



STATE OF WASHINGTON

STATE BUILDING CODE COUNCIL

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STATE BUILDING CODE INTERPRETATION NO. 00-09

- CODE:** 1997 Uniform Building Code (UBC),
State Regulations for Barrier-Free Facilities
- SECTIONS:** Sections 1101.4 Alternate Methods, 1106.11.7.3.1 Lavatories,
1106.11.7.3.2 Sinks, 1106.11.6 Urinals, 1106.16.3 Signage Finish and
color
- QUESTIONS:**
1. For 1101.4 Alternate Methods to be used to approve an ADA Accessibility Guidelines (ADAAG) provision as an alternate to the State Regulations for Barrier-Free Facilities, how is “substantially equivalent or greater accessibility” to be determined where numerical and/or physical differences result from applying the two regulations?
 2. To satisfy Section 1106.11.7.3.1 Lavatories, does compliance with ADAAG Section 4.19.2 Height and Clearances, which specifies compliance with ADAAG Figure 31 Lavatory Clearances, constitute equivalent accessibility per Section 1101.4 Alternate Methods?
 3. Section 1106.16.3 Finish and Color requires that all interior and exterior signs depicting the International Symbol of Access (ISA) shall be white on a blue background. ADAAG Section 4.30.5 requires “either light characters on a dark background or dark characters on a light background.” Would ADAAG complying ISA signs of black stencil on a brushed aluminum background, which matches the rest of a facility’s signage, provide equivalent accessibility per 1101.4 Alternate Methods?
 4. Does Section 1106.11.6 Urinals allow urinal shields (screens) to extend farther than the front edge of the urinal rim where the clear space between screens is 30 inches or more, as is allowed by ADAAG Section 4.18.3?
 5. Are sinks that are installed in kitchenettes or lounges intended for use solely by employees required to meet the accessibility requirements of the State Building Code (SBC)? Neither the SBC nor the ADAAG is specific as to how this requirement is scoped.
- ANSWERS:**
1. The State Regulations for Barrier-Free Facilities, UBC Chapter 11 as amended, is intended to comply with ADAAG and in large part to reflect

the same requirements. Section 1101.4 can be used to approve ADAAG requirements which clearly provide equivalent or greater *accessibility*. In determining “substantially equivalent or greater accessibility,” performance or usability is the issue rather than numerical and/or physical construction details. Therefore, where numerical and/or physical differences result from applying the two regulations, if a person with disabilities can utilize the ADAAG complying features with equal or greater ease, equivalent or greater accessibility is established.

2. Yes. Compliance with ADAAG Figure 31 compared to compliance with 1106.11.7.3.1 provides lavatory clearances which can be utilized by a person in a wheel chair with equal or greater ease and thus provides equivalent or greater accessibility.

3. No. To be universally recognizable, 1106.16.3 requires that the International Symbol of Accessibility be white on a blue background. All other signs regulated by Chapter 11 are required to meet the requirements for contrast, but do not have a specific color requirement. See also State Building Code Interpretation No. 92-33-1.

4. Yes. The intent of 1106.11.6 is to allow urinal shields (screens) which do not extend farther than the front edge of the urinal rim to be located between adjacent 30 inch wide urinal stalls where the clear space between screens is not less than 29 inches. This allows for providing the minimum 30 inch wide clear floor space for each urinal and for shields between them having a thickness of up to 1 inch. For urinal stalls or enclosures having a clear space width of 30 inches or greater, the extension distance of the urinal shield or enclosure is not regulated.

5. No. Since these applications are not scoped in Section 1105 Facility Accessibility, they are not required to meet the requirements of Section 1106 Accessible Design And Standards. See also State Building Code Interpretation No. 92-90.

SUPERSEDES: None

REQUESTED BY: City of Bothell