



## INFORMATION SHEET

**NO. DA-11**

**DATE** : January 29, 2016

**CATEGORY** : Disabled Access

**SUBJECT** : **Multi-family dwelling requirements for common area kitchens, dwelling unit kitchen, bathroom showers, entry doors, and mailboxes**

**SECTIONS INVOLVED**

- : San Francisco Building Code (SFBC) Sections**
- 202 Definitions: Common Use Area, Public Use
  - 1101A.1 Scope
  - 1102A.2 Existing buildings
  - 1127A Common use facilities
  - 1127A.12.4 Height of work surfaces
  - 1133A Kitchens
  - 1133A.1 Removable base cabinets
  - 1134A Bathing and toilet facilities
  - 1134A.6 Showers
  - 1138A.3 Reach ranges
  - 1138A.4 Controls and operating mechanisms
  - 11B-212 Kitchens, kitchenettes, wet bars and sinks
  - 11B-228.2 Mail boxes
  - 11B-309 Operable parts
  - 11B-606 Lavatories and sinks
  - 11B-804 Kitchens, kitchenettes, and wet bars
  - 11B-809.5.5.2 Identification

**A New Horizon Accessible / Adaptable Apartments for the Physically Disabled  
ANSI A117.1 – 1986  
Fair Housing Act Design Manual**

**INTENT** : To clarify the requirements for covered multi-family dwellings common area kitchens, the requirements for the installation of garbage disposals in covered dwelling unit kitchen sinks, the requirements for accessible showers within covered dwelling units, and the requirements for door bell and door viewer port locations at main entry doors of covered dwelling units.

This Information Sheet is not retroactive and shall be effective from the date of adoption forward.

**DISCUSSION** : Please note that this Information Sheet applies exclusively to privately-funded multi-family dwellings. For publically funded dwellings, please consult Chapter 11B with the Mayor's Office on Disabilities.

Because California had accessibility standards in place at the time of the adoption of the Federal Fair Housing Amendments Act, California Building Code Chapter 11A contains a number of regulations that differ from and are often considered more restrictive than the Federal statutes. This has often become the source of misunderstanding and confusion for many users when designing multi-family dwellings in California. Additionally, much of the language used in Chapter 11A is vague and unclear. This has led to some disagreements of the code's intent between designers and plan reviewers, contractors and inspectors and among building department personnel.

In an effort to determine consistencies and clarifications, we have investigated the three main source documents for this chapter; the Fair Housing Act Design Manual (FHADM), the 1986 ANSI A117.1 Standard, and A New Horizon, published by the Department of Housing and Community Development (HCD) effective September 15, 1984. We have also spent considerable time with the staff of HCD reviewing that the department's files for the history and intent of the code language.

In an effort to clarify some of these issues, HCD has revised much of the language in Chapter 11A in sizable rewording of the code sections in the 2010 Edition of the CBC and again in the 2013 Intervening Code Cycle Supplement effective July 1, 2015.

Based upon these sources, the Department offers the following interpretations that will be considered consistent with the intent of the code and will be effective as of the date of this Information Sheet:

- **Common Use Kitchens:** It is important to clarify that by definition, common use areas and kitchens are facilities whose use is limited to the owners, residence and their guests. If the areas are available for rent, use or lease by the general public at any time, it then becomes a public use facility and would be governed by Chapter 11B Sections 11B-212 and 11B-804.

It is also important to note that the FHADM, Chapter 11A and the HCD webpage state that compliance with both the Fair Housing Act and California State regulations (Chapter 11A) is required and that when there is a conflict, the more stringent requirements must be followed.

If the kitchen is truly a common use, then it is governed by Section 1127A of Chapter 11A and the Fair Housing Design Manual. Both of these documents are silent on "kitchens" but both offer some guidance on design. The Fair Housing Act Design Manual diagram on page 2.14 shows a common area kitchen with two notes. The first note states that sinks in common use spaces must comply with ANSI A117.1 Section 4.19 (attached). The second note stipulates that the knee space below the sink must be enlarged to 36" to provide a toe turning space if the kitchen is U-shaped and less than 60" wide.

It should also be noted that the diagram shows full height (36") cabinets where the dishwasher and stove are placed, but has a lowered (34") height sink and 30" work space. It also shows a lowered food serving / dining area with knee space that appears to be about 60" in length. This is consistent with Section 1127A.12.4 exception that states that where food or drink is served, a portion of the main counter 60" in length shall be provided at 34" in height. Section 1127A.12.3 would require knee and toe space be provided for this 60" section. The requirements for kitchens contained in A New Horizons stipulated that the minimum width of a kitchen in a covered dwelling must be a minimum of 48". This was carried forward into 11A and must be followed.

To summarize, a common use area kitchen must contain the following elements to be considered compliant with California Chapter 11A:

- Counters may be at the standard 36" height, except;
  - o Sink and 30" work space at 34" in height
  - o A 60" portion of the main counter where food is served at 34"

- The kitchen sink and work area must provide knee and toe space, the hot water line and drain must be insulated. The knee space at the sink must be 36" in width if the kitchen is U-shaped and less than 60" wide (48") to provide a tee turning space;
- The kitchen must be a minimum of 48" between the face of the cabinets and the opposing wall or face of appliances (not including handles);
- All switches, receptacles and controls must be within reach ranges. Controls must be located on the front of a cooktop or oven and may not require reaching over the burners to operate;
- All switches and controls must be operable with one hand, and be a maximum of 5 lbs. of pressure to operate;
- All floors and changes in level must comply with Division III of 11A and Chapter 2 of the FHADM.

The Department may also approve kitchens compliant with Chapter 11B or any of the six "Safe Harbors" listed in the FHADM preface on a case-by-case basis.

- **Garbage Disposals in Dwelling Unit Kitchens:** In Information Sheet DA-03, the Department responded to clients who had stated that they did not believe garbage disposal were allowed under sinks in adaptable kitchens. After discussion with both Fair Housing First and HCD, it was determined that neither the Fair Housing Act nor Chapter 11A prohibits the use of garbage disposals. What was not made clear is that although garbage disposals are not prohibited, their use is modified by other sections of the code. At the time of initial installation, a garbage disposal must not infringe upon the required knee space under the sink. HCD, in the July 1, 2015 supplement, has clarified the language regarding knee and toe space requirements to insure that they are better understood. Section 1133A.3 has been rewritten to say "Sinks and work surfaces..." "...shall be provided with knee and toe space complying with Section 1133A."

The FHADM on page 7.15 shows a diagram titled "Knee Space at Sink with Garbage Disposal and Pipe Protection Panel." In this diagram, it shows the required 27" high knee space going back 8" unencumbered by the disposal. The caption at the side of the diagram states a 9" deep sink is allowed and a rear drain preferred."

The average kitchen cabinet measures approximately 24" maximum. Centered exactly on a 24" cabinet, an 8" disposal would extend 4" in front of center leaving exactly 8" that is the required amount for the knee space. The average disposal is between 12" and 14" in depth. At an average of 13", the disposal would have to taper to a maximum width of 2" to 4" at its base in order to maintain compliance. This is an unrealistic dimension; therefore it would appear mandatory that a rear drain sink be installed if a garbage disposal is to be included. Unless the designer can provide proof that the required knee and toe space will be maintained at time of installation, the Department will require rear drain sinks on all kitchens equipped with garbage disposals.

- **Bathroom Showers / Shower Enclosures:** In the 2010 edition of the California Building Code, HCD rewrote Section 1134A.2 Number of complying bathrooms in order to clarify a number of points. One of these clarifications was the requirement that if a covered dwelling contains a shower stall, at least one shower stall must comply with Section 1134A.6. This is specified in Option #2, Item #6 of Section 1134A.6 which states that if a bathtub is selected to comply with Option #2, Item #6 (and there is a shower stall in the dwelling unit) "...at least one shower stall within the dwelling unit shall meet all the applicable accessibility requirements...". This is again restated in Section 1134A.6 "When one or more shower stalls are provided within the same dwelling unit, at least one of

the shower stalls shall comply with one of the following requirements" (followed by the three options for accessible shower stalls). In conversations with HCD, it was made clear that this requirement would also apply, even if there is only one bathroom and it contains a shower stall and a tub. You would not be required to make both the shower and the tub accessible if there is only one bathroom, but the shower stall must comply; the tub is optional if you choose Option #2. It should be noted that there is no requirement to provide a shower stall within a dwelling unit, but if they are provided, at least one shall comply.

The question of shower doors is often raised. Shower doors are allowed with some restrictions. Section 1134A.6 #7 specifies that the enclosure must be constructed of "approved shatter proof-resistant material," glazing shall be tempered or laminated safety glass complying with Chapter 24, or approved plastic. Hinged doors shall swing outward. A shower door that is surface mounted and attached with screws to the walls may be installed on any of the three shower options as it is easily removed and thus readily adaptable without special tools or knowledge.

A shower door that is recessed into the tile work or which would require a trained craftsman to remove may be installed only on Option #1.1 and Option #1.3 type showers if the following conditions are met:

- The door must provide a clear 36" opening when open 90 degrees, the door must comply with Section 1132A.5 with a 39" clear space at right angles to the door in its closed position and provide for an 18" strike side maneuvering space.
  - The door must have an opening force of 5lbs maximum and be operable with one hand and not require pinching grasping or turning of the wrist.
  - Additionally, any shower door that is permanent in nature must not interfere with the use of the required clear floor space for the shower.
- **Entry Doors:** The question was raised as to the required height of a viewing port in a front entry door. Although it would be courteous to provide a lower viewing port at a height that is usable by persons in mobility devices, there is no requirement in Chapter 11A for this. Section 1003A.2.2 of the San Francisco Building Code, however, does restrict door viewers to a maximum height of 58 inches.

Although Chapter 11A has no specific regulations for door viewers, guidance for installation of door viewers may be taken from Chapter 11B. In Section 11B-809.5.5.2, the code requires a door be equipped with a means of identifying a visitor without opening the door and allow for a 180 degree view. The associated advisory recommends the use of a prism type peep hole as these can be used by all persons, standing and in wheelchairs. This also would eliminate the problem noted by HUD of criminals identifying units occupied by person with disabilities due to the height of the door viewer.

**USDOJ**

**Advisory 11B-809.5.5.2 Identification.** In doors, peepholes that include prisms clarify the image and should offer a wide-angle view of the hallway or exterior for both standing persons and wheelchair users. Such peepholes can be placed at a standard height and permit a view from several feet from the door. ■

NOTE: If the viewer has a flip open door on it, or it is an adjustable viewer; this is an operable part and must be mounted within reach ranges and meet the conditions of operable parts. The reach range requirement would also apply to the required exterior doorbell at each unit entry.

*Tom C. Hui*

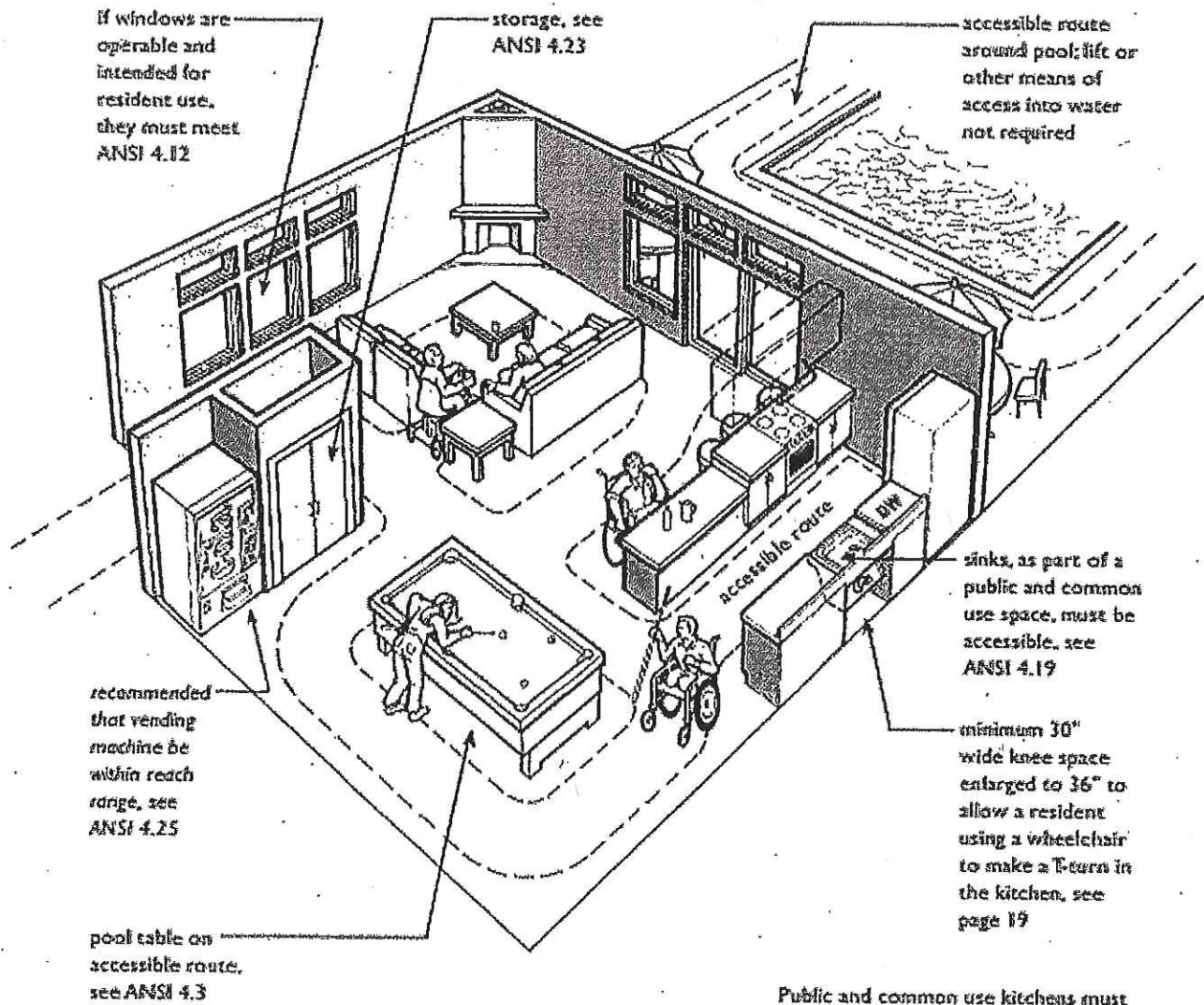
*1/29/16*

Tom C. Hui, S.E., C.B.O.  
Director  
Department of Building Inspection

*on* Date

Attachment: a/s

This Information Sheet is subject to modification at any time. For the most current version, visit our website at <http://www.sfdbi.org>



**Accessible Elements and Features of a Public and Common Use Clubhouse**

Public and common use kitchens must be usable and at least meet the requirements in the Guidelines for kitchens. If preferred, the requirements for kitchens in ANSI 4.32 could be followed.

*Notes in italic type are recommendations only and are not required by ANSI or the Guidelines. All recommended features are helpful to people with and without disabilities.*

#### 4.17 Toilet Stalls

**4.17.1 General.** Accessible toilet stalls shall be on an accessible route and shall comply with the requirements of 4.17.

**4.17.2 Water Closets.** Water closets in accessible stalls shall comply with 4.16.

**4.17.3 Size and Arrangement.** The size and arrangement of toilet stalls shall comply with either Fig. 30(a) or (b). Toilet stalls with a minimum depth of 56 in (1420 mm) (see Fig. 30(a)) or 66 in (1675 mm) (see Fig. 30(b)) shall have wall-mounted water closets. If the depth of toilet stalls is increased at least 3 in (75 mm), then a floor-mounted water closet may be used. Arrangements shown for stalls may be reversed to allow either a left-hand or a right-hand approach.

**4.17.4 Toe Clearances.** In standard stalls, the front partition and at least one side partition shall provide a toe clearance of at least 9 in (230 mm) above the floor. If the depth of the stall is greater than 60 in (1525 mm), then the toe clearance is not required.

**4.17.5\* Doors.** Toilet stall doors shall comply with 4.13, except that if the approach is to the latch side of the stall door, the clearance between the door side of the stall and any obstruction may be reduced to a minimum of 42 in (1065 mm) (see Fig. 30).

**4.17.6 Grab Bars.** Grab bars complying with the length and positioning shown in Fig. 30(a), (b), (c), and (d) shall be provided. Grab bars may be mounted by any desired method as long as they have a gripping surface at the locations shown and do not obstruct the required clear floor area. Grab bars shall comply with 4.24.

#### 4.18 Urinals

**4.18.1 General.** Accessible urinals shall comply with 4.18.

**4.18.2 Height.** Urinals shall be stall type or wall hung with an elongated rim at a maximum of 17 in (430 mm) above the floor (see Fig. 29(c)).

**4.18.3 Clear Floor Space.** A clear floor space 30 in by 48 in (760 mm by 1220 mm) shall be provided

in front of urinals to allow forward approach. This clear space shall adjoin or overlap an accessible route and shall comply with 4.2.4. Privacy shields allowing less than 30 in (760 mm) clear width shall not extend beyond the front edge of the urinal rim.

**4.18.4 Flush Controls.** Flush controls shall be hand operated or automatic, shall comply with 4.25.4, and shall be mounted no more than 44 in (1120 mm) above the floor.

#### 4.19 Lavatories, Sinks, and Mirrors

**4.19.1 General.** Accessible lavatory fixtures, sinks, vanities, and built-in lavatories shall comply with 4.19.

##### 4.19.2 Height and Clearances

**4.19.2.1 Lavatories.** Lavatories shall be mounted with a clearance of at least 29 in (735 mm) from the floor to the bottom of the apron. Knee and toe clearances shall comply with Fig. 31.

**4.19.2.2 Sinks.** Sinks shall be mounted with the counter or rim no higher than 34 in (865 mm) from the floor. Each sink shall be a maximum of 6½ in (165 mm) deep. (Sinks in kitchens of accessible dwelling units shall comply with 4.32.5.5.)

**4.19.3 Clear Floor Space.** A clear floor space 30 in by 48 in (760 mm by 1220 mm) complying with 4.2.4 shall be provided in front of a lavatory or sink to allow a forward approach. Such clear floor space shall adjoin or overlap an accessible route and shall extend a maximum of 19 in (485 mm) underneath the lavatory or sink (see Fig. 32).

**4.19.4 Exposed Pipes and Surfaces.** Hot water and drain pipes under lavatories or sinks shall be insulated or otherwise protected if they abut the clearance areas indicated in Fig. 31. There shall be no sharp or abrasive surfaces under lavatories or sinks.

**4.19.5 Faucets.** Faucets shall comply with 4.25.4. Conventional one-quarter-turn, lever-operated, push-type, and automatically controlled mechanisms are examples of acceptable designs. Self-closing valves are allowed if the faucet remains open for at least 10 seconds.

**4.19.6\* Mirrors.** Mirrors shall be mounted with the bottom edge of the reflecting surface no higher than 40 in (1015 mm) from the floor (see Fig. 31).

\*See Appendix for additional information.