



Subject Storage Comparability for Mobility Units

- References**
- 2019 California Building Code (CBC)
 - 2010 ADA Standards (ADAS)
 - Fair Housing Act Design Manual (FHADM)

Purpose This bulletin clarifies the storage requirements in Mobility Units for the purpose of comparability to Adaptable Units. It also clarifies the usability of closets and other storage by people with disabilities.

For more information visit the Mayor's Office on Disability (MOD) website: sf.gov/mod

CBC Code Section **Summary**

| | |
|--------------------|--|
| 11B-225.2 | Where storage is provided in accessible spaces, at least one of each type shall be accessible per 11B-811. Examples: • Clothes closets. • Wall shelves. • Linen closets. • Clothes rods. • Wall hooks. |
| 11B-233.3.5 | Dispersion in public housing facilities. |
| 11B-305 | Clear floor space. |
| 11B-308 | Reach ranges. |
| 11B-404.2.2 | Double leaf doors. |
| 11B-811.4 | Operable parts must comply with 11B-309. |

FHADM Section **Summary**

| | |
|--------------------|--------------|
| 3.14 - 3.15 | Closet Doors |
|--------------------|--------------|

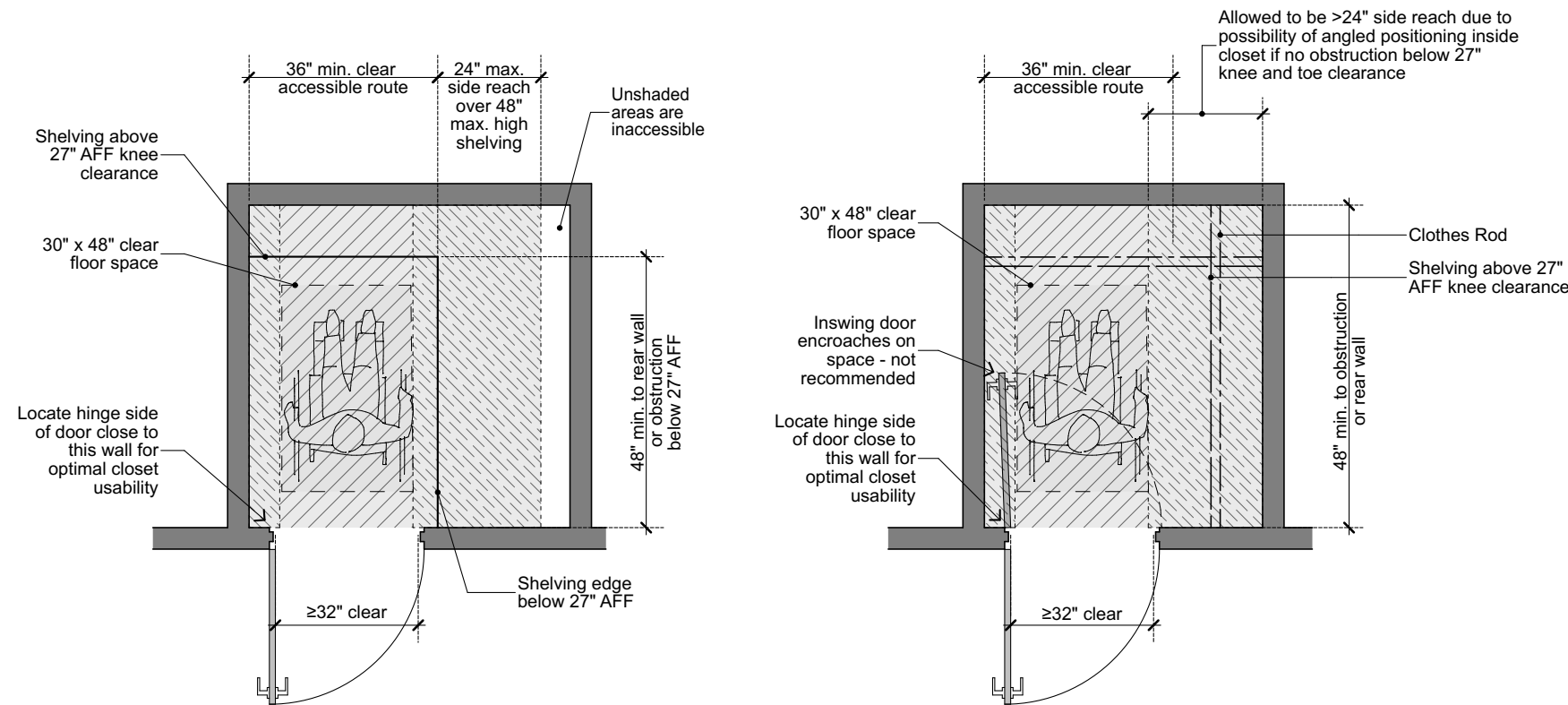
Comparability Criteria

- Quantity of Storage**
1. Accessible storage in Mobility Units must be comparable to the total storage in Adaptable Units.
 2. If storage provided for Mobility Units and Adaptable Units does not appear to be comparable, calculations documenting comparability may be required.

- Type of Storage**
1. Mobility Units and Adaptable Units are required to have comparable types of storage. Examples:
 - If Adaptable Units have vanity cabinets, removable vanity cabinets must be installed in Mobility Units.
 - Open shelves in Mobility Units are not equivalent to shelves with a door in Adaptable Units.
 2. Applicant is required to indicate on the Floor Plan the intended use of each closet (linen closet, clothes closet, etc.) to facilitate comparison of Adaptable and Mobility Units.
 3. Shaded areas on floor plans indicate accessible storage areas for inclusion when storage compatibility calculations are required.

Residential Dwelling Unit Terminology

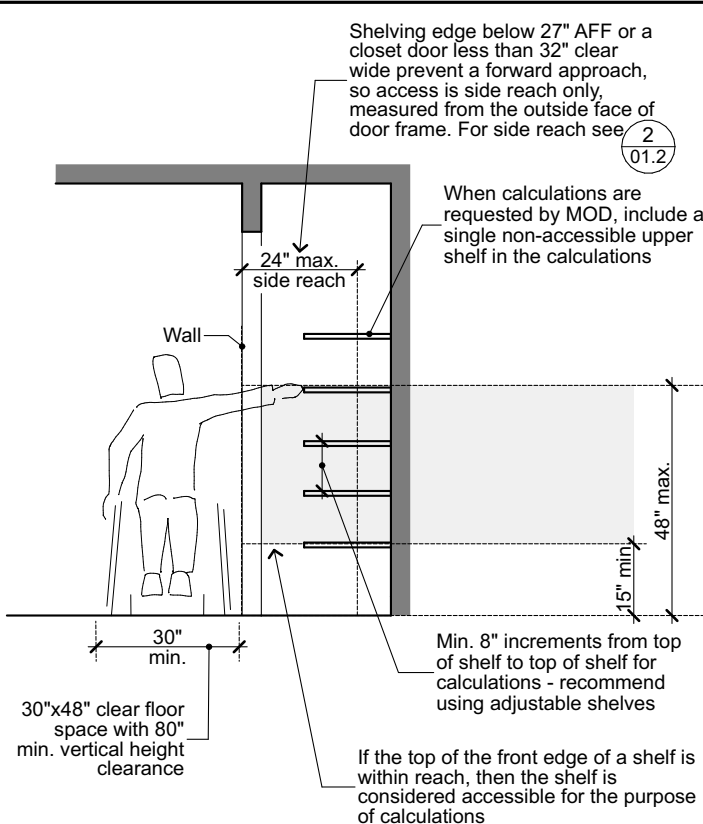
- Mobility Unit:** Residential dwelling unit per 11B-233.3.1.1 providing mobility features complying with Sections 11B-809.2 through 11B-809.4.
- Adaptable Unit:** Residential dwelling unit per 11B-233.3.1.2, providing adaptable accessibility features as required by Sections 11B-233.3.1.2.1 through 11B-233.3.1.2.6.
- Communication Unit:** Residential dwelling unit per 11B-233.3.1.3, providing communication features complying with Section 11B-809.5.



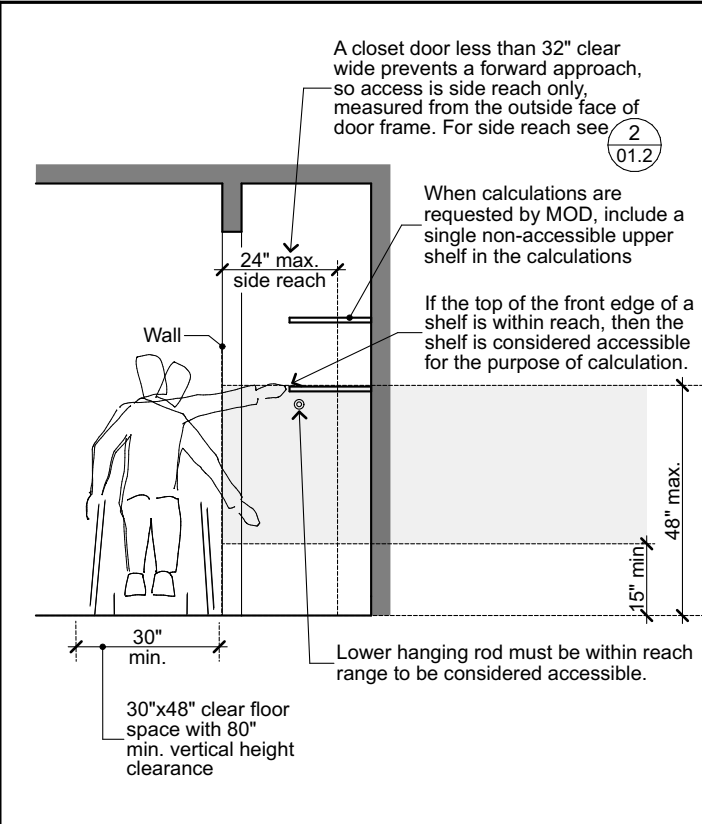
KEY TO SHADED AREAS

| | |
|--|--|
| | 30" x 48" Clear Floor Space |
| | Accessible Forward Reach |
| | Accessible Side Reach from Inside Closet |

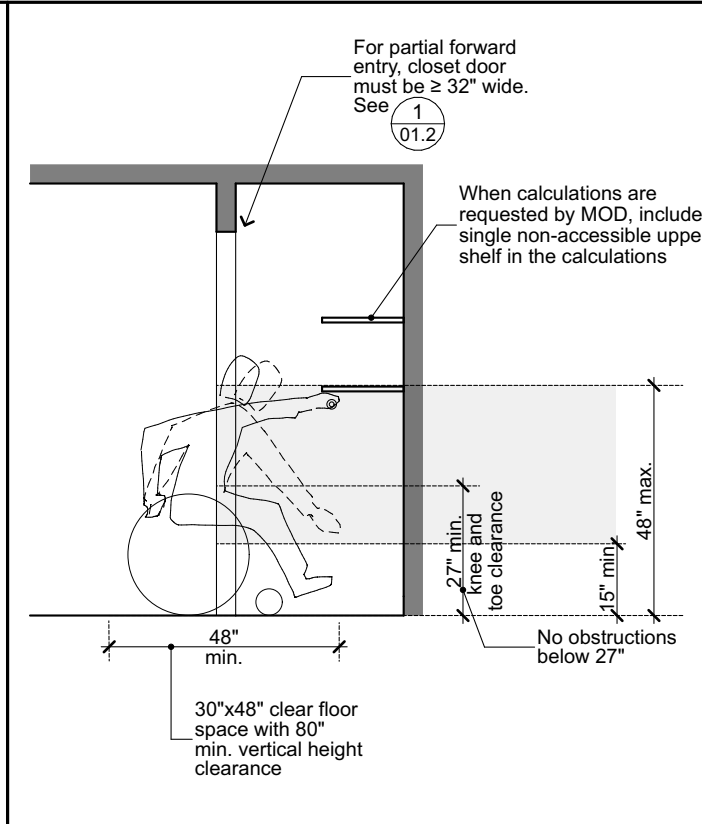
1 Roll-in / Back-out Closet Plans
01.1 Closets equal to or greater than 48" in depth



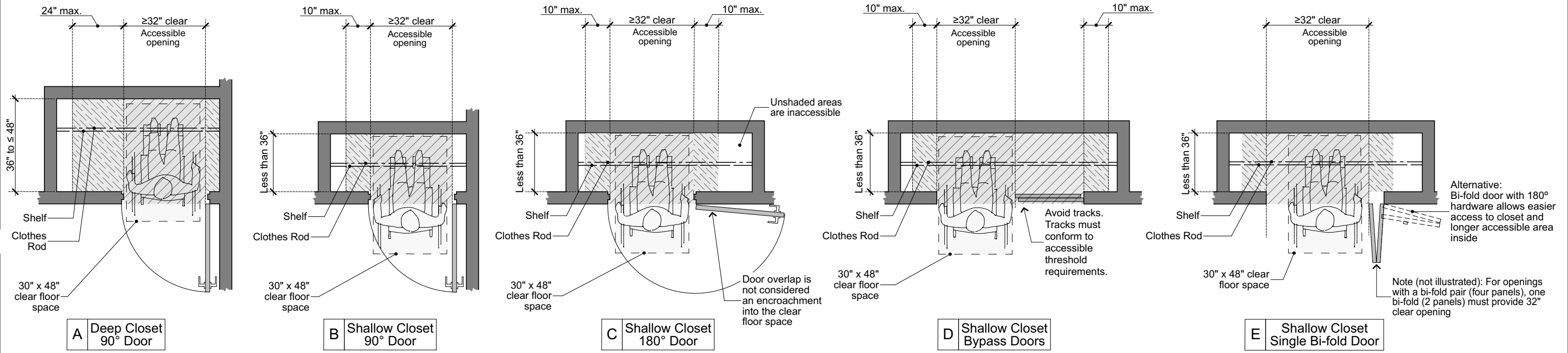
2 Closet Section
01.1 Side Reach Range



3 Closet Section
01.1 Side Reach Range

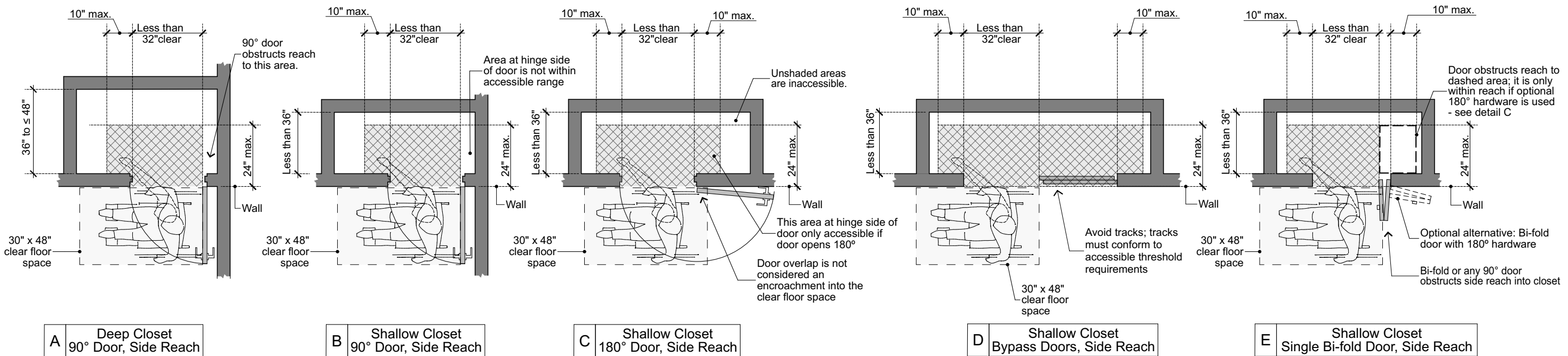


4 Closet Section
01.1 Forward Reach Range



1 Closets With a Clear Opening 32" Minimum
01.2 Door Intended for User Passage - Partial Entry, No Obstructions Below 27" Knee and Toe Clearance

| KEY TO SHADED AREAS | |
|---------------------|--|
| | 30" x 48" Clear Floor Space |
| | Accessible Forward Reach |
| | Accessible Side Reach from Inside Closet |



Note: 24" side reach is measured from the outside face of wall when the closet door does not allow a forward approach through the door.

2 Closet With Clear Openings Less Than 32"
01.2 Door Not Intended for User Passage

| KEY TO SHADED AREAS | |
|---------------------|---|
| | 30" x 48" Clear Floor Space |
| | Accessible Side Reach from Outside Closet |