



INFORMATION SHEET

NO. DA-10

DATE : April 2, 2015
CATEGORY : Disabled Access
SUBJECT : **Restrooms Within A Reasonable Distance**

SECTIONS INVOLVED: 2013 San Francisco Building Code

- Section 11B - 202.3 ex. 2 Technically Infeasible
- Section 11B - 202.4 ex. 8 Path of Travel Requirements
- Section 202 - Unreasonable Hardship defined
- Section 202 - Technically Infeasible defined
- Section 11B - 213.2 ex. 1 - Toilet Rooms and Bathing Rooms
- Chapter 29, Table 2902.1 - Minimum Plumbing Fixtures

PURPOSE : It is the intent of the following interpretation and policy to establish a standard for resolving conflicts that arise when existing restrooms can only be made accessible by either: (1) reducing the number of fixtures provided to a number that is less than that required in the San Francisco Building Code (SFBC) Chapter 29, Table 2902.1; or, (2) expanding restrooms into space that is leased or not otherwise under the control of the applicant or the building owner.

DISCUSSION : The SFBC Section 11B-204.4 requires that, in the absence of a technical infeasibility, restrooms serving a specific area of alteration must comply with accessibility requirements. Such compliance is often difficult to achieve because of lack of space available in existing restrooms to create an accessible stall without removing one or more existing plumbing fixtures. This may result in a potential conflict with other code requirements for number of plumbing fixtures. The Department's policy is that accessibility requirements supersede fixture count requirements; however, it is the intent of the Department to reconcile these two requirements whenever possible.

The SFBC Section 11B-213.2 ex.1 contains an exception when determined to be technically infeasible, that allows equivalent facilitation to be provided by an accessible single unisex restroom facility located "in the same area and on the same floor." The SFBC Section 11B-202.3 ex.2 contains an exception for alterations when the Department determines that full compliance is "technically infeasible" and states that "the alteration shall provide equivalent facilitation." Guidelines for the determination of what constitutes "in the same area" and what may be deemed as providing "equivalent facilitation" are provided herein by the Department.

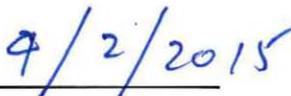
It is the ruling of the Department that an "Approval of Technical Infeasibility" request may be granted for existing restrooms when one of the following conditions applies:

- (1) There is no space available for expansion necessary to create the required dimensions based upon legal constraints; such as, binding leases with adjoining tenants or physical constraints; such as fixed structural elements, or the cost of restroom expansion constitutes a financial hardship; **or**,
- (2) The only reasonable option to restroom expansion is to reduce the number of fixtures below the number required in the San Francisco Building Code based on occupant load.

Documentation of these conditions shall be provided to the Department on the "Approval of Technical Infeasibility" and "Approval of Equivalent Facilitation" forms.

REQUIREMENTS FOR EQUIVALENT FACILITATION

The Department may grant a request for "Approval of an Equivalent Facilitation" when a single unisex toilet room or other accessible restrooms are provided within 200 ft. of the area of remodel on the same story on which disabled access is required; or, within one vertical story. When a restroom within this distance is designated as an equivalent facilitation, it shall be on an accessible path of travel and it shall comply with all accessibility requirements. Signage shall be provided at the restroom nearest the area of remodel directing persons with disabilities to the closest fully accessible facility.



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Director
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Date

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