

CHANGE TYPE: Modification

CHANGE SUMMARY: Relocates the provisions that allow clearances to overlap into the “building block” sections of Chapter 3. Allows for the elimination of redundant provisions in other locations and adds door maneuvering clearances into the permitted overlap.

2009 STANDARD:

301.2 Overlap. Unless otherwise specified, clear floor spaces, clearances at fixtures, maneuvering clearances at doors, and turning spaces shall be permitted to overlap.

603 Toilet and Bathing Rooms

603.2 Clearances.

603.2.2 Overlap. ~~Clear floor spaces, clearances at fixtures, and turning spaces shall be permitted to overlap.~~

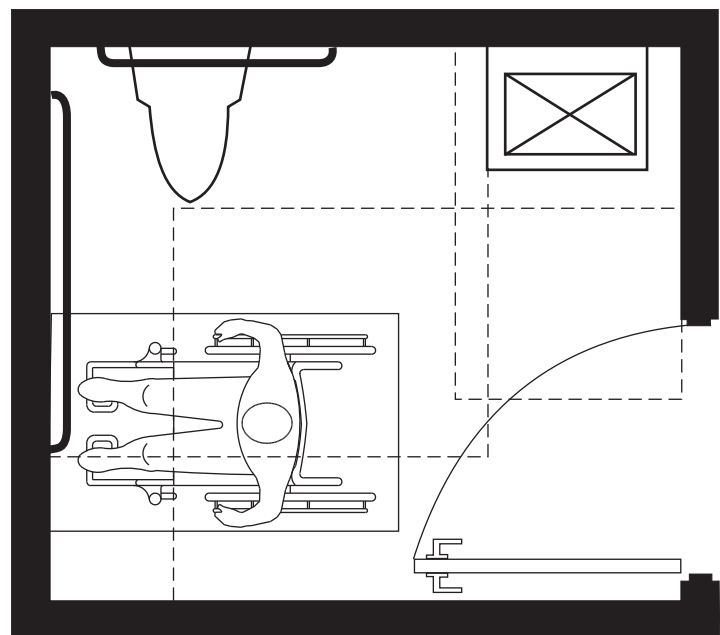
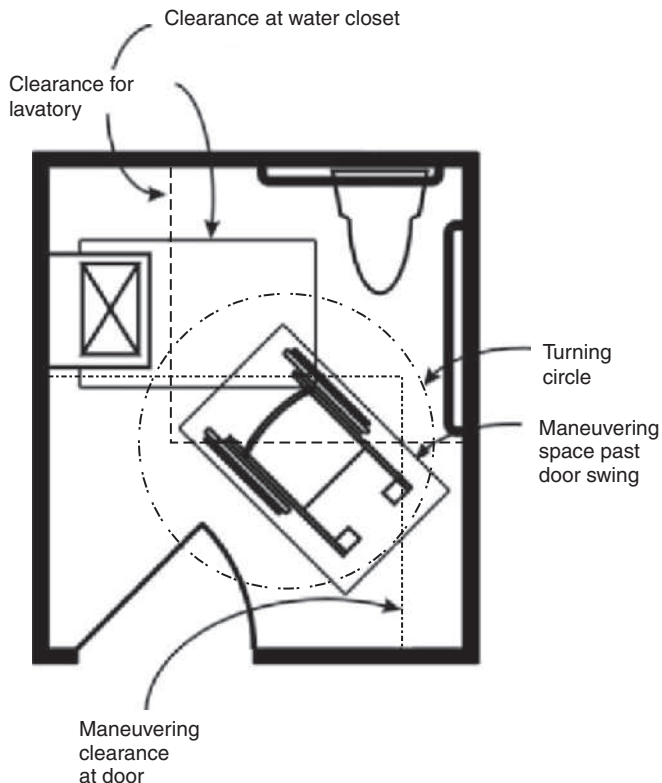
804 Kitchens and Kitchenettes

804.5 Appliances. Where provided, kitchen appliances shall comply with Section 804.5.

804.5.1 Clear Floor Space. A clear floor space complying with Section 305 shall be provided at each kitchen appliance. ~~Clear floor spaces are permitted to overlap.~~

301.2

Overlap of Clearances at Doors, Fixtures, Appliances, and Elements



301.2 continues

301.2 continued 1003 Type A Units**1003.11 Toilet and Bathing Facilities.**

1003.11.3 Overlap.—Clear floor spaces, clearances at fixtures and turning spaces are permitted to overlap.

1004 Type B Units

1004.11 Toilet and Bathing Facilities. Toilet and bathing fixtures shall comply with Section 1004.12.

1004.11.1.3 Overlap.—Clear floor spaces shall be permitted to overlap.

CHANGE SIGNIFICANCE: Relocating the provisions to the building block requirements of Chapter 3 will not only allow the elimination of redundant text in other sections but may help to point out that as a general provision, clear floor spaces are permitted to overlap and serve multiple elements.

Allowing the clear floor spaces or clearances for the various elements to overlap helps allow designs to use less space if desired. Persons in wheelchairs need clear floor spaces, clearances, and turning spaces to enter and exit kitchens or toilet and bathing rooms/facilities, and to approach and utilize the facilities within them, but they typically utilize them one at a time. Allowing the clear floor spaces to overlap allows the elements to share the access or space that is needed for other elements while maintaining accessibility and reducing the space that is needed or dedicated to each individual element.

In most situations these changes will not result in any significant changes of application or enforcement when compared to the 2003 edition of the standard. One advantage of the changes may be that the requirements are clarified and will be applied more consistently. The inconsistent text caused people to wonder about how the provisions applied or forced them to look at several sections to decide how it should be read. For example, the Type A and Type B units contained this overlap allowance within their toilet and bathing facility requirements but they did not address this issue in their kitchen requirements. Therefore users of the previous standard had to decide if the overlap was permitted in kitchens even though it was not specifically addressed similar to the toilet and bathing facilities or to decide it was not prohibited by any text stating the overlap was not permitted.

One difference that may appear to be significant to some users is the inclusion of the door maneuvering clearance into the overlap section. As stated earlier, the people who use these clear spaces typically utilize them one at a time. Therefore prohibiting the maneuvering clearance at the entry door from overlapping any of the required clear floor spaces, clearances, or turning spaces within the room/facility does not appear to be warranted. However, because of the inclusion of door maneuvering clearance into this overlap section an additional modification was made to Section 404.2.3 so that maneuvering clearances at doors could not include the use of the knee and toe clearances that are allowed for fixtures. The change to Section 404.2.3 should assure that access to door hardware is not impeded and that users do not need to reach over an obstruction.

CHANGE TYPE: Modification

CHANGE SUMMARY: Provides clarification as to where the clear floor space must be located to be considered as an unobstructed reach to an element or control. Also limits the high reach for existing elements.

2009 STANDARD:

308.3 Side Reach.

308.3.1 Unobstructed. Where a clear floor space complying with Section 305 allows a parallel approach to an element and the side reach is unobstructed, edge of the clear floor space is 10 inches (255 mm) maximum from the element, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the floor.

Exception: Existing elements that are not altered shall be permitted at 54 inches (1370 mm) maximum above the floor.

CHANGE SIGNIFICANCE: To provide an “unobstructed” reach to an element, the clear floor space must be located within 10 inches horizontally and the person must not need to reach over an object that would extend into the reach range height of 15 to 48 inches above the floor. This will help to distinguish when Section 308.3.1 for the “unobstructed” reach is used and when Section 308.3.2 for the “obstructed high reach” is applicable. By requiring the clear floor space to be located within the 10-inch horizontal distance and unobstructed, most users will be able to reach any element within the normal reach range limits.

The inclusion of this text will help to coordinate with the revised ADA and ABA Accessibility Guidelines. This revision was not intended to create any technical changes but was considered more as a clarification or interpretation of Figure 308.3.1 from the 2003 edition of the standard and Figure 6(b) from the original ADA Accessibility Guidelines (ADAAG). This will, however, make it obvious that in order to provide full access to an element a clear floor space must not be located more than 10 inches horizontally from the element.

Adding the text “that are not altered” into the exception helps to clarify and limit the application of the exception. If an existing element is altered it should comply with the 48-inch height limitation. Earlier editions of the A117.1 standard and the original ADAAG permitted a 54-inch high side reach. Because of this earlier allowance, numerous elements in existing buildings may be located above the 48-inch maximum height that is required by the base paragraph.

Existing elements may generally be left as they currently exist if they are not affected or changed during an alteration. The exception does, however, limit the height of these unaltered existing elements to the 54-inch height. If the existing element is above 54 inches then it would need to be lowered to the 48-inch maximum height. This revised exception will result in a slight difference between the A117.1 standard and the newly revised ADA and ABA Accessibility Guidelines (ADA and ABA AG). Under the new ADA and ABA AG there is no general exception that allows existing elements to be 54 inches high. In addition, under the federal law if it is technically infeasible to relocate an existing element there is no maximum height limit.

308.3.1 Unobstructed Side Reach Allowances

