



INFORMATION SHEET

NO. DA-03

DATE : August 1, 2016

CATEGORY : Disabled Access

SUBJECT : **Chapter 11A Multi-Family Dwelling Unit Kitchen Cabinets**

REFERENCE : **2013 California Building Code (CBC) Chapters 11A, Section 1133A**
U.S. Department of Housing and Urban Development Fair Housing
Design Manual
ANSI A117.1-1986 Standard
Approved **HCD Final Express Terms** for proposed building standards for
CBC Chapter 11A, 2013 intervening code adoption cycle dated June, 2014
HCD Initial Statement of Reasons for proposed building standards for CBC
Chapter 11A, 2013 intervening code adoption cycle dated
December 12, 2013
2010 ADA Guidelines for Accessible Design

NOTE : **The effective date of this Information Sheet shall be the date of signature by the Director.**

This Information Sheet is not retroactive and does not apply to permits issued prior to the effective date.

DISCUSSION :

The purpose of this Information Sheet is to clarify the regulations contained in the CBC Chapter 11A, Section 1133A pertaining to kitchens within individual covered dwelling units in a multi-family dwelling. There seems to be some confusion as to the requirements regarding distance between cabinets, when cabinets are required to be removable and when knee and toe space is required. There has also been disagreement over what depth of sink is allowed, what kind of "bread board" is allowed, if pipes under the sink are to be insulated, and whether garbage disposals are allowed.

The Initial Statement of Reasons published by the Department of Housing & Community Development (HCD) in December of 2013 states that Chapter 11A is primarily based upon the ANSI A117.1-1986 Standard. The statement further clarifies that HCD has also developed more stringent requirements in some areas, such as the requirement for removable bases under sinks in other than U-shaped kitchens. Chapter 11A contains a number of requirements that are more stringent than the Federal Fair Housing Act Design Manual, which is also based upon the 1986 ANSI standard.

The statement of reasons expresses HCD's intent to clarify these provisions in the proposed intervening code cycle language and reinforce "that the requirements for parallel and forward approach, knee and toe space, removable base cabinets and repositionable countertops apply to kitchen sinks and work surfaces."

In discussion with HCD, it has been determined that they take no position on the definition of "bread board" as referenced in Section 1133A.4 exception and they rely upon the local jurisdiction to make such a determination. This department's interpretation is derived from the language and implied intent of the 1986 ANSI Standard, the input of a number of other jurisdictions and members of the Certified Access Specialist Institute.

The following are the HCD's interpretation of these regulations:

Clear Floor Space: 1133A.2

The code requires that all fixtures and appliances have a clear floor space centered on the fixture allowing either a parallel or forward approach except for a range or cook-top. For a cook top or range, a front approach is optional, however a parallel approach must be provided as this approach provides greater safety for the user per the Fair Housing Act Design Manual.

Clear Width: 1133A.2.1

The California Building Code differs from the Federal Fair Housing Act Design Manual and from the 2010 ADA Guidelines regarding minimum width of kitchens. The California minimum width is more restrictive and thus must be applied.

- Where there is a U-shaped kitchen providing only a parallel approach to a cook top or range at the base (i.e. no removable base cabinet), the minimum width between counters and appliances is 60".
- Where there is a U-shaped kitchen with removable cabinets that will provide compliant knee and toe space when removed underneath a cook top or sink at the base, the minimum width shall be 48" between appliances and counters.
- All other conditions, including distance to islands, shall be 48" minimum in clear width.

The clear width is measured from the face of the cabinet or edge of counter top to the opposite wall, counter or appliance. It is the duty of the design professional, as well as the plan checker and the field inspector to verify the dimensions of the appliances, particularly stove and refrigerators, to assure that they do not violate the minimum clear width requirement when installed.

Removable Base Cabinet: 1133A.3

The California Building Code requirements for removable base cabinets also differ from the Federal regulations and are more restrictive. California requires:

- One 30" sink cabinet having a removable base that will provide for a clear 30" wide knee and toe space when removed. In addition, there shall also be one 30" counter top work surface cabinet that will provide for a clear 30" wide knee and toe space when removed. In lieu of two separate 30" cabinets, a single 60" removable cabinet may be used.

- For small kitchens where there is limited wall and cabinet space, two 15" bread boards may be used in lieu of the 30" counter top workspace cabinet. As there is no provision for this in the Federal codes, and neither California or the Federal codes has any exception for knee space under work areas, these bread boards must be installed in a manner that will provide for knee and toe clearance when in use. The most common type of bread board would be the pull-out or swing-out style that was common at the time the code was first written.
- The finished floor must extend to the back wall under all removable base cabinets.

Knee and Toe Space: 1133A.7

Knee and toe space is required under kitchen sink and workspace. Knee and toe space shall comply with 1133A.7 and 1138A.2.

- The knee and toe space shall be 30" wide clear. This space shall be centered on the fixture.
- The knee clearance shall be 27" minimum in height and extend back a minimum of 8" from the front edge. The knee space may then decrease by 6" vertical for each 1" horizontal for a total of 18" (3" x 6") to 9", (27" – 18").
- The toe clearance shall be a minimum of 9" in height, begin at a minimum of 11" deep.
- Combined knee and toe clearance shall extend at least 19" minimum under both the sink and the workspace (1138A.2.1.3).
- Clear floor space shall extend a maximum of 19" into the knee and toe space.

Plumbing Protection: 1133A.7.1

Water supply and drain under kitchen sink shall be insulated and free of sharp edges.

Notes:

- Although it is not required, it is recommended to insulate the bottom of a cook top when removable cabinets are provided to prevent users from undetected burns.
- Garbage disposals are not prohibited by code and may be allowed.
- California does not prescribe a 6.5" maximum depth for a sink, as does the Federal code, but the depth is restricted by the required knee space. For a standard 36" high cabinet* a self rimming sink would be allowed to be 9" deep if the space below the sink was 27" clear in height. For larger double sinks, the deeper portion may extend below 27" provided there is one sink that has a 30" wide clear space at 27" high beneath it.

Reach Ranges: 1138A.3

Reach ranges apply to kitchen cabinets and all switches and receptacle must comply. The maximum height of the switches and receptacles for front approach shall be 44" for cabinets between 20" and 25" in depth, measured from the edge of the counter top. The maximum height of the switches and receptacles for parallel approach shall be 46" for cabinets between 10" and 24" in depth, measured from the edge of the counter top. Cabinets over 25" in depth for front approach or 24" in depth for parallel approach must have switches and receptacles placed in an area other than the back wall such as the counter top or cabinet face that complies with the allowable reach ranges.

Cabinet Height: 1138A.3.2, #2 exception

In the July 1, 2015 supplement to Chapter 11A, the following exception was added to Chapter 11A, Section 1138A.3.2, #2:

"Exception: Kitchen 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 floor."

Prior to this supplement, the California code was silent on counter height inside dwelling units, but the Federal Fair Housing Design Manual has always allowed a 36" counter height as specified on the diagram on page 7.2 (Attachment C). The change in the California code was introduced as a clarification and not a

regulatory change. The 36" counter height has always been allowed within the dwelling unit, although not specified. It should be noted that this exception applies only to kitchens within adaptable units and does not apply to kitchens in accessible units, public spaces or in common use areas.

Tom C. Hui

8/1/16

Tom C. Hui, S.E., C.B.O.

Director

Department of Building Inspection

TH Date

Attachments - Please see following reference attachments:

- A & A.1) Initial Statement of Reasons, HCD; March 12, 2014
- B & B.1) Expressed Terms that were adopted by the Building Standards Commission at the July 22, 2014 meeting and will become California Law on July 1, 2015; and, Sections 1133A.2.1 for knee and toe space requirements and 1138A.3.2, #2 exception for reach ranges over kitchen counters
- C) HCD letter dated 7/01/2014, subject re base cabinets
- D) Fair Housing Act Design Manual, Guideline Specifications for Kitchens, page 7.2

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**21. SECTION 1132A
DOORS**

Section: 1132A.3 Width and height of interior doors and secondary exterior doors.

Rationale: HCD proposes to amend Item 2 of Section 1132A.3. The proposed amendment allows the installation of any width if the requirement for 32 inches clear door opening is met. This clarification is a result of comments received from stakeholders expressing concerns that the allowance of a 34-inch wide door creates the illusion that the 32-inch clear opening is not required.

HCD believes that the language, as written, is sufficiently clear and describes the intent. However, HCD agrees to provide clarification and avoid the confusion among some code users. There is no intended change in regulatory effect.

**Section: 1132A.5 Maneuvering clearance at doors.
1132A.5.1 General.**

Rationale: HCD proposes to amend Section 1132A.5.1. HCD proposes to repeal Exception 2, and relocate the same language as the first paragraph of this section. HCD also proposes to modify Exception 1, clarifying its application (applicable to interior doors).

HCD believes that the existing Exception 2 is not an exception, but the general requirement for maneuvering clearances at doors. The proposed amendment provides clarity to the code user. There is no intended change in regulatory effect.

Section: 1132A.9 Smooth surface.

Rationale: HCD proposes to amend the above referenced section. HCD proposes to repeal existing language, addressing the smooth surfaces required for the bottom 10 inches of a door, and replace it with new language consistent with Section 11B-404.2.10. HCD also proposes to amend the existing exception and add two new exceptions consistent with Section 11B-404.2.10.

Section 1132A.9, as written, requires smooth uninterrupted surface on the bottom 10", both sides. In comparison, Section 11B-404.2.10 clarifies that 10" are measured from finish floor, not from the bottom of the door, and are required on push side only. Section 1132A.9 also requires all doors and/or gates to have a smooth, uninterrupted surface; however, this section does not specify how big this surface should be. In comparison, Section 11B-404.2.10 clarifies the area – the full width of the door.

HCD took all concerns into consideration and proposes to modify this section for consistency with Section 1126A and Section 11B-404.2.10.

**22. SECTION 1133A
KITCHENS**

**Section: 1133A.2 Clear floor space.
Section: 1133A.3 Removable base cabinets.**

Rationale: HCD proposes to amend the above referenced sections. HCD proposes to replace existing language with new language that more accurately describes the intent. The proposed modification clarifies that the requirements for parallel and forward approach, knee and toe space, removable base cabinets, and repositionable countertops (see Section 1133A.4.1) apply to kitchen sinks and work surfaces. Stakeholders and other code users expressed a concern that currently the language, as written, is not as clear because it seems that the removable base cabinets are required under work surfaces only when repositionable countertops are required.

The Development of Chapter 11A and many of its current provisions date back to the 1986 ANSI A117.1; this was the primary document that HCD utilized. In some areas, HCD has promulgated more stringent requirements. The requirement for removable base cabinets under work surfaces is from ANSI A117.1 1986, Section 4.32.5.4. This is where and why HCD has consistently determined the provisions were also intended as a Chapter 11A requirement. However, some stakeholders successfully pointed out that HCD's language is not as clear.

HCD regulations went further than ANSI 1986 by also requiring removable base cabinets under the kitchen sink (1986 ANSI A117.1 only requires removable base cabinets at sinks in a U-shaped kitchen configuration). Therefore, HCD believes the intent has been (and continues to be) to require removable base cabinets under work areas, no different from that of the 1986 ANSI A117.1.

The proposed amendments in Sections 1133A.2 and 1133A.3 provide clarity and consistency to the code user. There is no intended change in regulatory effect.

Section: 1133A.4 Countertops.

Rationale: HCD proposes to amend the above referenced section by deleting the reference to Section 1133A.4.1. HCD believes that this sentence is not necessary since Section 1133A.4.1 is a subsection of Section 1134A.4, and follows the exception. It would be necessary if it were in a different chapter or division. Additional editorial corrections are also proposed for clarity. There is no intended change in regulatory effect.

Section: 1133A.4.1 Repositionable countertops.

Rationale: HCD proposes to amend the above referenced section. HCD proposes to replace the terms "kitchen sink and work surface space" and "kitchen sink counter area and work surface" with "sinks and work surfaces." This modification is a result of comments received from stakeholders expressing a concern that the use of different terms in the same section creates confusion. HCD proposes "Sinks and work surfaces" as a better combination of terms to be used in Section 1133A. HCD also proposes to amend Exception 2, clarifying that the repositioning is not required for breadboards used in lieu of countertop work surfaces.

The proposed modification of Section 1133A.4 provides clarity to the code user. There is no intended change in regulatory effect.

Section: 1133A.7. Knee and toe space.

Rationale: HCD proposes to amend the above referenced section. HCD proposes to repeal existing language addressing size of knee and toe spaces, and instead refer to Section 1138A.2. Section 1138A.2 was adopted during the 2012 Triennial Code Adoption Cycle; it contains the technical requirements for knee and toe spaces. The proposed amendment is consistent with Section 1127A.3, which also was amended during the 2012 Triennial Code Adoption Cycle.

Currently, five sections in Chapter 11A provide different language addressing knee and toe space. HCD intends to make all sections consistent by referring to Section 1138A.2 for the technical requirements and leaving only specific details in these five sections. The proposed amendment provides clarity. There is no intended change in regulatory effect.

Section: 1133A.7.1 Plumbing protection.

Rationale: HCD proposes to amend the above referenced section, providing consistency with Section 1127A.3. There is no intended change in regulatory effect.

**23. SECTION 1134A
BATHING AND TOILET FACILITIES**

Section: 1134A.5 Bathtubs.

Rationale: HCD proposes to amend Item 1 of the above referenced section. The proposed amendment incorporates language from the FHADM, and clarifies the location of bathtub controls and the required clear floor space. There is no intended change in regulatory effect.

Section: 1134A.7 Water closets.

Rationale: HCD proposes to amend the above referenced section. HCD proposes to modify Item 1, clarifying that the location of water closets shall permit a grab bar installation on at least one side of the fixture. The proposed amendment provides clarity and is based on comments received from stakeholders. There is no intended change in regulatory effect.

Reference: Health and Safety Code Sections 17000 through 17062.5, 17910 through 17995.5, 18200 through 18700, 18860 through 18874, and 19960 through 19997; and Government Code Sections 12955.1 and 12955.1.1.

22. HCD proposes to amend Section 1133A "Kitchens", as follows:

SECTION 1133A KITCHENS

1133A.1 General. Kitchens shall be on an accessible route and shall comply with this section. (See Figure 11A-10A).

1133A.2 Clear floor space. Clear floor space at kitchens shall comply with the following:

1. A clear floor space at least 30 inches (762 mm) by 48 inches (1219 mm) that allows a parallel approach by a person in a wheelchair shall be provided at the range or cooktop.
2. A clear floor space at least 30 inches (762 mm) by 48 inches (1219 mm) that allows either a parallel or a forward approach shall be provided at the kitchen sink and all other fixtures or appliances including the oven, dishwasher, refrigerator/freezer and trash compactor.
3. A clear floor space at least 30 inches (762 mm) by 48 inches (1219 mm) that allows either a parallel or a forward approach shall be provided at the work surface required by Section 1133A.4.
- 3.4. The centerline of the 30-inch (762 mm) by 48-inch (1219 mm) clear floor space provided for parallel or forward approach shall be aligned with the centerline of the work space, appliance or fixture. (See Figure 11A-10A).

1133A.3 Removable base cabinets.

Base cabinets directly under the kitchen sink counter area, including toeboard and shelving, shall be removable without the use of specialized tools or specialized knowledge in order to provide knee and toe space for a wheelchair. The finish floor beneath the kitchen sink counter area shall be extended to the wall.

Sinks and work surfaces required by Section 1133A.4 (see Item 1 and Item 2) shall be provided with knee and toe space complying with Section 1133A.7. Base cabinets (including toeboard and shelving) directly under kitchen sinks and work surfaces shall be removable without the use of specialized tools or specialized knowledge in order to provide knee and toe space. The finish floor beneath kitchen sinks and work surfaces shall be extended to the wall.

1133A.4 Countertops. Kitchen countertops shall comply with this section and shall be provided with the following (see Section 1133A.4.1 for repositionable countertop requirements):

1. A minimum linear length of 30 inches (762 mm) of countertop shall be provided for the kitchen sink installation.
2. A minimum linear length of 30 inches (762 mm) of countertop shall be provided for a work surface.
3. ~~The sink Sinks~~ and work surfaces may be a single integral unit a minimum of 60 inches (1524 mm) in length, or be separate components.

Exception: Two 15-inch (381 mm) wide minimum width breadboards may be provided in lieu of the required 30 inches (762 mm) of countertop work surface.

1133A.4.1 Repositionable countertops. Repositionable countertops shall be provided in a minimum of 5 percent of the covered multifamily dwelling units. Repositionable countertops shall comply with the following:

1. ~~The kitchen sink Sinks~~ and work surfaces space required by Section 1133A.4 shall be designed to enable repositioning to a minimum height of 28 inches (711 mm).
2. Base cabinets directly under ~~the kitchen sinks counter area~~ and work surfaces shall be removable as required in Section 1133A.3.
3. The sides of adjacent cabinets and the back wall, which may become exposed to moisture or food handling when a countertop is lowered, shall be constructed of durable, nonabsorbent materials appropriate for such uses.
4. Finished flooring shall be extended to the wall beneath the sink and work surface.

Exceptions:

1. Stone, cultured stone and tiled countertops may be used without meeting the repositioning requirements.

24. HCD proposes to amend Section 1138A “Space Allowances and Reach Ranges”, as follows:

**SECTION 1138A
SPACE ALLOWANCES AND REACH RANGES**

1138A.3.1 Forward reach.

1. **Unobstructed.** When the clear floor space allows only forward approach to an object, the maximum high forward reach allowed shall be 48 inches (1219 mm) and the minimum low forward reach shall be no less than 15 inches (381 mm) above the finish floor (See Figure 11A-1I(a)).
2. **Obstructed High Reach.** When the high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the reach depth over the obstruction.

The high forward reach shall be 48 inches (1219 mm) maximum when the reach depth is 20 inches (508 mm) maximum. When the reach depth exceeds 20 inches (508 mm), but is not more than 25 inches (635 mm), the high forward reach shall be 44 inches (1118 mm) maximum. (See Figure 11A-1I(b)).

1138A.3.2 Side reach.

1. **Unobstructed.** When a clear floor space allows a parallel approach to an element, and the side reach is unobstructed, the high side reach shall be 48 inches (1219 mm) maximum, and the low side reach shall be 15 inches (381 mm) minimum above the finish floor. (See Figure 11A-1J(a) and 11A-1J(b)).

Exceptions:

1. An obstruction shall be permitted between the clear floor space and the element when the depth of the obstruction is 10 inches (254 mm) maximum.
2. Bookshelves shall be permitted to be 54 inches (1372 mm) maximum above the finish floor. Bookshelves may be greater than 54 inches (1372 mm) above the finish floor when an attendant is available to assist persons with disabilities.
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:** Kitchen 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.

NOTE:

Authority Cited: Health and Safety Code Sections 17040, 17050, 17920.9, 17921, 17921.3, 17921.6, 17921.10, 17922, 17922.6, 17922.12, 17927, 17928, 17959.6, 18300, 18552, 18554, 18620, 18630, 18640, 18670, 18690, 18691, 18865, 18871.3, 18871.4, 18873, 18873.1, 18873.2, 18873.3, 18873.4, 18873.5, 18938.3, 18944.11 and 19990; and Government Code Section 12955.1.

Reference: Health and Safety Code Sections 17000 through 17062.5, 17910 through 17995.5, 18200 through 18700, 18860 through 18874, and 19960 through 19997; and Government Code Sections 12955.1 and 12955.1.1.

Halloran, Richard (DBI)

From: Bumbalov, Stoyan@HCD [Stoyan.Bumbalov@hcd.ca.gov]
Sent: Tuesday, July 01, 2014 3:37 PM
To: Halloran, Richard (DBI)
Subject: RE: Base cabinets

Rick,

As we discussed on the phone, during this rulemaking (2013 Intervening Code Adoption Cycle), HCD proposes to amend Section 1133A (Kitchens). The proposed modification clarifies that the requirements for parallel and forward approach, knee and toe space, and removable base cabinets apply to kitchen sinks **and work surfaces**. HCD's proposal is a result of comments received from stakeholders, expressing a concern that currently (in 2013 CBC) the language, as written, is not sufficiently clear, and could be interpreted incorrectly. HCD's Final Express Terms (FET) were sent to the Building Standards Commission; the Building Standards Commission meeting is scheduled for July 22, 2014. If approved, the amended section will become effective on July 1, 2015. You can use the links below to access HCD's Express Terms and the Initial Statement of Reasons.

http://www.documents.dgs.ca.gov/bsc/prpsd_chngs/2013/1st-45Day/HCD-04-13-ET-P12-11A-45day.pdf

http://www.documents.dgs.ca.gov/bsc/prpsd_chngs/2013/1st-45Day/HCD-04-13-ISOR-P12-11A-45day.pdf

Historically, HCD has maintained a consistent response in regards to the removable base cabinets in kitchens, similar to my verbal response on the phone. The development of Chapter 11A and many of its current provisions date back to the 1986 ANSI A117.1. This was one of the primary documents that HCD utilized in the development of Chapter 11A; although, HCD has promulgated more stringent requirements in several areas. The requirement for removable base cabinets for work surfaces originates from 1986 ANSI A117.1, Section 4.32.5.4. HCD has consistently maintained this as a Chapter 11A requirement; although, there are some who feel that HCD's language in Section 1133A is not as clear. HCD intends to continue adopting requirements for removable base cabinets at work surfaces, no different than in the 1986 ANSI A117.1.

I hope you find this information helpful. Please call if you have any additional questions.

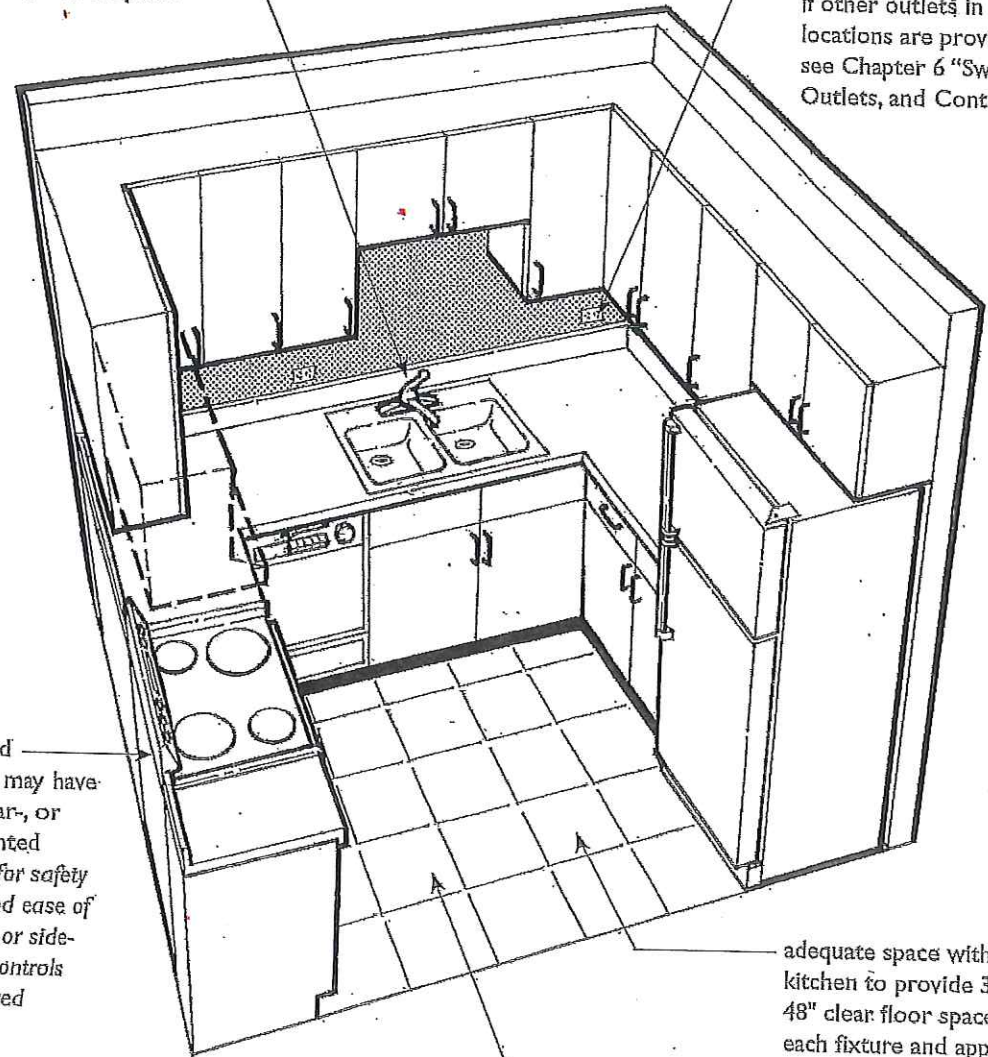
Stoyan Bumbalov
District Representative II
CA Department of Housing and Community Development
Division of Codes and Standards
State Housing Law Program
916-263-4715

counters may be at the standard height of 36" (counter height of 34" as shown in Fig. 2(c) of the Guidelines does not apply)

Kitchens in covered units must be on an accessible route and have door openings at least 32" clear to allow passage; see Chapter 4 "Usable Doors" and Chapter 5 "Accessible Route"

lever hardware, although preferred and more usable by everyone, is not required

outlet located beyond reach of seated person permitted if other outlets in accessible locations are provided, see Chapter 6 "Switches, Outlets, and Controls"



ranges and cooktops may have front-, rear-, or side-mounted controls; for safety reasons and ease of use, front- or side-mounted controls are preferred

adequate space within the kitchen to provide 30" X 48" clear floor space at each fixture and appliance

in U-shaped kitchens, if less than 60" between the two legs of the U, then sink base must be removable, see page 7.12

Notes in italic type are recommendations only and are not required by ANSI or Guidelines.

Guideline Specifications for Kitchens