INTER-OFFICE MEMORANDUM

To: State Fire Marshal

From: GSFIC/State ADA Coordinator’s Office

Subject: Technical Assistance for Georgia Accessibility Code/2010 ADA Standards for Accessible Design

Date: June 2014 Revised

213 Restrooms and Bathing Facilities – Toilet Compartments (604.8)

Question: Is it permissible to locate a lavatory within the designated accessible toilet stall?

Answer: Yes. However, the accessible toilet stall as shown in figure 604.8.1.1 and 604 8.1.2 and 604.8.1.4 does not permit a lavatory to be located in the clear floor space required for the toilet fixture as stated in 604.3.2 Overlap ... “no other fixtures shall be located within the required water closet clearance”. Further under 213.3.4 Lavatories, “where lavatories are provided at least one shall comply with 606 and shall not be located in a toilet compartment. (This means if only one is provided that one cannot be located in the toilet compartment; it must be located in the toilet room.)

The clear floor space requirement in the accessible compartment/stall projects not only horizontally but vertically. Therefore, when providing a lavatory in the accessible stall, additional floor space must be added to allow for its placement. This provides the proper space for a side approach transfer between wheelchair and toilet, which is required not only in stalls/compartment but also in “toilet rooms”. This is a major difference between the old ADAAG/Georgia Accessibility Code (120-3-20-.01 - .54) and the 2010 ADA Standards for Accessible Design our new Georgia Accessibility Code (adopted in120-3-20-.01-.08), See 604.3.2 Exception for “residential dwelling units”.

The additional space required in toilet compartments is dependent on two factors: (1) clear floor space required for the fixture (30” x 48”); and (2) the width of the lavatory. The additional width for the stall can be as little as the width of the lavatory with an inch or two of clearance, because the clear floor space required for the lavatory can overlap the clear floor space for the toilet as there is no requirement that the clear floor space for the lavatory be centered on the fixture.
The State of Georgia ADA Coordinator’s Office provides this information to assist the Commissioner of Insurance and State Fire Marshal in administering interpretative guidance for the Georgia Accessibility Code. However, it does not constitute a legal interpretation or legal advice.