



# Code Amendment Proposal Application **OSSC 22-02**

**Department of Consumer & Business Services**  
**Building Codes Division**  
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## APPLICANT INFORMATION

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## PROPOSAL INFORMATION

Specialty code:	Oregon Structural Specialty Code (OSSC)
Code section(s):	1102.1.2.10
Briefly explain the subject of your proposal:	The proposal adds an exception for range over counters to be 25½ inches.

## Code Review Committee Outcomes

Oct. 28, 2021 – Approved with proponent modifications. <a href="#">Revised language</a>
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**Proposed Code language change:**

**1102.1.2.10 Type A unit operable parts – ICC A117.1 Section 1109.9**

ICC A117.1, Section 1103.9 is deleted in its entirety and replaced with the following:

Lighting controls, electrical panelboards, electrical switches and receptacle outlets, environmental controls, appliance controls, plumbing fixture controls, and user controls for security or intercom systems shall comply with Section 309.

Exception:

1. Within kitchen, lighting controls, electrical switches and receptacle outlets are permitted to be located over countertops 25 1/2 inches maximum in depth.

Proposal:

1. The 2018 IBC Code Commentary describes the different unit types as follows: Accessible units are wheelchair ready, Type A are wheelchair friendly, and Type B are wheelchair usable. As designers, we are very conscious about trying to design Type A units to the same design standards as the Type B units as well as focus on making apartments feel residential and not institutional. For Type A units, the difference of the 24" side reach to 25 ½" side reach often means installing outlet and switch extenders, which are often perceived negatively from a design perspective. The depth can easily be made up by adding temporary extenders (and many screw in, so they won't fall out unintentionally) and rocker switches can be easily operated with a hand-held extender. Type A units currently allow removable cabinets and do not require grab bars and shower seats to be installed until requested by a tenant. Following the rationale of wheelchair friendly (not wheelchair ready) allowing the 25 ½" reach range with the intent to add temporary outlet extenders as necessary would be logical with the current regulations that allow removable cabinetry and improve design and perception of Type A kitchens.



Photo of outlet and switch extenders

2. The existing national code only allows reach for 24" over an obstruction. The most cost-effective solution is to add an inch and a half extender to switches and outlets. We find that creates a negative design impact. We feel it is important to match the same high-quality design without adding high cost to create Type A units (as compared to Type B units), and this exception will allow this to be the case.
3. This proposal is being submitted at the same time to the A117.1 and has been developed with guidance from Kim Paarlberg. However, given the time lapse between adoption of A117.1 standards by the A117.1 committee and adoption by Building Code, we request this proposal be considered for the 2022 OSSC and not wait several more years for the next code cycle.

Implementation and fiscal impact:

1. The proposed revision will more closely align with readily available construction materials and will reduce grey areas in the code, therefore simplifying inspections.
2. This proposal has little financial impact but will have a high design impact.

Impacted stakeholders and other specialty codes:

1. This proposal was prepared with input from Kim Paarlberg of the ICC A11.1 Committee. I have reviewed outlets with many stakeholders, including dozens developers and contractors of multifamily housing, accessibility consultants, and at accessibility conferences including authors of many of the accessibility documents as well nationally recognized accessibility consultants. The Pacific Northwest seems to be the strictest interpretation of outlets, and most all agree the current language does not match the intent.
2. No, this proposal does not affect other specialty codes or statewide programs.

## Revised language

### 1102.1.2.10 Type A unit operable parts – ICC A117.1 Section 1109.9

ICC A117.1, Section 1103.9 is modified to include the following exception:

Lighting controls, electrical panelboards, electrical switches and receptacle outlets, environmental controls, appliance controls, plumbing fixture controls, and user controls for security or intercom systems shall comply with Section 309.

**Exception:** In a kitchen receptacle outlets are permitted to be located over countertops 25 1/2 inches maximum in depth provided there is at least one countertop with an accessible outlet compliant with this section.