



**LAX**  
*Los Angeles World Airports*



## ADA REPORT 02-20

DATE: 11 August 2020

TO: Honorable ADA Committee

FROM: Lawrence J. Rolon, LAWA ADA Coordinator

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### SUBJECT:

**Height Regulations for fire extinguishers in the City of Los Angeles, California**

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### REFERENCES:

- (a) City of Los Angeles Municipal Code §57.906.2.5 Mounting Height
- (b) 2010 ADA Standards for Accessible Design
- (c) California Building Code (Title 24 CA Code of Regulations)

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### PURPOSE:

Brief the Disability Access and Accommodation Advisory Committee (DAAAC) on the new City of Los Angeles Ordinance for fire extinguisher heights.

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### BACKGROUND:

The City of Los Angeles has implemented a policy allowing fire extinguishers to be as low as 4" off the ground. We do not have a date for when this policy went into effect.

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### DISCUSSION:

The City of Los Angeles has incorporated the following policy into the city's municipal code (Reference (a)):

## “SEC. 57.906.2.5. MOUNTING HEIGHT.

Portable fire extinguishers having a gross weight not exceeding 40 pounds shall be installed so that the top of the extinguisher is not more than 5 feet above the floor. Extinguishers having a gross weight greater than 40 pounds (except wheeled type) shall be so installed that the top of the extinguisher is not more than 3 1/2 feet above the floor. In no case shall the clearance between the bottom of the extinguisher and the floor be less than 4 inches.”

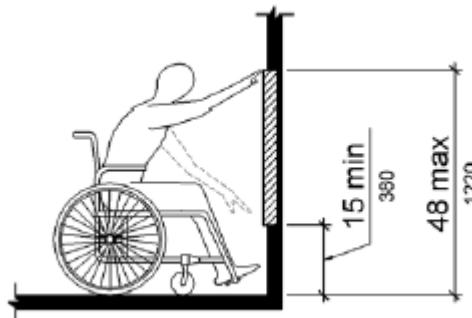
Note the minimum height for fire extinguishers is now 4” off the ground, with a maximum height of 5 feet (60 inches).

The mounting height regulations fails to address minimum and maximum heights for accessing door handles, and functional parts of the fire extinguishers. It only requires that the equipment be no less than 4” or more than 60” off the ground. In theory, accessible parts can be less than 15” from the ground or higher than 48” off the ground (not to exceed 60”).

To comply with the ADA, references (b) and (c), set a minimum height of 15” and a maximum height of 48”, for both forward reach and side reach. The accessible portion of the item/equipment being accessed must be within the 15”/48” range. See below:

### 308.2 Forward Reach.

**308.2.1 Unobstructed.** Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground.



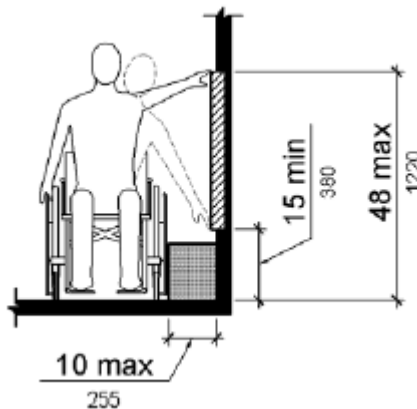
### 308.3 Side Reach.

**308.3.1 Unobstructed.** Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach

shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground.

**EXCEPTIONS:**

1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum.
2. Operable parts of fuel dispensers shall be permitted to be 54 inches (1370 mm) maximum measured from the surface of the vehicular way where fuel dispensers are installed on existing curbs.



**Figure 308.3.1 Unobstructed Side Reach**

Los Angeles World Airports (LAWA) desires to be compliant with all federal, state, and local regulations.

Reference (a), allows considerable leeway for contractors to place fire extinguishers at heights that conflict with references (b), and (c). It is reasonable to assume that the writers of the code failed to take the ADA into consideration. As written, the code would allow for contractors to place fire extinguishers at a height greater than 48", which would be in conflict with the ADA.

To address this, LAWA should include language in its building standards manual that specifies the minimum and maximum reach heights for all emergency equipment that is accessible to the general public. This includes fire extinguishers, automated external defibrillators (AEDs), and other equipment that may be located on airport property.

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**Conclusion:**

We must consider the compelling public interest in making our evaluation. Disabilities is one such compelling interest. Sound public policy enjoins the interest of the able bodied and disabled individuals into uniformed standards as illustrated in references (b), and (c).

The rule of thumb is that when two or more regulations are in conflict, public agencies should go with the more stringent policy. In this case, references (b), and (c) are more stringent than reference (a), and therefore provable.

Both references (b), and (c) fall within the parameters of reference (a). Therefore, complying with reference (a) is not at issue. To guide contractors in determining allowable heights, LAWA needs to update its building construction standards to incorporate language requiring fire extinguishers, AEDs, and other emergency equipment placed for immediate access by the general public, require a minimum height of 15" and maximum height of 48", to the accessible portions of the equipment being reached for. For example: the door handle to the fire extinguisher, and handle to the operating part of the extinguisher must be within the aforementioned range.

It is suggested that DAAAC recommend to LAWA's Chief Executive Officer that all fire extinguishers, AEDs , and other emergency equipment placed for immediate access by the general public be at a height in the range of 15" minimum from the ground, and 48" maximum from the ground, in accordance with references (b), and (c). And that said standards be incorporated into LAWA's building standards manual.

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**DISCLAIMER:** This document was prepared by LAWA's ADA Office to address a disabilities related matter. It was not prepared by lawyers and is not intended to serve as legal advice.

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