24 inches (610 mm) in depth.*

> *Water closets shall be located within bathrooms in a manner that permits a grab bar to be installed on* [ADD:*at least*] *one side of the fixture. The centerline of the water closet shall be 17 inches (406 mm) minimum to 18 inches (457 mm) maximum from a grab bar wall or partition. In locations where water closets are adjacent to non-grab bar walls, vanities, lavatories or bathtubs, the centerline of the fixture shall be a minimum of 18 inches (457 mm) from the obstacle.*

Recommendation:

> "In locations where water closets are adjacent to non-grab bar walls, vanities, lavatories, or bathtubs, the centerline of the fixture shall be a minimum of 18 inches (457 mm) from the obstacle."

For the sentence directly above, clarification is requested as to what the "obstacle" represents. Where a lavatory occurs directly adjacent to a toilet at one side, and this is where the space for a future fold-down grab bar is to be provided, frequently, a majority of design professionals identify the required 18" from the centerline of the toilet to the face of the base cabinet for the lavatory. Unfortunately, the typical millwork detailing for lavatory countertops is such that at the side adjacent to the toilet, the countertop edge projects/cantilevers beyond the face of the base cabinet. Because of this, the countertop often protrudes into the required 18" clearance. This protrusion limits the ability to effectively utilize grab bars at this location, in the future. To aid design professionals, fabricators, and installers to achieve the intended requirement, it is recommended that additional language, clarifying the nature of the obstacle be provided. Below is a recommendation for a proposed revision to the last sentence:

In locations where water closets are adjacent to non-grab bar walls, vanities, lavatories, or bathtubs, the centerline of the fixture shall be a minimum of 18 inches (457 mm) from the obstacle. [ADD: Where a lavatory occurs adjacent to a water closet, the minimum 18 inch distance will be measured from the centerline of the water closet to the furthest projecting surface at the face of the lavatory, adjacent to the water closet, which may include the face of the countertop edge.]

25. HCD proposes to amend Section 1138A "Space Allowances and Reach Ranges", as follows:

SECTION 1138A
SPACE ALLOWANCES AND REACH RANGES

1138A.3.2 Side reach.

2. ***Obstructed high reach.*** *When a clear floor space allows a parallel approach to an element and the high side reach is over an obstruction, the height of the obstruction shall be 34 inches (864 mm) maximum and the depth of the obstruction shall be 24 inches (610 mm) maximum.*

   The high side reach shall be 48 inches (1219 mm) maximum for a reach depth of 10 inches (254 mm) maximum. When the reach depth exceeds 10 inches (254 mm), but no more than 24 inches (610 mm), the high side reach shall be 46 inches (1168 mm) maximum. (See Figure 11A-1J(c)).

   Exception: [ADD: *Kitchen countertops in dwelling units, and*] ~~T~~*the top of washing machines and clothes dryers shall be permitted to be 36 inches (914 mm) maximum above the finish floor.*

Recommendation: For kitchen countertops within dwelling units, clarify whether the maximum 24 inch depth refers to the depth of the base cabinet (with or without overlay or flush doors) or the depth of the countertop. Industry standard casework is typically a 24 inch deep base cabinet box, 3/4 inch overlay doors, and an additional 3/4 inch countertop overhang, resulting in a 25-1/2" deep countertop. If the intent of the section is such that the maximum countertop depth must be 24 inches (assuming that the electrical boxes above the countertop are set flush with the rear wall), this would conflict with the Fair Housing Act, which allows a maximum countertop depth of 25-1/2 inches. Most recently, the 2009 edition of ANSI A117.1 (as referenced by the 2012 edition of the International Building Code) amended the requirement for Type 'B' units to "harmonize" with the FHA requirements and allow a maximum countertop depth of 25-1/2 inches, where outlets were located above the countertop.

One potential solution would be to amend the exception, as follows:

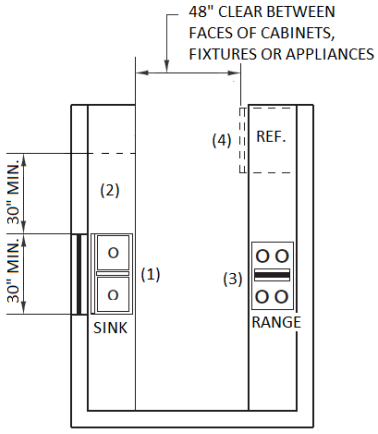
Exceptions:

1. *Kitchen* [ADD: and bathroom] *countertops in dwelling units, and the top of washing machines and clothes dryers shall be permitted to be 36 inches (914 mm) maximum above the finish floor.*
2. [ADD: Within kitchens and bathrooms, lighting controls, electrical switches and receptacle outlets are permitted to be located over cabinets with counter tops 36 inches (915 mm) maximum in height and 25 1/2 inches (650 mm) maximum in depth.]

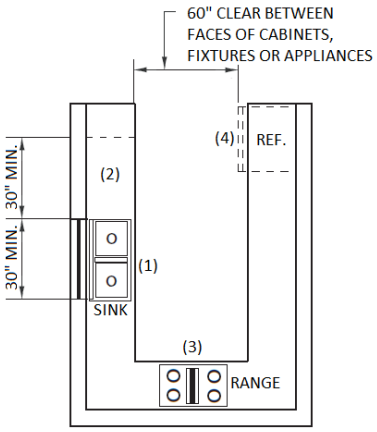
29. HCD proposes to amend Division VII – FIGURES as follows:

Division VII – FIGURES

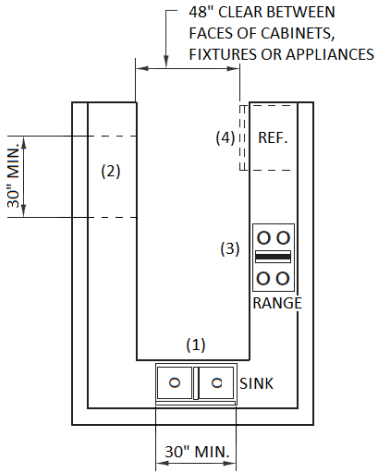
Diagrams illustrate the specific requirements of these regulations and are intended only as an aid for building design and construction. Diagrams are not to scale.



(a) TYPICAL KITCHEN



(b) "U" SHAPED KITCHEN WITH RANGE AT THE BASE



(c) "U" SHAPED KITCHEN WITH SINK AT THE BASE

(1) 30" minimum countertop space for sink installation with removable base cabinet and finish flooring beneath the sink; 30" x 48" minimum clear floor space to allow parallel or forward approach.

(2) 30" minimum countertop for work surface with removable base cabinet and finish flooring beneath; 30" x 48" minimum clear floor space to allow parallel or forward approach.

(3) 30" x 48" minimum clear floor space adjacent to range to allow parallel approach.

(4) 30" x 48" clear floor space at refrigerator, dishwasher, trash compactor or other appliances to allow parallel or forward approach.

FIGURE 11A-10A
KITCHEN SPECIFICATIONS

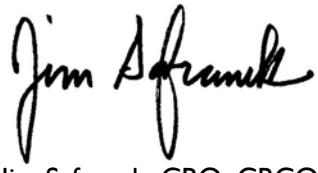
Recommendation: Revise clear width dimensions at kitchens to align with text in section 1133A.2.1 that identifies clear width as 48" minimum and 60" minimum. Dimensions in illustrations do not state "minimum" and should be revised to say:

"Minimum 48" clear between faces of cabinets, fixtures, or appliances"

"Minimum 60" clear between faces of cabinets, fixtures, or appliances"

If you should have any questions, please contact me.

Sincerely,



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