



## GENERAL PHYSICAL BARRIER RELATED DISABILITY ACCOMMODATIONS

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This handout is a reference guide for small business owners on **physical barrier** accommodations they may need to make in order to comply with the Americans with Disabilities Act (ADA), the California Unruh Civil Rights Act (Unruh Act), and the California Disabled Person's Act. These laws apply to all businesses open to the public, regardless of their size or the number of employees. We recommend obtaining a [CASp](#) (Certified Access Specialist) property inspection to assess your building or site for compliance with applicable state and federal disability laws.

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### **Background**

Compliance with disability laws means your business must make “reasonable accommodations” for people with disabilities.<sup>1</sup> Compliance might involve:

- Making minor adjustments to the way your business operates;
- Adjusting the way the business communicates with customers; and
- Removing physical barriers in existing facilities when it is “readily achievable” to do so. Readily achievable means “easily accomplishable without much difficulty or expense.” This requirement is based on the size and resources of a business. Businesses with more resources are expected to remove more barriers than businesses with fewer resources.<sup>2</sup>

Federal and state disability laws require that persons with disabilities have equal access to any area of your small business - meaning you must, for example, reduce clutter, rearrange furniture, and make aisles and walkways wide enough to remove barriers to access for disabled persons.

***When it comes to ADA and Unruh Act lawsuits, small business owners are commonly sued over the following:***

- Lack of accessible parking
- Lack of access into the building, such as stairs in front of entrance, a slope that is too steep, lack of a ramp and/or grab bar, lack of clearance space for wheelchairs, lack of signs to accessible doors

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<sup>1</sup> The ADA defines disabled person as a person who has a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such impairment, or a person who is perceived by others as having such impairment. 42 U.S.C. Section 12102(1).

<sup>2</sup> Generally, for example, widening aisles, adjusting the height of mirrors, toilet paper and paper towel dispensers, and changing indoor and outdoor dining furniture are considered “readily achievable.”

- Doors that make it difficult for a wheelchair to enter into a building – for example, if there is more than five pounds of pressure or too much of a lip
- Lack of space to navigate wheelchairs or access within the building
- Aisles or paths of travel that are too narrow
- Surfaces or appliances that are too high
- Indoor or outdoor dining that does not have enough space for a wheelchair to fit under the table or counter) and/or has table tops that are too high
- Lack of adequate signage designating areas as accessible
- Bathroom stalls without space for a wheelchair; no grab bars in stalls or grab bars out of compliance; mirrors that are too high, or a sink, toilet, dryer, paper towel or toilet paper dispenser that is too high

## **Applicable Regulations**

The ADA's regulations, the ADA Standards for Accessible Design, originally published in 1991 and then updated in 2010, and the California Building Code, contain guidelines for what makes a physical space/facility accessible.

The following is a non-exhaustive list of ADA Standards for Accessible Design and California Building Code guidelines on common physical barriers:

### **Parking**

Number of accessible spaces required	For lots with up to 100 parking spaces, there must be one accessible space for every 25 total parking spaces – if there are fewer than 25 total spaces, the lot needs at least one accessible space. <sup>3</sup> Note that the number of required accessible spaces changes for lots with more than 100 parking spaces. <sup>4</sup>
Number of van accessible spaces required	There must be one van accessible space for every six required accessible spaces – if there are fewer than six required accessible spaces, the lot needs at least one van accessible space. <sup>5</sup> Van-accessible spaces are not restricted to vans only. <sup>6</sup>
Size of accessible parking spaces	Must be at least 108 inches wide with a 60-inch-wide access aisle. <sup>7</sup>

<sup>3</sup> California Building Code (CBC) 11B-208.2 Minimum number.

<sup>4</sup> For example: lots with 101 to 150 spaces need five accessible spots, lots with 151 to 200 spaces need six accessible spots, lots with 201 to 300 spaces need seven accessible spots, etc. California Building Code (CBC) 11B-208.2 Minimum number.

<sup>5</sup> For example, a lot with only one accessible parking space should designate that spot as van-accessible.

<sup>6</sup> CBC 11B-208.2.4 Van parking spaces.

<sup>7</sup> CBC 11B-502.2 Vehicle spaces.

Size of van-accessible parking spaces	Must be at least 144 inches wide with a vertical clearance of 98 inches. Access aisle width for van-accessible spaces must be 96 inches. <sup>8</sup>
Adjacent access aisle requirements for accessible spaces	Accessible spaces must have an adjacent access aisle marked to deter parking. <sup>9</sup>
Signage requirements for accessible spaces	Accessible spaces must feature a sign designating them as accessible. The signs must include the Internal Symbol of Accessibility (ISA) and be at least 60 inches from the ground. Van-accessible spaces should also state "van accessible." <sup>10</sup>
Access requirements from accessible parking spaces to accessible entrances	Accessible spaces must connect to the shortest accessible route to each accessible entrance. <sup>11</sup> If there are multiple accessible entrances, arrange accessible parking to provide balanced access to each entry.
Accessible route requirements	Must be at least 3 feet wide with a ramp instead of curbs or stairs (there are limited exceptions to this rule). The ramp must not obstruct the space required for an access aisle, and the access aisle must not contain any other obstructions, including columns or signs.

### **ADA Ramps and Entrances**

Size of ramps	Width must be 48 inches, and the ramp must be no longer than 30 feet without a landing. <sup>12</sup> Dimensions for ramp landing vary based on type of door used. <sup>13</sup>
Size of door openings	Must provide a clear width of at least 32 inches, measuring from the open door to the opposite frame. <sup>14</sup>
Height of door's threshold	Threshold must be less than a half-inch off the ground to ensure a clear stepping motion. <sup>15</sup>
Door swing requirements	There must be at least 18 inches of clear space between the side of the door that swings out and any obstruction or object in the space. <sup>16</sup>
Weight of door	A maximum of five pounds of pressure to open. <sup>17</sup>

<sup>8</sup> *Id.*

<sup>9</sup> CBC 11B-502.2 Vehicle spaces. CBC 11B-502.3 Access aisle.

<sup>10</sup> ADA 502.6 Identification.

<sup>11</sup> CBC 11B-208.3.1 General. Location.

<sup>12</sup> CBC 11B-405.5 Clear width.; ADA 405 Ramps.

<sup>13</sup> CBC 11B-404.2.3 Clear width.; ADA 404.2.3 Clear Width.

<sup>14</sup> CBC 11B-404.2.3 Clear width.; ADA 404.2.3 Clear Width.

<sup>15</sup> CBC 11B-404.2.5 Thresholds.; ADA 404.2.5

<sup>16</sup> ADA Table 404.2.4.1 Maneuvering Clearances at Manual Swinging Doors and Gates

<sup>17</sup> CBC 11B-404.2.9 Door and gate opening force; ADA 404.2.9 Door and Gate Opening Force.

Handrails	Ramps are required to have handrails. <sup>18</sup>
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### Aisles

Aisle width	Generally, aisle width must be at least 36 inches. <sup>19</sup>
Passing space requirements	If the aisle is more than 200 feet long, a passing space of at least 60 inches by 60 inches must be provided. <sup>20</sup>

### Bathrooms

Number of accessible bathrooms	Multi-user bathrooms must include at least one wheelchair-accessible stall and sink, and if it contains urinals, at least one accessible urinal. <sup>21</sup>
Signage requirements for accessible bathrooms	Accessible bathrooms must be clearly labeled with an Internal Symbol of Accessibility (ISA) sign and braille identification, including pictograms. <sup>22</sup>
Turning space requirements for accessible bathrooms	Each accessible restroom must have at least 60 inches of turning space. <sup>23</sup>
Location of toilet for accessible bathrooms	The top of the seat should be 17-19 inches from the ground. The center of the toilet should be 16-18 inches from the wall. <sup>24</sup>
Flush control requirements for accessible bathrooms	The user should be able to access the flush handle from the side farthest from the wall. <sup>25</sup>
Toilet paper dispenser requirements for accessible bathrooms	Toilet paper can be recessed within a dispenser or not. All dispensers should be seven to nine inches from the toilet. The point where toilet paper comes out of the dispenser should be 15-48 inches from the ground. Non-recessed dispensers must be at least one and a half inches below the bar or precisely 12 inches above if placed near grab bars. <sup>26</sup>
Grab bar requirements for accessible bathrooms	All accessible bathrooms must have a grab bar beside and behind the toilet. <sup>27</sup> Grab bars should have rounded edges and must support 250 pounds of force without rotating. <sup>28</sup>

<sup>18</sup> CBC 11B-405.8

<sup>19</sup> CBC 11B-403.5.1 Clear width; ADA 403.

<sup>20</sup> CBC 11B-403.5.3 Passing spaces.

<sup>21</sup> ADA 605.2 Urinals. Height and Depth.

<sup>22</sup> ADA 216.8 Toilet Rooms and Bathing Rooms.

<sup>23</sup> ADA 604.3.1 Size.; 604.8.1.1 Size.

<sup>24</sup> CBC 11B-809.10.7.4 Seat height.

<sup>25</sup> CBC 11B-809.10.7.5 Controls.

<sup>26</sup> ADA 604.7 Dispensers.

<sup>27</sup> ADA 604.5.1 Side Wall; ADA 604.5.2 Rear Wall.

<sup>28</sup> ADA 609.5 Surface Hazards; ADA 609.8 Structural Strength.

Location of side grab bars	The side grab bar should be 33-36 inches from the ground and protrude at least 1 1/2 inches from the wall. <sup>29</sup>
Size of side grab bars	The side grab bar should be at least 42 inches long and stop no more than 12 inches from the rear wall. <sup>30</sup>
Size of rear grab bars	The rear grab bar should be at least 36 inches long, including 12 inches extending from the center of the toilet to the nearest wall and 24 inches from the center into the open space next to the toilet. <sup>31</sup>
Number of accessible sinks	Single-user restrooms must include compliant sinks. At least one sink in a multi-user restroom should be accessible. <sup>32</sup>
Floor requirements for accessible sinks	Accessible sinks shall have at least a 30 by 48 inch clear floor area in front of them. <sup>33</sup> This space may extend up to 19 inches underneath the sink. <sup>34</sup>
Counter heights for accessible sinks	Bathroom counter heights shall be a maximum of 34 inches off the ground. <sup>35</sup>
Counter space requirements for accessible sinks	Sinks located next to a wall or partition must have 18 inches of clear counter space to ensure adequate arm movement. <sup>36</sup>
Faucet requirements for accessible sinks	Faucets must be lever, push-operated, or sensory-controlled/automatic, running for at least 10 seconds. <sup>37</sup>
Pipe requirements for accessible sinks	Pipes beneath must be arranged to prevent contact, insulated, and free of sharp edges to avoid injury. <sup>38</sup>
Number of accessible vanities	Any bathroom vanities with mirrors must include at least one accessible mirror. <sup>39</sup>
Size of accessible vanities	Accessible over-the-counter mirrors must be no higher than 40 inches from the floor, measured from the reflecting surface's base. <sup>40</sup>
Dispenser requirements for accessible sinks	Users must be able to operate soap or paper towel dispensers with one hand, without

<sup>29</sup> ADA 609.4 Position of Grab Bars; ADA 609.3 Spacing.

<sup>30</sup> ADA 604.5.1 Side Wall.

<sup>31</sup> ADA 604.5.2 Rear Wall.

<sup>32</sup> ADA 606 Lavatories and Sinks.; 606.2

<sup>33</sup> CBC 11B-809.10.8.2 Floor space.

<sup>34</sup> ADA 606.2 Clear Floor or Ground Space.

<sup>35</sup> CBC 11B-606.3 Height.

<sup>36</sup> CBC 11B-606.6 Adjacent side wall or partition.

<sup>37</sup> ADA 606.4 Faucets.

<sup>38</sup> ADA 606 Lavatories and Sinks

<sup>39</sup> CBC 11B-809.10.8.7 Mirrors and towel bars.

<sup>40</sup> CBC 11B-809.10.8.7 Mirrors and towel bars.

	pinching or twisting the wrist, and with five or fewer pounds of force. <sup>41</sup>
Additional requirements	If bathroom includes coat hooks, shelves or mirrors, must also include accessible hooks, shelves, and mirrors within the restroom.

### Counters and Tables

Sales and service counter requirements	Must be less than 36 inches high and 36 inches long with at least a clear 30 by 48 inch area in front for adequate wheelchair access. <sup>42</sup>
Bar and restaurant counter requirements	Must be between 28 and 34 inches tall and a maximum of 60 inches long. <sup>43</sup>
Children's restaurant table requirements	Restaurant tables and counters meant for children must be between 26 and 30 inches high. <sup>44</sup>
Transaction or check-out counter requirements in retail locations	Must be a maximum 38 inches off the ground. Counter edge protection must be no more than 2 inches above the top of the counter surface on the customer side of the counter. <sup>45</sup>
Customer self-service counter requirements	Must avoid making a customer reach deeper than 20 inches or above 44 inches.
Reception desk counter requirements	Must be at least 36 inches wide and between 28 and 34 inches off the floor. <sup>46</sup>
Number of accessible tables	Five percent (5%) of all dining surfaces (or at least 1 if there are fewer than 20 tables), must be wheelchair accessible. <sup>47</sup> If there is a bar or outdoor area, five percent (5%) of the dining surfaces in these areas must be wheelchair accessible (or at least 1 if there are fewer than 20 tables).
Knee clearance requirements for accessible tables	Knee clearance must be at least 30 inches wide. <sup>48</sup> The knee clearance must be 27 inches high with a minimum depth of 19 inches. <sup>49</sup> Tables with a single leg mounted in the center of the table are usually not compliant.
Toe clearance requirements under accessible dining surfaces	Toe clearance must extend 19 inches minimum under built-in dining surfaces required to be accessible and must be minimum 30 inches wide. <sup>50</sup>

<sup>41</sup> ADA 606.4 Faucets and Operable Parts.; ADA 309.4 Operation.

<sup>42</sup> ADA 904.4.2 Forward Approach.

<sup>43</sup> CBC 11B-226.3 Dining surfaces exceeding 34 inches in height.

<sup>44</sup> CBC 11B-226.3 Dining surfaces exceeding 34 inches in height.

<sup>45</sup> CBC 11B-904.3.2 Counter.

<sup>46</sup> CBC 11B-902.3 Height.

<sup>47</sup> CBC 11B-226.1 General.

<sup>48</sup> CBC 11B-306.3.5 Width.

<sup>49</sup> CBC 11B-902.3 Height.

<sup>50</sup> CBC 11B-306.2 Toe Clearance.

Tabletop height for accessible tables	Cannot be below 28 inches or below 34 inches. <sup>51</sup>
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## **Helpful Resources**

<https://www.ada.gov/law-and-regs/title-iii-regulations/>

<https://www.ada.gov/resources/title-iii-primer/>

<https://www.dgs.ca.gov/casp>

<https://www.dor.ca.gov/Home/MakingReceptionAreasAccessible>

<https://www.access-board.gov/ada/#about-the-ada-accessibility-standards>

<https://www.access-board.gov/files/ada/guides/accessible-routes.pdf>

This document provides general guidance only and should not be construed as legal advice. The information in this document may change over time; small business owners are encouraged to verify the rules that apply to their specific situation. If your small business needs legal assistance, or if you have further questions about these topics, please contact Public Counsel's Community Development Project at (213) 385-2977, ext. 200. The Community Development Project provides free legal assistance to qualifying low-income entrepreneurs and qualifying nonprofit organizations that share our mission of serving low-income communities and addressing issues of poverty within Los Angeles County.

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<sup>51</sup> CBC 11B-902.3 Height.