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.
- <u>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 m²) maximum.</u>



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.

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

Committee Action

Disapproved

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

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.

Committee Review of Comments and Action – July 2013

Approved.

Committee Reason: The committee acknowledged that the topic is not addressed in the ADA, therefore approving it does not provide a conflict. The size and height chosen are not based on any study of such facilities, but are the same numbers which allows elevated press boxes to be exempt.

Ballot Comments on July 2013 Committee Action Report

Todd Andersen Abstains:

Reason: Based on very limited personal experience the area limit is too high and height limit is too tall. I fear that these limits will make the exception of little use to most shooting facilities.

11-2– 12 1101.2.3, 1103.2.1, 1103.2.2

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

1101.2.3 Recreational Boating Facilities. Operable parts of cleats and other boat securement devices shall not be required to comply with Section 308.

1103.2.1 Boat Slips. An accessible route shall serve boat slips.

EXCEPTIONS:

- 1. Where an existing gangway or series of gangways is replaced or altered, an increase in the length of the gangway shall not be required to comply with Section 1103.2.
- 2. Gangways shall not be required to comply with the maximum rise specified in Section 405.6.
- 3. Where the total length of a gangway or series of gangways serving as part of a required accessible route is 80 feet (24 m) minimum, gangways shall not be required to comply with Section 405.2.
- 4. Where facilities contain fewer than 25 boat slips and the total length of the gangway or series of gangways serving as part of a required accessible route is 30 feet (9145 mm) minimum, gangways shall not be required to comply with Section 405.2.
- 5. Where gangways connect to transition plates, landings specified by Section 405.7 shall not be required.
- 6. Where gangways and transition plates connect and are required to have handrails, handrail extensions shall not be required. Where handrail extensions are provided on gangways or transition plates, the handrail extensions shall not be required to be parallel with the floor.
- 7. The cross slope specified in Sections 403.3 and 405.3 for gangways, transition plates, and floating piers that are part of accessible routes shall be measured in the static position.
- 8. Changes in level complying with Sections 303.3 and 303.4 shall be permitted on the surfaces of gangways and boat launch ramps.
- Cleats and other boat securement devices shall not be required to comply with Section 309.3 308.

1103.2.2 Boarding Piers at Boat Launch Ramps. An accessible route shall serve boarding piers.

EXCEPTIONS:

- Accessible routes serving floating boarding piers shall be permitted to use Exceptions 1, 2, 5, 6, 7, and 8 and 9 in Section1103.2.1.
- 2. Where the total length of the gangway or series of gangways serving as part of a required accessible route is 30 feet (9145 mm) minimum, gangways shall not be required to comply with Section 405.2.
- 3. Where the accessible route serving a floating boarding pier or skid pier is located within a boat launch ramp, the portion of the accessible route located within the boat launch ramp shall not be required to comply with Section 405.

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 intent matches ADA 205.1 Exception 7. The idea is that cleats, on boat slips or boarding piers, are not required to meet reach ranges. The revision eliminated a repeat in 1101.2.3 and leaves it in the more specific location under boat slips in 1103.2.1. The addition in 1103.2.2 adds it to boarding piers. The change from 309.3 to 308 is just a more direct reference.

1101.2.3-PAARLBERG.doc

Committee Action

Approved

Committee Reason: The change eliminates redundancy in the standard and is consistent with the ADA 2010

11-3– 12 1102.4.3

Proposed Change as Submitted

Kim Paarlberg, International Code Council

Revise as follows:

1102.4.3 Gaps. Floors of amusement rides with wheelchair spaces and floors of load and unload areas shall be coordinated so that, when amusement rides are at rest in the load and unload position, the vertical difference between the floors shall be within plus or minus $\frac{5}{8}$ inch (16 mm) and the horizontal gap shall be 3 inches (75 mm) maximum under normal passenger load conditions.

EXCEPTION: Where complying is not operationally or structurally feasible, ramps, bridge plates, or similar devices complying with the applicable requirements of 36 CFR 1192.83(c), listed in Section 105.2.11, shall be provided. <u>Handrails on the ramps, bridge plates or similar devices are permitted</u> to comply with either the requirements of Section 505 or the requirements of 36 CFR 1192.83(c).

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.

Whether this proposal is needed is dependent upon the enforcement agency's interpretation of the requirements in federal regulations and Sections 104.5 and 105.1 of the A117.1 standard.

The CFR requirements which are specified include several items which would create confusion or conflict between the A117 standard and the referenced standard. These problems may be ignored by some jurisdictions based on the provisions of Section 105 which state that "Where criteria in this standard differ from those of these referenced documents, the criteria of this standard shall apply." On the other hand because the CFR provisions are presented as an exception, other users may view the CFR as a specific set of requirements to be used as an alternate to those of the A117.1.

This particular section in the A117 standard is really focused on the gap in the floor surface between an amusement ride and the load and unload area. Therefore the handrail issue is a minor aspect and should not create any problems which could not be easily resolved. The difficulty that lead to the submission of this proposal is the fact that the CFR will allow (a) the handrails to be as low as 30 inches while the A117.1 requires a minimum height of 34 inches, and (b) the gripping surface of the CFR handrail is limited to a maximum of 1 ½ inches while the A117.1 will accept a 2 inch maximum cross section. I was told that the CFR provisions were really developed based on iron pipe size (IPS) and that the 1 ½ inch IPS will have a nominal cross section that is more like 1.9 inches. However because the CFR does not specifically state this, an inspector had turned down a handrail on a bridge/ramp because it was larger than the 1 ½ inches even though it was less than the 2 inches that the A117.1 standard will accept.

While this proposal does address this specifically identified conflict between the A117.1 and the referenced CFR standard I hate to begin the precedence of needing to amend the A117 for each identified conflict versus simply relying on Section 105.1 unless there are very unique circumstances. I personally see no unique or compelling circumstances to specifically address this one identified conflict other than the fact that it has been brought to our attention and did create a problem on one known project. The committee should decide whether to approve this proposal or rely on Section 105.1 and its guidance.

The relevant text from the referenced federal standard is included below:

PART 1192 - AMERICANS WITH DISABILITIES ACT (ADA) ACCESSIBILITY GUIDELINES FOR TRANSPORTATION VEHICLES subpart d - LIGHT RAIL VEHICLES AND SYSTEMS

1192.83 - Mobility aid accessibility.(c) Vehicle ramp or bridge plate

(8) Handrails. If provided, handrails shall allow persons with disabilities to grasp them from outside the vehicle while starting to board, and to continue to use them throughout the boarding process, and shall have the top between 30 inches and 38 inches above the ramp surface. The handrails shall be capable of withstanding a force of 100 pounds concentrated at any point on the handrail without permanent deformation of the rail or its supporting structure. The handrail shall have a cross-sectional diameter between 1 1/4 inches and 1 1/2 inches or shall provide an equivalent grasping surface, and have eased edges with corner radii of not less than 1/8 inch. Handrails shall not interfere with wheelchair or mobility aid maneuverability when entering or leaving the vehicle.

1102.4.3-PAARLBERG.doc

Committee Action

Approved

Committee Reason: The change provides for 2 options for compliance. It doesn't conflict with the ADA 2010.

11-4– 12 1102.5, 1102.6

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

1102.5 Amusement Ride Seats Designed for Transfer <u>or transfer devices</u>. Amusement ride seats designed for transfer <u>or transfer devices</u> shall comply with Section 1102.5 when positioned for loading and unloading.

1102.5.1 Clear Floor Space. A clear floor space complying with Section 305 shall be provided in the load and unload area adjacent to the amusement ride seats designed for transfer <u>or transfer devices</u>.

1102.5.2 Transfer Height. The height of amusement ride seats designed for transfer <u>or transfer devices</u> shall be 14 inches (355 mm) minimum and 24 inches (610 mm) maximum measured from the surface of the load and unload area.

1102.5.4 Wheelchair Storage Space. Wheelchair storage spaces complying with Section 305 shall be provided in or adjacent to unload areas for each required amusement ride seat designed for transfer <u>or</u> <u>transfer devices</u> and shall not overlap any required means of egress or accessible route.

1102.6 Transfer Devices for Use with Amusement Rides. Transfer devices for use with amusement rides shall comply with Section 1102.6 when positioned for loading and unloading.

1102.6.1 Clear Floor Space. A clear floor space complying with Section 305 shall be provided in the load and unload area adjacent to the transfer device.

1102.6.2 Transfer Height. The height of transfer device seats shall be 14 inches (355 mm) minimum and 24 inches (610 mm) maximum measured from the load and unload surface.

1102.6.3 Wheelchair Storage Space. Wheelchair storage spaces complying with Section 305 shall be provided in or adjacent to unload areas for each required transfer device and shall not overlap any required means of egress or accessible route.

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.

There does not seem to be a reason for repeating the exact same requirements for amusement ride seats designed for transfer and transfer devices. The only difference is transfer openings (1102.5.3) however, transfer devices are a type of mobility devices, so there still needs to be an opening on the ride for people to move into.

1102.5-PAARLBERG.doc

Committee Action

Approval as Modified

Modification

1102.5 Amusement Ride <u>Transfer Devices and</u> <u>Seats Designed for Transfer or transfer devices</u>. Amusement ride <u>transfer devices and</u> seats designed for transfer or transfer devices shall comply with Section 1102.5 when positioned for loading and unloading.

1102.5.1 Clear Floor Space. A clear floor space complying with Section 305 shall be provided in the load and unload area adjacent to the amusement ride <u>transfer devices and</u> seats designed for transfer or transfer devices.

1102.5.2 Transfer Height. The height of amusement ride <u>transfer devices and</u> seats designed for transfer or transfer devices shall be 14 inches (355 mm) minimum and 24 inches (610 mm) maximum measured from the surface of the load and unload area.

1102.5.4 Wheelchair Storage Space. Wheelchair storage spaces complying with Section 305 shall be provided in or adjacent to unload areas for each required amusement ride <u>transfer device and each</u> seat designed for transfer or transfer devices and shall not overlap any required means of egress or accessible route.

Committee Reason: The change simplifies the standard by consolidating language that is mostly redundant. The word order of the sentences was reversed for clarity.

11-5– 12 1103.2.1

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

1103.2.1 Boat Slips. An accessible route shall serve boat slips.

EXCEPTIONS:

- 1. Where an existing gangway or series of gangways is replaced or altered, an increase in the length of the gangway shall not be required to comply with Section 1103.2.
- 2. Gangways shall not be required to comply with the maximum rise specified in Section 405.6.
- 3. Where the total length of a gangway or series of gangways serving as part of a required accessible route is 80 feet (24 m) minimum, gangways shall not be required to comply with Section 405.2.

- 4. Where facilities contain fewer than 25 boat slips and the total length of the gangway or series of gangways serving as part of a required accessible route is 30 feet (9145 mm) minimum, gangways shall not be required to comply with Section 405.2.
- 5. Where gangways connect to transition plates, landings specified by Section 405.7 shall not be required.
- 6. Where gangways and transition plates connect and are required to have handrails, handrail extensions shall not be required. Where handrail extensions are provided on gangways or transition plates, the handrail extensions shall not be required to be parallel with the floor.
- 7. The cross slope specified in Sections 403.3 and 405.3 for gangways, transition plates, and floating piers that are part of accessible routes shall be measured in the static position.
- 8. Changes in level complying with Sections 303.3 and 303.4 shall be permitted on the surfaces of gangways and boat launch ramps piers.
- 9. Cleats and other boat securement devices shall not be required to comply with Section 309.3.

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 to correct a mistake for accessible routes along boat slips. Accessible routes are not required on boat launch ramps. The accessible route is the gangways and piers. It is arguable that this allowance is not even needed since ¼" and ½" changes are already permitted by Chapter 4.

If this exception is deleted, the reference to Item 8 should be removed from Section 1103.2.1 and 1105.1.

1103.2.1-PAARLBERG.doc

Approved

Committee Action

Committee Reason: The change corrects an error in the existing standard.

11-6– 12 1103.3.1, 1103.3.2

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

1103.3.1 Boat Slip Clearance. <u>At</u> Boat slips <u>and on boarding piers at boat launch ramps</u> shall provide clear pier space 60 inches (1525 mm) minimum in width that extend the full length of the boat slips <u>or</u> <u>boarding pier</u>. Each 10 feet (3050 mm) of linear pier edge serving boat slips <u>or boarding pier</u> shall contain at least one continuous clear opening 60 inches (1525 mm) minimum in width.

EXCEPTIONS:

- Clear pier space shall be permitted to be 36 inches (915 mm) minimum in width and 24 inches (610 mm) maximum in length, provided that multiple 36-inch (915 mm) wide segments are separated by segments that are 60 inches (1525 mm) minimum in width and 60 inches (1525 mm) minimum in length.
- 2. Edge protection shall be permitted at the continuous clear openings, provided the edge

protection is 4 inches (100 mm) maximum in height and 2 inches (51 mm) maximum in width.

3. In existing piers for boat slips, clear pier space shall be permitted to be located perpendicular to the boat slip and shall extend the width of the boat slip, where the facility has at least one boat slip complying with Section 1103.3, and further compliance with Section 1103.3 would result in a reduction in the number of boat slips available or result in a reduction of the widths of existing slips.

1103.3.2 Boarding Pier Clearances. Boarding piers at boat launch ramps shall provide clear pier space 60 inches (1525 mm) minimum in width and shall extend the full length of the boarding pier. Every 10 feet (3050 mm) of linear pier edge shall contain at least one continuous clear opening 60 inches (1525 mm) minimum in width.

EXCEPTIONS:

- The clear pier space shall be permitted to be 36 inches (915 mm) minimum in width and 24 inches (610 mm) maximum in length provided that multiple 36-inch (915 mm) wide segments are separated by segments that are 60 inches (1525 mm) minimum in width and 60 inches (1525 mm) minimum in length.
- Edge protection shall be permitted at the continuous clear openings provided the edge protection is 4 inches (100 mm) maximum in height and 2 inches (51 mm) maximum in width.

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 requirements are the same for boat slips and boarding piers, so why repeat?

1103.3-PAARLBERG.doc

Committee Action

Approved

Committee Reason: The proposal simplifies the Standard by combining two provisions that are identical except for which feature they apply to. (Also referred to Editorial Task Group to address section titles.)

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 <u>along the perimeter of fishing piers or platforms</u>, railings, <u>barriers</u>, <u>or</u> guards, or handrails shall comply with Section 1105.2.

1105.2.1 Height. A minimum of 25 percent of the railings, guards <u>or barriers</u>, 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.

<u>1105.3.3</u> <u>1105.3.2</u> 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 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, <u>barriers or guards</u>, 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

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 then an IBC guard being required.

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 to 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.

PROPONENT COMMENT

11-7.3

Proponent: Kim Paarlberg, Representing ICC

Replace the proposal with the following:

1105.2 Railings. Where provided <u>along the perimeter of fishing piers or platforms</u>, railings, <u>or guards</u>, 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.

<u>1105.3.3</u> 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.

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.

Committee Review of Comments and Action – July 2013

Approval with Modifications based on Comments.

Committee Reason: The committee approved the proposal based on modifications shown in comment 11-7.3. Further modifications were made to address potential confusion with handrails as required in a building code. The consensus was that guards which complied with the building code applicable in a jurisdiction would be acceptable as the 'barrier' around such piers and platforms.

Replace the proposal with the following:

1105.2 Railings. Where provided <u>along the perimeter of fishing piers or platforms</u>, railings, <u>or guards</u>, 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 shall be provided.

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

<u>1105.3.2</u> 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.

11-8–12 1106.2, 1106.2.1 (New), 1106.2.2 (New), 1106.2.3 (New), 1106.4

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

1106.2 Accessible Routes. Accessible routes serving teeing grounds, practice teeing grounds, putting greens, practice putting greens, teeing stations at driving ranges, course weather shelters, golf car rental areas, bag drop areas, and course toilet rooms shall comply with Chapter 4. Exterior routes and shall be 48 inches (1220 mm) minimum in width. Where handrails are provided, accessible routes shall be 60 inches (1525 mm) minimum in width.

EXCEPTIONS:

- <u>1.</u> Handrails shall not be required on golf courses. Where handrails are provided on golf courses, the handrails shall not be required to comply with Section 505.
- 2. Accessible golf car passages in accordance with Section 1106.3 shall be permitted to be used for all or part of accessible routes required by this section.

1106.2.1 Teeing Grounds. Where one teeing ground is provided for a hole, the teeing ground shall be designed and constructed so that a golf car can enter and exit the teeing ground. Where two teeing grounds are provided for a hole, the teeing ground closest to the hole shall be designed and constructed so that a golf car can enter and exit the teeing ground. Where three or more teeing grounds are provided for a hole, including the teeing ground closest to the hole, shall be designed and constructed and constructed so that a golf car can enter and exit the teeing ground. Where three or more teeing grounds are provided for a hole, at least two teeing grounds, including the teeing ground closest to the hole, shall be designed and constructed so that a golf car can enter and exit each teeing ground.

EXCEPTION: Where existing golf courses are being altered, the forward teeing ground shall not be required to be one of the teeing grounds on a hole designed and constructed so that a golf car can enter and exit the teeing ground where compliance is not feasible due to terrain.

1106.2.2 Putting Greens. Putting greens shall be designed and constructed so that a golf car can enter and exit the putting green.

1106.2.3 Practice Putting Greens, Practice Teeing Grounds, and Teeing Stations at Driving Ranges. At least 5 percent, but no fewer than one, of practice putting greens, practice teeing grounds, and teeing stations at driving ranges shall be designed and constructed so that a golf car can enter and exit.

<u>1106.4</u> <u>1106.2.4</u> Weather Shelters. Where provided, weather shelters shall be designed and constructed so that a golf car can enter and exit the weather shelter.</u> A clear floor space 60 inches (1525 mm) minimum by 96 inches (2440 mm) minimum shall be provided within weather shelters.

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 IBC code development committee stated that they did not want requirements for the grounds in a golf course to be in the building code because it is not part of the built environment. Since the elements deal with accessible route, it would be within the technical purview of ICC A117.1 to contain these requirements. This would continue the coordination with the 2010 ADA Standard.

Clarifying that the exterior route is where the 48" width is required is consistent with the Public-rights of way suggestions and what I found in the ADA advisory pamphlets.

1106.1-PAARLBER.doc

Committee Action

Approved

Committee Reason: While there was some concern on the committee that this proposal verges on putting scoping requirements in the Standard, the committee concluded that the *International Building Code* requires that golf courses be accessible and this change provides specification for such

accessibility. The Standard has similar provisions in Chapter 10 for the various types of dwelling and sleeping units where specifications of elements of accessibility are specified.

11-9– 12 1106.2

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

1106.2 Accessible Routes. Accessible routes serving teeing grounds, practice teeing grounds, putting greens, practice putting greens, teeing stations at driving ranges, course weather shelters, golf car rental areas, bag drop areas, and course toilet rooms shall comply with Chapter 4 and shall be 48 inches (1220 mm) minimum in width. Where handrails guards, barriers or rails are provided, accessible routes shall be 60 inches (1525 mm) minimum in width.

EXCEPTION: Handrails shall not be required on golf courses. Where handrails are provided on golf courses, the handrails shall not be required to comply with Section 505.

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.

Handrails in Section 505 are only applicable at ramps and stairways. Section 403.6 only deals with handrails provided along the sides of corridors. Since the scope of handrails in the ICC A117.1 is different from 2010 ADA Standard, the exception for handrails is not applicable and should be deleted if it is intended to deal with the cart route. If the exterior route is a ramp where people may be walking, the exception for compliance with Section 505 is inappropriate and may be a safety hazard.

Handrails in an outdoor environment would not narrow an accessible route any more than any other guard or barrier, so what is the justification for the wider route specific to handrails? The sentence should be changed to deal with areas with barriers or guards running along the accessible route, not just handrails.

1106.2-PAARLBERG.doc

Committee Action

Approved

Committee Reason: The change provides specification for other common features along accessible routes which could restrict width. Handrails are sufficiently addressed in Section 505.

11-10– 12 1107.2

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

1107.2 Accessible Routes. Accessible routes serving holes on miniature golf courses shall comply with Chapter 4.

EXCEPTIONS:

Accessible routes located on playing surfaces of miniature golf holes shall be permitted to comply with the following:

- 1. Playing surfaces shall not be required to comply with Section 302.2.
- 2. Where accessible routes intersect playing surfaces of holes, a curb that is 1 inch (25 mm) maximum in height and 32 inches (815 mm) minimum in width shall be permitted.
- 3. A slope of 1:4 maximum shall be permitted for a rise of 4-inches (100 mm) maximum.
- 4. Ramp landing slopes specified by Section 405.7.1 shall be permitted to be 1:20 maximum.
- 5. Ramp landing length specified by Section 405.7.3 shall be permitted to be 48 inches (1220 mm) minimum.
- 6. Ramp landing size at a change in direction specified by Section 405.7.4 shall be permitted to be 48 inches (1220 mm) minimum by 60 inches (1525 mm) minimum.
- 7. Handrails shall not be required <u>along ramps located on the playing surface</u> on holes. Where handrails are provided on holes, the handrails shall not be required to comply with Section 505.

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 exception is clarified to allow for no required handrails on ramps that were part of the hole playing surface. However, if handrails are provided, the handrails should comply with Section 505 for safety reasons. Remember that the scope of handrails in ICC A117.1 is only along corridors, stairways and ramps; not where provided as in 2010 ADA Standard.

1107.2-PAARLBERG.doc

Committee Action

Approved

Committee Reason: The change clarifies the application of the exceptions to the playing surface of the miniature golf holes and not for the whole facility.

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. <u>Accessible routes within play areas shall comply with</u> 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.
- 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

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

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.

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.
- 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:

- 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.
- 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:

 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.

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.

Committee Review of Comments and Action – July 2013

Approval with Modifications based on Comments.

Committee Reason: The committee found the revised version of the proposal found in Comment 11-12.2 is a better organization of the exceptions for play areas.

Modification.

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.

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:

- 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.
- 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)

11-14– 12 1108.4.1.5

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

1108.4.1.5 Ramps. Within play areas, ramps connecting ground level play components and ramps connecting elevated play components shall comply with <u>Section 405 except at modified by</u> Section 1108.4.1.5.

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 addition would pick up cross slope, edge protection, landings – all of which are currently not directly required. This would also pick up rise for ground ramps and slope for elevated ramps.

1108.4.1.5-PAARLBERG.doc

Committee Action

Approved

Committee Reason: The change provides consistent language with the 2010 ADA.

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.

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 the 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

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.

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.

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.
- 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 pools 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?



Committee Review of Comments and Action – July 2013

Approval with Modifications based on Comment.

Committee Reason: The committee found the revision provided as Comment 1 within Comment 11-16.3 provided the correct direction and exceptions for accessible routes into pools.

Modification:

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.

11-17– 12 1109.6.1, 1109.6.2

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

1109.6.1 Pool Stairs. Pool stairs shall comply with Sections 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. <u>At least two handrails complying with Section 505 shall be provided on the pool</u> <u>stairs</u>. The width between handrails shall be 20 inches (510 mm) minimum and 24 inches (610 mm) maximum.

EXCEPTION: Handrail extensions required by <u>Section</u> 505.10.3 shall not be required <u>at the bottom</u> 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.

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 for pool sloped entries in Section 1109.3.3. The direct reference to handrails through 505 is better than through 504.6.

The committee disapproved this change because the wanted to include stair stripes. Since that information is in 504.5.1, this change in reference would not lose that requirement.

Committee Review of Comments and Action – July 2013

Approved.

Committee Reason: Based upon information provided by the pool industry and provided in the comments, the committee concluded that the direction provided in the proposed text is appropriate.

11-18-12 1110.2 (New)

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Add new text as follows:

1110.2 Firing position counters. Where a firing position requires shooting over a counter or wall, the top of the counter or wall shall be 34 inches maximum in height above the floor surface. If counter surfaces are provided at other firing positions of the same type, equivalent counter surfaces shall be provided at the accessible firing position.

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.

Typical interior ranges are set up as firing positions separated by walls. The shooter fires over a wall or shelf at the target. Since the typical shooter is standing, the typical shelf height would obstruct the shooter in a seated position.



1110.2 (NEW)-PAARLBERG.doc

Committee Action

Approved

Committee Reason: This new section would provide accessible standards for firing ranges.