San Francisco Ordinance 51-16
Mandatory Disability Access Improvement Program

Technical Specifications
Guidelines

To be used in conjunction with the Category Checklist Compliance Form

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Technical Specifications

These technical specifications for compliance with San Francisco Ordinance 51-16 (hereafter referred to as “the Ordinance”) do not fully comply with current State or Federal regulations. The specifications herein contain the standards from the 1998 California Building Code, Part 2, Chapter 11B (CBC). These standards will be accepted as minimum compliance standards for this ordinance. There are a number of differences between the 1998 CBC regulations and the current CBC and the 2010 Americans with Disabilities Act Accessible Standards (ADAAS). The intent of this ordinance is to require a useable entrance, rather than a fully compliant entry. The differences between the current regulations and those required by this ordinance have been noted wherever possible, but the Department does not warrant that all differences are noted within this document. Although full and complete compliance with current codes is not required by this ordinance, it is strongly suggested that the licensed design professional recommend to the client to meet current codes wherever it is readily achievable to do so.

This document will reference “the owner” in many places. It is important to note that neither the ordinance nor this document purport to alter any existing agreement between owners and tenants. The CBC only recognizes and addresses the “owner”, and as such, this amendment to the San Francisco Building Code Chapter 11D will follow suit. Please read, “tenant” in place of “owner” where pre-existing agreements would so stipulate and where applicable.

This document is offered solely as a guide to assist the licensed design professional or CASp to determine if the entry being assessed is in compliance with the requirements of this ordinance. Compliance with the requirements of this ordinance does not in any way imply that the structure in question complies with State or Federal Accessibility Regulations, nor does it purport to offer any legal defense against lawsuits that may be filed against the property, owner, or tenant. Further information may also be obtained from the U.S. Access Board, the U.S. Department of Justice, and the California Division of the State Architect.

For questions regarding any legal aspects of State or Federal accessibility statutes and regulations please consult with a qualified Attorney experienced in Disabled Access Laws.

Standard industry tolerances are only allowed where the dimensions stated in the code are absolute and not stated as a range with minimum and maximum dimensions. Good practice dictates that all work should have been designed to allowed for tolerances and not designed to the minimum or maximum allowed.
The specifications in this guide correlate to the items numbered in the Category Checklist Compliance Form, Section 3 – Primary Entry Compliance Checklist.

Checklist Item #:
1. Site Arrival Point-Accessible Routes ................................................................. 4
2. Site Arrival Point-Sidewalks .............................................................................. 7
3. Entry Approach-Exterior Ramps ........................................................................ 8
4. Entry Approach-Exterior Elevators & Lifts ....................................................... 10
5. Level Landings-Exterior/Interior ................................................................... 11
6. Thresholds ........................................................................................................ 12
7. Floor Levels at Doors ....................................................................................... 12
8. Doorway Size .................................................................................................. 13
9. Doors-Smooth Surface .................................................................................... 13
10. Doors-Hardware .............................................................................................. 14
11. Doors-Hardware Height .................................................................................. 14
12. Door Operating Force ..................................................................................... 15
13. Panic Hardware ............................................................................................... 16
14. Maneuvering Space- Exterior/Interior ............................................................ 17
15. Recess Doormats ............................................................................................ 18
16. Vestibules and Doors in Series ....................................................................... 19
17. Automatic Doors ............................................................................................. 20
18. Turnstiles, Rails, Pedestrian Controls, Security Doors, Revolving Doors, and Gates .................................................. 21
19. Historic Buildings-CHBC ............................................................................. 22
20. Conclusion ....................................................................................................... 23
1. Site Arrival Point-Accessible Routes

Reference:
1998 CBC Sections:
- 1127B.1 General
- 1102B Accessible Route of Travel
- 1114B.1.2 Accessible Route of Travel
- 1116B Elevators and Special Access Lifts
- 1129B Accessible Parking
  - Figures 11B-18 A, B, and C
- 1130B Parking Structures
- 1131B Passenger Drop-Off and Loading Zones
  - Figure 11B-24
- 1134B.2.1 Existing Buildings

In new buildings, all entrances must be accessible and on an accessible route. In existing buildings, the primary entrance, as designated by the Building Official, must be accessible and on an accessible route. At least one accessible route within the boundary of the site shall be provided from public transportation stops, accessible parking, accessible loading zones, and public streets or sidewalks to the primary entrance. The accessible route must be the most practical direct route between the site entry point and the building entrance.

Accessible routes may include walks, sidewalks, curb ramps, ramps, elevators, and lifts that comply with the code sections cited above. Accessible routes must coincide with the route taken by the general public to the extent feasible. Where the accessible route deviates from the route used by the general public, directional signs with the International Symbol of Access (ISA) must be provided. An accessible route may not include stairs.

The owner is also responsible to provide an accessible route of travel from the point of entry to the site from these elements. If the site contains privately owned parking, walks, etc. these must comply with the above regulations for the entrance to be considered accessible.

Parking must comply with the CBC in effect at the time of construction or the last alteration served by the parking spaces or facility. The parking regulations in the 1998 CBC were substantially the same as the current regulations with a few notable differences. California Commission on Disability Access (CCDA) determined that parking was the number one source of litigation for small businesses in California over the last few years. It is strongly suggested that the owner upgrade the parking to meet current standards as it is a relatively inexpensive item, and may be difficult to prove that upgrades would not be “readily achievable” for owners who have owned the building for more than a short period. Parking spaces serving an entrance to a public accommodation must:
- Be located on the shortest accessible route to the entrance. In parking structures serving multiple entrances, parking must be divided to provide accessible parking to all entrances.
- Provide vertical clearance of 8 feet 2 inches to all accessible parking spaces (exceptions for existing buildings).
- Provide accessible spaces as required by appropriate table with a length of 18 feet and a width of 9 feet. A 5-foot access aisle must be provided that adjoins an accessible route to the entrance. The vehicle may not encroach into the required width of the accessible route and the route must not require a person with a disability to travel behind any parked vehicle other than his or her own.
- Have a slope of 2% at entire parking space and loading zone.
• Van spaces must be provided with either a 12-foot wide parking space and a 5-foot access aisle; or a 9-foot space with an 8-foot aisle. Van spaces must be provided in a ratio of 1 for every 6 accessible spaces. (Note exception below).
• Provide accessible parking as required per table where valet parking is provided.
• Must comply with the requirements of the current CBC for EV Charging Stations in existing buildings.
• Must provide identifying signage as specified in the CBC at the time of construction or alteration.

The major differences between the 1998 CBC and the Current CBC are as follows:
• Current CBC specifies measuring width of space from the center of the lines, allowing measurement from outside edge of lines only when space is a single standalone space. The 1998 CBC was silent on how to measure the spaces.
• The current CBC does not allow a ramp to encroach into the access aisle. The 1998 CBC allowed this encroachment provided it did not “limit the capacity of a person with a disability to leave or enter a vehicle”. The diagram shows a maximum length of 60 inches with a maximum slope of 1:12. These ramps should be removed and replaced with a compliant ramp where ever possible as they can be very hazardous and often render spaces unusable, especially in diagonal parking spaces where the 1998 code did not require the parking space to be elongated in order to align with the access aisle.
• There was no requirement for the 12-inch lettering stating “No Parking” in the 1998 CBC and the stripping and size is only referenced in the diagram.
• The 1998 code allowed two options for the ISA: 1) painting the accessible space in blue and outlining a profile of the person in a wheelchair in white, or 2) outlining the profile in a blue background, 36 inches by 36 inches. The symbol (ISA) was to be placed where “visible to traffic enforcement officers”. The ISA is now required to be aligned and approximately centered with the end of the space.
• When the space abutted a wall or fence, the sign for the parking space was stipulated to be affixed to the wall at a height of 36 inches. The minimum is now 60 inches, unless in a circulation path, then it is required at 80 inches minimum above finished grade.
• There was no requirement for the “minimum $250 fine” sign.
• The language for the “additional sign” which states vehicles illegally parked in accessible space will be towed has changed.

1998 CBC DIAGRAMS
Vehicle Spaces (§502.3)
Spaces must be marked to define the 96" minimum width.

Access Aisle (§502.3)
An access aisle at least 96" wide and at least as long as the parking space is required on either side of the parking space and must be marked to discourage parking in it. Two spaces can share one aisle. Access aisles cannot overlap vehicular ways.

Surfaces (§502.4)
Parking spaces and access aisles must meet requirements for floor and ground surfaces (§502) and cannot have changes in level other than tapers not exceeding 1:48.

Markings (§502.1, §502.2, §502.3.3)
Both the parking space and access aisle must be marked. The marking method and color is not specified in the Standards, but may be addressed by state or local codes or regulations. The width of spaces and aisles is measured to the centerline of markings (but it can include the full width of lines where there is no adjacent parking space or aisle).

Accessible routes must connect directly to access aisles. Curb ramps, where provided, cannot protrude into access aisles (which cannot slope more than 1:48 max) to accommodate wheelchair transfers and vehicle ramps or lifts (§502.4). A landing at least 36" deep is required at the top of curb ramps, in alterations where space for this landing is unavailable, curb ramps must have side flares with a 1:12 max. slope (§406.4).

Bollards, signs, columns, or other elements, cannot be located in the access aisle or reduce the minimum clear width of accessible routes. Spaces and aisles must be designed so that parked vehicles do not obstruct the required clear width of adjacent accessible routes (§502.7).

Where space for curb ramps is limited, including in alterations, parallel ramps can provide an alternative.

Standard Space-ADA/CBC

Van Space-ADA/CBC
2. Site Arrival Point-Sidewalks

Reference:
1998 CBC Sections:
- 1133B.7 Walks and Sidewalks

Walks and sidewalks shall have smooth firm and stable surfaces that are slip resistant and free of abrupt changes in level greater than ¼ inch vertical and ¼ inch beveled at 2:1 for a ½ inch total maximum rise.

Openings shall be a maximum of ½ inch and elongated openings such as grates shall be orientated so that the long dimension is perpendicular to the direction of travel.

The maximum slope shall be 1:20 and the maximum cross slope may not exceed 1:48 (1:50 for 1998 CBC). Cross slope is extremely important as excessive cross slope may cause a person in a mobility device to tip over and suffer injury.

The clear width of sidewalks and walks is 48 inches minimum measured from the inside of the curb. The jurisdiction may allow a reduction to 36 inches for right of way restrictions, natural barriers, etc.

Sidewalks and walks outside of the site boundary are under the jurisdiction of the San Francisco Public Works. Public Works requires owner to inspect and repair damaged sidewalks with a few exceptions. As part of approved alterations, San Francisco Public Works, Bureau of Street Use and Mapping, requires the sidewalk within the front boundary of the building be repaired or reconstructed to create such an accessible route. This often requires repair or re-sloping of the sidewalk. The requirements for sidewalks and walks under the jurisdiction of Public Works are contained in Appendix A under “Public Works”. You may also find the information on their website at [http://www.sfpublicworks.org/sirp](http://www.sfpublicworks.org/sirp). Please see DPW Order No. 177,526 Good neighbor Guidelines for Repairing Sidewalk Defects and DPW Order No. 178,884 Guidelines for Inspection of Sidewalk Defects. Please refer to these specifications to determine compliance status of the sidewalk or walk in question.
3. Entry Approach-Exterior Ramps

Reference:
1998 CBC Sections:
- 1003.3.2.3 Exit Width
- 1003.3.4 Ramps
- 1133B.5 Ramps
- 1133B.5.1 General
- 1133B.5.2 Width
- 1133B.5.3 Slope
- 1133B.5.4 Landings
- 1133B.5.5 Handrails
  - Figures 11B-27, 11B-38, 11B-39

Any walking surface with a slope exceeding 5% (1:20) is considered a ramp and must comply with this Section. The width of a ramp must meet or exceed the minimum exiting requirements of Chapter 10. The minimum width of a pedestrian ramp must be 48 inches (see exception for residential). The minimum width of a ramp serving an occupant load equal to or greater than 300 is 60 inches. Handrails may encroach a maximum of 3½ inches on each side, and other elements may encroach a maximum of 1½ inches.

The maximum slope allowed for a ramp is 8.33% (1:12). The maximum cross slope allowed is 1:50 (2%). [Note: Current code allowance of 1:48 would be considered equivalent.]

Accessible ramps must provide a landing for every 30 inches of vertical rise. Accessible ramps must have a top landing 60 inches by 60 inches and intermediate landings equal to the width of the ramp and 60 inches in length. Intermediate landings at a change of direction greater than 30 degrees and bottom landings must be of the same width as the ramp and 72 inches in length. Doors when fully open may not reduce the required width by more than 7 inches and may not reduce the landing size to less than 42 inches when open in any position.

Ramps must have handrails on each side. Ramps serving exterior door landings with a rise less than 6 inches or a length less than 72 inches. Handrails shall be continuous for the full length of the ramp and extend 12 inches past the top and bottom of the ramp. Handrails must be between 34 and 38 inches in height and the gripping portion shall be between 1¼ inches and 1½ inches in diameter. [Current code requirements shall be considered equivalent.]

Ramps greater than 10 feet in length and not bounded by a wall or fence shall have either a 2-inch curb or a wheel guide center 3 inches plus or minus 1 inch above the ramp surface.

Ramp surfaces greater than 30 inches above the adjacent ground shall be provided with guard rails.
INFORMATION SHEET DA-17

Technical Specifications Guidelines

RAMP DIMENSIONS

EDGE PROTECTION
4. Entry Approach-Exterior Elevators & Lifts

Reference:
1998 CBC and California Elevator Safety Code (CESC) Sections:
- 1116B.1 Elevators
- 1116B.2 Special Access (Wheelchair) Lifts
- Chapter 30 - Title 24 Part 7, 1998 Elevator Safety Code Excerpts
- ASME 17.1 – 1990 & 1993
- ASME A18.1 – 1999-2003
- ANSI 17.1 – 1986
  - Figures 30-A through 30-D
- 3003.4.1 Elevators

Special Access Lifts (wheelchair lifts) must be in compliance with the minimum standards set forth in CBC Section 1116B, as well as Title 24, Part 7, Article 15 (1998 CBC Section 3094) and ASME 17.1 1993 (except rule 2010a and 2010i(2)). Lifts may also comply with current standards as well as the ASME / ANSI A18.1 1999 through 2003 versions.

Wheelchair lifts may be incorporated as part of an accessible route in existing buildings; their use in new construction is limited to four conditions - see 1116B.2.4.1-4. There were two exceptions for unreasonable hardship in the 1998 CBC. In order for the use of these exceptions to be valid, the unreasonable hardship must have been documented and approved on the permit or plans, or have been approved in a “Notice of Decision” by the Access Appeals Commission.

Landings for lifts must be a minimum of 60 inches by 60 inches. A qualified person using a 30 inches by 48 inches wheelchair per 1116B.2.4.1 may document alternate conditions as safe and useable. Check the code in the year of the last applicable alteration to see if this exception still applies.

Inclined Stairway Lifts are covered under the same standards and may be used in alterations and additions to existing buildings.

Wheelchair lifts must be maintained per the 1998 Elevator Safety Code 7-3094.5. The owner must do a weekly check and perform regular maintenance every six months. The owner is required to document all maintenance in a log. The Compliance Unit may ask to see the log if there is any question of reliability of the lift.

Lifts must display four signs:
1) The ISA
2) “lift is not to be used to transport materials or equipment” or equivalent language
3) The lift capacity
4) Phone number to call in an emergency

The signs must be durable and posted in a conspicuous place.

Elevators are required to comply with the California Code of Regulations, ANSI 17.1 (1986) and ASME 17.1 (1990). Chapter 30 of the CBC includes excerpts from these regulations and standards that cover the general design and function requirements including regulations for:

Exterior elevators used to complete an accessible route from the site arrival point to the entrance must comply with all of the above sections.

Note: There are multiple exceptions and unreasonable hardship exceptions that must be evaluated on a case-by-case basis.
5. Level Landings-Exterior/Interior

Reference:
1998 CBC Sections:
- 1003.3.1.6 Floor level at doors
- 1003.3.1.6a Floor level at doors [DSA-AC]
- 1003.3.1.6.1a Thresholds [DSA-AC w/o exceptions]
- 1003.3.1.7 Landings

Regardless of the occupant load, doors shall have a floor or landing on each side. The floor or landing shall be a maximum of ½ inch lower than the threshold. Doors, when fully opened, may not reduce the required width of the landing by more than 7 inches and may not reduce the landing size to less than 42 inches when open in any position.

Rise more than ¼" vertical and ¼" beveled at 2:1 prohibited.
6. Thresholds

Reference:
1998 CBC Sections:
- 1003.3.1.6.1a Thresholds [DSA-AC w/o exceptions]

Changes in level between ¼ inch and ½ inch shall be beveled with a slope no greater than 1 unit vertical to 2 units horizontal. Ramp, lift, or elevator shall accomplish changes in level greater than ½ inch.

7. Floor Levels at Doors

Reference:
1998 CBC Sections:
- 1003.3.1.6 Floor Level at Doors

Regardless of the occupant load, there shall be a floor or landing on both sides of the door. For doors required to be accessible, the floor or landing shall be no more than ½ inch lower than the threshold.
8. Doorway Size

Reference:
1998 CBC Sections:
- 1003.3.1.3 Width and Height

Exit doorways serving an occupant load of 10 or more shall have a door not less than 3 feet in nominal width and not less than 6 feet 8 inches in nominal height. Clear width of exit doors shall be not less than 32 inches.

9. Doors-Smooth Surface

Reference:
1998 CBC Sections:
- 1133B.2.6 Smooth Surface

10 inches smooth uninterrupted surface shall be provided at the push side of doors to allow the doors to be open by a wheelchair footrest.

Exception: Automatic and sliding doors

Example of lower kick plate blocked by lock and door hardware.
10. Doors-Hardware

Reference:
1998 CBC Sections:
- 1003.3.1.8
- 1133B.2.1
- 1133B.2.5.1

Locks or latches on the interior of the door must be operable without a key or any special tools or knowledge. The door hardware may not require more than one motion to unlatch any leaf. Door and gate hardware must:
- allow one-hand operation
- not require tight grasping, pinching, or twisting of the wrist
- operate with 5 pounds maximum

Hardware that can be operated with a loose grip or closed fist, such as lever-shaped handles and U-shaped pulls, accommodates the greatest range of users. (Closed-fist operation, while advisable, is not mandated by the Standards). Round door knobs do not comply because they require twisting of the wrist.

Latches and locks with small parts that must be manipulated can be difficult to use and will not comply if pinching is necessary. However, keys and access cards that are not part of the lockset are not required to comply (those that do not require pinching or turning provides better access). Hardware that does not require simultaneous actions are better, but some types, such as handles with thumb latches are acceptable.

<table>
<thead>
<tr>
<th>Examples of Accessible Door Hardware</th>
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<tbody>
<tr>
<td>Handle</td>
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<td><img src="image1" alt="Handle" /></td>
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</table>

11. Doors-Hardware Height

Reference:
1998 CBC Sections:
- 1133B.2.5.1

Hand activated door hardware shall be centered between 30 inches and 44 inches above the floor. Hand activated door hardware in a path of travel shall be operable with a single effort by lever type hardware, panic bars, push pull activating bars, or other hardware designed to operate without requiring grasping the opening hardware.

Note: Current regulations differ. Current minimum is 34 inches and the maximum is 44 inches. This also differs from the 2010 ADA Standards.
12. Door Operating Force

Reference:
1998 CBC Sections:
- 1133B.2.5 Closer-effort to operate doors

Maximum effort to operate exterior doors shall not exceed 8 ½ pounds. Fire doors shall not exceed 15 pounds to operate the door.

Compensating devices or automatic door operators may be used to meet the door operating force standards. The opening force of exterior swing doors is impacted by wind loading and other exterior conditions, gasketing, HVAC systems, energy efficiency, and the weight of doors. The minimum force needed to ensure proper closure and positive latch may exceed the current accessible limit of 5 pounds of opening force and the 1998 allowable force of 8.5 pounds of opening force at exterior doors. For this reason, the CBC and the Department allow the use of powered door operators to compensate for these excessive door opening force. See DSA Advisory Manual Advisory 11B-404.3 and DBI Information Sheet DA-05.

See Manual Section: Tolerance, tools, and measurements for description of recommended tools and their proper use.
13. Panic Hardware

Reference:
1998 CBC Sections:
• 1003.3.1.9 Panic Hardware

Panic hardware shall comply with UBC Standard 10-4 (See Appendix A). The activating member must be mounted between 30 inches and 44 inches on center above the floor. The unlatching force must not exceed 15 pounds when applied in the direction of travel. (Current code limit is 5 pounds and 15 pounds for fire rated assemblies). For pivoted or balanced doors, panic hardware is required and be a push pad type and the pad shall not extend more than half the width of the door.
14. Maneuvering Space- Exterior/Interior

Reference:
1998 CBC Sections:
- 1133B.2.4.2 Maneuvering clearance at doors
- 1133B.2.4.3 Width of maneuvering space

Maneuvering clearances at doors shall be as shown below in Figures 11B-26A and 11B-26B. The floor and ground area within the required space shall be level and clear. The level area shall have a length of 60 inches in the direction of the door swing and 48 inches in the direction opposite the direction of the door swing. The distance shall be measured at right angles to the door in its closed position.

Exception: The length of the clear space in the opposite direction of the door swing may be reduced to 44 inches if the door has no closer and allows for a latch side approach, or if the door has neither a latch or closer and approach can be made from the hinge side.

The width of the level area on the side to which the door swings shall extend 24 inches past the strike edge of the door for exterior doors and 18 inches for interior doors. (The interior side of an inward swinging door leading to the exterior would be considered an interior door and would only require 18 inches of width past the strike edge of the door.)
15. Recess Doormats

Reference:
1998 CBC Sections:
- 1133B.1.1.1.3 Recessed Door Mats

Doormats that are permanently placed must be adequately anchored so as to not interfere with the motion of a wheelchair. Loose and high pile carpeting is rated one of the most difficult surfaces to traverse for wheelchair users. Later code editions require a maximum ½ inch pile, solid substrate and beveled edges on non-recessed carpet.

Carpeting must be securely attached so that it does not shift or buckle against wheeled traffic. Cushions or pads, if used, also must be properly secured to resist movement. Rolling or buckling occurs when carpet is not properly secured and makes wheelchair maneuvering very difficult.

Later codes require beveled edges on carpet.

Carpet to tile: ¼" vertical transition maximum
16. Vestibules and Doors in Series

Reference:
1998 CBC Sections:
- 1133B.2.4.4 Doors in series.

The space between two consecutive door openings in a vestibule shall provide a minimum of 48 inches of clear space from any door opening into such vestibule when the door is positioned at an angle of 90 degrees from its closed position. Doors in series shall either swing in the same direction or away from each other. (Current code allows doors to swing inward if there is 48 inches between the doors in open positions).
17. Automatic Doors

Reference:
1998 CBC Sections:
- 1001.2 Standards
- 1003.3.1.2 Special Doors
- 1133B.2.3.2

Powered doors must comply with UBC Standard 10-1 for doors installed under the 1998 Code. Later and current installations must comply with the requirements of the applicable BHMA/ANSI Standards. For power assist and low energy power operated doors, see BHMA/ANSI A156.19. For automatic doors installation, see BHMA/ANSI A156.10.

The CBC requires that powered doors have at least one door that provides a clear unobstructed net opening of 32 inches when in a position of 90 degrees. Note: This differs and is more restrictive than the 2010 ADA Standards. For automatic doors, such as those at most supermarkets, please see requirements of BHMA/ANSI Standard and Section 1003.3.1.2 for installation requirements of pedestrian protection rails, etc.
18. Turnstiles, Rails, Pedestrian Controls, Security Doors, Revolving Doors, and Gates

Reference:
1998 CBC Sections:
- 1003.3.1.2 Special Doors
- 1003.3.1.10 Special egress-control devices
- 1003.3.2 Gates
- 1133B.1.1.1.4 Gates
- 1133B.2.3.3 Revolving Doors
- 1133B.2.3.4 Turnstiles, rails and pedestrian controls

Revolving doors may not be used as part of an accessible route. If the main entrance is a revolving door, an accessible swinging door must be located adjacent to the revolving door. Gates shall be constructed with the same requirements as doors. See Section 1003.3.2 for exceptions for large auditorium and stadium gates. Special access controls and crowd control barriers must comply with the requirements of 133B.2.3.4. Where crowd control barriers lanes are employed, a minimum of one lane must be accessible. Where turnstiles are used, a separate accessible gate or door must be provided. The gate or door must be unlocked, unless all entrances are locked. No signal or alarm devices may be used on this gate, unless all entrances are so equipped.
19. Historic Buildings-CHBC

Reference:
1998 CBC and CHBC Sections:

CBC Sections:
- 209 Definition
- 1135B Historic Preservation
- 3403.5

San Francisco Building Code (SFBC) Sections:

California Historic Building Code (CHBC) Sections:
- 8-101 Title Purpose and Intent
- 8-102 Application
- 8-103 Enforcement
- 8-104 Review and appeal
- 8-2 Definitions
  - Character Defining Feature
  - Historical Fabric Or Material
  - Historical Significance
  - Qualified Historical Building Or Property
- 8-601 through 8-605 Alternate Accessibility Provisions

The intent of the CHBC is to “preserve the integrity of qualified historical buildings and properties and provide access to and use by persons with disabilities”. “Qualified Historical Buildings” are allowed to use the provisions of the CHBC for alternate methods of providing accessibility on a case by case basis when (and only when) the historical significance or character defining features of the building would be threatened or destroyed by compliance with the regular code. Use of other designs and technologies, or deviation from particular technical and scoping requirements, are permitted if the application of the alternative provisions contained in Section 8-603 (Alternatives) would threaten or destroy the historical significance or character-defining features of the historical building or property.

If your entrance was granted the use of any of the alternate methods of compliance, we will ask that you provide the permit application number under which the alternate was approved and a description with reasoning and photo of the alternate method in Section 8-603 used.

If access to your entrance was not provided as per Section 8-603.3, you will be required to provide the permit application number under which the use of other designs and technologies, or deviation from particular technical and scoping requirements were approved and copies of the documentation of equivalent facilitation that is compliant with Section 8-604 which was submitted with the application. This documentation would include description of how compliance with the regular code and Section 8-603 would have threatened the historical significance of the building and include the opinions and comments of state or local accessibility officials and the comments of representative local groups of people with disabilities.
20. Conclusion

This section asks the licensed design professional or the CASp inspector to categorize the entry into one of four categories.