



CITY OF SAN ANTONIO
DEVELOPMENT SERVICES DEPARTMENT
MEMORANDUM

TO: DSD Associates
FROM: Roderick Sanchez, Director and Code Official
DATE: July 25, 2013

INTERPERTATION NUMBER: CI2013-007

TITLE: Lavatory Clearances Fixture Spacing

CODE/EDITION: 2012 International Plumbing Code (IPC) as adopted by COSA

SECTION: **405.3.1 Water closets, urinals, lavatories and bidets.** *A water closet, urinal, lavatory or bidet shall not be set closer than 15 inches (381 mm) from its center to any side wall, partition, vanity or other obstruction, or closer than 30 inches (762 mm) center to center between adjacent fixtures. There shall be not less than a 21-inch (533 mm) clearance in front of the water closet, urinal, lavatory or bidet to any wall, fixture or door.*

QUESTION 1: For lavatories, does the City of San Antonio enforce the 15-inch clearance from the center of the fixture to any side wall, vanity or obstruction. Does the City enforce the 30-inch center to center clearance between adjacent lavatory fixtures?

ANSWER: No. The City of San Antonio finds that the primary reason for lavatory clearances is for ease of cleaning. Under the Uniform Plumbing Code, there are no minimum clearances for lavatories, only clearances for water closets, urinals and bidets; and the city finds that there have been no health and safety issues related to clearances of lavatories even without past regulation. In addition, lavatory clearances are not reasonably reviewable at plan review and can't be measured in the field until the final inspection. Therefore the City of San Antonio will not enforce lavatory clearances; either center of fixture to side walls, partitions or other obstructions or the 30-inch clearance center to center between adjacent lavatory fixtures in section 405.3.1 of the 2012 IPC.

QUESTION 2: Does the City of San Antonio enforce the 21-inch clearance from the front of a lavatory fixture to any wall, fixture or door?

ANSWER: Yes.

QUESTION 3: Since the City of San Antonio will not enforce the clearance of a lavatory fixture to a wall, partition or obstruction or enforce the center to center clearances between lavatories, are the lavatory clearances required to meet the Americans with Disability Act?

ANSWER: Yes. All construction must meet the clearances required by the State of Texas Department of Licensing and Regulation under the Architectural Barriers Texas Accessibility Standards (TAS). Inspections are performed by others, rather than the City of San Antonio as required by Section 469.105 of the Architectural Barriers Law.



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