



**Storage (Not in Kitchens or Kitchenettes)**

**Effective Date:** October 3, 2013  
**2012 TAS Reference:** 225.2

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TAS 225.2 requires at least **one of each type** of storage to comply with TAS 811 when storage is provided in all accessible spaces except kitchens and kitchenettes.\*

Based on Advisory 225.2 and input from the U.S. Access Board, “**type**” refers to the design of the element (i.e. closets, cabinets, shelves, clothes rods, hooks, and drawers) as well as the intended use (i.e. coat closets, supply closets).

For purposes of compliance with TAS 225.2, the Department shall consider base and wall cabinets to be the same type of storage if designed the same (i.e. both have doors), used for the same purpose, and located in the same room or space.

It is acceptable, therefore, for all accessible storage to be placed in base cabinets when both base and wall cabinets are provided, however, the lowest shelf of at least one wall cabinet shall comply with TAS 811 when only wall cabinets are provided.

Counter surfaces shall not be considered a type of storage nor be used to satisfy the requirements of TAS 225.2.

This clarification does not constitute a substantive change to the compliance requirements of TAS 225.2 nor is it applicable to compliance with the storage requirements of TAS 804.5 for kitchens and kitchenettes.

\*See TM 2013-22 for information about the compliance requirements of TAS 804.5 for storage provided in kitchens and kitchenettes.