

Chapter 5

Items 5-1-12 through 5-24-12

June 14, 2013.

This is one of ten documents containing those proposed changes to the A117.1 Standard, 2009 edition; for which Committee Ballot comments or Proponent Comments were received. Each item will be discussed at the meeting of A117.1 Committee during the week of July 15, 2013, in Washington D.C. This document does not contain proposals for which no comments were received. Those proposals, and the Committee decision on each one, can be viewed in the Committee Action Report (CAR) under the title: First Draft Standard Development at this following location: <http://www.iccsafe.org/cs/standards/A117/Pages/default.aspx>

5-1– 12

502.1, 502.9 (New), 502.10 (New)

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

502.1 General. Accessible car and van parking spaces in parking lots shall comply with Sections 502.2 through 502.8. Accessible car and van parking spaces provided as part of on-street parking shall comply with Sections 502.9 through 502.10.

502.9 Parallel Parking Spaces. On-street parallel parking spaces shall comply with Section 502.9.1. On-street perpendicular or angled parking shall comply with Section 502.9.2.

502.9.1 Wide Sidewalks. Where the width of the adjacent sidewalk or available right-of-way exceeds 14 feet (4267 mm), an access aisle 60 inches (1525 mm) wide minimum shall be provided at street level the full length of the parking space and shall connect to a pedestrian access route. The access aisle shall comply with Section 502.4 and shall not encroach on the vehicular travel lane.

502.9.1.1 Alterations. In alterations where the street or sidewalk adjacent to the parking spaces is not altered, an access aisle shall not be required provided the parking spaces are located at the end of the block face.

502.9.1.2 Narrow Sidewalks. An access aisle is not required where the width of the adjacent sidewalk or the available right-of-way is less than or equal to 14 feet (4267 mm). Where an access aisle is not provided, the parking spaces shall be located at the end of the block face.

502.9.2 Perpendicular or Angled Parking Spaces. Where perpendicular or angled parking is provided, an access aisle 96 inches (2440 mm) wide minimum shall be provided at street level the full length of the parking space and shall connect to a pedestrian access route. The access aisle shall comply with Section 502.4 and shall be marked so as to discourage parking in the access aisle. Two parking spaces are permitted to share a common access aisle.

502.10 Parking Meters and Parking Pay Stations. Parking meters and parking pay stations that serve accessible parking spaces shall comply with Section 309.

Ballot Comment and Proponent Comment Agenda- July 15-19, 2013:
Proposals of 2012 submitted on the ICC A117.1-2009

502.10.1 Location. At accessible parallel parking spaces, parking meters shall be located at the head or foot of the parking space.

502.10.2 Displays and Information. Displays and information shall be visible from a point located 40 inches (1016 mm) maximum above the center of the clear space in front of the parking meter or parking pay station.

Reason: The quantity of change proposals submitted by International Code Council is reflective of three elements of our work: 1. ICC is the Secretariat for the Standard and some changes reflect inconsistencies or improvements suggested by staff; 2. ICC develops and publishes a Commentary on the standard and writing the commentary illuminates issues of the text and figures; and 3. ICC provides an interpretation service for the standard which results in the observation of provisions the users find most confusing.

The provisions from the Access Boards' proposed Public Right-of-way requirements address street parking (R309). The current requirements in A117.1 really only works on a practical basis for parking lots.

502.9 (NEW)-PAARLBERG.doc

Committee Action

Approved

Committee Reason: The proposal provides standards not currently addressed in the Standard. The proposal is consistent with the Access Board's Public Rights of Way report. The Committee asked that one or more figures be added to the published Standard to illustrate the provisions.

BALLOT COMMENTS

5-1.1

Commenter: Ron Burton, Representing BOMA

Ballot: Negative with comment:

Comment: See reason on 4-42-12.

5-1.2

Commenter: Steve Orlowski, Representing NAHB

Ballot: Negative with comment:

Comment: See negative comment on proposal 4-42-12.

5-1.3

Commenter: Edward Steinfeld, Representing RESNA

Ballot: Negative with comment:

Comment: Reflecting on this proposal, I realized that 502.9.1 will often create a dangerous pedestrian condition that I observed in a local town. At an accessible on street parking location, the access aisle was at street level but it cut into the sidewalk presenting a drop off along the edge of the cut in, except at one end where the curb ramp was located. A pedestrian exiting a retail location did not notice that drop off in the middle of the sidewalk and was severely injured falling off the edge. This is a particularly bad problem for people with visual impairments. We should not be introducing unsafe conditions and causing disability in the name of accessibility. The access aisle would be safer if it was at the sidewalk elevation. 502.9.1.2 could apply to all sidewalks.

**Ballot Comment and Proponent Comment Agenda- July 15-19, 2013:
Proposals of 2012 submitted on the ICC A117.1-2009**

5-2- 12
502.3

Proposed Change as Submitted

Proponent: Gene Boecker, Code Consultants, Inc.

Revise as follows:

502.3 Vehicle Space Marking. Car and van parking spaces shall be marked to define the width. Where parking spaces are marked with lines, the width measurements of parking spaces and adjacent access aisles shall be made from the centerline of the markings.

EXCEPTIONS:

1. Where parking spaces or access aisles are not adjacent to another parking space or access aisle, measurements shall be permitted to include the full width of the line defining the parking space or access aisle.
2. Marked spaces are not required in valet or mechanical parking facilities provided all of the following conditions are met:
 - 2.1 Accessible van spaces are provided as follows:
 - 2.1.1. Not less than one space, or;
 - 2.1.2. Not less than two spaces where a facility has a total parking capacity of 200 or more.
 - 2.2. A passenger loading zone complying with Section 503 is provided;
 - 2.3. At least one accessible parking space is made available unless all required accessible parking spaces are occupied;
 - 2.4. Each van accessible space shall be permanently marked and provided with signage containing the International Symbol of Accessibility complying with Section 703.6.3.1 and accompanied by a sign stating "Vehicles parked in this space are subject to relocation if necessary to accommodate a vehicle that cannot be parked in another accessible parking space." Such signs shall not be obstructed by a vehicle parked in the space; and
 - 2.5 A plan is provided to the Authority Having Jurisdiction indicating the following:
 - 2.5.1. An attendant shall park and retrieve all vehicles not equipped with special controls in which either the driver or passenger is a person with a disability;
 - 2.5.2. An attendant shall direct drivers of vehicles equipped with special controls to the accessible parking spaces, accompanying the driver to and from the space along the drive route and the accessible route from the parking space.

Reason: The Standard is not clear regarding how parking facilities are to be addressed where they are served by an attendant (valet) or by mechanical parking. In both of those instances, the operator of the vehicle does not actually park the vehicle but leaves it for an attendant to park. In these types of facilities, parking spaces are usually not marked so identifying specific accessible parking spaces is not easily found. As the standard is written now, all accessible spaces must be marked so it is in conflict with the use of these valet and mechanical parking facilities. Shall all accessible spaces be marked? If so where must these be? Why mark the spaces if an attendant parks the vehicle? Why mark access aisles if the aisles disappear as soon as the next vehicle is parked by the attendant?

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This language is modeled from the exception in the New York City Building Code. It places some degree of responsibility on the method used for attendant parking. In order to be able to use this exception, all of the conditions must be met. The following describes each of the provisions:

2.1 Accessible van spaces must be provided in addition to regular accessible spaces.

2.1.1 and 2.1.2 At least one accessible van parking space must be provided and permanently marked. Where the facility has 200 or more parking spaces possible, two accessible van spaces must be provided. This is based on the scoping provisions in Section 1106.1 of the International Building Code (IBC) and Section 208.2 of the 2010 ADA Standards for Accessible Design (2010 Standards) as adopted by the US Department of Justice for one in six accessible spaces to be a van accessible space. Where the number of total parking spaces is not more than 200, only six accessible spaces are required, resulting in a single van accessible space. This makes the responsibility for van spaces consistent with other types of parking. (See 2.4 for additional discussion.)

2.2 The passenger loading zone is already required by the scoping provisions of Section 1106.7.3 and 1106.7.3 of the IBC as well as Sections 209.4 and 209.5 of the 2010 Standards. This provision acts as a pointer and reminder that this condition is required regardless of what other equivalencies may be provided.

2.3 Because this is an exception to required marked parking spaces, the ability to create an accessible parking space in valet parking is based on how the attendant parks the vehicle. The space is the size of the vehicle. The key is making sure that the access aisle is available for the persons seeking to use them. This is usually accommodated by parking the vehicle such that one or the other side has sufficient space next to a vehicular aisle or pedestrian path. The last part of this item is simply stating that at some time it may not be possible to provide the access aisle any longer due to the manner in which valet parking is accommodated. In mechanical parking facilities, the criteria are more along the lines of access to/from the vehicle parking position. The word "required" parking spaces is intentionally used to bring attention to the fact that there is a specific minimum number of accessible spaces required elsewhere which must be addressed.

2.4 The van accessible spaces required in 2.1 must be marked and provided with signage. Because van spaces require additional height these spaces should be identified and made available. The remainder of the parking facility may or may not have adequate height. This provision requires that at least these two spaces have adequate height and the proper access aisles. Should the facility have sufficient height, more than two van accessible spaces could be provided if the vehicles can be moved (subject to 2.4 and 2.5 above).

2.5 In order to be able to not have marked parking spaces, an operations plan must be submitted to the Authority Having Jurisdiction. The official receives the plan and files it with the project.

2.5.1 and 2.5.2 These two criteria address the method for getting the vehicle to the accessible parking space. If the vehicle does not have special controls, then it can be driven and parked by the attendant. If the vehicle has special controls, then the attendant assists the driver in parking the vehicle at what is an accessible space (albeit not marked) and directing the driver along the vehicular path to the parking space and then along the pedestrian path to available accessible routes into and through the parking facility.

This may allow for more accessible spaces to be provided and more accessible van spaces to be provided than what would be available with permanently marked parking lots. The minimum required number of accessible spaces must be provided. However, attendant parking gives the attendant the control over location and parking which means that in a valet arrangement almost all parking spaces could be accessible spaces.

The current text is not clear regarding what must be done to mark parking spaces in valet and mechanical parking facilities. This proposal seeks to maintain the requirement that accessible spaces be provided while removing the obligation to mark spaces in facilities where parking is either flexible in configuration (valet) or fixed in regard to position but flexible regarding usage (mechanical).

5-2-502.3-BOECKER-update.doc

Committee Action

Approved

Committee Reason: The change provides an equivalent facilitation that may actually increase parking available to people with disabilities.

BALLOT COMMENTS

5-2.1

Commenter: Todd Andersen
Ballot: Negative with comment:

Comment: I object to condition 2.3 of Exception 2 at 502.3. I can't imagine how to design for this to happen, nor how a code official could find that I did what was required. This is an operational and not a built environment issue.

Revise as follows:

**Ballot Comment and Proponent Comment Agenda- July 15-19, 2013:
Proposals of 2012 submitted on the ICC A117.1-2009**

502.3 Vehicle Space Marking. Car and van parking spaces shall be marked to define the width. Where parking spaces are marked with lines, the width measurements of parking spaces and adjacent access aisles shall be made from the centerline of the markings.

EXCEPTIONS:

1. ~~Where parking spaces or access aisles are not adjacent to another parking space or access aisle, measurements shall be permitted to include the full width of the line defining the parking space or access aisle.~~
2. Marked spaces are not required in valet or mechanical parking facilities provided all of the following conditions are met:
 - 2.1 Accessible van spaces are provided as follows:
 - 2.1.1. ~~Not less than one space, or;~~
 - 2.1.2. ~~Not less than two spaces where a facility has a total parking capacity of 200 or more.~~
 - 2.2. ~~A passenger loading zone complying with Section 503 is provided;~~
 - 2.3. At least one accessible parking space is made available unless all required accessible parking spaces are occupied;
 - 2.4. Each van accessible space shall be permanently marked and provided with signage containing the International Symbol of Accessibility complying with Section 703.6.3.1 and accompanied by a sign stating "Vehicles parked in this space are subject to relocation if necessary to accommodate a vehicle that cannot be parked in another accessible parking space." Such signs shall not be obstructed by a vehicle parked in the space; and
 - 2.5 A plan is provided to the Authority Having Jurisdiction indicating the following:
 - 2.5.1. An attendant shall park and retrieve all vehicles not equipped with special controls in which either the driver or passenger is a person with a disability;
 - 2.5.2. An attendant shall direct drivers of vehicles equipped with special controls to the accessible parking spaces, accompanying the driver to and from the space along the drive route and the accessible route from the parking space.

5-2.2

Commenter: Marsha K. Mazz, Representing Access Board

Ballot: Negative with comment:

Comment: We request the committee to DISAPPROVE this proposal. It is in conflict with the 2010 ADA Standards which do not exempt valet parking facilities from providing marked accessible parking space. Furthermore, by exempting the marked spaces, the proposal removes the accessible elements from the section and, consequently, removes the requirement for an accessible route even though the plan required by 2.5 would require the facilities to allow some individuals with disabilities to self-park. The Access Board removed the exception for accessible spaces in valet parking facilities that was contained in the 1991 ADA Standards because for two reasons:

- (1) Valet parking is a service, not a facility type. There is nothing in the design of a valet parking facility that would differentiate it from another type of parking facility. Often, these services are provided only during certain hours and they can be terminated without any change to the built environment; and
- (2) Cars driven by individuals with disabilities are often not drivable by persons who are unfamiliar with the equipment. In some cases, there is no driver'

New Exception 2 added by this proposal is fraught with difficulties:

1. By using the word "or" between conditions 2.1.1 and 2.1.2, the proposal provides a choice of providing 1 van space *or*, where 200 or more parking spaces are provided, 2 van spaces. Who would ever opt to provide 2 when 1 van space will satisfy the requirement? The committee reasoning is flawed; it suggests that this proposal could result in more accessible parking than required by the ADA. Van parking spaces are scoped in the 2010 ADA Standards based on the number of accessible (car) spaces required. Three van spaces would be required when more than 12 car spaces are required. The ADA Standards require 13 accessible spaces when there are 650 spaces in a facility (2%) of the 13 accessible spaces 3 (1:6) must be van spaces.
2. 2.3 requires "at least one" accessible parking space to be "made available" unless "all required" accessible parking spaces are occupied. What on earth does this mean? What does "made available" mean in the context of a building code? This appears to be an operational concern, not a matter of design and construction – compliance would not be observable by an enforcing official. Since, at most, only one van space will ever be provided in any facility, what are the chances that it will be "occupied"?
3. 2.4 requires a sign stating that vehicles parked in the van space are "subject to relocation" when the space is needed by another vehicle that cannot be parked in an inaccessible space. While I think I understand the intent, nothing in this standard can compel a valet service to carry out the threat posted on the sign.
4. 2.5 requires the permit applicant to provide the AHJ a plan – nothing in these Standards can compel the AHJ to require the plan to be implemented. Furthermore, 2.5.1 and 2.5.2 require a parking attendant to determine if a car has "special controls" and whether an occupant of the car is a person with a disability. Inquires about a person's disability are generally prohibited by the Americans with Disabilities Act and, even if they were permitted, a parking attendant is not likely to be qualified to make decisions about whether, or not, a person has a disability.

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5. 2.5.1 and 2.5.2 are in conflict. One requires the parking attendant to park the car for a person with a disability in a car with special controls and the other requires the parking attendant to permit a person with a disability to self-park if their car has special controls.

Finally, this is a scoping issue that should be addressed in a building code, not the accessibility standards.

5-3– 12

502.4.2

Proposed Change as Submitted

Proponent: Gail Himes, City of Tacoma, Washington

Revise as follows:

502.4.2 Width. Access aisles serving car and van parking spaces shall be 60 inches (1525 mm) minimum in width. Building elements shall not reduce the width.

Reason: It is common for designers to locate obstructions in the access aisle. This will emphasize that this is not permissible. Reducing the width can impede or deny access to people with disabilities.

502.4.2-HIMES.doc

Committee Action

Disapproved

Committee Reason: The proposed statement is unneeded. The minimum widths are the minimums, they can't be reduced by building elements, even if the Standard doesn't have an explicit statement. 'Building elements' is undefined.

BALLOT COMMENTS

5-3.1

Commenter: Rick Lupton, Representing WABO

Ballot: Affirmative with comment:

Comment: While poorly worded, I think the proponent makes a good point. It is not clear that there can be no obstructions in the aisle space.

5-4– 12

This proposal was disapproved by the committee. No ballot or proponent comments were received. There was one ballot abstention. No further action is needed.

5-5– 12
502.5

Proposed Change as Submitted

Proponent: Gail Himes, City of Tacoma, Washington

Revise as follows:

502.5 Floor Surfaces. Parking spaces and access aisles shall comply with Section 302 and have surface slopes not steeper than 1:48. Access aisles shall be at the same level as the parking spaces they serve. Ramps shall not be located in the access aisle.

Reason: Ramps in the access aisle may impede the deployment of a ramp or lift, or create an uneven surface when entering or exiting a vehicle.

502.5-HIMES.doc

Committee Action

Disapproved

Committee Reason: The Standard requires that access aisles be level (no more than 2% slope). This prohibits anything with a greater slope including ramps, therefore this text is unnecessary.

BALLOT COMMENTS

5-5.1

Commenter: M. Bradley Gaskins, Representing NACS
Ballot: Negative with comment:

Comment: While this is already the requirement it is fairly obvious that it is confusing due to the number of ramps being built within the access aisle. This would clarify and out the issue to rest by making it obvious that ramps are not allowed in the access aisle.

5-6– 12
502.7

Proposed Change as Submitted

Proponent: Gail Himes, City of Tacoma, Washington

Revise as follows:

502.7 Identification. Where accessible parking spaces are required to be identified by signs, the signs shall include the International Symbol of Accessibility complying with Section 703.6.3.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Such signs shall be located at the head and centered on each parking space. Such signs shall be 60 inches (1525 mm) minimum above the floor of the parking space, measured to the bottom of the sign.

Reason: Accessible parking signs that are off to one side of the parking stall or shared by two stalls make it confusing for drivers and parking enforcement staff. In Washington State, the ground symbol for the parking space is optional. Centering the parking sign on the stall would reduce confusion and violations.

502.7-HIMES.doc

**Ballot Comment and Proponent Comment Agenda- July 15-19, 2013:
Proposals of 2012 submitted on the ICC A117.1-2009**

Committee Action

Disapproved

Committee Reason: The Committee was concerned that this proposed text would prohibit placement of signs at locations such as on a wall across a sidewalk from the head of the parking space. Such a location would be less hazardous than signs always on a post at the head of the stall. 'Centered' is too restrictive. Overall it was concluded that the change don't address the issue raised in the proponent's reason statement.

BALLOT COMMENTS

5-6.1

Commenter: Hope Reed, Representing NMGCD
Ballot: Negative with comment:

Comment: Parking signs need to be centered at the head of each space and this is an amendment to the New Mexico Building Code. Perhaps a range could be designated.

5-7– 12
502.9 (NEW)

Proposed Change as Submitted

Proponent: Robert D. Feibleman, HAND Construction, representing self

Add new text as follows:

502.9 Carport Structures. Carport structural supports posts are permitted to reduce the required width of parking spaces and access aisles provided the post complies with the following:

1. The post is centered on a line delineating two parking spaces or between a parking space and access aisle.
2. The post is 7 inches maximum in width and 16 inches maximum in length as measured along the delineating line;
3. The post is located 72 inches maximum from the head of the parking space.



Reason: Carport supports are not addressed and are currently not allowed in the parking space nor access aisle. The resulting narrowed point will create a maneuvering issue. The location of the post in the front third of the space allows for the structural design and for most car/van doors to open without hitting them.

502.9 (NEW)-FEIBLEMAN.doc

Committee Action

Disapproved

Committee Reason: The Committee was not persuaded this is a significant issue which requires addressing in the Standard. The structure could easily be designed to avoid any intrusion into the dimensions required for parking, access aisles and accessible routes.

BALLOT COMMENTS

5-7.1

Commenter: Rick Lupton, Representing WABO

Ballot: Affirmative with comment:

Comment: Consistent with committee action on 5-3-12.

5-8– 12

This proposal was approved by the committee. There was one abstention ballot. No other ballot or proponent comments were received. It will be included in the Public Draft.

**Ballot Comment and Proponent Comment Agenda- July 15-19, 2013:
Proposals of 2012 submitted on the ICC A117.1-2009**

5-9- 12
504

Proposed Change as Submitted

Proponent: Gail Himes, City of Tacoma, Washington

Delete without substitution as follows:

504 Stairways

504.1 General. Accessible stairs shall comply with Section 504.

504.2 Treads and Risers. All steps on a flight of stairs shall have uniform riser height and uniform tread depth. Risers shall be 4 inches (100 mm) minimum and 7 inches (180 mm) maximum in height. Treads shall be 11 inches (280 mm) minimum in depth.

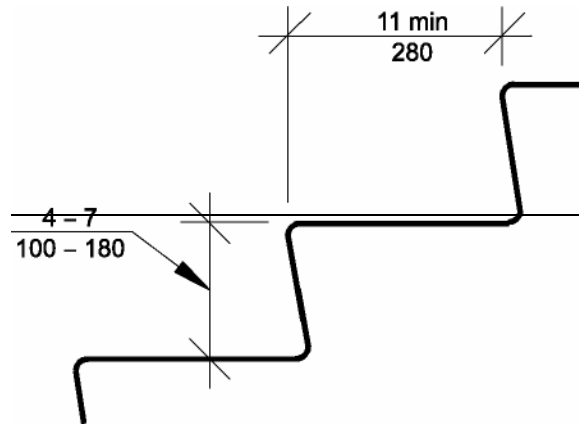


Fig. 504.2
Treads and Risers for Accessible Stairways

504.3 Open Risers. Open risers shall not be permitted.

504.4 Tread Surface. Stair treads shall comply with Section 302 and shall have a slope not steeper than 1:48.

504.5 Nosings. The radius of curvature at the leading edge of the tread shall be $\frac{1}{2}$ inch (13 mm) maximum. Nosings that project beyond risers shall have the underside of the leading edge curved or beveled. Risers shall be permitted to slope under the tread at an angle of 30 degrees maximum from vertical. The permitted projection of the nosing shall be $1\frac{1}{2}$ inches (38 mm) maximum over the tread or floor below.

504.5.1 Visual contrast. The leading 2 inches (51 mm) of the tread shall have visual contrast of dark-on-light or light-on-dark from the remainder of the tread.

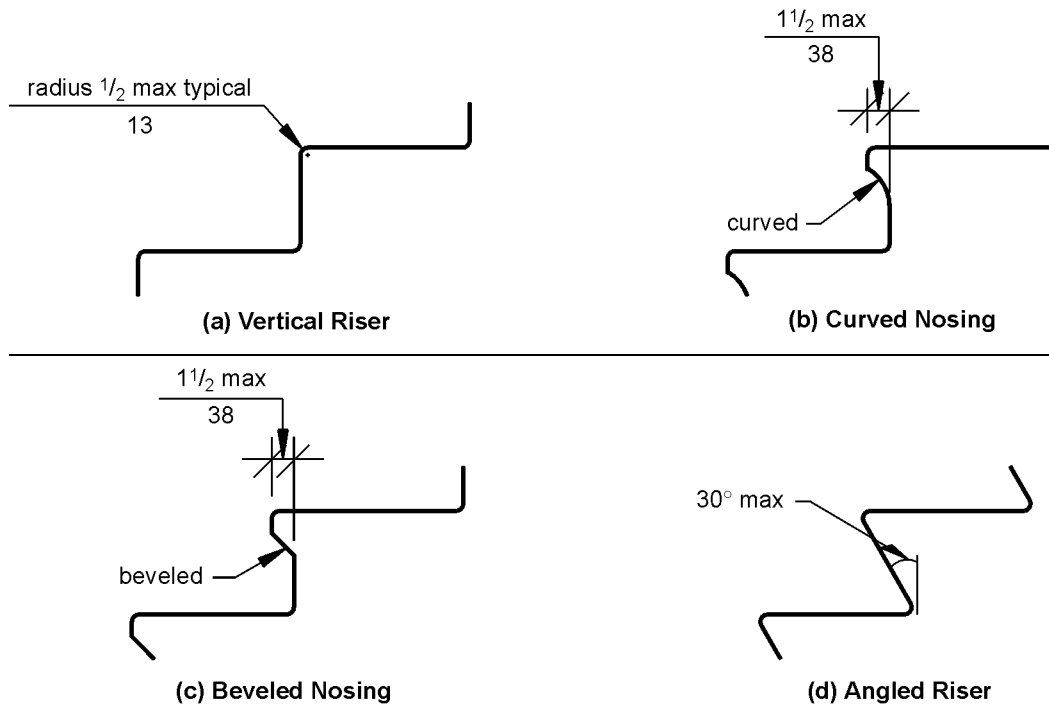


Fig. 504.5
Stair Nosings

504.6 Handrails. Stairs shall have handrails complying with Section 505.

504.7 Wet Conditions. Stair treads and landings subject to wet conditions shall be designed to prevent the accumulation of water.

504.8 Lighting. Lighting for interior stairways shall comply with Section 504.8.

504.8.1 Illumination Level. Lighting facilities shall be capable of providing 10 foot candles (108 lux) of illuminance measured at the center of tread surfaces and on landing surfaces within 24 inches (610 mm) of step nosings.

504.8.2 Lighting Controls. If provided, occupancy-sensing automatic controls shall activate the stairway lighting so the illuminance level required by Section 504.8.1 is provided on the entrance landing, each stair flight adjacent to the entrance landing, and on the landings above and below the entrance landing prior to any step being used.

504.9 Stair Level Identification. Stair level identification signs in raised characters and braille complying with Sections 703.3 and 703.4 shall be located at each floor level landing in all enclosed stairways adjacent to the door leading from the stairwell into the corridor to identify the floor level. The exit door discharging to the outside or to the level of exit discharge shall have a sign with raised characters and braille stating "EXIT."

Reason: These requirements are in International Building Code Section 1009. Stairs are not considered an accessible route of travel under the 2009 International Building Code, Chapter 11 or ICC/ANSI A117.1, Chapter 4.

504-HIMES.doc

Committee Action

Disapproved

Committee Reason: The proposal is inappropriate for two key reasons: 1. The Standard contains provisions for stairways which are not found in the IBC; deleting these provisions would eliminate those additional requirements. 2. IBC is not the only document which could be used to reference the A117.1; if the other referenced standard do not have adequate stairway provisions, again deleting such from the Standard would be a disservice.

There was considerable debate over this issue. Among the issues raised are:

1. Discrepancies between the IBC and the Standard, both have provisions not in the other.
2. A concern over how stairways have been addressed in the ICC processes.
3. The contrasting leading tread requirement is not in the IBC.
4. While stairways are not part of an 'accessible' route, people with disabilities do use stairways and therefore provisions regarding stairways should remain in the Standard.

BALLOT COMMENTS

5-9.1

Commenter: Rick Lupton, Representing WABO

Ballot: Affirmative with comment:

Comment: The committee's response to this proposal and 5-10-12 begs the question "what is an accessible stair". It appears, from committee comments that an accessible stair, though not part of an accessible means of egress, is one that serves an accessible portion of a building –thus recognizing that not all people with disabilities use a wheelchair. A definition would be helpful though it edges on scoping.

5-9.2

Commenter: Kim Paarlberg, Representing

Ballot: Negative with comment:

Comment: Stairways are addressed adequately in the building codes. The provisions in the ICC A117.1 do not address stairway provisions sufficiently (i.e., curved stairways, spiral stairways, guards).

5-10– 12

504.1, 504.2, 504.3, 504.4, 504.5, 504.5.1, 504.6, 504.6.1 (New), 504.6.2 (New), 504.6.3, 504.7, 504.8 (New), 504.9 (New), 504.10, 504.11

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

504.1 General. Accessible stairs shall comply with Section 504.

EXCEPTION: Stepped aisles providing access to tiered seating are not required to comply with this section.

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Proposals of 2012 submitted on the ICC A117.1-2009**

504.2 Treads and Risers. All steps on a flight of stairs shall have uniform riser height and uniform tread depth. Risers shall be 4 inches (100 mm) minimum and 7 inches (180 mm) maximum in height. Treads shall be 11 inches (280 mm) minimum in depth. The riser height shall be measured vertically between the nosings of adjacent treads. Rectangular tread depths shall be 11 inches (279 mm) minimum measured horizontally between the vertical planes of the foremost projection of adjacent treads and at a right angle to the tread's nosing. Winder treads shall have a minimum tread depth of 11 inches (279 mm) between the vertical planes of the foremost projection of adjacent treads at the intersections with the walkline and a minimum tread depth of 10 inches (254 mm) within the clear width of the stair.

504.3 Dimensional uniformity. Stair treads and risers shall be of uniform size and shape. The tolerance between the largest and smallest riser height or between the largest and smallest tread depth shall not exceed 3/8 inch (9.5 mm) in any flight of stairs. The greatest winder tread depth at the walkline within any flight of stairs shall not exceed the smallest by more than 3/8 inch (9.5 mm).

EXCEPTIONS:

1. Consistently shaped winders, complying with Section 504.2, differing from rectangular treads in the same stairway flight.
2. Risers complying with Section 504.3.1.

504.3.1 Sloping public way. Where the bottom or top riser adjoins a sloping public way, walkway or driveway having an established grade and serving as a landing, the bottom or top riser is permitted to be reduced along the slope to less than 4 inches (102 mm) in height, with the variation in height of the bottom or top riser not to exceed one unit vertical in 12 units horizontal (8-percent slope) of stairway width. The nosings or leading edges of treads at such nonuniform height risers shall have a distinctive marking stripe, different from any other nosing marking provided on the stair flight. The distinctive marking stripe shall be visible in descent of the stair and shall have a slip-resistant surface. Marking stripes shall have a width of at least 1 inch (25 mm) but not more than 2 inches (51 mm).

504.4 ~~504.3~~ Open Solid Risers. Open risers shall not be permitted. Risers shall be solid.

EXCEPTIONS:

1. Solid risers are not required for stairways provided that the opening between treads does not permit the passage of a sphere with a diameter of 4 inches (102 mm).
2. Solid risers are not required for occupancies in Group I-3 or in Group F, H and S occupancies other than areas accessible to the public. There are no restrictions on the size of the opening in the riser.
3. Solid risers are not required for spiral stairways.

504.5 ~~504.4~~ Tread Stairway walking Surface. Stair treads shall comply with Section 302 and shall have a slope not steeper than 1:48. The walking surface of treads and landings of a stairway shall not be sloped steeper than one unit vertical in 48 units horizontal (2-percent slope) in any direction. Stairway treads and landings shall have a solid surface. Finish floor surfaces shall be securely attached.

EXCEPTIONS:

1. Openings in stair walking surfaces shall be a size that does not permit the passage of 1/2-inch-diameter (12.7 mm) sphere. Elongated openings shall be placed so that the long dimension is perpendicular to the direction of travel.
2. In Group F, H and S occupancies, other than areas of parking structures accessible to the public, openings in treads and landings shall not be prohibited provided a sphere with a diameter of 1 1/8 inches (29 mm) cannot pass through the opening.

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504.6 504.5 Nosings. The radius of curvature at the leading edge of the tread shall be $4\frac{1}{2}$ 9/16inch (43 14.3 mm) maximum. Nosings that project beyond risers shall have the underside of the leading edge curved or beveled. Beveling of nosings shall not exceed 9/16 inch (14.3 mm). Risers shall be permitted to slope under the tread at an angle of 30 degrees maximum from vertical.

504.6.1 Nosing projection size. The permitted projection of the nosing shall be $4\frac{1}{2}$ 1-1/4 inches (38 32 mm) maximum over the tread or floor below.

504.6.2 Nosing projection uniformity. All nosing projections of the leading edges shall be of uniform size, including the projections of the nosings leading edge of the floor at the top of a flight.

504.5.4 504.6.3 Visual contrast. The leading 2 inches (51 mm) of the tread shall have visual contrast of dark on-light or light-on-dark from the remainder of the tread.

504.7 Stairway landings. There shall be a floor or landing at the top and bottom of each stairway. The width of landings shall not be less than the width of stairways they serve. Every landing shall have a minimum width measured perpendicular to the direction of travel equal to the width of the stairway. Where the stairway has a straight run the depth need not exceed 48 inches (1219 mm). Doors opening onto a landing shall not reduce the landing to less than one-half the required width. When fully open, the door shall not project more than 7 inches (178 mm) into a landing. When wheelchair spaces are required on the stairway landing as an area of refuge, the wheelchair space shall not be located in the required width of the landing and doors shall not swing over the wheelchair spaces.

504.8 Curved stairways. Curved stairways with winder treads shall have treads and risers in accordance with Section 504.2 and the smallest radius shall not be less than twice the required width of the stairway.

EXCEPTION: The radius restriction shall not apply to curved stairways for occupancies in Group R-3 and within individual dwelling units.

504.9 Spiral stairways. Spiral stairways are permitted to be used as a component in the means of egress only within dwelling units or from a space not more than 250 square feet (23 m²) in area and serving not more than five occupants, or from technical production areas.

A spiral stairway shall have a 7 1/2-inch (191 mm) minimum clear tread depth at a point 12 inches (305 mm) from the narrow edge. The risers shall be sufficient to provide a headroom of 78 inches (1981 mm) minimum, but riser height shall not be more than 9 1/2 inches (241 mm). The minimum stairway clear width at and below the handrail shall be 26 inches (660 mm).

504.6 504.10 Handrails. Stairs shall have handrails complying with Section 505.

504.7 504.11 Wet Conditions. Stair treads and landings subject to wet conditions shall be designed to prevent the accumulation of water.

Reason: The quantity of change proposals submitted by International Code Council is reflective of three elements of our work: 1. ICC is the Secretariat for the Standard and some changes reflect inconsistencies or improvements suggested by staff; 2. ICC develops and publishes a Commentary on the standard and writing the commentary illuminates issues of the text and figures; and 3. ICC provides an interpretation service for the standard which results in the observation of provisions the users find most confusing.

If the A117 is going to address stairways, they should address straight, curved and spiral stairways. They should also include safety issues they do not currently address like uniformity, landings, walk lines, etc. The text of this proposal is based on the 2012 International Building Code.

504-PAARLBERG.doc

Committee Action

Disapproved

Committee Reason: The Committee concluded that putting all of the IBC stairway provisions into the Standard was as inappropriate as is taking them out as proposed by 5-9-12. Of particular concern were provisions allowing winders and curved stairways; the clarity of provisions for spiral stairways; and the provisions regarding the size of openings allowed in risers.

BALLOT COMMENTS

5-10.1

Commenter: Kim Paarlberg, Representing ICC
Ballot: Negative with comment:

Comment: The ICC A117.1 needs to either delete the stairway provisions (see 5-9) or improve them to address all types of stairways (see 5-10).

Proponent Comment

5-10.2

Commenter: Kim Paarlberg, Representing ICC

Request the proposal be Approved as Submitted.

Reason: The current text for stairways in ICC A117.1 does not address several serious stairway safety issues. There are no provisions for curved or spiral stairways. Dimensional uniformity on treads and risers, limitations on opening and nosing shapes are serious safety issues for persons with mobility impairments. The current text does not address when a stairway intersects with a sloped sidewalk. There are no requirements for stairway landings, at the top, bottom or between flights.

The proposal does not change any requirements currently in the standard, but does address many gaps in requirements. If they committee wants to address stairways in ICC A117.1, the provisions should be complete.

5-11– 12

504.5

Proposed Change as Submitted

Proponent: David W. Cooper, Stairway Manufacturing and Design Consulting, representing Stairway Manufacturers Association

Revise as follows:

504.5 Nosings. ~~The radius of curvature or bevel at the nosing shall not exceed ½ inch (12.7 mm) maximum from at the leading edge of the tread shall be ½ inch (13 mm) maximum.~~ Nosings that project beyond risers shall have the underside of the leading edge curved or beveled. Risers shall be permitted to slope under the tread at an angle of 30 degrees maximum from vertical. The permitted projection of the nosing shall be 1 ½ inches (38 mm) maximum over the tread or floor below.

Reason: This proposal provides needed correlation with changes in the building code recognizing that the radius of the curvature is a nonfactor but rather the limitation of the distance from the leading edge.

504.5-COOPER.doc

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Committee Action

Disapproved

Committee Reason: The Committee was not convinced that change improved the Standard. There was concern that a beveled nosing would present maintenance issues.

BALLOT COMMENTS

5-11.1

Commenter: Gene Boecker, Representing NATO
Ballot: Negative with comment:

Comment: A bevel is a standard way to address the edge of the nosing on concrete stair design. It has been used for years and should be included in the standard. The length of the nosing deformation is the same as that for a radius but less costly to construct in concrete work. If there is a concern about potential maintenance issues then those should be identified. I am not aware of maintenance problems with the beveled edge design.

5-11.2

Commenter: David W. Cooper, Representing SMA
Ballot: Negative with comment:

Comment: The proposal correlates with the ICC building code. The SMA will submit a modification by public comment to clarify.

5-11.3

Commenter: Barbara Huelat, Representing ASID
Ballot: Negative with comment:

Comment: Agree with committee.

Proponent Comment

5-11.4

Commenter: David W. Cooper, Representing SMA

Revise the proposal as follows:

504.5 Nosings. ~~The radius of curvature~~ Rounding or beveling at the leading edge of the tread shall ~~be not exceed the limit of a~~ ½ inch (13 mm) radius maximum. Nosings that project beyond risers shall have the underside of the leading edge curved or beveled. Risers shall be permitted to slope under the tread at an angle of 30 degrees maximum from vertical. The permitted projection of the nosing shall be 1 ½ inches (38 mm) maximum over the tread or floor below.

Reason: I am opposed to the committee action but recognize that this modification meets the intent of the original proposal. It more simply allows the use of a bevel or curvature while succinctly describing safe limits based on that which is currently allowed in the standard and providing additional design options needed. The limit established would restrict encroachment on to the flat portion of the tread and prevent any beveling that would remove more material than that described by a ½ inch radius. Rounding and Beveling of the leading edge provide for contrast by modeling the reflected light, decreasing likely maintenance and the cost to repair chipped and broken edges that are common when the nosing is left sharp, and offer a softer edge when bumped.

5-12- 12

504.5.1

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

504.5.1 Visual contrast. At the nosing of a stairway landing and at the nosing of the bottom tread, the leading 2 inches (51 mm) of the landing or tread shall have visual contrast of dark on-light or light-on-dark from the remainder of the tread.

Reason: The quantity of change proposals submitted by International Code Council is reflective of three elements of our work: 1. ICC is the Secretariat for the Standard and some changes reflect inconsistencies or improvements suggested by staff; 2. ICC develops and publishes a Commentary on the standard and writing the commentary illuminates issues of the text and figures; and 3. ICC provides an interpretation service for the standard which results in the observation of provisions the users find most confusing.

Cadence is established within two or three steps, so you do not look down at your feet. The location where the change is from level to steps and from steps to level is where the visual cues are relevant.



504.5.1 (revised)-PAARLBERG.doc

Committee Action

Disapproved

Committee Reason: The Committee felt this would result in dangerous conditions. The issue isn't simply cadence but one of providing a clear visual guide to where each step is located. Without marking, stairs can disappear as is demonstrated by the proponent's own photograph. Markings are vital in conditions of low light levels such as aisle stairways. See action taken on 5-13-12.

BALLOT COMMENTS

5-12.1

Commenter: Barbara Huelat, Representing ASID

Ballot: Negative with comment:

Comment: Agree with committee.

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5-13– 12
504.5.1

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

504.5.1 Visual contrast. The leading 2 inches (51 mm) of the landing or tread shall have visual contrast of dark on-light or light-on-dark from the remainder of the tread.

EXCEPTION: Where a stair has detectable warnings complying with Section 705 at the leading edge of each landing, visual contrast is not needed provided the detectable warnings extend the full width of the stairway and extend 24 inches minimum from the nosing.

Reason: The quantity of change proposals submitted by International Code Council is reflective of three elements of our work: 1. ICC is the Secretariat for the Standard and some changes reflect inconsistencies or improvements suggested by staff; 2. ICC develops and publishes a Commentary on the standard and writing the commentary illuminates issues of the text and figures; and 3. ICC provides an interpretation service for the standard which results in the observation of provisions the users find most confusing.

Cadence is established within two or three steps, so you do not look down at your feet. The application shown is in the Air and Space Museum in Washington D.C. This may be a good option for high traffic stairways where the contrasting stripe might be worn off, or if the stairway is patterned so that there contrasting color is in question, or in stairways where there is a requirement for photoluminescent striping also required.

Committee Action

Approval as Modified

Modification

504.5.1 Visual contrast. The leading 2 inches (51 mm) of the landing ~~or~~ and tread shall have visual contrast of dark on-light or light-on-dark from the remainder of the tread.

~~EXCEPTION:~~ ~~Where a stair has detectable warnings complying with Section 705 at the leading edge of each landing, visual contrast is not needed provided the detectable warnings extend the full width of the stairway and extend 24 inches minimum from the nosing.~~

Committee Reason: The Committee deleted the exception because of concerns that placing detectable warnings on a stairway landing introduces a hazard. The proposal does provide clarity by adding landings to the requirement, but it needs to be landings and treads. Landings are often the 'top step' tread of a stairway and therefore this change clarifies that, as such, landings need to be marked.

BALLOT COMMENTS

5-13.1

Commenter: Kim Paarlberg, Representing ICC
Ballot: Affirmative with comment:

Comment: The IBC requires luminous path markings on stairways in highrises. The change in the depth of the stripe will allow for those markings to also serve as the visual contrast on stairways. The added language should improve understanding and increase consistency in application. In addition, this will allow a little bit of freedom in design with no impact on the visual contrast.

Further revise as follows:

504.5.1 Visual contrast. A solid and continuous stripe shall be applied to the horizontal leading edge 2 inches (51 mm) of the landings and each tread and shall extend the full length of the step. The stripe shall have a minimum horizontal width of 1 inch (25 mm) and a maximum width of 2 inches (51mm). The leading edge of the stripe shall be placed a maximum of ½ inch (13mm) from the leading edge of the step and shall not overlap the leading edge of the step by more than ½ inch (13 mm). The stripes shall have visual contrast of dark on-light or light-on-dark from the remainder of the tread or landing.

Proponent Comment

5-13.2

Commenter: Kim Paarlberg, Representing ICC

Further modify the proposal with the following:

504.5.1 Visual contrast. A solid and continuous stripe shall be applied to the horizontal leading edge 2 inches (51 mm) of the landings and each tread and shall extend the full length of the step. The stripe shall have a minimum horizontal width of 1 inch (25 mm) and a maximum width of 2 inches (51mm). The leading edge of the stripe shall be placed a maximum of ½ inch (13mm) from the leading edge of the step and shall not overlap the leading edge of the step by more than ½ inch (13 mm). The stripes shall have visual contrast of dark on-light or light-on-dark from the remainder of the tread or landing.

Reason: The IBC requires luminous path markings on stairways in highrises. The change in the depth of the stripe will allow for those markings to also serve as the visual contrast on stairways. The added language should improve understanding and increase consistency in application. In addition, this will allow a little bit of freedom in design with no impact on the visual contrast.

5-14– 12

504.8.1

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

504.8.1 Illumination Level. Lighting facilities shall be capable of providing ~~40~~10.8 foot-candles (~~408~~10.8 lux) of illuminance measured at the center of tread surfaces and on landing surfaces within 24 inches (610 mm) of step nosings.

Reason: The quantity of change proposals submitted by International Code Council is reflective of three elements of our work: 1. ICC is the Secretariat for the Standard and some changes reflect inconsistencies or improvements suggested by staff; 2. ICC develops and publishes a Commentary on the standard and writing the commentary illuminates issues of the text and figures; and 3. ICC provides an interpretation service for the standard which results in the observation of provisions the users find most confusing.

The building code requires 1 footcandle for means of egress lighting. The standard to charge photoluminescent stripes requires 1 footcandle. OSHA asks for 5 footcandles for exit ways and 3 footcandles for access ways. What is the justification for 10 footcandles in ICC A117.1.

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Committee Action

Disapproved

Committee Reason: The change is not consistent with provisions in the NFPA 101 standard. The 101 requires 10 footcandle of light when a stairway is in use, but it can be reduced to 1 footcandles at other times.

BALLOT COMMENTS

5-14.1

Commenter: Rick Lupton, Representing WABO

Ballot: Affirmative with comment:

Comment: The commentary should clarify that while this standard requires capability of 10 foot candles, the scoping code has jurisdiction of required illumination levels. 10 foot candles is a lot of wasted energy in an unoccupied stair.

Revise as follows:

5-14.2

Commenter: Allan B. Fraser, Representing NFPA

Ballot: Negative with comment:

Revise as follows:

504.8.1 Illumination Level. Lighting facilities shall be capable of providing ~~10 foot candles (108 lux) of illuminance~~ illumination of stairs measured at the center of tread surfaces and on landing surfaces within 24 inches (610 mm) of step nosings- as follows:

1. A 1 foot candle (10.8 lux) minimum illumination at times other than conditions of stair use
2. A 10 foot candle (108 lux) minimum illumination during conditions of stair use
3. The transition from 1 foot candle (10.8 lux) to 10 foot candle (108 lux) under conditions of stair use shall be permitted to be achieved by automatic, motion sensor-type lighting switches provided the switch controllers comply with all of the following:
 - a. The switch controllers are equipped for fail-safe operation and evaluated for this purpose
 - b. The motion sensor is activated by occupant movement on the stair or stair landings
 - c. The illumination timers are set for a minimum 15-minute duration

The 10 ft-candle illumination currently required for stairs and stair landings needs to be retained, as lesser lighting levels make stair use too dangerous for persons with low vision and most anyone with mobility impairment. Yet, the 10 ft-candle illumination level is needed only under conditions of stair use. Illuminating stairs to the 10 ft-candle illumination level under conditions other than stair use is wasteful of natural resources and can lead to disablement of the system. It is better to permit automatic, motion sensor-type lighting switches to control the transition from 1 ft-candle to 10 ft-candle than to foolishly believe that the stair will be illuminated to the full 10 ft-candle level at all times. Once the illumination level has been increased in response to occupant movement on the stair or stair landing, the illumination level needs to be maintained for a period of 15 minutes in recognition that stair users might stop to rest on the stair and another motion detector might not pick up occupant motion until the occupant has traveled an additional stair tread or two.

The criteria proposed are well founded in the NFPA 101®, *Life Safety Code*®, a code devoted wholly to occupant life safety. The criteria proposed also respond to the Committee Reason provided for the Disapproval of 5-14- 12. The proponent of 5-14- 12 should be concerned with raising the level of safety in the IBC for all stair users, rather than lowering the level of safety in ANSI A117.1 from what is currently required.

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5-14.3

Commenter: Kim Paarlberg, Representing ICC
Ballot: Negative with comment:

Comment: The committee's reason states that NFPA 101 still says 10 footcandles. I have been advised that the 2012 edition of NFPA has been revised to 1 footcandle. The IBC also uses 1 footcandle for means of egress lighting. This proposal originally went in because the 10 footcandles was in NFPA 101. This A117.1 standard should be consistent.

Proponent Comment

5-14.4

Commenter: Kim Paarlberg, Representing ICC

Request the proposal be Approved as Submitted:

Reason: The committee's reason states that NFPA 101 still says 10 footcandles. I have been advised that the 2012 edition of NFPA has been revised to 1 footcandle. The IBC also uses 1 footcandle for means of egress lighting. This proposal originally went in because the 10 footcandles was in NFPA 101. This A117.1 standard should be consistent with the two main safety standards in the United States.

5-15– 12

504.8.2

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

504.8.2 Lighting Controls. ~~If provided, occupancy sensing automatic controls shall activate the stairway lighting so the illuminance level required by Section 504.8.1 is provided on the entrance landing, each stair flight adjacent to the entrance landing, and on the landings above and below the entrance landing prior to any step being used.~~

504.8.2 Automatic lighting controls. Automatic lighting controls shall be permitted to activate the required illumination for the means of egress provided they meet all of the following conditions:

1. The controls shall be configured to provide the required illumination within each room or space while occupied.
2. Where provided, occupant sensors shall activate the required illumination for a minimum duration of 15 minutes.
3. Where the automatic lighting controls fail, the controls shall fail in the on or operating state.
4. Occupant sensors shall not turn extinguish lighting to charge luminous egress path markings
5. All designated emergency lighting luminaries in the means of egress path shall operate in the event of a loss of power.
6. The automatic lighting controls shall be tested as a component of the emergency lighting equipment in accordance with Section 604.5 of the *International Fire Code*.

Reason: The quantity of change proposals submitted by International Code Council is reflective of three elements of our work: 1. ICC is the Secretariat for the Standard and some changes reflect inconsistencies or improvements suggested by staff; 2. ICC develops and publishes a Commentary on the standard and writing the commentary illuminates issues of the text and figures; and 3. ICC provides an interpretation service for the standard which results in the observation of provisions the users find most confusing.

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If there are automatic controls in stairways, they should be addressed in a totally safe manor or removed from the A117.1 standard as outside the scope.

504.8 #2-PAARLBERG.doc

Committee Action

Disapproved

Committee Reason: While the Committee felt the proposal had merit, there were concerns about specific provisions. Does this need to be limited to means of egress stairways? Why only 15 minutes; should it be as long as stairway is in use?

BALLOT COMMENTS

5-15.1

Commenter: Rick Lupton, Representing WABO
Ballot: Negative with comment:

Comment: I would recommend a modification that strikes only "by Section 504.8.1" from the current language because Section 504.8.1 does not require an illumination level, only a capability. The scoping code more properly addresses required illumination levels. Otherwise the proposal belongs in the scoping code.

5-15.2

Commenter: Kim Paarlberg, Representing ICC
Ballot: Negative with comment:

Comment: The ICC A117.1 committee felt that this proposal should be brought back with modifications.

A modification will be provided for this proposal.

5-15.3

Commenter: Hope Reed, Representing NMGCD
Ballot: Negative with comment:

Comment: This is a good start to improve automatic lighting in stairways.

Proponent Comment

5-15.4

Commenter: Kim Paarlberg, Representing ICC

Further revise the proposal as follows:

504.8.2 Automatic lighting controls. Automatic lighting controls shall be permitted to activate the required illumination for the means of egress provided they meet all of the following conditions:

1. The controls shall be configured to provide the required illumination within each room or space while occupied.
2. Where provided, occupant sensors shall activate the required illumination for a minimum duration of 15 minutes after the occupant sensor no longer detects movement within the space.
3. Where the automatic lighting controls fail, the controls shall fail in the on or operating state.
4. Occupant sensors shall not ~~turn extinguish~~ control lighting utilized to charge luminous egress path markings
5. All designated emergency lighting luminaries in the means of egress path shall operate in the event of a loss of power.
6. The automatic lighting controls shall be tested as a component of the emergency lighting equipment in accordance with Section 604.5 of the *International Fire Code*.

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Reason: The proposal is modified to address the issue brought up by the committee regarding the duration of the lighting being on. While this might be an issue for locations other than at stairways, currently this is the only location that the A117.1 addresses lighting requirements.

The current language in 504.8.2 can be perceived as a conflict with the requirement stated in 504.8.1 as to where and how to measure appropriate lighting on a stairway.

5-16– 12

This proposal was approved by the committee. No ballot or proponent comments were received. It will be included in the Public Draft.

5-17– 12

505.3

Proposed Change as Submitted

Proponent: David W. Cooper, Stair Manufacturing and Design Consulting, representing Stairway Manufacturers Association

Revise as follows:

505.3 Open Risers. Open risers shall not be permitted.

EXCEPTION:

1. Openings that do not allow the passage of a 4 inches (102 mm) diameter sphere shall be permitted in the lower 4 inches (102 mm) of the riser height.

Reason: This proposal provides needed correlation with the building code sphere rule limitation and improved specification to require the opening in the lower portion of the riser allowing for compliance with the ADA recommended nosing profiles.

505.3-COOPER.doc

Committee Action

Disapproved

Committee Reason: Consistent with the discussion of opening and the decision to disapprove Proposal 5-10-12.

BALLOT COMMENTS

5-17.1

Commenter: David W. Cooper, Representing SMA

Ballot: Negative with comment:

Comment: The proposal complies with the ICC building code. The SMA will submit a modification by public comment.

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5-17.2

Commenter: Barbara Huelat, Representing ASID
Ballot: Negative with comment:

Comment: Agree with committee.

Proponent Comment

5-17.3

Commenter: David W. Cooper, Representing SMA

Revise the proposal as follows:

505.3 Open Risers. Open risers shall not be permitted.

EXCEPTION:

1. Openings that do not allow the passage of a 2 inches (51 mm) diameter sphere shall be permitted.

Reason: Although I would prefer the 4 inch sphere rule used in the ICC Codes, this modification of the proposal reduces the opening size based on the committees concerns and allows for more practical removal of snow, ice and debris from stairs with closed risers by describing a much smaller limit of the size of openings in closed risers.

5-18– 12

This proposal was disapproved by the committee. No ballot or proponent comments were received. No further action is needed.

5-19– 12

505.6, 505.7.2

Proposed Change as Submitted

Proponent: David W. Cooper, Stairway Manufacturing and Design Consulting, representing Stairway Manufacturers Association

Revise as follows:

505.6 Gripping Surface. Gripping surfaces shall be continuous, without interruption by newel posts, other construction elements, or obstructions.

Exceptions:

1. Handrail brackets or balusters attached to the bottom surface of the handrail shall not be considered obstructions, provided they comply with one of the following criteria options:

Option 1

1.1 The perimeter dimension of the handrail cross section is 4 inches (102 mm) minimum and 6 ¼ inches (159 mm) maximum,

1.2 Not more than 20 percent of the handrail length is obstructed,

1.3 Horizontal projections beyond the sides of the handrail occur 1 1/2 inches (38 mm) minimum below the bottom of the handrail, and provided that for each 1/2 inch (13 mm)

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- of additional handrail perimeter dimension above 4 inches (100 mm), the vertical clearance dimension of 1 1/2 inch (38 mm) can be reduced by 1/8 inch (3.2 mm), and
- 1.4 ~~Edges shall be~~ are rounded.

Option 2

- 2.1 The handrail has a noncircular cross section.
- 2.2. The perimeter dimension of the handrail cross section shall be greater than 6-1/4 inches (159 mm).
- 2.3. Horizontal projections beyond the sides of the handrail occur 2 1/4 inches (63 mm) minimum below the tallest portion of the handrail and
- 2.4 Edges are rounded.
2. Where handrails are provided along walking surfaces with slopes not steeper than 1:20, the bottoms of handrails ~~gripping surfaces~~ shall be permitted to be obstructed along their entire length where they are integral to crash rails or bumper guards.

505.7.2 Noncircular Cross Sections. Handrails with a noncircular cross section shall have a perimeter dimension of 4 inches (100 mm) minimum. Handrails with a perimeter greater than and 6 1/4 inches (159 mm) shall provide a graspable finger recess area on both sides of the profile. The finger recess shall begin within a distance of 3/4 inch (19 mm) measured vertically from the tallest portion of the profile and achieve a depth of at least 5/16 inch (8 mm) within 7/8 inch (22mm) below the widest portion of the profile. This required depth shall continue for at least 3/8 inch (10 mm) to a level that is not less than 1 3/4 inches (45mm) below the tallest portion of the profile. The minimum width of the handrail above the recess shall be 1 1/4 inches (32 mm) to a maximum of 2 3/4 inches (70 mm). ~~maximum, and~~ Handrails with a perimeter less than 6 1/4 inches (102 mm) shall have a cross-section dimension of 1 inch (25.4 mm) minimum and 2 1/4 inches (57 mm) maximum.

Reason: This proposal provides needed handrail rail shape options for the majority of users both with and without disabilities that do not use the bottom surface of the handrail, by providing handrail shape options with recesses that provide surfaces and sizes that offer preferred visual and tactile recognition, guidance, ready stabilization, greater resistance to shear forces that cause slipping.

Handrail profiles with the grip surface designed in the upper portion are not prone to interrupted loss of grip caused by "hand hopping" obstacles such as supporting elements. A constant stabilizing grip can be maintained during the full traverse of the stair or ramp. Such a grip is essential to prosthetic users.

This proposal also adds a needed minimum cross section dimension of 1 inch for non-circular cross sections to correlate with recent changes in the building code.

[Dusenberry DO, Simpson H, Dellorusso SJ](#), 2009 Jul. Effect of handrail shape on graspability. [Applied Ergonomics](#), ;40(4):657-69. Epub 2008 Oct 26.

Gray DB, 2009 Jan. [Uses and Preferences of Handrails: People with Mobility and Visual Impairments and Limitations](#)

505.6-COOPER.doc

Committee Action

Disapproved

Committee Reason: The Committee has considered similar proposals in the past. There is strong disagreement between committee members regarding the referenced studies. The proponent stated that additional studies will be available in the future. At this time the Committee was not convinced a change was warranted.

BALLOT COMMENTS

5-19.1

Commenter: David W. Cooper, Representing SMA
Ballot: Negative with comment:

Comment: The standard is too restrictive and eliminates the design and use of profiles that allow the use of a constant grip without interruption by supports. The study by DB Gray points to advantages recognized by many persons with disabilities. The SMA will submit a modification by public comment.

Proponent Comment

5-19.2

Commenter: David W. Cooper, Representing SMA

Replace with the following:

505.7 Cross Section. Handrails shall have a cross section complying with Section 505.7.1 or 505.7.2 or shall provide equivalent graspability.

Reason: The studies submitted by the proponent show that there is little difference in the performance of handrail shapes and that in a significant number of cases other profiles than those currently permitted provide additional benefits to persons with certain disabilities, benefits that are denied by the standard. Although equivalency is addressed elsewhere in the standard the language suggested in this modification was previously in the standard. Until further study can be done this change would more clearly identify that other design options could be used to benefit a wider range of disabilities. The fact that this language was dropped has implied that equivalent graspability is no longer an option.

The SMA fully intends to provide further testing of handrails for persons with disabilities in actual use on stairs and ramps. Economic conditions have not permitted this to occur during this cycle.

Dusenberry DO, Simpson H, Dellorusso SJ, 2009 Jul. Effect of handrail shape on graspability. [Applied Ergonomics](#). 40(4):657-69. Epub 2008 Oct 26. Gray DB, 2009 Jan. Uses and Preferences of Handrails: People with Mobility and Visual Impairments and Limitations.

5-20– 12

This proposal was disapproved by the committee. No ballot or proponent comments were received. No further action is needed.

5-21– 12

This proposal was disapproved by the committee. No ballot or proponent comments were received. No further action is needed.

5-22– 12

506.1, 506.2 (New), 1002.9, 1002.13, 1003.9, 1003.13

Proposed Change as Submitted

Proponent: Ed Roether, representing ADA/A117 Harmonization Task Group

Proponent: Kim Paarlberg, representing International Code Council.

STAFF NOTE – This proposal was submitted by Kim and misidentified as coming from the task group.

Revise as follows:

506.1 General. Where operable Accessible windows are provided in an accessible room or space, at least one shall have operable parts complying with Section 309. Operable windows required to provide natural ventilation shall have operable parts complying with Section 309. Operable windows required to provide an emergency escape and rescue openings shall have operable parts complying with Section 309.

EXCEPTIONS:

1. Operable windows that are operated only by employees are not required to comply with this section.
2. Operable windows in Type A units that comply with Section 1003.13.

506.2 Opening force. The opening force for opening operable windows shall be as follows:

1. 8.5 pounds (37.7 N) maximum for casement or horizontal sliding windows
2. 25 pounds (111 N) maximum for double hung windows

1002.9 Operable Parts. Lighting controls, electrical panelboards, electrical switches and receptacle outlets, environmental controls, appliance controls, ~~operating hardware for operable windows~~, plumbing fixture controls, and user controls for security or intercom systems shall comply with Section 309.

EXCEPTIONS:

1. Receptacle outlets serving a dedicated use.
2. Where two or more receptacle outlets are provided in a kitchen above a length of counter top that is uninterrupted by a sink or appliance, one receptacle outlet shall not be required to comply with 309.
3. Floor receptacle outlets.
4. HVAC diffusers.
5. Controls mounted on ceiling fans.
6. Where redundant controls other than light switches are provided for a single element, one control in each space shall not be required to be accessible.
7. Reset buttons and shut-offs serving appliances, piping and plumbing fixtures.
8. Electrical panelboards shall not be required to comply with Section 309.4.

1002.13 Windows. Operable windows shall comply with Section ~~1002.13~~ 506.1.

EXCEPTIONS:

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1. Windows in kitchens are not required to comply with this section.
2. Windows in bathrooms are not required to comply with this section.

1002.13.1 Natural ventilation. ~~Operable windows required to provide natural ventilation shall comply with Sections 309.2 and 309.3.~~

1002.13.2 Emergency escape. ~~Operable windows required to provide an emergency escape and rescue opening shall comply with Section 309.2.~~

1003.9 Operable Parts. Lighting controls, electrical panelboards, electrical switches and receptacle outlets, environmental controls, appliance controls, ~~operating hardware for operable windows,~~ plumbing fixture controls, and user controls for security or intercom systems shall comply with Section 309.

EXCEPTIONS:

1. Receptacle outlets serving a dedicated use.
2. Where two or more receptacle outlets are provided in a kitchen above a length of counter top that is uninterrupted by a sink or appliance, one receptacle outlet shall not be required to comply with Section 309.
3. Floor receptacle outlets.
4. HVAC diffusers.
5. Controls mounted on ceiling fans.
6. Where redundant controls other than light switches are provided for a single element, one control in each space shall not be required to be accessible.
7. Reset buttons and shut-offs serving appliances, piping and plumbing fixtures.
8. Electrical panelboards shall not be required to comply with Section 309.4.

1003.13 Windows. Operable windows shall comply with Section 1003.13.

1003.13.1 Natural ventilation. Operable windows required to provide natural ventilation shall comply with Sections 309.2 and 309.3.

1003.13.2 Emergency escape. Operable windows required to provide an emergency escape and rescue opening shall comply with Section 309.2.

Reason: The ADA/A117 Harmonization Task Group (HTG) was created as a task group of the A117.1 Committee to compare the 2010 ADA with the 2009 A117.1 Standard. The HTG has recommend a series of changes through a set of change proposals. The HTG is recommending changes, for the most part, address where the ADA was viewed as more stringent than the A117. Where the A117 contained provisions not addressed in the ADA, these were not considered a conflict needing action to amend the A117. In addition there are a number of places where the ADA and A117.1 are different as a result of specific actions, by the A117.1 Committee during the development of the 2009 edition, to remain or create a difference where, in the judgment of the committee the ADA was deficient.

Section: ADA 229 Windows

ADA 229.1 General. Where glazed openings are provided in *accessible* rooms or *spaces* for operation by occupants, at least one opening shall comply with 309. Each glazed opening required by an *administrative authority* to be operable shall comply with 309.

EXCEPTION:

1. Glazed openings in *residential dwelling units* required to comply with 809 shall not be required to comply with 229.
2. Glazed openings in guest rooms required to provide communication features and in guest rooms required to comply with 206.5.3 shall not be required to comply with 229.

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506.1 - In ICC A117.1 terminology – The exceptions are basically for Type A dwelling units and non-accessible hotel rooms. 'Operation by occupants' is basically an employee only exception. The only operable windows 'required by the administrative authority' is for ventilation or emergency escape.

506.2 – This is not coordination, but there is the question if the operable parts includes not only opening the locks and latches, but lifting the sash. The pounds force is from the window standards as a start. This could be changed to any force the committee wants. Remember last cycle that they window industry said that there was no double hung on the market that could meet the force requirements. An option would be to say that an add on could get the 5 lbs. force.

1002.9 & 1003.9 – If 1002.13 and 1003.13 is going to address windows, then window hardware should not also be in the operable parts section. This is currently how we address doors and door hardware, so that would be consistent.

1002.13 – Accessible units are required to comply with the accessible window provisions. Question – I understand that hotel rooms and dorm rooms would be operated by residents, but is the same considered for hospitals and nursing homes? Or would their windows be operated by employees? The exceptions for kitchens and bathrooms is because the window in the kitchen is typically over the sink and the window in the bathroom may be elevated for privacy or have a fixture in the immediate area. I could not find a similar exception in ADA, but this seemed logical and was in ICC A117.1 last cycle.

1003.13 – Windows in Type A units are exempted under ADA. For a total match, this would be deleted. It is shown here to see if the committee wants to match, or would prefer to exceed as currently written.

506.1-ROETHER.doc

Committee Action

Disapproved

Committee Reason: Although this proposal was labeled as coming from the Harmonization Task Group, it was quickly recognized that this was not a harmonization issue. There were concerns expressed that the proposal was, in part, a scoping provision. Some felt this was reducing accessibility below that required by the Standard. While it addressing opening force, it is silent on closing forces. There were no consensus on how bathroom and kitchen windows are addressed. At the same time there were opinions seeking clarity on the application of this provision of the Standard.

BALLOT COMMENTS

5-22.1

Commenter: Kim Paarlberg, Representing ICC

Ballot: Negative with comment:

Comment: The door and window manufactures association would like to work with the ICC A117.1 committee to develop a complete proposal for windows.

There will be a modification for this proposal.

Proponent Comments

5-22.2

Commenter: Kim Paarlberg, Representing ICC

Further revise as follows:

506.1 General. Where operable windows are provided in an accessible room or space, at least one shall be accessible and have operable parts complying with ~~Section 309~~ Sections 309.2, 309.3 and an operating force complying with Section 506.2. Where operable windows are required to provide natural ventilation ~~shall have operable parts complying with Section 309.~~ or operable windows are required to provide an emergency escape and rescue openings ~~shall have operable parts complying with Section 309~~ that window shall be the accessible operable window.

EXCEPTIONS:

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3. Operable windows that are operated only by employees are not required to comply with this section.
4. Operable windows in Type A units that comply with Section 1003.13.
5. Operable skylights are not required to comply with this section.

506.2 Opening Operating force. The operating force for windows includes forces for opening, closing, locking and unlocking and shall be determined in accordance with AAMA 513. Operable parts shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required for locking and unlocking shall be 22.5 pounds (100 N) maximum. The opening operating force for opening and closing operable windows shall be as follows:

3. 10 8.5 pounds (45 37.7 N) maximum for casement or horizontal sliding windows
4. 45 25 pounds (200 111 N) maximum for double hung windows
5. 30 pounds (135 N) for awning, hopper and projected windows
6. 25 pounds (115 N) for horizontal sliding windows

Reason: This proposal is indicated as coming from the ADA/A117 Harmonization study group. While this was discussed during the teleconferences, the timing was such that the study group did not have the opportunity to review it. Therefore, Kim Paarlberg proposed this instead. This fact was brought up during the testimony at the July meeting.

The ICC A117.1 committee was looking at appropriate forces for windows during the last cycle as well. The new requirements for wind resistance and energy efficiency has affected the weight and operation of many types of windows. For example, many homes now typically have double and triple pane glass windows instead of single pane windows that were common many years ago. While the original change was proposed by Kim Paarlberg of ICC, Kim is working with the AAMA in an effort to provide to the committee expert information on the design, construction and requirements placed on windows today.

The numbers provided in this proposal were maximum forces required based on 4580 windows tested in accordance with AAMA/WDMA/CSA 101/I.S.2/A440, as required by the IBC and IRC. The tests include four performance classes of windows and 8 operator types. The classes determined the tested window size, and is based on expected end use and common size. For example, a hung window in a high rise building would have a tested size of 59 inches x 98 inches (1500 x 2500 mm), while a hung window for a single family home would have a tested size of 40 inches x 63 inches (1000 x 1600 mm). The forces given here are based on the largest window.

A reference to the AAMA 513 standard would provide a consistent way to measure the forces required to open, close, lock and unlock many types of operable windows. This should improve compliance with whatever numbers are finally decided on.

The intent is not necessarily to set the operable window force at these proposed levels as much as it is to indicate to the committee the types of forces on these windows that exist in the current market. While there are add-ons for hung windows to reduce this force, there are not similar devices available for casement and awning type windows. The add-ons currently on the market are not very attractive, so if provided they are often removed. On the other hand, if needed by an individual, they can be added, similar to screwing up grab bars on walls where blocking is provided.

Regardless of operator type, there is additional cost incurred in providing a window that can operate with no more than 5 lbs. force. The difficulty of providing a window that can operate with no more than 5 lbs. force, the negative aesthetics and increase in cost all increase the likelihood that a fixed window will be provided instead of an operable one.

The AAMA would like the opportunity to work with the ICC A117.1 committee to establish requirements that could reasonably be met by at least a percentage of windows available on the market. The current requirement of 5 lbs. unfortunately leads to may Accessible and Type A units only having fixed windows.

5-22.3

Commenter: Kim Paarlberg, Representing ICC

Request for this portion as submitted:

1002.9 Operable Parts. Lighting controls, electrical panelboards, electrical switches and receptacle outlets, environmental controls, appliance controls, ~~operating hardware for operable windows~~, plumbing fixture controls, and user controls for security or intercom systems shall comply with Section 309.

EXCEPTIONS:

9. Receptacle outlets serving a dedicated use.
10. Where two or more receptacle outlets are provided in a kitchen above a length of counter top that is uninterrupted by a sink or appliance, one receptacle outlet shall not be required to

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- comply with 309.
11. Floor receptacle outlets.
 12. HVAC diffusers.
 13. Controls mounted on ceiling fans.
 14. Where redundant controls other than light switches are provided for a single element, one control in each space shall not be required to be accessible.
 15. Reset buttons and shut-offs serving appliances, piping and plumbing fixtures.
 16. Electrical panelboards shall not be required to comply with Section 309.4.

1002.13 Windows. Operable windows shall comply with Section ~~4002.13~~ 506.1.

EXCEPTIONS:

3. Windows in kitchens are not required to comply with this section.
4. Windows in bathrooms are not required to comply with this section.

~~**1002.13.1 Natural ventilation.** Operable windows required to provide natural ventilation shall comply with Sections 309.2 and 309.3.~~

~~**1002.13.2 Emergency escape.** Operable windows required to provide an emergency escape and rescue opening shall comply with Section 309.2.~~

Reason: If we are going to deal with window hardware and opening force separately, it should be removed from the general operable parts list and dealt with in 1002.13. This would be consistent with how we handle doors.

The reference back to 506.1 would put the Accessible units in line with windows in public spaces. Requirements should be consistent regardless of what numbers are finally decided on. The exceptions for windows in kitchens is because the typical window is over the sink, and the exception for bathrooms is because windows are typically raised for privacy or over the tub. These exceptions would be consistent with what were the permitted in the 2003 ICC A117.1.

5-22.4

Commenter: Kim Paarlberg, Representing ICC

Request for this portion as submitted:

1003.9 Operable Parts. Lighting controls, electrical panelboards, electrical switches and receptacle outlets, environmental controls, appliance controls, ~~operating hardware for operable windows~~, plumbing fixture controls, and user controls for security or intercom systems shall comply with Section 309.

EXCEPTIONS:

1. Receptacle outlets serving a dedicated use.
2. Where two or more receptacle outlets are provided in a kitchen above a length of counter top that is uninterrupted by a sink or appliance, one receptacle outlet shall not be required to comply with Section 309.
3. Floor receptacle outlets.
4. HVAC diffusers.
5. Controls mounted on ceiling fans.
6. Where redundant controls other than light switches are provided for a single element, one control in each space shall not be required to be accessible.
7. Reset buttons and shut-offs serving appliances, piping and plumbing fixtures.
8. Electrical panelboards shall not be required to comply with Section 309.4.

1003.13 Windows. Operable windows shall comply with Section 1003.13.

1003.13.1 Natural ventilation. Operable windows required to provide natural ventilation shall comply with Sections 309.2 and 309.3.

1003.13.2 Emergency escape. Operable windows required to provide an emergency escape and rescue opening shall comply with Section 309.2.

Reason: Since the committee voted last cycle to just require windows to have clear floor space and reach ranges, the operating hardware for operable windows should be removed from the general operable parts section. This would be consistent with how we handle doors and door hardware.

5-23– 12

507 (New), 507.1 (New), 507.2 (New)

Proposed Change as Submitted

Proponent: Melanie J. Hughes, VA Department for the Blind and Vision Impaired, representing Association for the Education and Rehabilitation of the Blind and Visually Impaired (AER)

507. Accessible Routes Adjacent to Vehicular Drives

507.1. Separation Accessible routes located adjacent and parallel to vehicular drives shall be separated from the vehicular drive by one or more of the following:

1. A vertical change in level of 4 inches, minimum.
2. Barriers or railings.
3. Landscape area.

507.2 Barriers. Where parking spaces are immediately adjacent to the accessible walkway, wheelstops shall be required. Barriers used to separate an accessible route from the vehicular drive shall comply with current MUTCD requirements.

Reason: Lack of protected accessible routes to shopping centers, malls and other public spaces separated from the roadway by large parking lots present a barrier to those who are dependent upon public transportation and pedestrian modes of travel. The need to walk through parking lots to get from public transportation stops, public streets, or sidewalks, makes it difficult and unsafe for persons who have visual impairments or mobility impairments and persons of short stature, including children, to access many facilities.

507 (New)-HUGHES.doc

Committee Action

Approval as Modified

Modification

507 Accessible Routes through Parking. Where accessible routes pass through parking facilities, they shall be physically separated from vehicular traffic.

EXCEPTIONS:

1. Crossings at drive aisles shall not be required to comply with 507.
2. Parking spaces complying with 502 and passenger loading zones complying with 503 shall not be required to comply with 507.

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Committee Reason: The Committee felt that this proposal addressed an issue that has been of concern for many years. It addresses a serious safety issue for the visually impaired when they need to travel from arrival points across parking lots (and facilities) in order to reach accessible entrances. The discussed and tabled the proposal multiple times to allow the proponent and interested parties to develop a solution. It will apply, to both surface parking lots and parking structures. The intent of exception #1 is to allow crosswalks that were not required to be raised. The intent of exception #2 is to allow for no obstructions between an accessible parking space and an access aisle if it happened to be along the route from another side arrival point.

BALLOT COMMENTS

5-23.1

Commenter: Ron Burton, Representing BOMA

Ballot: Affirmative with comment:

Comment: To avoid confusion by the code official, the language proposed should be accompanied by a figure to explain exactly what is intended.

5-23.2

Commenter: Gina Hilberry, Representing UCP

Ballot: Affirmative with comment:

Comment: The modification is not clear. Is this 507.3 Accessible Routes through Parking? Or is it 508? I want to be sure that 507 as written stands.

5-23.3

Commenter: David S. Collins, Representing AIA

Ballot: Negative with comment:

Comment: This is arbitrary and leaves the owner/designer without direction as to how to address this requirement. Either required or it isn't.

5-23.4

Commenter: Steve Orlowski, Representing NAHB

Ballot: Negative with comment:

Comment: The proposed language is vague in regards to where parking spaces are immediately adjacent to accessible walkways. Some walkways cross parking lots and run across the vehicular route or run parallel to the roadway. To avoid confusion by the code official, the language proposed should be accompanied by a figure to explain exactly what is intended.

5-23.5

Commenter: Kim Paarlberg, Representing ICC

Ballot: Negative with comment:

Comment: The term 'physically separated' is too broad to be uniformly enforced. I have a concern that some might interpret this as a raised sidewalk or barriers that would now allow for persons in wheelchairs to access this walkway easily. If we are going to provide a protected route, it should be useable by persons with all disabilities.

5-23.6

Commenter: Edward Steinfeld, Representing RESNA

Ballot: Negative with comment:

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Comment: I am not opposed to this requirement per se but as an architect, I believe it is too restrictive in many locations without further clarification. What is a “parking facility”? In rural areas, in particular, driveways are used for parking and as pedestrian paths. This requirement could mean that a driveway used as a path of travel will need a sidewalk and curb alongside it. Also, code officials will interpret “barriers” to mean guardrails. Bollards would be sufficient in many locations. While the intent is good, more work is needed.

Proponent Comment

5-23.7

Commenter: Melanie Hughes, representing VA Department for the Blind and Vision Impaired, representing Association for the Education and Rehabilitation of the Blind and Visually Impaired (AER)

Comment: I support the committee's actions.

5-24– 12
507 (NEW)

Proposed Change as Submitted

Proponent: Robert D. Feibleman, HAND Construction, representing self

Add new text as follows:

507 Fire Safety Devices

507.1 General. Fire fighting devices such as fire extinguishers, hose connections, valve controls, gauges, and annunciator panels are not required to comply with this standard.

Reason: Basic fire alarm and suppression devices are not covered by this standard. However, fire extinguishers and the like are typically located in exit corridors and mistakenly treated as a device that should comply with reach ranges. Locating them low conflicts with placement of handrails. Fire officials prefer occupants leave the building or seek shelter until rescue they do not encourage occupants to fight fires.

507 (NEW)-FEIBLEMAN.doc

Committee Action

Disapproved

Committee Reason: The Committee disapproved this proposal after expressing a variety of concerns. The first was that this may be a scoping issue and therefore should be address in the IBC and other scoping documents. This would be a blanket exemption which would allow this equipment to become protruding objects. There is nothing in the IBC or IFC that says these devices are limited to use by staff or firefighters. If the issue is compliance with operable parts, it should be addressed in Chapter 3 and not a broad exemption from the standard.

BALLOT COMMENTS

5-24.1

Commenter: Kim Paarlberg, Representing ICC

Ballot: Negative with comment:

Comment: There are many elements in a building that are intended for emergency responders (i.e., lock-boxed, elevator fire department recall, stand pipes, fire hoses, fire department communication devices in the stairway). None of these elements should be required to be within reach or meet operable parts requirements. Some facilities have trained staff that operate as emergency

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responders, but not all emergency responders are staff, so the exception for elements of employee work areas in the codes does not address this issue. To allow this in the standard is consistent with the allowances for doors do be controlled by security personnel. A modification could be made so that there was not an exception from the protruding objects provisions.

Replace proposal as follows:

309.1 General. Operable parts required to be accessible shall comply with Section 309.

Exception: Equipment used only for emergencies by emergency responders or emergency personnel shall not be required to comply with Section 309.
