

## Chapter 11

### Items 11-1-12 through 11-18-12

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>

## 11-1– 12

### 1101.2.1

#### *Proposed Change as Submitted*

**Proponent:** Kim Paarlberg, International Code Council

**Revise as follows:**

**1101.2 .1 General Exceptions.** The following shall not be required to be accessible or to be on an accessible route:

1. Raised structures used solely for refereeing, judging, or scoring a sport.
2. Water Slides.
3. Animal containment areas that are not for public use.
4. Raised boxing or wrestling rings.
5. Raised diving boards and diving platforms.
6. Bowling lanes that are not required to provide wheelchair spaces.
7. Mobile or portable amusement rides
8. Amusement rides that are controlled or operated by the rider.
9. Amusement rides designed primarily for children, where children are assisted on and off the ride by an adult.
10. Amusement rides that do not provide amusement ride seats.
11. Shooting facilities with firing positions on free-standing platforms that are elevated above grade 12 feet (3660 mm) minimum provided that the aggregate area of elevated firing positions is 500 square feet (46 m<sup>2</sup>) maximum.



**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.

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

Firing positions may be elevated to allow people to practice shooting from a tree blind. The exception is intended to be consistent with what is permitted for press boxes by the IBC and ADA.

1101.2.1 (New)-PAARLBERG.doc

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**Committee Action**

**Disapproved**

**Committee Reason:** The proposal would result in the A117.1 being in conflict with the 2010 ADA.

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**BALLOT COMMENTS**

**11-1.1**

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

**Comment:** This is a standard set up for people who want to practice shooting from a blind. If an elevated stand is provided, is there an option of providing a ground level space adjacent? Or is a size limit exception appropriate.

A modification for this proposal will be forthcoming.

**PROPONENT COMMENT**

**11-1.2**

**Proponent:** Kim Paarlberg, Representing ICC

**Request that 11-1-12 be Approved as submitted.**

**Reason:** The committee said this proposal will conflict with ADA. However, it is my opinion that the 2010 ADA does not address this type of shooting facility. Surely the 2010 ADA did not intend to prohibit target practice that would be used when located in a tree stand. This is an extremely common hunting practice.

These locations are typically located in remote areas without power, therefore, a lift would have problems with both power and vandalism.

There should be an allowance for small elevated stations. This is consistent with press boxes, which would be much more heavily used.

Lower platforms or larger platforms would be required to have an accessible route.

Facilities such as this that are part of a practice shooting trail would be exempt as an area of sports activity.

There is a product out that takes people into a tree stand using a sling, but that would not include a persons mobility device. These systems require assistance or substantial strength.

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**11-2– 12**

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

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**11-3– 12**

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

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

## 11-4– 12

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

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## 11-5– 12

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

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## 11-6– 12

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

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## 11-7– 12

1105.2, 1105.2.1, 1105.2.1.1, 1105.3.1, 1105.3.1, 1105.3.2, 1105.4

### *Proposed Change as Submitted*

**Proponent:** Kim Paarlberg, International Code Council

#### **Revise as follows:**

**1105.2 Railings.** Where provided along the perimeter of fishing piers or platforms, railings, barriers, or guards, ~~or handrails~~ shall comply with Section 1105.2.

**1105.2.1 Height.** A minimum of 25 percent of the railings, guards or barriers, ~~or handrails~~ shall be 34 inches (865 mm) maximum above the ground or deck surface.

**EXCEPTION:** Where a guard complying with the applicable building code is provided, the guard shall not be required to comply with Section 1105.2.1.

**1105.2.1.1 Dispersion.** Railings, guards or barriers, ~~or handrails~~ required to comply with Section 1105.2.1 shall be dispersed throughout the fishing pier or platform.

**1105.3 Edge Protection.** Where railings, guards or barriers, ~~or handrails~~ complying with Section 1105.2 are provided, edge protection complying with Section 1105.3.1, ~~or~~ 1105.3.2 or 1105.3.3 shall be provided.

**1105.3.1 Curb or Barrier.** Curbs ~~or barriers~~ shall ~~extend~~ be a minimum of 2 inches (51 mm) minimum in height above the surface of the fishing pier or platform.

**1105.3.2 Barrier.** Barriers shall be constructed so that the barrier prevents the passage of a 4-inch (100 mm) diameter sphere where any portion of the sphere is within 4 inches (100 mm) of the floor.

**1105.3.3 1105.3.2 Extended Ground or Deck Surface.** The ground or deck surface shall extend 12 inches (305 mm) minimum beyond the inside face of the railing. Toe clearance shall be provided and shall be 30 inches (760 mm) minimum in width and 9 inches (230 mm) minimum in height above the ground or deck surface beyond the railing.

**Ballot Comment and Proponent Comment Agenda- July 15-19, 2013:  
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**1105.4 Clear Floor Space.** At each location where there are railings, guards or barriers, ~~or handrails~~ complying with Section 1105.2.1, a clear floor space complying with Section 305 shall be provided. Where there are no railings, barriers or guards, ~~or handrails~~, at least one clear floor space complying with Section 305 shall be provided on the fishing pier or platform.

**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 purpose is to use terms consistent with building codes.

Guards are a subset of barriers. Barriers are considerably more than just a curb.

Guards are required by the building code to have a minimum height of 42 inches. Therefore, a 'guard' cannot be 34" maximum in height and provide an accessible fishing location.

If the exception says guard can be high enough so that there are no 34" high locations, there are no locations to disperse.

Handrails are required along ramps and stairs. With the fishing location required to be level, there will not be a handrail at these accessible fishing locations.

Edge protection should be handled similar ramp requirements. This clarification for separating curbs and barriers is important. I am assuming that the difference (i.e., 2 inches) is based on the boat dock edge limitations and the old ADA 2 inch curbs. If the intent is to protect the small front wheels, the appropriate opening limitation is 4 inches. This would be consistent with guard openings (based on the size of a child's head) and may be used in a barrier where the pier owners were concerned about child falls.

1105-PAARLBERG.doc

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### Committee Action

#### **Disapproved**

**Committee Reason:** The intent of the 2010 ADA is to require a guard which is in compliance with the *International Building Code*. This proposed change by removing the word 'guard' would result in something less than an IBC guard being required.

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### BALLOT COMMENTS

#### **11-7.1**

**Commenter:** Gene Boecker, Representing NATO

**Ballot:** Negative with comment:

**Comment:** The current text says, "Where provided, railings, guards, or handrails shall...." Any argument that says that the guard provisions are removed only has to look at the current language to see that guards are not ever required. If the intent of the 2010 ADA was to require a guard in accordance with the IBC, then this proposal should be used to make that clear. As written, it does not make that clear. It leaves open the question about "where provided." The modifications proposed are consistent with the IBC requirements for guards relative to the 4 inch spacing (information that isn't in the standard now) and consistent with the IBC and A117.1 for ramp edge protection (which has nothing to do with guards). If a guard is intended, then language must be added. A consensus approach should be taken with a task group set up to offer a revised proposal for the July meeting. Something needs to be done but there are too many variables based on the committee statement to offer a single suggestion without another round of discussion such as can be found in a task group.

#### **11-7.2**

**Commenter:** Kim Paarlberg, Representing ICC

**Ballot:** Negative with comment:

**Comment:** The revised requirements actually coordinate with what the building code considers a guard. A barrier can aid in prevention of falls, but does not have the height or opening limitations of a guard.

A modification for this proposal will be forthcoming.

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

## **PROPONENT COMMENT**

### **11-7.3**

**Proponent:** Kim Paarlberg, Representing ICC

**Replace the proposal with the following:**

**1105.2 Railings.** Where provided along the perimeter of fishing piers or platforms, railings, or guards, ~~or handrails~~ shall comply with Section 1105.2.

**EXCEPTION:** Where a guard complying with the applicable building code is provided, the guard shall not be required to comply with Section 1105.2.

**1105.2.1 Height.** A minimum of 25 percent of the railings, ~~guards or handrails~~ shall be 34 inches (865 mm) maximum above the ground or deck surface.

**EXCEPTION:** ~~Where a guard complying with the applicable building code is provided, the guard shall not be required to comply with Section 1105.2.1.~~

**1105.2.1.1 Dispersion.** ~~Railings, guards or handrails~~ required to comply with Section 1105.2.1 shall be dispersed throughout the fishing pier or platform.

**1105.3 Edge Protection.** Where railings, ~~guards or handrails~~ complying with Section 1105.2 are provided, edge protection complying with Section 1105.3.1, ~~or 1105.3.2 or 1105.3.3~~ shall be provided.

**1105.3.1 Curb or Barrier.** ~~Curbs or barriers shall extend~~ be a minimum of 2 inches (51 mm) minimum in height above the surface of the fishing pier or platform.

**1105.3.2 Barrier.** Barriers shall be constructed so that the barrier prevents the passage of a 4-inch (100 mm) diameter sphere where any portion of the sphere is within 4 inches (100 mm) of the floor.

**1105.3.3 ~~1105.3.2~~ Extended Ground or Deck Surface.** The ground or deck surface shall extend 12 inches (305 mm) minimum beyond the inside face of the railing. Toe clearance shall be provided and shall be 30 inches (760 mm) minimum in width and 9 inches (230 mm) minimum in height above the ground or deck surface beyond the railing.

**1105.4 Clear Floor Space.** At each location where there are railings, ~~guards or handrails~~ complying with Section 1105.2.1, a clear floor space complying with Section 305 shall be provided. Where there are no railings, guards, or handrails, at least one clear floor space complying with Section 305 shall be provided on the fishing pier or platform.

**Reason:** The committee said the ADA intended to allow guards compliant with IBC in hazardous situations. The proposed text still includes 'guards' in 1105.2 and the exception, therefore this proposal will not conflict with ADA. The goal is also not to conflict with what is understood in IBC.

The IBC defines handrails as follows:

**HANDRAIL.** A horizontal or sloping rail intended for grasping by the hand for guidance or support.

Handrails are required at ramps and stairways. While there would be handrails on the ramps getting to and from the platform, that would not be the fishing location. While handrails are horizontal at the ends, handrails would not be provided around the perimeter of a flat surface. They also will not meet the dispersement or clear floor space requirement in current text. Handrails should not be listed in 1105.2 or 1105.4.

The IBC defines guards as follows:

**GUARD.** A building component or a system of building components located at or near the open sides of elevated walking surfaces that minimizes the possibility of a fall from the walking surface to a lower level.

Guards are required where there is a danger of a fall. The minimum height of a guard is 42" high, and no openings are permitted to be larger than 4". Therefore, guards are not required to meet the height requirements. And if they are not lowered, they also do not need to meet the dispersement or clear floor space requirement. Guards should not be listed in 1105.2.1, 1105.2.2 or 1105.4.

If there will be no accessible fishing position at a handrail or guard, then they don't need the edge protection. Guards and handrails should not be in 1105.3.

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

The split between curbs and barriers is intended to be consistent with the similar split of edge protection at ramps (405.9.2.1 and 405.9.2.2). In addition, since the front wheels of a wheelchair on a ramp are assumed to not move through a 4" gap, what is the reason for a 2" gap at fishing piers? I think this is the old 2" curb from the 1994 ADAAG.

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## 11-8– 12

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

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## 11-9– 12

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

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## 11-10– 12

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

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## 11-11– 12

### 1108.3.2.1

#### *Proposed Change as Submitted*

**Proponent:** Kim Paarlberg, International Code Council

#### **Revise as follows:**

**1108.3.2.1 Ground Level Play Components.** Accessible ground level play components shall be provided in the number and types required by Section 1108.3.2.1.1 or 1108.3.2.1.2, whichever is greater. ~~Ground level play components that are provided to comply with Section 1108.3.2.1.1 shall be permitted to satisfy the additional number required by Section 1108.3.2.1.2 if the minimum required types of play components are satisfied. Where two or more required Accessible ground level play components are provided, they shall be dispersed throughout the play area and integrated with other play components.~~

**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 proposal clarifies confusing language.

1108.3.2.1 (REVISED)-PAARLBERG.doc

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#### *Committee Action*

#### **Disapproved**

**Committee Reason:** There text that would result from this proposal is unclear. It may result in fewer accessible components than intended by the ADA 2010.

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

## **BALLOT COMMENTS**

### **11-11.1**

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

**Comment:** The current language for determining the number of ground level and elevated level play components is confusing. A modification for this proposal will be forthcoming.

## **PROPONENT COMMENT**

### **11-11.2**

**Proponent:** Kim Paarlberg, Representing ICC

**Request that 11-11-12 be Approved as submitted.**

**Reason:** The current language is very confusing. If you look at the tables, you can see that this text says the same thing in a more straightforward manner. There is no reduction in required numbers.

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### **11-12– 12**

**1108.4, 1108.4.1, 1108.4.1.1, 1108.4.1.2, 1108.4.1.3**

#### **Proposed Change as Submitted**

**Proponent:** Kim Paarlberg, International Code Council

**Revise as follows:**

**1108.4 Accessible Routes Within Play Areas.** Accessible routes within play areas shall comply with Section 1108.4.

**1108.4.1 Accessible Routes.** Accessible routes serving play areas shall comply with Chapter 4 and Section 1108.4.1 and shall be permitted to use the exceptions in Sections 1108.4.1.1 through 1108.4.1.3. Where accessible routes serve ground level play components, the vertical clearance shall be 80 inches (2030 mm) minimum in height.

#### **EXCEPTIONS:**

1. Accessible routes serving ground level play components and elevated play components shall be permitted to use transfer systems complying with Section 1108.4.2. The transfer systems shall be permitted to connect elevated play components except where 20 or more elevated play components are provided no more than 25 percent of the elevated play components shall be permitted to be connected by transfer systems.
2. Where transfer systems are provided on the accessible routes serving ground level play components and elevated play components, an elevated play component shall be permitted to connect to another elevated play component as part of an accessible route.
3. Accessible routes serving soft contained play structures shall be permitted to use transfer systems complying with Section 1108.4.2 as part of an accessible route.

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

4. Where the surface of the accessible route, clear floor spaces, or turning spaces serving water play components is submerged, complying with Sections 302, 403.3, 405.2, 405.3, and 1108.4.1.6 shall not be required.
5. Accessible routes serving water play components shall be permitted to use transfer systems complying with Section 1108.4.2 to connect elevated play components in water.

**1108.4.1.1 Ground Level and Elevated Play Components.** ~~Accessible routes serving ground level play components and elevated play components shall be permitted to use the exceptions in Section 1108.4.1.1.~~

**EXCEPTIONS:**

1. ~~Transfer systems complying with Section 1108.4.2 shall be permitted to connect elevated play components except where 20 or more elevated play components are provided no more than 25 percent of the elevated play components shall be permitted to be connected by transfer systems.~~
2. ~~Where transfer systems are provided, an elevated play component shall be permitted to connect to another elevated play component as part of an accessible route.~~

**1108.4.1.2 Soft Contained Play Structures.** ~~Accessible routes serving soft contained play structures shall be permitted to use the exception in Section 1108.4.1.2.~~

**EXCEPTION:** ~~Transfer systems complying with Section 1108.4.2 shall be permitted to be used as part of an accessible route.~~

**1108.4.1.3 Water Play Components.** ~~Accessible routes serving water play components shall be permitted to use the exceptions in Section 1108.4.1.3.~~

**EXCEPTIONS:**

1. ~~Where the surface of the accessible route, clear floor spaces, or turning spaces serving water play components is submerged, complying with Sections 302, 403.3, 405.2, 405.3, and 1108.4.1.6 shall not be required.~~
2. ~~Transfer systems complying with Section 1108.4.2 shall be permitted to connect elevated play components in water.~~

Renumber remaining sections of 1108.4.1 as indicated.

**1108.4.1.4 1108.4.1.1 Clear Width.**

**1108.4.1.4.1 1108.4.1.1.1 Ground Level.**

**1108.4.1.4.2 1108.4.1.1.2 Elevated.**

**1108.4.1.5 1108.4.1.2 Ramps**

**1108.4.1.5.1 1108.4.1.2.1 Ground Level**

**1108.4.1.5.2 1108.4.1.2.2 Elevated**

**1108.4.1.5.3 1108.4.1.2.3 Handrails**

**1108.5.1.5.3.1 1108.5.1.2.3.1 Handrail Gripping Surfaces**

**1108.5.1.5.3.2 1108.5.1.2.3.2 Handrail Height**

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**1108.4.1.6 1108.4.1.3 Ground Surfaces**  
**1108.4.1.6.1 1108.4.1.3.1 Surface Condition**  
**1108.4.1.6.2 1108.4.1.3.2 Use Zones**

**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.

This is intended to be an editorial revision without any technical changes being made. The purpose of the proposal is to revise the section into the format that is common for the standard and eliminate references to the exceptions within the section. Instead of referencing and saying that the exceptions can be used, simply show them as exceptions which will allow them to be used and accomplish the same thing in the normal format.

The format change should make the provisions less confusing and easier to follow.

1108.4-PAARLBERG.doc

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**Committee Action**

**Disapproved**

**Committee Reason:** It is preferable to retain the same format as the ADA 2010. Users could incorrectly assume that the different formats between the Standard and the ADA means that the requirements are different.

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**BALLOT COMMENTS**

**11-12.1**

**Commenter:** Kim Paarlberg, Representing ICC

**Ballot:** Negative with comment:

**Comment:** The proposed language will match 2010 ADA and provide additional clarification.

A modification for this proposal will be forthcoming.

**PROPONENT COMMENT**

**11-12.2**

**Proponent:** Kim Paarlberg, Representing ICC

**Replace the proposal with the following:**

**1108.4 Accessible Routes Within Play Areas.** Accessible routes within play areas shall comply with Section 1108.4.

**1108.4.1 Accessible Routes.** Accessible routes serving play areas shall comply with Chapter 4 and Section 1108.4.1 ~~and shall be permitted to use the exceptions in Sections 1108.4.1.1 through 1108.4.1.3.~~ Where accessible routes serve ground level play components, the vertical clearance shall be 80 inches (2030 mm) minimum in height.

**EXCEPTIONS:**

1. Where 20 or more elevated play components are provided, transfer systems complying with Section 1108.4.2. shall be permitted to be used as part of an accessible route for a maximum of 25 percent of the play components.
2. Where fewer than 20 elevated play components are provided, transfer systems complying with Section 1108.4.2 shall be permitted to be used as part of an accessible route.
3. Where transfer systems are provided, an elevated play component shall be permitted to connect to another elevated play component as part of an accessible route.
4. Accessible routes serving soft contained play structures shall be permitted to use transfer systems complying with Section 1108.4.2 as part of an accessible route.

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

5. ~~Where the surface of the accessible route, clear floor spaces, or turning spaces serving water play components is submerged, complying with Sections 302, 403.3, 405.2, 405.3, and 1108.4.1.6 shall not be required.~~
6. ~~Accessible routes serving water play components shall be permitted to use transfer systems complying with Section 1108.4.2 to connect elevated play components in water.~~

~~**1108.4.1.1 Ground Level and Elevated Play Components.** Accessible routes serving ground level play components and elevated play components shall be permitted to use the exceptions in Section 1108.4.1.1.~~

**EXCEPTIONS:**

1. ~~Transfer systems complying with Section 1108.4.2 shall be permitted to connect elevated play components except where 20 or more elevated play components are provided no more than 25 percent of the elevated play components shall be permitted to be connected by transfer systems.~~
2. ~~Where transfer systems are provided, an elevated play component shall be permitted to connect to another elevated play component as part of an accessible route.~~

~~**1108.4.1.2 Soft Contained Play Structures.** Accessible routes serving soft contained play structures shall be permitted to use the exception in Section 1108.4.1.2.~~

~~**EXCEPTION:** Transfer systems complying with Section 1108.4.2 shall be permitted to be used as part of an accessible route.~~

~~**1108.4.1.3 Water Play Components.** Accessible routes serving water play components shall be permitted to use the exceptions in Section 1108.4.1.3.~~

**EXCEPTIONS:**

1. ~~Where the surface of the accessible route, clear floor spaces, or turning spaces serving water play components is submerged, complying with Sections 302, 403.3, 405.2, 405.3, and 1108.4.1.6 shall not be required.~~
2. ~~Transfer systems complying with Section 1108.4.2 shall be permitted to connect elevated play components in water.~~

*(Renumber remaining sections of 1108.4.1)*

**Reason:** The ICC A117.1 does not make separate statements with the sole purpose of allowing for exceptions. Nor do we write exceptions within exceptions (1108.4.1.1 Exception 1). The only thing this proposal does is group the exceptions in one section. This would make the existing language consistent with ICC format with no change in requirements. While I support coordination with ADA, ICC A117.1 should not follow bad code writing practices.

## 11-13– 12

### 1108.4.1, 1108.4.1.1, 1108.4.1.2, 1108.4.1.3

#### *Proposed Change as Submitted*

**Proponent:** Kim Paarlberg, International Code Council

**Revise as follows:**

**1108.4.1 Accessible Routes.** Accessible routes serving play areas shall comply with Chapter 4 and Section 1108.4.1.1 through 1108.4.1.6.2 and shall be permitted to use the exceptions in Sections 1108.4.1.1 through 1108.4.1.3.

**1108.4.1.1 Ground level play components.** Accessible routes serving ground level play components shall comply with Chapter 4. ~~Where accessible routes serve ground level play components, the vertical clearance shall be 80 inches (2030 mm) minimum in height.~~

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

~~1108.4.1.1~~ ~~1108.4.1.2~~ **Ground Level and Elevated Play Components.** Accessible routes serving ground level play components and elevated play components shall comply with Chapter 4 ~~be permitted to use the exceptions in Section 1108.4.1.1.~~

**EXCEPTIONS:**

1. Where 20 or more elevated play components are provided, transfer systems complying with Section 1108.4.2. shall be permitted to be used as part of an accessible route for a maximum of 25 percent of the play components ~~connect elevated play components except where 20 or more elevated play components are provided no more than 25 percent of the elevated play components shall be permitted to be connected by transfer systems.~~
2. Where fewer than 20 elevated play components are provided, transfer systems complying with Section 1108.4.2 shall be permitted to be used as part of an accessible route.
3. Where transfer systems are provided, An elevated play component shall be permitted to connect to another elevated play component as part of an accessible route.
4. Where accessible routes serve elevated level play components, the vertical clearance is not required to comply with Section 307.

~~1108.4.1.2~~ ~~1108.4.1.3~~ **Soft Contained Play Structures.** Accessible routes serving soft contained play structures shall comply with Chapter 4 ~~be permitted to use the exception in Section 1108.4.1.2.~~

**EXCEPTIONS:**

1. Transfer systems complying with Section 1108.4.2 shall be permitted to be used as part of an accessible route.
2. Where accessible routes serve the soft contained play components, the vertical clearance is not required to comply with Section 307..

**1108.4.1.4 Water Play Components.** Accessible routes serving water play components shall comply with Chapter 4 ~~be permitted to use the exceptions in Section 1108.4.1.3.~~

**EXCEPTIONS:**

1. Where the surface of the accessible route, clear floor spaces, or turning spaces serving water play components is submerged, complying with Sections 302, 403.3, 405.2, 405.3, and 1108.4.1.6 shall not be required.
2. Transfer systems complying with Section 1108.4.2 shall be permitted to be used as part of an accessible route to connect elevated play components in water.
3. Where accessible routes serve elevated level play components, the vertical clearance is not required to comply with Section 307.

**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.

Remove redundant language. When you reference a section you don't have to also say they can use the exceptions. The main text should state requirements, not be there just to allow for exceptions.

Chapter 4 requires vertical clearance. Rather than repeating that for ground level accessible routes, there should be exceptions for the route within the play components.

1108.4.1-PAARLBERG.doc

## Committee Action

### Disapproved

**Committee Reason:** The Committee was concerned that this revision was straying too far from the wording contained in the 2010 ADA. As most compliance will occur via compliance through the *International Building Code* and the Standard, this change could result in facilities that would be out of compliance with the ADA.

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### BALLOT COMMENTS

#### 11-13.1

**Commenter:** Gene Boecker, Representing NATO

Ballot: Negative with comment:

**Comment:** In reviewing the proposal, I did not find anything that reduced the requirements below what is in the 2010 ADA other than a question about removing the vertical clearance requirements (which should be revised for elevated and water play areas). It is a revision in language to be consistent with the formatting used elsewhere in the standard. If the items related to the vertical clearance is a problem, change that, but the rest are good change proposals.

#### 11-13.2

**Commenter:** Kim Paarlberg, Representing ICC

Ballot: Negative with comment:

**Comment:** The proposed language will match 2010 ADA and provide additional clarification.  
A modification for this proposal will be forthcoming.

### PROPONENT COMMENT

#### 11-13.3

**Proponent:** Kim Paarlberg, Representing ICC

#### Replace the proposal with the following:

**1101.3 Protruding Objects.** Protruding objects on circulation paths shall comply with Section 307.

**EXCEPTIONS:**

1. Within areas of sport activity, protruding objects on circulation paths shall not be required to comply with Section 307.
2. Within play areas, protruding objects on circulation paths shall not be required to comply with Section 307 provided that ground level accessible routes provide vertical clearance complying with Section ~~4408.2~~ 1108.4.1.

**1108.2 Accessible Routes for Play Areas.** Play areas shall provide accessible routes in accordance with Section 1108.2. Accessible routes serving play areas shall comply with ~~Chapter 4~~ Sections 402, 403, 405 and 406 except as modified by Section 1108.4.

**1108.2.1 Ground Level and Elevated Play Components.** At least one accessible route shall be provided within the play area. The accessible route shall connect ground level play components required to comply with Section 1108.3.2.1 and elevated play components required to comply with Section 1108.3.2.2, including entry and exit points of the play components.

**1108.2.2 Soft Contained Play Structures.** Where three or fewer entry points are provided for soft contained play structures, at least one entry point shall be on an accessible route. Where four or more entry points are provided for soft contained play structures, at least two entry points shall be on an accessible route.

**1108.4 Accessible Routes Within Play areas.** Play areas shall comply with Section 1108.4.

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**1108.4.1 Accessible Routes.** Accessible routes serving play areas shall comply with Chapter 4 and Section 1108.4.1 and shall be permitted to use the exceptions in Sections 1108.4.1.1 through 1108.4.1.3. Where accessible routes serve ground level play components, the vertical clearance shall be 80 inches (2030 mm) minimum in height.

**Reason:** The original proposal was trying to clarify exceptions, similar to 11-12.

However, there was also two issues here that are separate.

There is the issue of a general reference to Chapter 4. Playground components will not have doors or elevators. A more selective reference is appropriate.

There is also the issue of the head clearance along the accessible route within the play area components. Given playgrounds are for kids, the protruding object limitations are only applicable along ground level accessible routes. Since there is no heights in 1108.2, it seems the correct reference should be 1108.4.1.

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## 11-14– 12

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

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## 11-15– 12

### 1108.4.1.5.3, 1108.4.5.3.1

#### *Proposed Change as Submitted*

**Proponent:** Kim Paarlberg, International Code Council

**Revise as follows:**

**1108.4.1.5.3 Handrails.** ~~Where Handrails are required on both sides of ramps serving play components, and the handrails shall comply with Section 505 except as modified by Section 1108.4.1.5.3.~~

#### **EXCEPTIONS:**

1. Handrails shall not be required on ramps located within ground level use zones.
2. Handrail extensions shall not be required.

**1108.4.1.5.3.1 Handrail ~~Gripping Surfaces~~ Cross section.** ~~Handrail gripping surfaces~~ with a circular cross section shall have an outside diameter of 0.95 inch (24 mm) minimum and 1.55 inches (39 mm) maximum. ~~Where the shape of the gripping surface handrail cross section is non-circular, the handrail shall provide an equivalent gripping surface.~~

**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 ADA guidelines for playgrounds says that handrails are required on all elevated ramps within playground structures. The provisions for ramps say only when there is greater than a 6 inch rise. The literal code text says 'where required' but does not require it anywhere.

The change handrail gripping surface if for consistent terminology with handrails in Section 505.7.

1108.4.1.5.3-PAARLBERG.doc

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**Committee Action**

**Approval as Modified**

**Modification**

**1108.4.1.5.3 Handrails.** ~~Where Handrails are~~ required on both sides of ramps serving play components, and the handrails shall comply with Section 505 except as modified by Section 1108.4.1.5.3.

**EXCEPTIONS:**

1. Handrails shall not be required on ramps located within ground level use zones.
2. Handrail extensions shall not be required.

**1108.4.1.5.3.1 Handrail Gripping Surfaces** (No change to current text, this portion of proposal not accepted.)

**Committee Reason:** The changes to Section 1108.4.1.5.3 provide a clarification. The changes to Section 1108.4.1.5.3.1 would be in conflict with Section 505.7 and therefore were not accepted.

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**PROPONENT COMMENT**

**11-15.1**

**Proponent:** Kim Paarlberg, Representing ICC

**Further modify the proposal as follows:**

**1108.4.1.5.3.1 Handrail Gripping Surfaces Cross section.** ~~Handrail gripping surfaces~~ with a circular cross section shall have an outside diameter of 0.95 inch (24 mm) minimum and 1.55 inches (39 mm) maximum. Where the shape of the ~~gripping surface~~ ~~handrail cross section~~ is non-circular, the handrail shall provide an equivalent gripping surface.

**Reason:** The committee reason for disapproval of 1108.4.1.5.3.1 was a conflict with 505.7. This is not the case. The change from "handrail gripping surface" if for consistent terminology with handrails in Section 505.7. ICC A117.1 needs to have consistent language/terms within its own document.

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**11-16– 12**

**1109.3.1, 1109.3.3**

**Proposed Change as Submitted**

**Proponent:** Kim Paarlberg, International Code Council

**Revise as follows:**

**1109.3.1 Sloped Entry Route.** Sloped entries shall comply with ~~Chapter 4~~ Sections 402, 403 and 405 except as modified by Sections 1109.3.1 through 1109.3.3.

**EXCEPTION:** Where sloped entries are provided, the surfaces shall not be required to be slip resistant.

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**1109.3.3 Handrails.** At least two handrails complying with Section 505 shall be provided on the sloped entry where the sloped entry has a slope greater than 1:20. The clear width between required handrails shall be 33 inches (840 mm) minimum and 38 inches (965 mm) maximum.

**EXCEPTIONS:**

1. Handrail extensions specified by Section 505.10.1 shall not be required at the bottom landing serving a sloped entry.
2. Where a sloped entry is provided for wave action pools, leisure rivers, sand bottom pools, and other pools where user access is limited to one area, the handrails shall not be required to comply with the clear width requirements of Section 1109.3.3.
3. ~~Sloped entries in wading pools shall not be required to provide handrails complying with Section 1109.3.3. If provided, handrails on sloped entries in wading pools shall not be required to comply with Section 505.~~ Where sloped entries are required to have handrails in wading pools, handrails are permitted to be located at the height appropriate for the age level the pool is designed for.

**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.

A reference to chapter 4 is too broad – this includes doors, elevators and platform lifts. The reference should be to walking surfaces and ramps.

Handrails are appropriate for ramps, but not for sloped walks. Having two handrails at a width of 33"-38" apart on a pool that chooses to have a large sloped walk entry is not necessary. This is very common in large pool settings where there may be areas or play that transition over to deeper pool areas for swimming. This is very common in family water parks. The exception for only one entry is not valid in these situations (1109.3.3 Exception 2). There is also a scoping issue between ADA and ICC A117.1 – 505.1 only requires handrails on ramps and stairs.

Typically a wading pool is a sloped walk, not a ramp slope, so handrails would not be required by 505.1. If handrails are required, the only thing that is appropriate to be deleted as a requirement is height. For small hands the designer can choose the smaller diameter permitted.

1109.3-PAARLBERG.doc

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**Committee Action**

**Disapproved**

**Committee Reason:** The Committee was concerned that changing Chapter 4 reference to Sections 402, 403 and 405 exclusively would eliminate consideration of such concerns as slip resistance. Other parts of the change would result in provisions more stringent than the ADA 2010. The Committee did not feel the increased stringency was needed.

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**BALLOT COMMENTS**

**11-16.1**

**Commenter:** Gene Boecker, Representing NATO

**Ballot:** Negative with comment:

**Comment:** The concern expressed is not valid. The change would still address slip resistance since Section 403 refers to Section 302 which contains the requirement for slip resistance. The added text to 1109.3 is not increasing stringency but clarifying intent. If the slope is less than 1:20 no handrails are required. This would allow wave pool entry without handrails. The revision to the exception is only a clarification of the language to indicate that age specific design is preferred.

**Ballot Comment and Proponent Comment Agenda- July 15-19, 2013:  
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## 11-16.2

**Commenter:** Kim Paarlberg, Representing ICC

**Ballot:** Negative with comment:

**Comment:** It is not clear when sloped entries can be used vs. ramps with handrails. Some of the language seems to indicate that sloped entry has to have handrails at 36" apart.

A modification for this proposal will be forthcoming.

### **PROPONENT COMMENT**

## 11-16.3

**Proponent:** Kim Paarlberg, Representing ICC

**Comment 1 –**

**Replace the proposal with the following:**

**1109.3.1 Sloped Entry Route.** Sloped entries shall comply with ~~Chapter 4~~ Sections 402, 403 and 405 except as modified by Sections 1109.3.1 through 1109.3.3.

**EXCEPTION:** Where sloped entries are provided, the surfaces shall not be required to be slip resistant.

**Reason:** A reference to chapter 4 is too broad – this includes doors, elevators and platform lifts. The reference should be to walking surfaces and ramps.

**Comment 2 –**

**Replace the proposal with the following:**

**1109.3.3 Handrails.** At least two handrails complying with Section 505 shall be provided on the sloped entry. The clear width between required handrails shall be 33 inches (840 mm) minimum and 38 inches (965 mm) maximum.

**EXCEPTIONS:**

1. Handrail extensions specified by Section 505.10.1 shall not be required at the bottom landing serving a sloped entry.
2. Where a sloped entry is provided for wave action pools, leisure rivers, sand bottom pools, and other pools where the primary user access is limited to one area or one side, the handrails shall not be required to comply with the clear width requirements of Section 1109.3.3.
3. Sloped entries in wading pools shall not be required to provide handrails complying with Section 1109.3.3. If provided, handrails on sloped entries in wading pools shall not be required to comply with Section 505.

**Reason:** I am unclear when a pool has an entire side that is sloped entry, but does not have moving water, if that pool is required to have handrails into the water at 33"-38" apart, or can it have handrails on each side?

Also, all pools can be entered from the side wall. What is meant by "limited to one area"? If I have a lazy river that is large enough I let people come in at two locations, do I now have to do two handrails close together? Are these examples violations?

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



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## 11-17– 12

### 1109.6.1, 1109.6.2

#### *Proposed Change as Submitted*

**Proponent:** Kim Paarlberg, International Code Council

**Revise as follows:**

**1109.6.1 Pool Stairs.** Pool stairs shall comply with Sections 504 504.2 through 504.5.

**EXCEPTION:** Pool step risers shall not be required to be 4 inches (100 mm) minimum and 7 inches (180 mm) maximum in height provided that riser heights are uniform.

**1109.6.2 Handrails.** At least two handrails complying with Section 505 shall be provided on the pool stairs. The width between handrails shall be 20 inches (510 mm) minimum and 24 inches (610 mm) maximum.

**EXCEPTION:** Handrail extensions required by Section 505.10.3 shall not be required at the bottom on pool stairs.

**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 change to Section 1109.6.1 is to revise the reference to only include appropriate sections. Pools stairs should comply with treads and riser dimensions, open risers, tread surface, nosings and handrails. The requirements for visual contrast, wet conditions, lighting and stair level identification are not appropriate for these stairs.

The change in Section 1109.6.2 is consistent with the style used for pool sloped entries in Section 1109.3.3. The direct reference to handrails through 505 is better than through 504.6.

1109.6-PAARLBERG.doc

## Committee Action

### Disapproved

**Committee Reason:** While the ADA 2010 references all of Section 504, it has fewer provisions in that section. This change would eliminate the marking of steps which Committee members felt was important in a pool environment where the water can obscure clear vision of the steps.

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## BALLOT COMMENTS

### 11-17.1

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

**Comment:** Some provisions for handrails will not work for pool stairs.  
A modification for this proposal will be forthcoming.

## PROPONENT COMMENT

### 11-17.2

**Proponent:** Kim Paarlberg, Representing ICC

**Request that 11-17-12 be Approved as Submitted.**

**Reason:** The change to Section 1109.6.1 is to revise the reference to only include appropriate sections. Pools stairs should comply with treads and riser dimensions, open risers, tread surface, nosings and handrails. The requirements for visual contrast, wet conditions, lighting and stair level identification are not appropriate for these stairs. The change in Section 1109.6.2 is consistent with the style used in Section 1109.3.3. The direct reference to handrails through 505 is better than through 504.6. The committee disapproved this change because they wanted to include stair stripes. Since that information is in 504.5.1, this change in reference would not lose that requirement.

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### 11-18– 12

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

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