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.

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

Director

Department of Building Inspection

**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

1. Fair Housing Act Design Manual, Guideline Specifications for Kitchens, page 7.2

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