Chapter 3

3-2 – 12

Revise as follows:

302.1 General. Floor surfaces shall be stable, firm, and slip resistant, and shall comply with Section 302. Changes in level in floor surfaces shall comply with Section 303.

EXCEPTIONS:

1. Within animal containment areas not exempted by Section 1101.2.1, floor and ground surfaces shall not be required to be stable, firm, and slip resistant.

2. Within areas of sports activity exempted in Chapter 11, the floor and ground surfaces shall not be required to comply with this section.

303.1 General. Changes in level in floor surfaces shall comply with Section 303.

EXCEPTIONS:

1. Animal containment areas not exempted by Section 1101.2.1 shall not be required to comply with this section.

2. Within areas of sports activity exempted in Chapter 11, the changes in level shall not be required to comply with this section.

3-2-12 PC1

Harold Kiewel, representing self

Further revise as follows:

302.1 General. Floor surfaces shall be stable, firm, and slip resistant, and shall comply with Section 302. Changes in level in floor surfaces shall comply with Section 303.

EXCEPTIONS:

1. Within animal containment areas not exempted by Section 1101.2.1, floor and ground surfaces shall not be required to ~~be stable, firm, and slip resistant~~ comply with this section.

2. Within areas of sports activity exempted in Chapter 11, the floor and ground surfaces shall not be required to comply with this section.

303.1 General. Changes in level in floor surfaces shall comply with Section 303.

EXCEPTIONS:

1. Animal containment areas not exempted by Section 1101.2.1 shall not be required to comply with this section.

2. Within areas of sports activity exempted in Chapter 11, the changes in level shall not be required to comply with this section.

Reason: If, as is shown in 3.02.1 Exception 2, and 3.03.1 Exceptions 1 & 2, the preferred phasing is "*shall not be required to comply with this section,*" then for clarity and consistency Article 302.1, Exception 1 should also use that phrase. Failure to do so

makes the phrase "*shall not be required to be firm, stable, and slip-resistant*" used in Exception 1 stand out as meaning something different; if you didn't mean something different, why did you write something different? For additional information from Mr. Kiewel, see 1-1--12.

3-4 – 12

Revise as follows:

303 Changes in Level

303.1 General. Changes in level in floor surfaces shall comply with Section 303.

303.2 Vertical. Changes in level of 1 /4 inch (6.4 mm) maximum in height shall be permitted to be vertical.

303.3 Beveled. Changes in level greater than 1/4 inch (6.4 mm) in height and not more than 1/2 inch (13 mm) maximum in height shall comply with one of the following:

1. The change in level shall be beveled with a slope not steeper than 1:2.

2. The change in level shall be a combination of vertical change in level of ¼ inch (6.4 mm) maximum below a bevel with a slope not steeper than 1:2.

3-4-12 PC1

Gene Boecker, Code Consultants, Inc, representing National Association of Theatre Owners

Further revise as follows:

302.3 Openings. Openings in floor surfaces shall be of a size that does not permit the passage of a 1/2 inch (13 mm) diameter sphere, except as allowed in Sections 407.4.3, 408.4.3, 409.4.3, 410.4, and 805.10. Elongated openings shall be placed so that the long dimension is perpendicular to the predominant direction of travel.

EXCEPTION: Where the opening is no greater than 1/4 inch (6.5 mm), the orientation of the elongated opening shall not be required to be perpendicular to the predominant direction of travel.

303.2 Vertical. Changes in level of 1 /4 inch (6.4 mm) maximum in height shall be permitted to be vertical.

EXCEPTION: Where the gap between adjacent surfaces complies with Section 302.3, the change in level shall be measured from adjacent surfaces.

Reason: The proposal is an attempt to address the unresolved issues included within proposal 3-5 which sought to address allowed changes of level. Proposal 305 failed to gather sufficient support due to some flaws in the manner in which it was presented. As originally proposed, it would have allowed changes within the floor surface for turning spaces, door landings, within stair treads and surfaces. It was stated during the committee discussions on 3-5 that the problem was in the manner in which Section 303 addresses changes in level; most areas allow the changes in level implicitly due to omission of any prohibition. While proposal 3-5 sought to address this bey stating in each location where changes in level could and could not take place, the fundamental issue was how changes in level are addressed for surfaces such as ceramic tile and wood decks where a change takes place at each gap between adjacent surfaces.

The proposal above seeks to solve the underlying problem by addressing the adjacent surfaces issue. Where the gap between adjacent surfaces meets the requirements for openings, the proposal would recognize the fact that there is a change due to the opening can be ignored. This would allow gaps between wood decking to be up to 1/2 inch. If so, the vertical change would be measured between the adjacent surfaces and the gap itself would be ignored as a change in level.

A companion change is necessary to Section 302.3 to address small gaps such as what takes place in ceramic tile. According to the Tile Council of America the standard for tile joints is less than 1/2 inch in almost all conditions. A "wide" joint is considered 3/8 inch (http://www.tcnatile.com/faqs/40-grout-joint-size.html#faq29). Most joints are 1/4 inch or less. The proposal would recognize those 1/4 inch gaps by allowing them to be treated like openings. Additionally, close-mesh bar grating (one example:

http://www.mcnichols.com/product/6601319999?navCode=cc:bar&navCode=avc:bargrtclosemsh) would be allowed for floor surfaces where the direction of travel may be unclear such as at large areas. The 1/4 –inch gap at tile has been in place for some time and has not been identified as a problem. Therefore, it is used as the basis for this dimension. The difference in wording is due to the fact that in the first case, the intent is to limit openings to be less than 1/2 inch (due to the requirement to refuse a 1/2 inch sphere); and, in the second case, the 1/4 inch gap is standard spacer dimension for tile grout joints and spacing between the bars in grating.

The end result should be that the issue in proposal 3-5 can be addressed by this change to 3-4. For any floor surface with a gap less than 1/2 inch, the gap is treated like an opening. For any gap that is less than 1/4 inch, the orientation of those gaps is irrelevant.

3-4-12 PC2

Gene Boecker, Code Consultants, Inc, representing National Association of Theatre Owners

Add text as follows:

303.4 Series of changes. Changes in level which occur within a 10 inch (255 mm) horizontal dimension shall be considered in aggregate.

> **EXCEPTION:** Changes in level not exceeding 1/4 inch (6.4 mm) shall be permitted within 5 inches (130 mm) maximum of another change in level.

Reason: The proposal seeks to address an aspect of proposal 3-5 that was left unresolved. Where changes in level occur, it was not clear how those changes can be addressed when viewed in sequence. One point in the committee discussion was that if changes in level would be allowed in all the places proposed, then it would be possible to "piggy-back" those changes into a significant change by adding a beveled change, then another, then another, and so on.

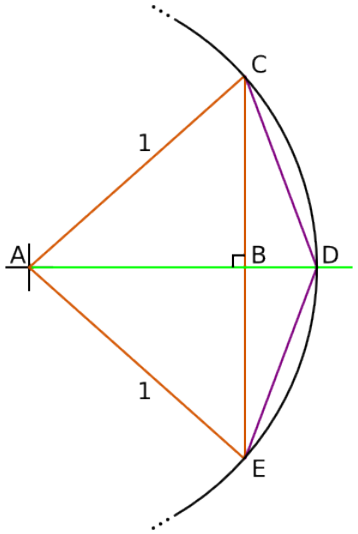
The proposal would limit the allowable change to be what is measured within a 10 inch horizontal dimension. Because the allowable maximum change is 1/2 inch, if a line was to be drawn from the top of that change in level to the base level, it would equate to a 1:20 slope; the maximum allowed before the slope must be addressed as a ramp. A series of such changes could be combined to form a slope which is the maximum allowed according to Section 403.3.

The allowance for a vertical change to be closer than 10 inches is based on the physical dimensions of the large wheel of a standard wheelchair. The large wheel is generally 26 inches in diameter. Using geometry as expressed by the image at right, the number "1" is the wheel radius (13") and a 1/4 inch (0.25") vertical change is the segment B-D. Therefore, the segment A-B would be 12-3/4 inches (12.75"). The question is: what the length is for Segment B-C.

Using Pythagorean's Theorem: $(A\text{-}B)^2 + (B\text{-}C)^2 = (A\text{-}C)^2$.

Or, $13^2 - (12.75)^2 = (B\text{-}C)^2$

Solving, the result is 2.54 inches.



The decision to use 5 inches was to provide a dimension with a safety factor of two which allows the wheel to be placed on a flat surface before negotiating the next change. The fact that it coincides with a horizontal dimension that is half the 10 inch measurement is not part of the rationale but makes the concept easier to remember.

The application to the small wheels of a wheelchair is the limitation on the height of the vertical change itself. That is unaffected by this.

Although this seeks to address the unresolved issues expressed in Proposal 3-5, the solution can be placed within the text in Proposal 3-4. This will allow a better understanding of how to address multiple allowable changes in level.

3-4-12 PC3

Larry Perry – representing self

Further revise as follows:

303.3 Beveled. Changes in level greater than 1/4 inch (6.4 mm) in height and not more than 1/2 inch (13 mm) maximum in height shall comply with one of the following:

1. The change in level shall be beveled with a slope not steeper than 1:2.
2. The change in level shall be a combination of vertical change in level of ¼ inch (6.4 mm) maximum ~~below~~ and a bevel with a slope not steeper than 1:2.

Reason: The proposed change to allow a 1/4" vertical portion of a 1/2" high overall level change to be only below the bevel is overly restrictive, and was made with no substantiation. Prohibiting the 1/4" vertical change from being above the beveled portion would eliminate a great number of metal threshold profiles that are currently permitted.

3-4-12 PC4

Hope Reed, – representing New Mexico Governor's Commission on Disability (NMGCD)

Revise as follows:

~~**303.3 Beveled.** Changes in level greater than 1/4 inch (6.4 mm) in height and not more than 1/2 inch (13 mm) maximum in height shall comply with one of the following:~~

1. ~~The change in level shall be beveled with a slope not steeper than 1:2.~~

2. ~~The change in level shall be a combination of vertical change in level of ¼ inch (6.4 mm) maximum below a bevel with a slope not steeper than 1:2.~~

303.3 Beveled. Changes in level greater than 1/4 inch (6.4 mm) in height and not more than 1/2 inch (13 mm) maximum in height shall be beveled with a slope not steeper than 1:2.

Reason: The new language does not improve accessibility, understanding, or enforcement. Leave the language to remain in compliance with 2010 ADA. Provide exception for door thresholds. See companion proposal 404.2.4.

3-4-12 PC5

Michael Tierney, – representing The Builders Hardware Manufacturers Association

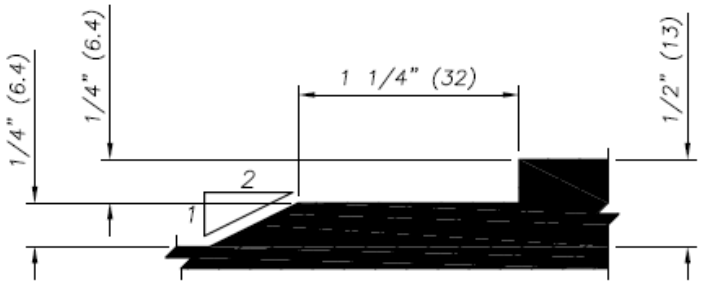
Revise as follows:

~~**303.3 Beveled.** Changes in level greater than 1/4 inch (6.4 mm) in height and not more than 1/2 inch (13 mm) maximum in height shall comply with one of the following:~~

1. ~~The change in level shall be beveled with a slope not steeper than 1:2.~~

2. ~~The change in level shall be a combination of vertical change in level of ¼ inch (6.4 mm) maximum below a bevel with a slope not steeper than 1:2.~~

303.3 Beveled. Changes in level greater than 1/4 inch (6.4 mm) in height and not more than 1/2 inch (13 mm) maximum in height shall be beveled with a slope not steeper than 1:2.



Reason: The current committee action would render hundreds of thousands of existing openings noncompliant – the bumper seal threshold style illustrated below has been in use for over two decades, and there is no record of any deleterious effects on accessibility.

The design, with the ¼ inch vertical above the ¼ inch bevel, functions, along with an applied gasket, to seal the bottom of the door from air, smoke or water infiltration, increasingly necessary for energy and other code requirements. Although not addressed currently, the ¼ inch vertical rise is separated by a minimum one inch horizontal run as shown in the proposed illustration. This design is clearly permitted by the 2009 A117.1 language of section 303.3.

3-6 – 12

Revise as follows:

304.3.1 Circular Space. The turning space shall be a circular space with a ~~60~~ 67 inch (~~1525~~ 1700 mm) minimum diameter. The turning space shall be permitted to include knee and toe clearance complying with Section 306.

3-6-12 PC1

Brian Black, – representing self

Revise as follows:

304.3.1 Circular Space. The turning space shall be a circular space with a 67 inch (1700 mm) minimum diameter. The turning space shall be permitted to include knee and toe clearance complying with Section 306.

> **Exception:** In existing buildings and facilities, a circular space with a 60 inch (1525 mm) minimum diameter shall be permitted.

Reason: The 2012 *International Existing Building Code* (IEBC) states:

> **705.2 Alterations affecting an area containing a primary function.** Where an *alteration* affects the accessibility to a, or contains an area of, *primary function*, the route to the *primary function* area shall be accessible. The accessible route to the *primary function* area shall include toilet facilities or drinking fountains serving the area of *primary function*.
>
> **Exceptions:**
>
> 1. The costs of providing the accessible route are not required to exceed 20 percent of the costs of the alterations affecting the area of *primary function*.
> 2. This provision does not apply to *alterations* limited solely to windows, hardware, operating controls, electrical outlets and signs.
> 3. This provision does not apply to *alterations* limited solely to mechanical systems, electrical systems, installation or *alteration* of fire protection systems and abatement of hazardous materials.
> 4. This provision does not apply to *alterations* undertaken for the primary purpose of increasing the accessibility of a *facility*.
> 5. This provision does not apply to altered areas limited to Type B dwelling and sleeping units.

Consider a building constructed in 2013 under the 2012 *International Building Code* that complies with all of the accessibility requirements of that code and its referenced ICC A117.1-2009 standard. If a primary function area of that building is altered under a future edition of the IEBC that references ICC A117.1-2014, and if that future edition of the IEBC retains language similar to that cited above, the building owner may be required to make significant modifications to the primary function area and toilet facilities serving that area to comply with the increased turning and clear floor space requirements of the 2014 standard. A minimal increase in accessibility may result even where costs and structural changes are significant. Adding exceptions for existing buildings and facilities that permit the turning and clear floor spaces that are considered accessible under the 2009 edition of the standard would resolve this problem.

I appreciate there has been a continuing "technical *vs*. scoping" tension between the A117.1 accessibility standard and the model building codes, and that some may argue that these exceptions belong in the model codes, not the accessibility standard. I believe the technical expertise needed to determine where exceptions for existing buildings are appropriate is in the A117 Accredited Standards Committee and not the committees or voting memberships of the model code groups. This committee should decide whether exceptions are warranted and, if so, where they should be permitted.

The 2009 edition of ICC A117.1 has at least 23 exceptions that can be applied in existing buildings and facilities, making allowances for side reaches, door thresholds, ramp slopes, LU/LA sizes, shower thresholds, play areas and boat slips. There are 11 exceptions for existing passenger elevators alone. All of these exceptions belong in the standard and not a building code to ensure that the A117 Accredited Standards Committee retains control of what are essentially technical access considerations. Adding additional exceptions for the larger floor spaces of the 2014 standard would merely continue this policy.

3-6-12 PC2

Ron Burton, PTW Advisors LLC, representing Building Owners and Managers Association, International; David S. Collins, The Preview Group, representing American Institute of Architects

(AIA); Ron Nickson, representing the National Multi-housing Council; Steve Orlowski, representing the National Association of Home Builders; Kim Paarlberg, representing International Code Council

Revise as follows:

~~106.5~~ 107.5 Defined Terms.
Existing building. A building erected prior to the date of adoption of this standard, or one for which a legal building permit has been issued.

304.3.1 Circular Space.

304.3.1.1 New buildings. In new buildings, the turning space shall be a circular space with a 67 inch (1700 mm) minimum diameter. The turning space shall be permitted to include knee and toe clearance complying with Section 306. Where the turning space includes knee and toe clearances under an obstruction, the overlap shall comply with all of the following: . (3-6-12) (3-8-12)

1. The depth of the overlap shall not be more than 10 inches (255 mm), and

2. The depth shall not exceed the depth of the knee and toe clearances provided, and

3. The overlap shall be permitted only within the turning circle area shown shaded in Figure 304.3.1. (3-8-12)

304.3.1.2 Existing buildings. In existing buildings, the turning space shall be a circular space with a 60 inch (1525 mm) minimum diameter. The turning space shall be permitted to include knee and toe clearance complying with Section 306.

304.3.2 T-Shaped Space.

304.3.2.1 New construction. In new buildings, the turning space shall be a T–shaped space complying with one of the following:

1. A T-shaped space, clear of obstruction, that fits within an area 68 inches (1725 mm) wide and 60 inches (1525 mm) deep, with two arms and one base that are all 36 inches (915 mm) minimum in width. Each arm shall extend 16 inches (405 mm) minimum from each side of the base located opposite the other, and the base shall extend 24 inches (610 mm) minimum from the arms. At the intersection of each arm and the base, the interior corners shall be chamfered for 8 inches (205 mm) minimum along both the arm and along the base.

2. A T-shaped space, clear of obstruction, that fits within an area 64 inches (1625 mm) wide and 60 inches (1525 mm) deep, with two arms 38 inches (965 mm) minimum in width and a base 42 inches (1065 mm) minimum in width. Each arm shall extend 11 inches (280 mm) minimum from each side of the base, located opposite the other, and the base shall extend 22 inches (560 mm) minimum from each arm.

3. A T-shaped space, clear of obstruction, that fits within an area 64 inches (1625 mm) wide and 60 inches (1525 mm) deep, with two arms and one base 40 inches (1015 mm) minimum in width. Each arm shall be 16 inches (405 mm) minimum in each direction from the base and the base shall extend 24 inches (610 mm) minimum from each arm. (3-9-12)

T-TURN DIMENSIONS

	Rectangular Space		Widths		Chamfer	Length Clear of Obstructions	
	Width	Depth	Arms	Base		Arms	Base
1	68	60	36	36	8	16	24
2	64	60	38	42		11	22

3	64	60	40	40		12	20

304.3.2.2 Existing buildings. In existing buildings, the turning space shall be a T-shaped space within a 60-inch (1525 mm) minimum square, with arms and base 36 inches (915 mm) minimum in width. Each arm of the T shall be clear of obstructions 12 inches (305 mm) minimum in each direction, and the base shall be clear of obstructions 24 inches (610 mm) minimum. The turning space shall be permitted to include knee and toe clearance complying with Section 306 only at the end of either the base or one arm.

305.3 Size.

305.3.1 New buildings. In new buildings, the clear floor space shall be 52 inches (1320 mm) minimum in length and 30 inches (760 mm) minimum in width. (3-13-12)

305.3.2 Existing buildings and within new Type B units. In existing construction and within new Type B units, the clear floor space shall be 48 inches (1220 mm) minimum in length and 30 inches (760 mm) minimum in width.

305.7.2 Forward Approach.

305.7.2.1 New buildings. In new buildings, Where the clear floor space is positioned for a forward approach, the alcove shall be 36 inches (915 mm) minimum in width where the depth exceeds 20 inches (510 mm). (3-13-12)

305.7.2.2 Existing buildings and within new Type B units. In existing buildings and within new Type B units, where the clear floor space is positioned for a forward approach, the alcove shall be 36 inches (915 mm) minimum in width where the depth exceeds 24 inches (610 mm).

308.2 Forward Reach.

308.2.1 Unobstructed.

308.2.1.1 New buildings. In new buildings, where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 23 inches (585 mm) minimum above the floor. (3-20-12)

308.2.1.2 Existing buildings and within new Type B units. In existing buildings and within new Type B units, where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the floor.

403.5.1 General. The clear width of an accessible route shall be 36 inches (915 mm) minimum. The clear width of an exterior accessible route shall be 48 inches (1220 mm) minimum. (4-7-12) (4-5-12)

EXCEPTIONS:

1. In new buildings, the clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided the reduced width segments are separated by segments that are 52 inches (1320 mm) minimum in length and 36 inches (915 mm) minimum in width. (4-6-12)
2. In existing buildings and within new Type B units, the clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided the reduced width segments are separated by segments that are 48 inches (1220 mm) minimum in length and 36 inches (915 mm) minimum in width.

3. The clear width of an exterior ramp shall comply with Section 405.5. (4-7-12)

~~**403.5.1**~~ **403.5.2 Clear Width at 180 Degree Turn**.

403.5.2.1 New buildings. In new buildings, where an accessible route makes a 180 degree turn around an object that is equal to or greater than 52 inches (1320 mm) in width, the clear widths in the turn shall comply with Section 405.5.1. Where an accessible route makes a 180 degree turn around an object that is less than 52 inches (1320 mm) inches in width, the clear widths approaching the turn, during the turn and leaving the turn, shall be one of the following sets of dimensions: (4-5-12)

1. Approaching width is 36 inches (915 mm) minimum, during width is 60 inches (1525 mm) minimum, and leaving width is 36 inches (915 mm) minimum.

2. Approaching width is 42 (1065 mm) inches minimum, during width is 48 inches (1220 mm) minimum, and leaving width is 42 (1065 mm) inches minimum.

3. Approaching width is 43 inches (1090 mm) minimum, during width is 43 inches (1090 mm) minimum, and leaving width is 43 inches (1090 mm) minimum. (4-8-12)

403.5.2.2 Existing buildings and within new Type B units. In existing buildings and within new Type B units, where an accessible route makes a 180 degree turn around an object that is less than 48 inches (1220 mm) in width, clear widths shall be 42 inches (1065 mm) minimum approaching the turn, 48 inches (1220 mm) minimum during the turn and 42 (1065 mm) inches minimum leaving the turn.

EXCEPTION: Section 403.5.1 shall not apply where the clear width during the turn is 60 inches (1525 mm) minimum.

403.5.3 Clear Width at 90 Degree Turn.

403.5.3.1 New buildings. In new buildings, where an accessible route makes a 90 degree turn the clear widths approaching the turn and leaving the turn shall be one of the following sets of dimensions:

1. Both legs of the turn shall be 40 inches (1016 mm) minimum in width The width of each leg of the turn shall be maintained for 28 inches minimum from the inner corner.

2. Where the interior corners of the turn are chamfered for 8 inches minimum (205 mm) along both walls, both legs of the turn shall be 36 inches (915 mm) minimum in width. (4-9-12)(4-10-12)

EXCEPTIONS:

1. Where one leg of the turn is 42 inches (1065 mm) minimum in width, the other shall be permitted to be 38 inches (965 mm) minimum in width. (4-10-12)

2. Where one leg of the turn is 44 inches (1115 mm) minimum in width, the other shall be permitted to be 36 inches (915 mm) minimum in width. (4-10-12)

403.5.3.2 Existing buildings and within Type B units. In existing buildings and within new Type B units, where an accessible route makes a 90 degree turn the clear widths approaching the turn and leaving the turn shall be 36 inches (915 mm) minimum.

403.5.4 ~~403.5.2~~ Passing Space.

403.5.4.1 New construction. In new buildings, An accessible route with a clear width less than 60 inches (1525 mm) shall provide passing spaces at intervals of 200 feet (61 m) maximum. Passing spaces shall be either a 60-inch (1525 mm) minimum by 60-inch (1525 mm) minimum space, or an intersection of two walking surfaces that provide a T-shaped turning space

complying with Section 304.3.2, provided the base and arms of the T-shaped space extend 52 inches (1320 mm) minimum beyond the intersection. (4-6-12) (4-5-12)

403.5.4.2 Existing buildings and within new Type B units. In existing buildings and within new Type B units, an accessible route with a clear width less than 60 inches (1525 mm) shall provide passing spaces at intervals of 200 feet (61 m) maximum. Passing spaces shall be either a 60-inch (1525 mm) minimum by 60-inch (1525 mm) minimum space, or an intersection of two walking surfaces that provide a T-shaped turning space complying with Section 304.3.2, provided the base and arms of the T-shaped space extend 48 inches (1220 mm) minimum beyond the intersection. (4-6-12) (4-5-12)

404.2.3.2 Swinging Doors and Gates. Swinging doors and gates shall have maneuvering clearances complying with Table 404.2.3.2. (4-11-12)

Table 404.2.3.2—Maneuvering Clearances at Manual Swinging Doors and Gates

TYPE OF USE		**MINIMUM MANEUVERING CLEARANCES**	
Approach Direction	**Door or Gate Side**	**Perpendicular to Doorway**	**Parallel to Doorway (beyond latch unless noted)**
From front	Pull	60 inches (1525 mm)	18 inches (455 mm)
From front	Push	52 inches [5] (1320 mm)	0 inches (0 mm)3
From hinge side	Pull	60 inches (1525 mm)	36 inches (915 mm)
From hinge side	Pull	54 inches (1370 mm)	42 inches (1065 mm)
From hinge side	Push	42 inches (1065 mm)[1]	22 inches (560 mm)3 & 4
From latch side	Pull	48 inches (1220 mm)[2]	24 inches (610 mm)
From latch side	Push	42 inches (1065 mm)[2]	24 inches (610 mm)

1. Add 6 inches (150 mm) if closer and latch provided.
2. Add 6 inches (150 mm) if closer provided.
3. Add 12 inches (305 mm) beyond latch if closer and latch provided.
4. Beyond hinge side. (4-11-12) (4-14-12)(4-15-12)
5. In existing buildings and within new Type B buildings the dimension perpendicular to the door for the front direction on the push side shall be 48 inches (122 mm) minimum.

404.2.3.3 Sliding and Folding Doors. Sliding doors and folding doors shall have maneuvering clearances complying with Table 404.2.3.3.

Table 404.2.3.3—Maneuvering Clearances at Sliding and Folding Doors

Approach Direction	**MINIMUM MANEUVERING CLEARANCES**	
	Perpendicular to Doorway	**Parallel to Doorway (beyond stop or latch side unless noted)**
From front	52 inches [2] (1320 mm)	0 inches (0 mm)
From nonlatch side	42 inches (1065 mm)	22 inches (560 mm)[1]

From latch side	42 inches (1065 mm)	24 inches (610 mm)

1. Beyond pocket or hinge side. (4-15-12)
2. In existing buildings and within new Type B buildings the dimension perpendicular to the door for the front direction shall be 48 inches (122 mm) minimum.

404.2.3.4 Doorways without Doors or Gates. Doorways without doors or gates that are less than 36 inches (915 mm) in width shall have maneuvering clearances complying with Table 404.2.3.4. (4-11-12)

Table 404.2.3.4—Maneuvering Clearances for Doorways without Doors (4-15-12)

Approach Direction	MINIMUM MANEUVERING CLEARANCES Perpendicular to Doorway
From front	52 inches (1320 mm) [1]
From side	42 inches (1065 mm)

1. In existing buildings and within new Type B buildings the dimension perpendicular to the doorway for the front direction shall be 48 inches (122 mm) minimum.

408 Limited-Use/Limited-Application Elevators

408.4.1 Inside Dimensions. Elevator cars shall provide a clear floor width of 42 inches (1065 mm) minimum. The clear floor area shall not be less than 15.75 square feet (1.46 m^2). The elevator car shall provide a clear floor space complying with Section 305.3.

EXCEPTIONS:

1. For installations in existing buildings, elevator cars that provide a clear floor area of 15 square feet (1.4 m^2) minimum, and provide a clear inside dimension of 36 inches (915 mm) minimum in width and 54 inches (1370 mm) minimum in depth, shall be permitted. This exception shall not apply to cars with doors on adjacent sides.

2. For installations in existing buildings, cars that provide a clear width 51 inches (1295 mm) minimum shall be permitted to provide a clear depth 51 inches (1295 mm) minimum provided that car doors provide a clear opening 36 inches (915 mm) wide minimum. (**4-56–12)**

409 Private Residence Elevators *(no exceptions for existing PRE currently)*

409.4.1 Inside Dimensions.

409.4.1.1 New buildings. In new buildings, elevator cars shall provide a clear floor area 36 inches (915 mm) minimum in width and 52 inches (1322 mm) minimum in depth. (3-13B-12)

409.4.1.2 Existing buildings and within new Type B units. In existing buildings and within new Type B units, elevator cars shall provide a clear floor area 36 inches (915 mm) minimum in width and 48 inches (1220 mm) minimum in depth.

410 Platform Lifts

410.5.1 Lifts with Single Doors or Doors on Opposite Ends.

410.5.1.1 New buildings. In new buildings, platform lifts with a single door or doors on opposite ends shall provide a clear floor width of 36 inches (915 mm) minimum and a clear floor depth of 52 inches (1322 minimum). (3-13C-12)

Exception: Incline platform lifts with passenger restraining arms, shall be permitted to provide a clear floor width of 36 inches (915 mm) minimum and a clear floor depth of 48 inches (1220) mm. (3-13C-12)

410.5.1.2 Existing buildings and within new Type B units. In existing buildings and within new Type B units, platform lifts with a single door or doors on opposite ends shall provide a clear floor width of 36 inches (915 mm) minimum and a clear floor depth of 48 inches (1220 minimum).

502.4.2 Width.

502.4.2.1 New buildings. In new buildings, access aisles serving car and van parking spaces shall be 67 inches (1700 mm) minimum in width**. (3-6C – 12)**

502.4.2.2 Existing buildings and within new Type B units. In existing buildings and seving new Type B units, access aisles serving car and van parking spaces shall be 60 inches (1525 mm) minimum in width.

503 Passenger Loading Zones

503.3.2 Width.

503.3.2.1 New buildings. In new buildings, access aisles serving vehicle pull-up spaces shall be 67 inches (1700 mm) minimum in width. (3-6D-12)

503.3.2.2 Existing buildings and within new Type B units. In existing buildings and seving new Type B units, access aisles serving vehicle pull-up spaces shall be 60 inches (1525 mm) minimum in width.

608.2.1.2 Clearance.

608.2.1.2.1 New buildings. In new buildings, a clearance of 52 inches (? mm) minimum in length measured perpendicular from 12 inches beyond the seat wall, and 36 inches (915 mm) minimum in depth shall be provided adjacent to the open face of the compartment. (6-46-12)

608.2.1.2.2 Existing buildings and within new Type B units. In existing buildings and within new Type B units, a clearance of 48 inches (1220 mm) minimum in length measured perpendicular from the control wall, and 36 inches (915 mm) minimum in depth shall be provided adjacent to the open face of the compartment.

802 Assembly Areas

802.4 Depth.

802.4.1 New buildings. In new buildings, where a wheelchair space can be entered from the front or rear, the wheelchair space shall be 52 inches (1320 mm) minimum in depth. Where a wheelchair space can only be entered from the side, the wheelchair space shall be 60 inches (1525 mm) minimum in depth. (8-3-12)

802.4.2 Existing buildings. In existing buildings, where a wheelchair space can be entered from the front or rear, the wheelchair space shall be 48 inches (1220 mm) minimum in depth. Where a wheelchair space can only be entered from the side, the wheelchair space shall be 60 inches (1525 mm) minimum in depth.

802.5 Approach. The wheelchair space shall adjoin an accessible route. The accessible route shall not overlap the wheelchair space.

802.5.1 Overlap. A wheelchair space location shall not overlap the required width of an aisle.

Exception: In new buildings, the depth of the wheelchair space shall be permitted to overlap the required aisle width a maximum of 4 inches (100 mm). (3-13D-12)

802.7.2 Companion Seat Alignment. In row seating, the companion seat shall be located to provide shoulder alignment with the wheelchair space occupant. ~~The shoulder of the wheelchair space occupant is considered to be 36 inches (915 mm) from the front or 16 inches (??? mm) from the rear of the wheelchair space.~~ The floor surface for the companion seat shall be at the same elevation as the wheelchair space floor surface. (3-13E-12)

EXCEPTION: Companion seat alignment is not required in tiered seating that includes dining surfaces or work surfaces. (8-2-12)

802.7.2.1 New buildings. In new buildings, the shoulder of the wheelchair space occupant is considered to be 36 inches (915 mm) from the front or 16 inches (??? mm) from the rear of the wheelchair space.

802.7.2.2 Existing buildings. In existing buildings, The shoulder of the wheelchair space occupant is considered to be 36 inches (915 mm) from the front or 12 inches (305 mm) from the rear of the wheelchair space.

804 Kitchens and Kitchenettes

804.2.2 U-Shaped Kitchens.

804.2.2.1 New buildings. In new buildings, in kitchens enclosed on three contiguous sides, clearance between all opposing base cabinets, countertops, appliances, or walls within kitchen work areas shall be 67 inches (1700 mm) minimum. (3-6E-12)

EXCEPTION: U-shaped kitchens with an island shall be permitted to comply with Section 804.2.1. (8-9-12)

804.2.2.2 Existing buildings. In existing buildings, in kitchens enclosed on three contiguous sides, clearance between all opposing base cabinets, countertops, appliances, or walls within kitchen work areas shall be 60 inches (1525 mm) minimum. (3-6E-12)

EXCEPTION: U-shaped kitchens with an island shall be permitted to comply with Section 804.2.1. (8-9-12)

805 Transportation Facilities

805.2.2 Dimensions.

805.2.2.1 New buildings and sites. In new buildings and sites, bus stop boarding and alighting areas shall have a 100-inch (2540 mm) minimum clear length, measured perpendicular to the curb or vehicle roadway edge, and a 60-inch (1525 mm) minimum clear width, measured parallel to the vehicle roadway. (3-13F-12)

805.2.2.2 Existing buildings and sites. In existing buildings and sites, bus stop boarding and alighting areas shall have a 96 -inch (2540 mm) minimum clear length, measured perpendicular to the curb or vehicle roadway edge, and a 60-inch (1525 mm) minimum clear width, measured parallel to the vehicle roadway.

1007.3.2 Golf Club Reach Range Area.

1007.3.2.1 New buildings. In new buildings, all areas within holes where golf balls rest shall be within 36 inches (915 mm) maximum of a clear floor space 36 inches (915 mm) minimum in width and 52 inches (1320 mm) minimum in length complying with Section 305 having a running slope not steeper than 1:20. The clear floor space shall be served by an accessible route. (3-13H-12)

1007.3.2.2 Existing buildings. In existing buildings, all areas within holes where golf balls rest shall be within 36 inches (915 mm) maximum of a clear floor space 36 inches (915 mm) minimum in width and 48 inches (1220 mm) minimum in length complying with Section 305 having a running slope not steeper than 1:20. The clear floor space shall be served by an accessible route.

1009.2.3 Clear Deck Space.

1009.2.3.1 New buildings. In new buildings, on the side of the seat opposite the water, a clear deck space shall be provided parallel with the seat. The space shall be 36 inches (915 mm) minimum in width and shall extend forward 52 inches (1320 mm) minimum from a line located 12 inches (305 mm) behind the rear edge of the seat. The clear deck space shall have a slope not steeper than 1:48. (3-13K-12)

1009.2.3.2 Existing buildings. In existing buildings, on the side of the seat opposite the water, a clear deck space shall be provided parallel with the seat. The space shall be 36 inches (915 mm) minimum in width and shall extend forward 48 inches (1220 mm) minimum from a line located 12 inches (305 mm) behind the rear edge of the seat. The clear deck space shall have a slope not steeper than 1:48.

Reason: The A117.1 Committee has proposed major changes to the basic building blocks in Chapter 3, accessible routes in Chapter 4, general site and building elements in Chapter 5, plumbing elements and facilities in Chapter 6, special rooms and spaces in Chapter 8, and recreational facilities in Chapter 10. The Committee debated both the need and cost of these changes prior to the release of the current Public Review Draft. While these major changes represent a significant construction cost increase for new buildings, they would represent a much more significant cost impact to existing buildings. More importantly, in many cases these changes will impose an impossible burden on these facilities by requiring dimensions that cannot be implemented given structural and other limitations in existing buildings. This comment proposes to include separate existing building provisions, most of which leave in place the current dimensions for the affected sections of the Standard for existing buildings while continuing to incorporate the revised dimensions included in the current Public Review draft for new buildings. This approach follows historical trends in recognizing the need to have exceptions for existing accessibility regulations such as in the ADAAG and earlier editions of Standard A117.1.

3-6-12 PC3

Chad Beebe, – representing American Society for Healthcare Engineering (ASHE)

Disapprove this change. Return the text to that found in existing standard.

Reason: In review of the 2014 Final Draft of the ICC A117.1 document, it has come to our attention that several of the proposed changes will have a significantly negative impact to the healthcare industry design/built environment of buildings designed under the 2015 IBC. Further, it is our understanding that the overwhelming majority of these changes have been derived from a single uncorroborated report which has neither been properly vetted nor adopted by any other credible agency or (similar) jurisdictional body.

As we do not feel these dramatic and substantial changes have been given proper and appropriate consideration by all interested stakeholders in this process, and since we question the authenticity of the underlying premise used to make such changes, we respectfully request they either be removed entirely from consideration in this draft, or that the entire draft adoption process be held in abeyance for a minimum of 12-months so that further collaboration can be conducted with all interested parties. If the Committee opts to delay this process for 12-months, it will be in keeping with the mission of the ICC, and best assure that all parties can be provided with the opportunity to reasonably participate in this process.

3-6-12 - The increasing of the 60-inch diameter turning space to 67-inches, an increase of 5 square feet for every required turning space and approximately 15 – 20 square feet for every patient room.

These new requirements would add thousands of required square feet to a new hospital and significantly impact any renovations to an existing hospital by requiring increased patient room sizes to meet the new requirements and thus, due to the fixed square footage within the building foot print, will reduce the number of allowable beds the hospital can maintain. With hospital construction cost averaging around $300.00 per square foot these additional increases in square footage will significantly impact the cost of construction. Thank you for your consideration of this request, and in keeping alive the goals and mandates of the entire ICC organization and membership.

3-6-12 PC4

Tony Ewalt, representing Sletten Construction of Nevada, Inc.; Michael Gentille, representing Philip Chun North America, Inc.; Michael McGettigan, representing Terracon Consultant; Robert W. Potter, Construction Company, representing Affordable Concepts; Eric J. Rowland, representing Rowland Design;

Disapprove the change. Return the text to that found in existing standard.

Reason: In review of the 2014 Final Draft of the ICC A117.1 document, it has come to my attention that several of the proposed changes (ratified by this Committee) will have a significantly negative impact to the design/built environment of buildings designed under the 2015 IBC. Further, it is my understanding that the overwhelming majority of these changes have been derived from a single uncorroborated report which has neither been properly vetted nor adopted by any other credible agency or (similar) jurisdictional body.

As I do not feel these dramatic and substantial changes have been given proper and appropriate consideration by all interested stakeholders in this process, and I question the authenticity of the underlying premise used to make such changes, I respectfully request they either be removed entirely from consideration in this draft, or that the entire draft adoption process be held in abeyance for a minimum of 12-months.

If the Committee opts to delay this process for 12-months, it will be in keeping with the mission of the ICC, and best assure that all parties can be provided with the opportunity to reasonably participate in this process.

3-6-12 PC5

Rob Gilkerson – representing self

Disapprove the change. Return the text to that found in existing standard.

Reason: The impact of increasing the circular space from 60 to 67 is so vast, I believe most states, regional building departments, or municipalities will never adopt the 2014 ANSI A117.1; thereby never implementing other good code changes like curb ramps, 48 inch wide exterior routes and accessible routes through parking (507) that are contained within ANSI A117.1-2014.

3-6-12 PC6

Karen Gridley, representing Target Corporation

Disapprove the change. Return the text to that found in existing standard.

Reason: The size of the circular turning space should remain at the current dimension of 60 inches, and not be increased to 67 inches. Several reasons are noted here to demonstrate that the increase to 67 inches will ultimately result in a reduction of access from a broader perspective.

During the July 2013 Committee Action Meeting we heard comments by committee members wondering if there is data available regarding how the size of the current turning space works in “real world” applications as compared to findings in the study completed by Dr. Steinfeld.

In response, Target can offer some data that will help add real world context to the discussion.
For reference, Dr. Steinfeld’s study, which lead the committee to propose a new 67” circular turning space, included 500 participants from a localized geographic area, as we understand it.

Target’s data is based on feedback from people across the nation who visit our stores, totaling nearly 36 million transactions *per week*, on average. Keeping in mind that often the person making the transaction has another person with them so there are well into the multi-millions of guests at Target stores every week. Of these guests, many share comments of all sorts with Target (not just access related) through various channels. We find that of the guests who contacted us in 2012, the percentage of comments related to accessibility of the building was limited to an extremely small fraction of less than 1%. (Less than .0003% of 1%.). Of that fraction of 1%, an even smaller fraction of those comments were related to concerns about turning space for wheeled mobility devices. This tells us that the current sizes and dimensions in the existing Standard work for circular turning space, as-is, for the greater majority of guests using wheeled mobility devices. The data presents no compelling evidence or reason to change the existing dimension.

Additional Information:
During the July 2013 Committee Action Meeting, members of the committee commented that the committee’s job was to look at the A117.1 Standard and implement changes to increase access through that document. In response, we urge the committee to consider that ‘bigger is not always better, sometimes it’s just bigger’.

Supporting this would be the observation that the committee has not done its due diligence in evoking or investigating the Wheeled Mobility Device Manufacturing Industry to see what can be accomplished to improve maneuvering through existing engineering practices in ‘Like’ industry trends and innovation in designs on their end, as that industry as a whole is changing too. Like the automotive industry that went from large cars, trucks and vans to smaller frame vehicles to achieve sustainable efficiencies throughout their redesign all while maintaining safety and functionality.

From an architectural perspective, designers and building owners do not have the luxury of looking at a building in isolation through only a single Standard or Regulation when we design buildings. We must consider many regulations and standards, each having an impact and interplay with other requirements that ultimately drive the size, shape and design of the spaces we provide for people. Considering this interplay, Target respectfully submits that increasing the size of the Circular Space, and other building block sizes, will actually result in decreased accessibility when applied in conjunction with forces in place from other codes and standards.

For example: Green codes and standards are increasingly challenging us to "reduce our carbon footprint", and be responsible stewards of the environment, which includes making buildings smaller in order to achieve compliance with those standards and newly developing regulations. While at the same time, the proposed increases in size of accessibility building blocks within the A117.1 standard would have us increasing our building size.

It is true that designers can adjust, tweak, push and pull designs of the physical buildings to meet these conflicting requirements. In the past we've had the luxury of being able to make buildings larger. However that luxury is increasingly limited in today's environment. The cost comes in what will subsequently be able to fit within in these buildings that are experiencing a compound squeeze (squeezed smaller in footprint on the outside, but interior spaces pushed larger from within). From a retail perspective, this will reduce capacity for merchandise offerings. What was once able to be provided on store shelves may no longer be available due to compromised available space for shelving to house merchandise, having a negative impact on guest's shopping trips.

From a product perspective, of the guest comments received in 2012, approximately 12% were related to product, as compared to the less-than 1% of comments related to building accessibility. Product availability is already of greater concern to guests than building access. Thus, increasing the building blocks of accessibility would drive product concern even higher, since the very things that persons with disabilities might travel to a store to purchase could no longer be available. Considering the effort it takes to travel to shopping destinations for many persons with disabilities, it is a disservice to them for retailers to not be able to offer the items that they currently go there for, forcing them to extend strenuous shopping trips to additional stores in search of what they are looking for, and for some, making the shopping trip as a whole inaccessible all together.

Finally, from an existing building perspective, increased sizes in existing buildings where in many cases barrier removal has already been accomplished in compliance with existing codes and the "20% rule" as triggered by a previous alteration project, will be extremely onerous and in some cases not possible at all. For example restroom fixture count may have already been reduced in order to comply with the current codes and standards sizes. It will not be possible to reduce fixture counts further in order to comply with the proposed building block size increases when new alterations occur, without creating a violation of plumbing codes.

We encourage the committee to reconsider the proposals that would increase the size of the circular space, and other building block sizes, and instead maintain the current sizes. At least until such time as more investigation of the Wheeled Mobility Device Manufacturing Industry can take place to identify what can be done to improve design of those devices via engineering and technology advancements, towards improved access.

3-6-12 PC7

Douglas Kantor, Steptoe & Johnson, LLP, representing National Association of Convenience Stores

Disapprove the change. Return the text to that found in existing standard.

Reason: NACS is not in favor of this proposed change. We believe that the impact of this change could be significantly negative to the convenience and fuel retailing industry.

This proposed change could increase the floor area required for a turning space by 25% or 6.2 SF. We anticipate that this change would primarily impact the size of the toilet rooms causing them to become larger. This change to the toilet rooms would therefore lead to a loss in selling space or an increase in store size which will have significant impact to our members. It is estimated that this change would have a negative impact on sales of $600 per month, based upon 2 toilet rooms per store.

Based upon this negative impact to sales NACS is not in favor of this proposal without evidence that this proposal is absolutely necessary for the accessibility of persons with disabilities. While we recognize that the research provided indicates that wheeled mobility devices are becoming larger we do not see any research or reason provided for the increase in size in wheeled mobility devices. Should we, as an industry, be required to pay this cost or increased size out of the choice for bigger devices or should the necessity of larger devices be provided prior to requiring larger spaces.

3-6-12 PC8

Jeffrey T. O'Neill, AIA, ACHA – representing self

Disapprove the change. Return the text to that found in existing standard.

Reason: In review of the 2014 Final Draft of the ICC A117.1 document, it has come to my attention that several of the proposed changes (ratified by this Committee) will have a significantly negative impact to the design/built environment of buildings designed under the 2015 IBC. Further, it is my understanding that the overwhelming majority of these changes have been derived from a single uncorroborated report which has neither been properly vetted, peer-reviewed, nor adopted by any other credibleagency or (similar) jurisdictional body.

I respectfully request they either be removed entirely from consideration in this draft, or that the entire draft adoption process be held in abeyance for a minimum of 12-months, to give time for these proposed changes to be properly discussed and vetted. If the

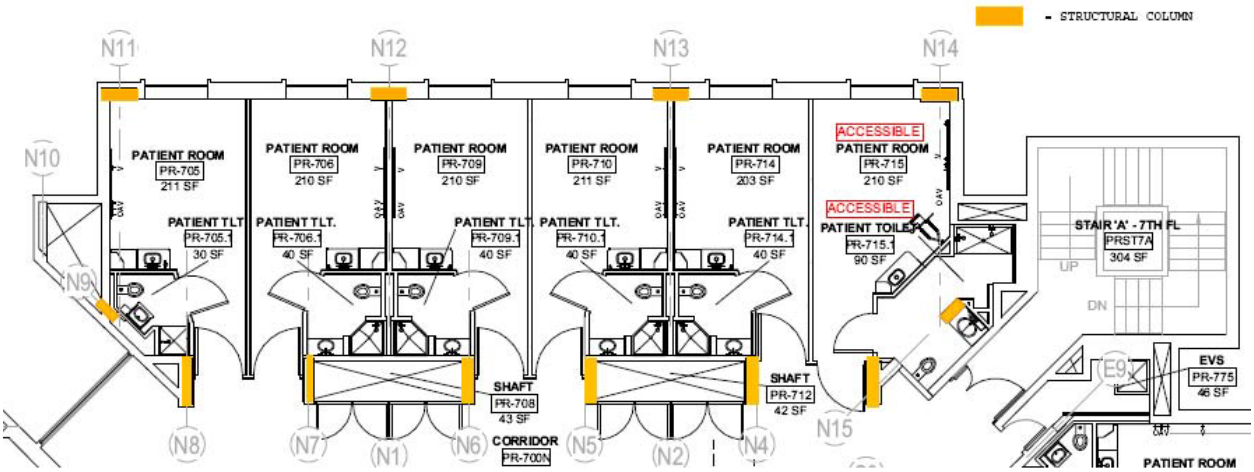
Committee opts to delay this process for 12-months, it will be in keeping with the mission of the ICC, and best assure that all parties can be provided with the opportunity to reasonably participate in this process.

From the healthcare perspective, hospitals are places that are designed to create an accessible environment for patients, visitors and staff. Clearances are developed for patient movement operations, and for those with mobility issues. The newly proposed requirements, however will have a dramatic effect on the delivery of patient care, by reducing the amount of treatment spaces available to patients, especially in renovation areas. Clearances are required around every bed per the FGI Guidelines, in addition to accessibility requirements.

For example, if designing a new 18 bed inpatient unit in an existing hospital, the existing structure cannot be avoided. The floorspace is a finite quantity. Since there would be two required accessible patient rooms. The larger toilet room would need to expand, eliminating the adjacent patient room because the Guideline requirements cannot be met. This make what currently can be an 18 bed unit into a 16 bed unit, which is an 11% reduction, while still requiring the two accessible rooms.

The example below shows a design for a new inpatient bed unit in an existing structure. One of the required accessible rooms is on the right, and clearly shows moving outside the "box" of the other regular rooms.

These additional requirements noted above would add to this situation. Also, note that the existing structure forces the accessible toilet room to be fragmented. Although maintaining the required clearances at each fixture, the columns and structure of the stair make for a highly inefficient layout.



SAMPLE PATIENT UNIT
RENOVATION IN EXISTING BUILDING STRUCTURE
DECEMBER 2013

Reducing possible beds is a significant issue in healthcare today. The Affordable Care Act strives to improve access for patients in pursuit of universal coverage. An 11% reduction in beds means that those beds are not available to patients. This means patients will be waiting in Emergency Departments for beds to become available, and in turn could potentially cause that hospital to divert patients away from the hospital, reducing access to that institution. Although well intended, the newly proposed accessibility requirements will have the opposite effect of reducing the amount of treatment spaces in an existing healthcare institution.

Thank you for your consideration of this request, and in keeping alive the goals and mandates of the entire ICC organization and membership.

3-6-12 PC9

Hope Reed – representing New Mexico governor's Commission on Disability (NMGCD)

Disapprove the change. Return the text to that found in existing standard.

Reason: Do not adopt 67" turning circle and other increased clear floor areas. ANSI Section 304.3 should remain consistent with 2010 ADA Standards. The **2010 ADA Standards for Accessible Design** became effective just 21 months ago. The 2010 ADA requires a 60 inch turning circle. Why would anyone choose to use this stricter requirement in ANSI-2014? Many jurisdictions will not adopt the ANSI-2014 and will just use the 2010 ADA Standards.

At this time people already have a hard time getting the turning circle and door clearances correct, but at least all the dimensions are logical and similar so we can easily understand what is required and we don't have to argue about a few inches. Changing the current basic clearances will throw out all the progress we have earned to this point.

Adopting larger turning and maneuvering clearances in ANSI-2014 negates all the careful progress the Committee has made toward harmonization. There are too many variations in the proposed floor clearances. No one will remember these tiny variations in the field, and it is difficult to figure out and explain with contractors under a deadline.

The larger turning circle and clearances should go in the **Appendix** with good diagrams and rationale supporting the increased areas. Designers need to understand the reason for larger areas and be encouraged to choose them for airports, convention centers, stadiums, theaters, shopping malls, and similar.

Placing these larger clearances in the **Appendix** will prepare us for the time when the ADA adopts them. Then implementation will be easy and understandable.

3-6-12 PC10

Minh N. Vu – American Hotel & Lodging Association

Disapprove the change. Return the text to that found in existing standard.

Reason: Reason: AH&LA COMMENTS ON PROPOSED CHANGES TO TURNING RADIUS AND CLEAR FLOOR SPACE REQUIREMENTS AND ALL RELATED CHANGES.

The American Hotel & Lodging Association (1) (hereinafter, "AH&LA") strongly objects to the proposal to (1) increase the minimum turning radius space from 60" to 67" (Section 304.3.1); and (2) increase the minimum clear floor space required to accommodate a manual or power wheelchair and scooter (referred to herein as "wheeled mobility device or WhMD") from 30"x48" to 30"x52" (Section 305.3).

The proposed increase in the minimum size of the turning radius has resulted in proposals to change the following additional requirements:

- Parking Access Aisle Width: Increase the width of parking access aisle from 60" to 67" (Section 502.4.2)
- Access Aisle For Passenger Loading Zone: Increase the width of access aisles serving vehicle pull up spaces from 60-67" (Section 503.3.2)
- Clear Space in U-Shaped Kitchens: Increase the clear space in middle of U-shaped kitchens from 60" to 67" (Section 804.2.2)

The proposed increase in the minimum clear floor space required to accommodate a WhMD has prompted proposals to change the following additional requirements:

- T-Turn Space: Increase the amount of space required for a T-turn from a 60" square with two arms and a base that are at least 36" wide to three different configurations that are all significantly larger (60" x 68" or 60" x 64", depending on the width of the arms and base) and the removal of an existing provision that allows one of the arms or the base to overlap knee and toe space under an obstruction. (Section 304.3.2)
- Platform Lift Size: Increase the minimum depth of platform lifts from 48" to 52" (Section 410.5.1)
- Lavatory Knee/Toe Space: Increase the clear floor space required at lavatories to reflect larger clear floor space (Section 1004.11.3.1.1)

  180 Degree Turn Space: Increase the required width of an accessible route at 180 degree turns (Sections 403.5.1, 403.5.2)
- 90 Degree Turn Space: Increase the required width of an accessible route at 90 degree turns (Section 403.5.3)
- Door Maneuvering Space: Increase the amount of maneuvering space on the push side of doorways and gates to 52" deep (Tables 404.2.3.2, 404.2.3.3, and 404.2.3.4)
- Clear Floor Space at Transfer Shower Compartment: Increase the clear floor space outside of a transfer shower compartment from 48" (L) to 52" (L) (Section 608.2.1.2)

As discussed below, the AH&LA opposes all of the changes listed above (the "Proposed Changes") because they are not justified by any relevant data, would impose enormous unnecessary costs on the lodging and other industries in new construction and future alterations of existing facilities, and would undo the efforts of the ANSI Committee, the Access Board, and the U.S. Department of Justice (DOJ) to harmonize building code accessibility requirements with the 2010 ADA Standards. The lack of consistency between building code requirements and the ADA Standards that would result if the Proposed Changes are adopted would cause unnecessary confusion, undermine compliance efforts, and fuel frivolous ADA Title III lawsuits.

The purported reason for the Proposed Changes is that many WhMDs used by individuals with mobility disabilities in the United States (1) are not able to make a 360 degree turn within the current 60" radius, and (2) occupy a footprint larger than 30" x 48". *There is no factual basis for these assumptions.* AH&LA's review of WhMDs sold in the United States shows that there are more than 129 models of WhMDs (including manual and power wheelchairs and scooters) on the market that can make a 360 degree turn within a 60" turning radius and have a footprint that is smaller than the 30" x 48" clear floor space currently required by the ANSI A117.1 and the 2010 ADA Standards. Thus, the use of any WhMD that is larger than optimal for the existing built environment is rarely, if ever, out of necessity. Among the WhMDs that AH&LA identified, virtually all can accommodate a load of 350 lbs., and some as much as 600 lbs.

The incorrect assumption that current standards do not accommodate many WhMDs used in the United States is based on findings from a study conducted by the Center for Inclusive Design and Environmental Access (hereinafter, "IdeA"), *Anthropometry of Wheeled Mobility Project,* Final Report (December 31, 2010) (hereinafter, the "Study"). As explained below, the Study provides no insight into the space requirements of WhMD users in the United States because it is based on a group of participants who do not constitute a representative sample of WhMD users in the United States. The Study made no attempt to ensure that its participants reflected the U.S. population of WhMD users with respect to (1) the type of WhMDs used *(i.e.* manual wheelchair, power wheelchair, or scooter), (2) the models of manual wheelchair, power wheelchair, or scooters used, or (3) their medical conditions. In fact, the study authors readily admit that their sample was neither random nor representative. Accordingly, no conclusions about WhMD users in the United States can be drawn from the Study and the Study provides no basis or justification for changing longstanding accessibility standards for the entire United States.

AH&LA supports the issuance of ANSI A117.1 standards that promote access for people who use WhMDs. However, the

Proposed Changes will have an extreme impact on lodging and all other types of commercial facilities and should only be adopted if there are *legitimate and compelling reasons,* and only after a *meaningful analysis ofthe impact of such changes* on existing and new facilities. As explained below, the record, as it exists today, contains no such reasons or meaningful analysis. The ANSI Committee also has conducted no cost/benefit analysis for the proposed changes. AH&LA's preliminary analysis of how some of the Proposed Changes would affect spaces such as accessible guest rooms and restrooms shows that the cost impact would be enormous, would put owners of existing buildings in very difficult situations in future renovations, and expose them to frivolous lawsuits. These reasons, when combined with mass confusion that will result from having an ANSI A117.1 that is different from the 2010 ADA Standards that just went into effect last year, all support the rejection of all the Proposed Changes.

I. The Proposed Changes Are Based On The Baseless Assumption That WhMDs Are Unable To Operate Under The Current Standards.

A. At Least 129 WhMD Models on the U.S. Market Can Operate Within The Current Standards.

The AH&LA strongly disputes the notion that WhMDs in the United States cannot operate within the current standards. To address this misconception, AH&LA undertook a review of the specifications of all models of power wheelchairs, manual wheelchairs, and scooters manufactured for sale by the top eleven (11) manufacturers in the United States (2). *See* Chart at Attachment A. This review revealed the following facts:

- At least forty-eight (48) power wheelchairs have a footprint smaller than 30" x 48" and can make a 360 degree turn within a 60" radius. *See id.* The weight capacity of this group of power wheelchairs ranges from 242 to 600 lbs. The count may actually be as high as sixty-six (66) power wheelchairs but AH&LA excluded from this count chairs whose reported lengths (usually substantially less than 48") did not include footrests. Of the group of forty-eight (48) twenty-eight (28) have lengths of 40" or less -- eight inches shorter than the current required clear floor space of 48".
- Fifty (50) scooter models have a footprint that is smaller than 30" x 48" and can make a 360 degree turn within a 60" radius. *!d.* The weight capacity of this group of scooters ranges from 250 to 500 lbs. Of this group of scooters, fifteen (15) have lengths of 40" or less-- eight inches shorter than the current required clear floor space of 48".
- At least thirty-one (31) manual wheelchair models have a footprint smaller than 30" x 48" and can make a 360 degree turn within a 60" radius. The weight capacity of this group of wheelchairs ranges from 250 to 450 lbs. Of this group, nineteen (19) have lengths of 40" or less -- eight inches shorter than the current required clear floor space of 48".

AH&LA's review makes clear that individuals who need to use WhMDs for mobility can choose from a wide array of manual wheelchairs, power wheelchairs, and scooters that are able to maneuver within facilities constructed in accordance with existing accessibility standards. The fact that some individuals choose larger WhMDs is largely a matter of personal choice which should not dictate changes to accessibility standards that have been in place for decades. By way of analogy, roads are not widened simply because some people might want to drive larger cars. Car manufacturers can and must produce cars that can operate within current road standards. WhMD manufacturers can also produce devices that work within the current accessibility standards, as shown by AH&LA's review. Accordingly, there is no need to enlarge turning radius or clear floor space requirements.

B. The Study's Conclusion That WhMD Users In The United States Cannot Operate Under The Current Standards Is Baseless.

The Study which forms the sole basis for the Proposed Changes is somewhat inconsistent about whether its findings can be generalized to the U.S. population of WhMD users. The Study limits the findings to the Study participants in some places but then extends the findings to the entire U.S. population ofWhMD users in others. *(Compare* Study Finding 10 to Study Finding 7, p. 4). One basic fact is clear, however: Because the Study participants were not a representative sample of WhMD users in the United States, the Study could not be the basis for any findings about WhMD users in the United States. As two statistics experts have written: "If you happen to choose a sample that is very unrepresentative of the corresponding population, you will make very inaccurate predictions when you try to estimate the characteristics of the population based on that sample." (3)

In this case, the Study authors readily admit that their participant pool did not a represent a sample ofWhMD users in the United States. (Study at 13). For example:

- The 495 study participants were not randomly selected WhMD users. Instead, they were recruited from: Buffalo, NY; Pittsburg, PA; and Ithaca, NY. (Study at 3).
- The study "intentionally oversampled powered wheelchair users," so that the relative percentage of users of manual wheelchairs, power wheelchairs, and scooters did not reflect the breakdown in the U.S. population. (Study at 13). Because power wheelchairs tend to require more room, this oversampling of power wheelchair users resulted in a larger number of WhMDs in the study that were not able to operate within the current standards.
- Within each of the three (3) categories (manual wheelchair, power wheelchair and scooter), the Study made no attempt to correlate the models of WhMDs used by the study participants with those currently used in the United States. This is an important point because, as shown in Attachment A, there are many different models of manual wheelchairs, power wheelchairs and scooters. Within each category, there are variations with regard to turning

radii and footprint. Thus, it is entirely possible -- in fact quite likely -- that a greater percentage of study participants choose larger WhMD models which would drive the finding that the existing standards provide inadequate space.

- The Study also made no attempt to choose participants whose medical conditions proportionately reflect the medical conditions of WhMD users in the United States. (Study at 36). The Study's authors stated that there was "a higher prevalence of spinal cord injuries" in the Study sample, in addition to a larger percentage of participants with "nervous system disorders," relative to the percentage of people with this condition in the U.S. population (indeed, 32% of study participants had "nervous system disorders," whereas only 8% ofthe general population ofWhMD users have such disorders). (Study at 36). The disproportionately higher percentage of study participants with spinal cord and central nervous system injuries likely increased the number of people who would have difficulty controlling their WhMDs in making turns.

Although they were not were not always so careful with their language, the Study's authors did acknowledge the Study's limitations on several occasions by limiting their findings to the participants *in the survey.* For example, Finding Number 7 about "clear floor space" states: "A large minority of *participants in our research* would not be accommodated by the current U.S. Standards for clear floor space, especially for length." (Study at 4) (emphasis added). Finding Number 10 about "maneuvering clearances" states that "the current standards do not accommodate *most of our sample* for completing a 360 degree turn." (Study at 4) (emphasis added). In short, no conclusions can be drawn from the Study's findings about whether WhMD users in the United States can operate under the current standards or whether the standards need to be changed.

II. The ANSI Committee Has Not Studied The Impact Of The Proposed Changes On Various Types Of Facilities; AH&LA's Analysis Shows That The Proposed Changes Will Have A Radical Impact On Lodging Facilities.

A. The Larger Turning Radius Will Require Larger Accessible Guest Rooms, Single User Restrooms, U-Shaped Kitchens, And Access Aisles.

Before approving any new requirements, the ANSI Committee should, at a minimum, review the impact of the proposed changes on the different types of affected facilities to appreciate the magnitude of the consequences of its actions. Even the Study's authors acknowledged that there must be careful consideration of the impact of any proposed changes. With regard to the 360 degree turning space, the Study stated: "The implications of these findings are *so significant* that the authors recommend starting [sic] broad discussion of options among stakeholders before a concrete proposal is made to adopt a particular strategy." (Study at 83) (emphasis added). It is also undisputed that the ANSI Committee's Wheeled Mobility Task Force has not completed its work and any decisions on proposed changes are, therefore, premature.

Attachment B contains some preliminary drawings showing the impact of the larger proposed turning radius and clear floor space requirement on a typical accessible guestroom, a single user restroom and aU-shaped kitchen. *See* Attachment B. The drawings show that the enlarged turning radius will require a typical 13' wide accessible guest room to be at least 7" wider and 14 square feet larger overall. Because a typical hotel is required to have a number of accessible guest rooms (approximately three percent (3%) of inventory), the impact will be very significant. Single-user restrooms will have to be at least 4.5 square feet larger and U-shaped kitchens will have to be at least 8 square feet larger. Every access aisle for accessible parking spaces also will have to be 7" wider, thereby decreasing the overall number of parking spaces that can be provided on a site.

In new construction, the increased space requirements for accessible guest rooms will result in a decrease in revenue generating space for the entire life of a building because a building will be able to accommodate fewer rooms than it would have under existing standards. Alternatively, if a building can be made larger to accommodate the same number of rooms, owners will incur additional construction and land acquisition costs.

The impact on existing facilities will be even more serious because the diagrams plainly show that there would be no way to comply with the new turning space requirement in future renovations within the existing footprint of the rooms. Accessible rooms and restrooms are typically built just large enough meet current accessibility requirements. The owners of existing facilities seeking to renovate will either have to demolish existing walls to create new room footprints that will reduce room count, or seek variances from local building officials who may or may not agree to issue them. The process of seeking variances will inject additional delays, cost, and uncertainty to the renovation process.

The requirement to make wider accessible parking access aisles to accommodate the larger turning radius will reduce the number of parking spaces that can be constructed in a new parking facility. Existing parking facilities that are renovated also would lose spaces because of the proposed change and this could be problematic for facilities that already have a shortage of parking spaces. The potential shortage of parking spaces will be compounded by the proposed new requirement that accessible routes in parking facilities be "physically separated" from that proposed change, the physical separation requirement would presumably require the creation of a path that is distinct from the vehicular drive. This path will further reduce the amount of space available for parking.

B. Increasing The Length Of The Minimum Clear Floor Space Requirement From 30" x 48" To 30" x 52" Will Impact Small Spaces Such As Accessible Guest Rooms, Restrooms, Gym Facilities, Locker Rooms And Business Centers.

Operable controls in accessible spaces must be adjacent to a clear floor space. Increasing the size of that clear floor space by 4" in length likely will result in accessible guest rooms having to be larger in order to provide the larger clear floor space at climate controls, light switches, lavatories, in-room safes and drapery pulls. In AH&LA's experience, providing a 30" x 48" clear floor space at all controls in an accessible guestroom, while retaining the same furniture that is

offered in non-accessible rooms, already presents a spacial challenge. An increase in the clear floor space length will exacerbate the problem, particularly in existing facilities. The same is true in other spaces where clear floor space is at a premium. In gym facilities, the enlarged clear floor space would have to be provided at one of each type of exercise equipment (e.g., cardio machines, weight machines, free weights, exercise tools), as well as the house phone and water fountain/cooler. In locker rooms, the enlarged clear floor space would have to be provided at the entry to transfer showers, lavatories, accessible lockers, clothing hooks, hairdryers, dispensers and towels. In business centers, the clear floor space would have to be increased at printers, computer stations and house phones.

C. The Proposed Increase In Space Requirements For T-Turns At 90 Degree Turns And At 180 Degree Turns Will Require Many Spaces To Be Enlarged And Decrease The Amount Of Productive Space.

(304.3.2), 180 degree turns (403.5.) and 90 degree turns (404.2.3) will result in the decrease of productive, revenue generating space in retail and food and beverage venues. Space for seating and product displays are at a premium in these types of spaces. Increasing the amount of space required for the T-turn and the 180 degree turn, and introducing an entirely new space requirement for 90 degree turns, will decrease the amount of merchandise that can be displayed in a retail venue and the number of tables that can be placed in a restaurant.

Another very significant proposed change to the T-turn provision is the elimination of an existing provision that allows a portion of the T-turn space to overlap the knee/toe clear space that must be provided under an obstruction such as a bathroom vanity. As shown in Attachment C, this deletion, when combined with the increased space requirements for a T-turn, results in an accessible guest room that must be approximately 10 square feet larger. In a single user restroom, the proposed T-turn changes would require an increase of 3.5 square feet to a typical single user restroom.

The impact of the T-turn change is especially problematic in the accessible guestroom scenario because the length of the entire room would have to be increased by 9", making the accessible room longer than the standard room. This is an untenable situation in both new construction and alterations. In new construction, the lengthening of one room type would cause all other rooms on that corridor to be deeper, resulting in decreased room count. In existing facilities, there would be no way to lengthen the room because doing so would intrude into the corridor. Thus, the better option for providing a turning space in this room configuration is to use the 67" radius shown in Attachment B which would require the room to be 14 square feet larger.

D. Increasing The Minimum Maneuvering Space On The Push Side Of Doors From 48" To 52" (D) Would Require the Enlargement of Small Spaces.

The ANSI Committee has proposed to increase the depth of the maneuvering space on the push side of a door or gate from 48" to 52" for a perpendicular approach. (Tables 404.2.3.2, 404.2.3.3, and 404.2.3.4). In a lodging facility, this change would require more clear floor space at a swinging doorway. This change would impact small spaces such as business centers, retail spaces, and entries into fitting rooms and restrooms which would have to be made larger to accommodate the same amount of furniture, fixtures, and equipment.

In existing facilities that are renovated, most owners will not have the option of making these impacted spaces larger because doing so will impact the space on the other side of the wall. Owners would then have to seek variances from this new requirement. In the best case scenario, owners would experience additional costs, delays, and uncertainty in the renovation process. In the worst case scenarios, the variance would not be granted and the renovation would not take place.

E. Increasing the Minimum Depth Of Platform Lifts From 48" To 52" Will Make It More Difficult To Provide Access.

The proposed increase in the minimum length of platform lifts from 48" to 52" (Section 409.51) could make it substantially more difficult for owners of existing lodging facilities to use a platform lift as a means for providing access because more space will be required for a larger lift. There may not be room for a larger lift in which case a facility may be able to take the position that putting one in is not technically feasible. In short, this proposed rule may negatively impact access.

III. The Proposed Changes Will Make The ANSI A117.1 Standard Inconsistent With The New 2010 ADA Standards And Undermine Harmonization And Compliance Objectives.

As the ANSI Committee is well aware, for the first twenty (20) years of the Americans with Disabilities Act of 1990 (hereinafter, "ADA"), the ANSI A117.1 Standard was not the same as the ADA Standards for Accessible Design adopted by the DOJ. The lack of harmonization caused a great deal of confusion among owners of public accommodations and commercial facilities who had to comply with building code and ADA requirements that differed. In September 2010, the DOJ issued the 2010 ADA Standards which was the culmination of an effort by the ANSI Committee and the Access Board to harmonize the ANSI A117.1 Standard with the 2010 ADA Standards. The 2010 ADA Standards have only been in effect for fewer than two years.

If adopted, the proposed changes to the ANSI A117.1 Standard will undo this harmonization effort by introducing entirely different standards into future editions of the International Building Code (IBC) which will then be adopted by state governments as their building codes. Owners seeking to comply with both sets of requirements will, yet again, be thrown into a state of confusion even though, as discussed above, there is no need for the changes in the first place. In AH&LA's experience, compliance regimes that are confusing or difficult to understand/implement usually result in less accessibility and operate to the detriment of individuals with disabilities. AH&LA, thus, urges the ANSI Committee to reject any rule changes that would conflict with the 2010 ADA Standards, including those

discussed above.

IV. At A Minimum, The Proposed Changes Should Not Apply To Existing Buildings.

As can be seen throughout the preceding discussion, the proposed changes -- once they are adopted by jurisdictions as part of their building codes -- will be particularly problematic for existing facilities that will have to comply with them in future renovations. In most instances, lodging facility owners will face three alternatives: (1) comply with the new requirements by moving walls and radically changing the footprint of the accessible guest rooms, restrooms, locker rooms and other spaces; (2) attempt to obtain a variance from local building officials assuming such a process is available; and (3) not renovate. All options are highly undesirable. The first two options add substantial cost and uncertainty to renovation projects. The last option would undermine accessibility because renovations usually improve access. Accordingly, if the ANSI Committee is unwilling to postpone the adoption of the Proposed Changes for further study, it should, at a minimum, limit their application to facilities constructed after a jurisdiction adopts the changes.

1. The American Hotel & Lodging Association is a membership organization that represents the interests of every segment of the lodging industry, including REITs, brand, franchisee, management companies, independent property owners, and state associations.

2 The manufacturers reviewed were Afikim, Drive Medical, Graham Field, Innovation in Motion, Golden Technologies, Hoveround, Invacare, Ottobock, Permobil, Pride, and Sunrise Medical.

3 D. Downing and **J.** Clark, *Business Statistics* at 3. Barron's Education Series, 2003 Print.

ATTACHMENT A
AMERICAN HOTEL & LODGING ASSOCIATION REVIEW OF
POWER WHEELCHAIRS, MANUAL WHEELCHAIRS, AND SCOOTERS WITH FOOTPRINTS AND TURNING RADII WITHIN CURRENT STANDARDS
DECEMBER 9, 2013

COUNT[1]	TYPE	TERRAIN	MODEL	MANUFACTURER[2]	WIDTH (INCHES)[3]	LENGTH (INCHES)[4]	TURNING RADIUS (INCHES)[5]	WEIGHT CAPACITY (POUNDS)
POWER WHEELCHAIRS								
1	Power	Heavy-Duty	Super Compact	Innovation in Motion	24.8	35.8 base only	19.3	242
2	Power	Compact	Cobalt	Drive Medical	24	38.5	29	250
3	Power	Standard	Cobalt X 16	Drive Medical	24	38.5	29	250
4	Power	Compact	Cobalt X 14	Drive Medical	24	38.5	29	250
5	Power	Standard	Cobalt X 23	Drive Medical	24	38.5	29	250

[1] Sorting scheme is by type of device, then by ascending weight.

[2] Survey includes models of power wheelchairs, manual wheelchairs, and scooters manufactured by Afikim, Drive Medical, Graham Field, Innovation in Motion, Golden Technologies, Hoveround, Invacare, Ottobock, Permobil, Pride, and Sunrise Medical.

[3] Unless otherwise noted, width information was obtained from the respective manufacturer's literature and represents the width of the entire mobility device. In all instances where multiple configurations existed for a given mobility device, the largest configuration was selected. Width measurements with respect to manual wheelchairs manufactured by Sunrise Medical is not available in the literature; but upon telephonic inquiry, the technical support department advised to add 8.5 inches to the listed seat width to calculate overall mobility device width.

[4] Unless otherwise noted, length information was obtained from the respective manufacturer's literature and represents the length of the entire mobility device. In all instances where multiple configurations existed for a given mobility device, the largest configuration was selected. Length measurements with respect to manual wheelchairs manufactured by Sunrise Medical is not available in the literature; but upon telephonic inquiry, the technical support department advised to add 12 inches to the listed seat depth to calculate overall mobility device length.

[5] Unless otherwise noted, turning radius information was obtained from the respective manufacturer's literature and represents the turning radius of the entire mobility device. In all instances where multiple configurations existed for a given mobility device, the largest configuration was selected. Turning radius measurements with respect to manual wheelchairs were not available in the literature. Upon telephonic inquiry, the technical support department of Drive Medical advised that each manual wheelchair has a turning radius of 24 inches. Upon telephonic inquiry, the technical support departments of Graham Field and Invacare advised to use the given length measurement as the turning radius measurement due to the fact that the pivot point in a manual wheelchair would make the radius no greater than the overall length of the wheelchair. Upon telephonic inquiry, Sunrise Medical and Ottobock were unable to verify this information; however for purposes of this survey, where the radius was unavailable, the length measurement was used.

COUNT[1]	TYPE	TERRAIN	MODEL	MANUFACTURER[2]	WIDTH (INCHES)[3]	LENGTH (INCHES)[4]	TURNING RADIUS (INCHES)[5]	WEIGHT CAPACITY (POUNDS)
6	Power	Standard	P9000 XDT	Invacare	24.5 w/o joystick	47	36	250
7	Power	Standard	Intrepid	Drive Medical	24.5	40	18	300
8	Power	Standard	Trident	Drive Medical	27.25	42.25	24	300
9	Power	Standard	Titan	Drive Medical	25	40	25	300
10	Power	Standard	Image EC	Drive Medical	24	42	27.5	300
11	Power	Standard	Medalist	Drive Medical	26	41	31	300
12	Power	Standard	Sunfire Plus	Drive Medical	24	39	33	300
13	Power	Compact	Cirrus Plus	Drive Medical	28	42.5	33	300
14	Power	Standard	Compass 605	Golden Technologies	24	39	19.5	300
15	Power	Standard	Compass 600	Golden Technologies	24.5	38.5	19	300
16	Power	Standard	Compass 615	Golden Technologies	26.2	42.7	21.95	300
17	Power	Standard	Alante 204	Golden Technologies	24	40	24.5	300
18	Power	Standard	Alante 215	Golden Technologies	24	40	24.5	300
19	Power	Standard/Large	Metro Power	Graham Field	27.5	41	33.5	300
20	Power	Standard	MPV 5	Hoverround	24	38	22.7	300
21	Power	Compact	Teknique FWD	Hoverround	25	41.9	24	300
22	Power	Standard	Pronto M51	Invacare	24 w/o	40	19.5	300

COUNT[1]	TYPE	TERRAIN	MODEL	MANUFACTURER[2]	WIDTH (INCHES)[3]	LENGTH (INCHES)[4]	TURNING RADIUS (INCHES)[5]	WEIGHT CAPACITY (POUNDS)
					joystick			
23	Power	Standard	Pronto M41	Invacare	24	39.4	19.5	300
24	Power	Standard	Pronto M61	Invacare	24	40	19.5	300
25	Power	Standard	FDX	Invacare	24	41.5	23	300
26	Power	Standard	R51	Invacare	26	40.75	33	300
27	Power	Standard	Nutron	Invacare	26	40.75	45	300
28	Power	Rehab Standard	M 300	Permobil	24	36.5	20	300
29	Power	Rehab Standard	M 400	Permobil	24	36.5	20	300
30	Power	Rehab Standard	C 300	Permobil	24	40	25	300
31	Power	Rehab Standard	C 400	Permobil	24	35	26	300
32	Power	Rehab Standard	C 350	Permobil	24.5	36	26	300
33	Power	Rehab Standard	C 500	Permobil	26	36.5	27	300
34	Power	Compact	J6	Pride	23.5	34.25 w/o riggings	19 w/o riggings	300
35	Power	Standard	Quantum Q6	Pride	24	35.5 w/o riggings	20 w/o riggings	300
36	Power	Midsize	Jazzy 600 ES	Pride	24.5	40.25	20.5	300
37	Power	Midsize	Jazzy Select 6	Pride	23.5	35.625 w/o	21.5	300

COUNT[1]	TYPE	TERRAIN	MODEL	MANUFACTURER[2]	WIDTH (INCHES)[3]	LENGTH (INCHES)[4]	TURNING RADIUS (INCHES)[5]	WEIGHT CAPACITY (POUNDS)
						riggings		
38	Power	Standard	Jazzy Elite 14	Pride	24.5	42.5	24	300
39	Power	Midsize	Jazzy Select Elite	Pride	23	35 w/o riggings	24.75	300
40	Power	Compact	Jazzy Sport 2	Pride	23	35 w/o riggings	24.75	300
41	Power	Standard	Jazzy Elite ES	Pride	23	42 w/o riggings	24.75	300
42	Power	Compact	Pulse	Sunrise Medical	24	34 w/o footrests	18	300
43	Power	Standard	S6	Sunrise Medical	27.75	33.5	24	300
44	Power	Standard	Pronto M91	Invacare	25.75 w/o joystick	29 w/o footrests	21.5	300
45	Power	Heavy Duty	Renegade	Drive Medical	26	41	31	350
46	Power	Standard	P222	Sunrise Medical	24.5	31.5 w/o footrests	25	350
47	Power	Heavy Duty	Cirrus Plus HD	Drive Medical	29	42.5	35	400
48	Power	Heavy-Duty	Compact 40	Innovation in Motion	24.8	35.8 base only	20.9	400
49	Power	Heavy-Duty	Compact 73	Innovation in Motion	24.8	37.4 base only	20.9	400
50	Power	Heavy-Duty	Hybrid	Innovation in Motion	26.4	41.33 base only	22.8	400
51	Power	Heavy-Duty	All Terrain	Innovation in Motion	27.95	41.33 base only	22.8	400
52	Power	Heavy-Duty	RWD	Innovation in Motion	28	32 base only	27	400
53	Power	Heavy-Duty	FWD	Innovation in	28	35.8 base only	27.5	400

COUNT[1]	TYPE	TERRAIN	MODEL	MANUFACTURER[2]	WIDTH (INCHES)[3]	LENGTH (INCHES)[4]	TURNING RADIUS (INCHES)[5]	WEIGHT CAPACITY (POUNDS)
				Motion				
54	Power	Heavy-Duty	Extreme X8	Innovation in Motion	28	45.25	52	400
55	Power	Bariatric	QM7	Sunrise Medical	25	36 w/o footrests	20	400
56	Power	Heavy Duty	Medalist 450	Drive Medical	24	40	31	450
57	Power	Heavy Duty	Wildcat 450	Drive Medical	26.5	48	41	450
58	Power	Standard	Compass 620	Golden Technologies	25	40	20	450
59	Power	Bariatric	Teknique XHD	Hoverround	27.5	47	28	450
60	Power	Standard	TDX	Invacare	24	38.5	23	450
61	Power	Rehab Bariatric	M 300 HD	Permobil	26	38	22	450
62	Power	Bariatric	Jazzy 614 HD	Pride	25.125	35.5	22.75	450
63	Power	Bariatric	Jazzy Elite HD	Pride	24.5	42.5	24	450
64	Power	Standard	Pronto M94	Invacare	28	36 w/o footrests	19.5	500
65	Power	Bariatric	Teknique HD6	Hoverround	29	47	28	600
66	Power	Bariatric	Jazzy 1450	Pride	29.25	38.25	26.5	600
MANUAL WHEELCHAIRS								
67	Manual	Standard	Blue Streak	Drive Medical	26	42	24	250
68	Manual	Standard	Cougar	Drive Medical	26	44	24	250
69	Manual	Standard	Traveler L3	Graham Field	28.5	29	29	250
70	Manual	Standard	Traveler SE	Graham Field	28.5	31.5	31.5	250

COUNT[1]	TYPE	TERRAIN	MODEL	MANUFACTURER[2]	WIDTH (INCHES)[3]	LENGTH (INCHES)[4]	TURNING RADIUS (INCHES)[5]	WEIGHT CAPACITY (POUNDS)
71	Manual	Top End	Terminator Everyday	Invacare	24.75	18	18	250
72	Manual	Top End	Reveal	Invacare	20	20	20	250
73	Manual	Top End	Crossfire T6	Invacare	26.75	20	20	250
74	Manual	Top End	Crossfire Titanium	Invacare	20	21	21	250
75	Manual	Standard	TRAN19FR	Invacare	21	27 w/o riggings	27	250
76	Manual	Standard	V16RFR	Invacare	23	30 w/o riggings	30	250
77	Manual	Standard	V18LR	Invacare	25	30 w/o riggings	30	250
78	Manual	Standard	Tracer EX2	Invacare	28.25	31.88 w/o riggings	31.88	250
79	Manual	Standard	Tracer EX2P	Invacare	28.25	31.88 w/o riggings	31.88	250
80	Manual	Standard	Q7	Sunrise Medical	28.5	32	32	265
81	Manual	Standard	GT	Sunrise Medical	28.5	32	32	265
82	Manual	Standard	QRi	Sunrise Medical	28.5	32	32	265
83	Manual	Standard	QXi	Sunrise Medical	28.5	32	32	265
84	Manual	Standard	SR45	Sunrise Medical	28.5	34	34	265
85	Manual	Standard	Silver Sport	Drive Medical	24	42	24	300
86	Manual	Standard	Cirrus IV	Drive Medical	28	42	24	300
87	Manual	Standard	Viper	Drive Medical	28	42	24	300
88	Manual	Standard	Rebel	Drive Medical	25.5	43	24	300
89	Manual	Standard	Traveler L4	Graham Field	27	33	33	300
90	Manual	Standard	Traveler	Graham Field	28.25	34	34	300

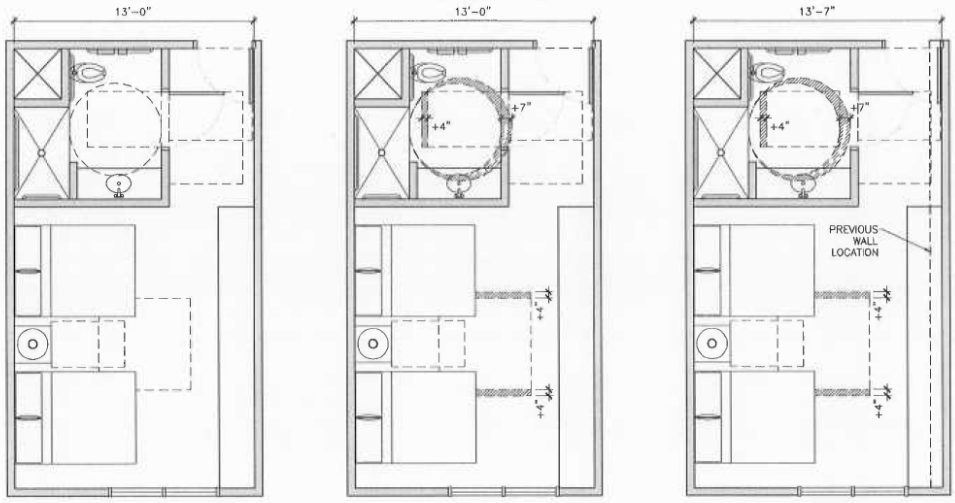
COUNT[1]	TYPE	TERRAIN	MODEL	MANUFACTURER[2]	WIDTH (INCHES)[3]	LENGTH (INCHES)[4]	TURNING RADIUS (INCHES)[5]	WEIGHT CAPACITY (POUNDS)
91	Manual	Standard	Metro IC3 Plus	Graham Field	29.5	41	41	300
92	Manual	Standard	Metro IC4	Graham Field	25	45	45	300
93	Manual	Standard	Motus	Ottobock	28	44.5	44.5	308
94	Manual	Standard	Silver Sport II	Drive Medical	28	42	24	350
95	Manual	Standard	Cruiser III	Drive Medical	28	42	24	350
96	Manual	Standard	Chrome	Drive Medical	28	42	24	350
97	Manual	Standard	Viper GT	Drive Medical	30	42	24	350
98	Manual	Bariatric	XDT	Invacare	29	29	29	350
99	Manual	Top End	Terminator	Invacare	24.75	18	18	400
100	Manual	Bariatric	Transport	Invacare	28	36.5	36.5	400
101	Manual	Bariatric	Heavy-Duty Silver	Invacare	29	30	30	450
102	Manual	Bariatric	Tracer	Invacare	29	30	30	450
103	Manual	Bariatric	Heavy-Duty Silver Vein	Invacare	29	30	30	450
SCOOTERS								
104	Scooter	Compact	Caddy	Afikim	24	48	41	220
105	Scooter	All-Purpose	GB 106	Golden Technologies	21.5	36.5	31	250
106	Scooter	Compact	Go Go ES2	Pride	19.5	37	31	250
107	Scooter	Compact	Go Go Ultra	Pride	19.5	39.75	44	260
108	Scooter	Compact	Bobcat 3	Drive Medical	19	38	32	285

COUNT[1]	TYPE	TERRAIN	MODEL	MANUFACTURER[2]	WIDTH (INCHES)[3]	LENGTH (INCHES)[4]	TURNING RADIUS (INCHES)[5]	WEIGHT CAPACITY (POUNDS)
109	Scooter	Compact	Dart 3	Drive Medical	19	38	32	285
110	Scooter	Compact	Bobcat 4	Drive Medical	19	37	35.5	285
111	Scooter	Compact	Dart 4	Drive Medical	19	37	35.5	285
112	Scooter	Compact	Spitfire EX 1320	Drive Medical	19.5	39	46	300
113	Scooter	Compact	Spitfire Scout 3 DLX	Drive Medical	20.5	42.5	51.2	300
114	Scooter	Compact	Spitfire Scout 4	Drive Medical	20.5	42.5	53.75	300
115	Scooter	Compact	Spitfire Scout 4 DLX	Drive Medical	20.5	42.5	53.75	300
116	Scooter	Compact	Spitfire Scout 3	Drive Medical	20.5	42.5	53.75	300
117	Scooter	Compact	Spitfire EX 1420	Drive Medical	20	42	54	300
118	Scooter	All-Purpose	GB 116	Golden Technologies	21.5	40.5	37	300
119	Scooter	All-Purpose	GL 110	Golden Technologies	22	41.5	39	300
120	Scooter	All-Purpose	GC 240	Golden Technologies	23.5	42.5	39	300
121	Scooter	All-Purpose	GL 140	Golden Technologies	22	43.25	48	300
122	Scooter	All-Purpose	GB 146	Golden Technologies	21.5	42	48.5	300
123	Scooter	Compact	Spitfire EX3	Hoveround	20	41	46	300
124	Scooter	Standard	Lynx 3R	Invacare	22	39.8	39.4	300
125	Scooter	Standard	Lynx L3	Invacare	22	39.8	39.4	300

COUNT[1]	TYPE	TERRAIN	MODEL	MANUFACTURER[2]	WIDTH (INCHES)[3]	LENGTH (INCHES)[4]	TURNING RADIUS (INCHES)[5]	WEIGHT CAPACITY (POUNDS)
126	Scooter	Standard	Lynx 3X	Invacare	22	44	44.7	300
127	Scooter	Standard	Lynx 3XR	Invacare	22	44	44.7	300
128	Scooter	Standard	Lynx L4	Invacare	22	39.9	51.2	300
129	Scooter	Standard	Lynx 4R	Invacare	22	39.9	51.2	300
130	Scooter	Standard	Go Go Elite Traveler	Pride	19.5	39.5	44	300
131	Scooter	Standard	Go Go LX	Pride	20.5	41	44.75	300
132	Scooter	Standard	Go Go Elite +	Pride	21	40.25	45.75	300
133	Scooter	Standard	Victory 9	Pride	22.5	45.5	51	300
134	Scooter	Standard	Go Go Sport	Pride	20	43	52	325
135	Scooter	Compact	Phoenix HD 3	Drive Medical	22.5	39	43	350
136	Scooter	Full-Size	Pilot 2310	Drive Medical	22	47	53	350
137	Scooter	Full-Size	Pilot 2410	Drive Medical	22	47	53	350
138	Scooter	Full-Size	Ventura 3	Drive Medical	25	48	53	350
139	Scooter	Full-Size	Ventura 3 DLX	Drive Medical	25	48	53	350
140	Scooter	Compact	Phoenix HD 4	Drive Medical	22.5	41.5	54	350
141	Scooter	Full-Size	Ventura 4	Drive Medical	25	48	54	350
142	Scooter	Full-Size	Ventura 4 DLX	Drive Medical	25	48	54	350
143	Scooter	All-Purpose	GC 340	Golden Technologies	23.5	45.5	40.5	350
144	Scooter	All-Purpose	GC 440	Golden Technologies	23.5	47.5	53.5	350

COUNT[1]	TYPE	TERRAIN	MODEL	MANUFACTURER[2]	WIDTH (INCHES)[3]	LENGTH (INCHES)[4]	TURNING RADIUS (INCHES)[5]	WEIGHT CAPACITY (POUNDS)
145	Scooter	Compact	Phoenix	Hoveround	19	37	43	350
146	Scooter	Standard	Ventura	Hoveround	25	48	54	350
147	Scooter	Standard	Leo 3	Invacare	23.6	47.5	47.2	350
148	Scooter	Standard	Leo 3S	Invacare	23.6	47.5	47.2	350
149	Scooter	Standard	Leo 4	Invacare	23.6	47.5	51	350
150	Scooter	Standard	Leo 4S	Invacare	23.6	47.5	51	350
151	Scooter	Standard	Victory Sport	Pride	26	47	51.75	350
152	Scooter	Standard	Victory 10	Pride	22.5	47	54	400
153	Scooter	Bariatric	Maxima	Pride	28.5	46.9	54	500

ATTACHMENT B TO AMERICAN HOTEL & LODGING COMMENTS
IMPACT OF PROPOSED CHANGES TO TURNING RADIUS

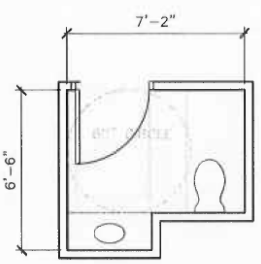


2010 ADA STDS.
(311 SQ. FT. ROOM)

2014 ANSI
(311 SQ. FT. ROOM)

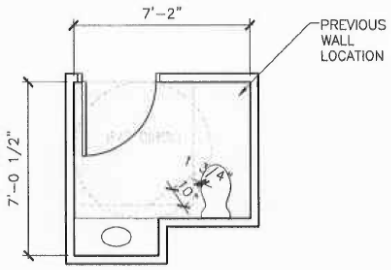
2014 ANSI (W/ ENLARGED ROOM)
(325 SQ. FT. ROOM)

- INCREASE IN ROOM SIZE: 14 SQ. FT.
- COST PER SQ. FT. OF CONSTRUCTION: X
- ADDITIONAL COST PER ROOM = 14 x X



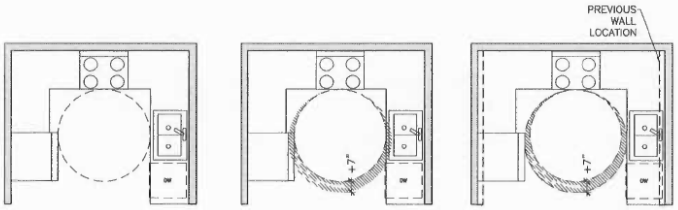
2010 ADA STDS.
(40.3 SQ. FT. ROOM)

BASE ROOM LAYOUT BASED ON DIAGRAM ON PAGE 103 OF THE GUIDANCE ON THE 2010 STANDARDS



2014 ANSI (W/ ENLARGED ROOM FOR LARGER TURNING CIRCLE)
(44.8 SQ. FT. ROOM)

-INCREASE IN ROOM SIZE: 4.5 SQ. FT.
-COST PER SQ. FT. OF CONSTRUCTION: X
-ADDITIONAL COST PER ROOM = 4.5 x X



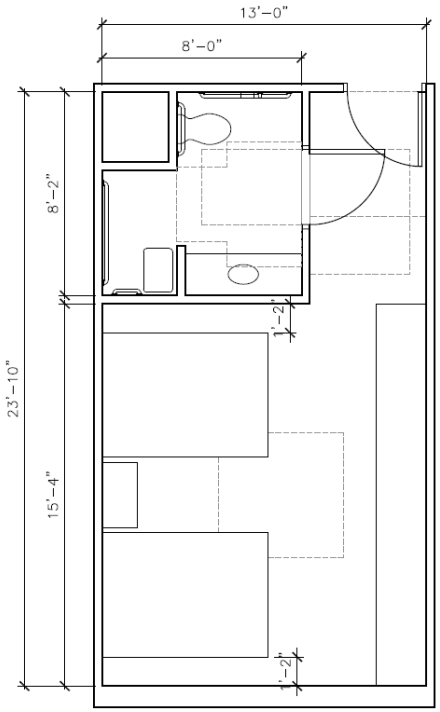
2010 ADA STDS.
(80 SQ. FT. ROOM)

2014 ANSI
(80 SQ. FT. ROOM)

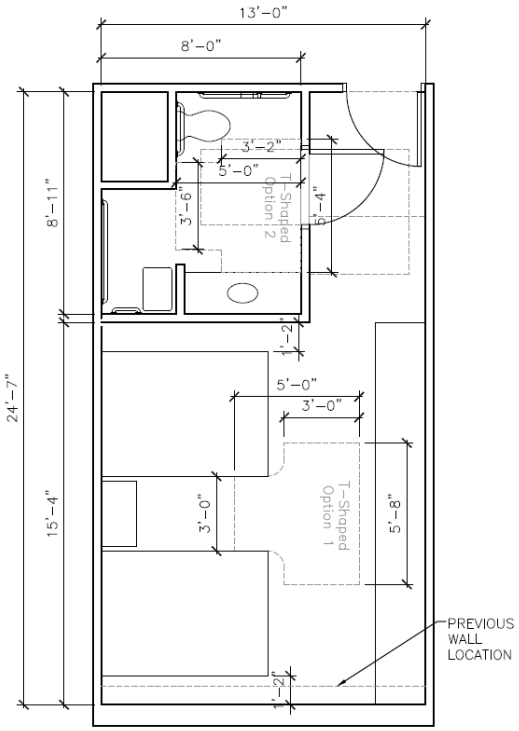
2014 ANSI (W/ ENLARGED ROOM)
(85 SQ. FT. ROOM)

- INCREASE IN ROOM SIZE: 5 SQ. FT.
- COST PER SQ. FT. OF CONSTRUCTION: X
- ADDITIONAL COST PER ROOM = 5 x X

IMPACT OF PROPOSED CHANGES TO T-TURN

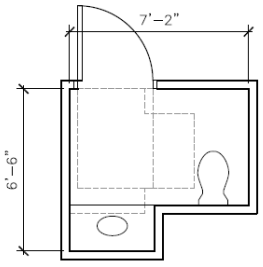


2010 ADA STDS.
(310 SQ. FT. ROOM)

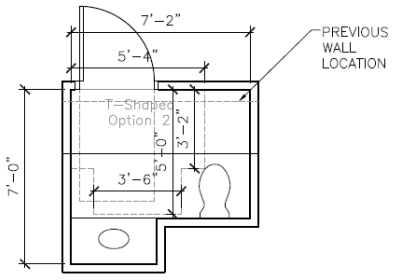


2014 ANSI (W/ ENLARGED ROOM FOR LARGER T-SHAPED TURN)
(320 SQ. FT)

-INCREASE IN ROOM SIZE: 10 SQ. FT.
-COST PER SQ. FT. OF CONSTRUCTION: X
-ADDITIONAL COST PER ROOM = 10 x X



2010 ADA STDS.
(39.7 SQ. FT. ROOM)



2014 ANSI (W/ ENLARGED ROOM FOR LARGER T-SHAPED TURN)
(43.2 SQ. FT. ROOM)

-INCREASE IN ROOM SIZE: 3.5 SQ. FT.
-COST PER SQ. FT. OF CONSTRUCTION: X
-ADDITIONAL COST PER ROOM = 3.5 x X

3-6B – 12

Revise as follows:

Table 407.4.1—Minimum Dimensions of Elevator Cars

Door Location	Door Clear Opening Width	Inside Car, Side to Side	Inside Car, Back Wall to Front Return	Inside Car, Back Wall to Inside Face of Door
Centered	42 inches (1065 mm)	80 inches (2030 mm)	51 inches (1295 mm)	54 inches (1370 mm)
Side (Off Center)	36 inches (915 mm)[1]	68 inches (1725 mm)	51 inches (1295 mm)	54 inches (1370 mm)
Any	36 inches (915 mm)[1]	54 inches (1370 mm)	80 inches (2030 mm)	80 inches (2030 mm)
Any	36 inches (915 mm)[1]	60 inches (1525 mm)[2]	60 inches (1525 mm)[2]	60 inches (1525 mm)[2]

[1]A tolerance of minus 5/8 inch (16 mm) is permitted.

[2]Other car configurations that provide a 36-inch (915mm) door clear opening width and a 60 inch (1525 mm) ~~turning~~ diameter space ~~complying with Section 304~~ with the door closed are permitted.

3-6B-12 PC1

Harold Kiewel, representing self

Revise as follows:

Table 407.4.1—Minimum Dimensions of Elevator Cars

Door Location	Door Clear Opening Width	Inside Car, Side to Side	Inside Car, Back Wall to Front Return	Inside Car, Back Wall to Inside Face of Door
Centered	42 inches (1065 mm)	80 inches (2030 mm)	51 inches (1295 mm)	54 inches (1370 mm)
Side (Off Center)	36 inches (915 mm)[1]	68 inches (1725 mm)	51 inches (1295 mm)	54 inches (1370 mm)
Any	36 inches (915 mm)[1]	54 inches (1370 mm)	80 inches (2030 mm)	80 inches (2030 mm)
Any	36 inches (915 mm)[1]	60 inches (1525 mm)[2]	60 inches (1525 mm)[2]	60 inches (1525 mm)[2]

[1]A tolerance of minus 5/8 inch (16 mm) is permitted.

[2]Other car configurations ~~that provide a~~ are permitted provided that car has 36-inches (915mm) ~~door~~ clear opening width ~~and a 60 inch (1525 mm) diameter space with the door closed are permitted~~ at the door or doors, a 67 inch (1700 mm) diameter, clear-floor-space for turning complying with Section 304 when the door is closed, and the control panel is centered in one edge of its required clear-floor-space..

Reason: If 67-inches is the new standard, then why regress to 60-inches for elevators? For additional comments from Mr. Kiewel see 1-1-12.

3-6C – 12

Revise as follows:

502.4.2 Width. Access aisles serving car and van parking spaces shall be ~~60~~ 67 inches (~~1525~~ 1700 mm) minimum in width.

3-6C-12 PC1

Tim Larson – representing self

Comment: -OK- This will affect all parking layouts. The HC access isle is proposed to go from 60" to 67" wide. *It doesn't affect many sites. Our standard site design uses a full 8' width for the access isle*.

3-6C-12 PC2

Ron Burton, PTW Advisors LLC, representing Building Owners and Managers Association, International; David S. Collins, The Preview Group, representing American Institute of Architects (AIA); Ron Nickson, representing the National Multi-housing Council; Steve Orlowski, representing the National Association of Home Builders; Kim Paarlberg, representing International Code Council

See comment under 3-6-12 PC2

3-6C-12 PC3

Chad Beebe, – representing American Society for Healthcare Engineering (ASHE)

Disapprove the change. Return the text to that found in existing standard.

Reason: In review of the 2014 Final Draft of the ICC A117.1 document, it has come to our attention that several of the proposed changes will have a significantly negative impact to the healthcare industry design/built environment of buildings designed under the 2015 IBC. Further, it is our understanding that the overwhelming majority of these changes have been derived from a single uncorroborated report which has neither been properly vetted nor adopted by any other credible agency or (similar) jurisdictional body.

As we do not feel these dramatic and substantial changes have been given proper and appropriate consideration by all interested stakeholders in this process, and since we question the authenticity of the underlying premise used to make such changes, we respectfully request they either be removed entirely from consideration in this draft, or that the entire draft adoption process be held in abeyance for a minimum of 12-months so that further collaboration can be conducted with all interested parties. If the Committee opts to delay this process for 12-months, it will be in keeping with the mission of the ICC, and best assure that all parties can be provided with the opportunity to reasonably participate in this process.

3-6C-12 / 3-6D-12 – The increasing of the accessible parking aisles being changed from 60-inches wide to 67-inches wide at both regular and van accessible spaces, an increase of 12 square feet for every required accessible parking aisles.

These new requirements would add thousands of required square feet to a new hospital and significantly impact any renovations to an existing hospital by requiring increased patient room sizes to meet the new requirements and thus, due to the fixed square footage within the building foot print, will reduce the number of allowable beds the hospital can maintain. With hospital construction cost averaging around $300.00 per square foot these additional increases in square footage will significantly impact the cost of construction. Thank you for your consideration of this request, and in keeping alive the goals and mandates of the entire ICC organization and membership.

3-6C-12 PC4

Larry Eberly, – representing Pennsylvania Builders Association

Disapprove the change. Return the text to that found in existing standard.

Reason: The size of a standard Handicap Accessible parking space which is widely accepted, planned in residential communities and consistent with other laws and standards is based on an aisle width of 60" adjacent to a parking space 96" with a typical total width of 13' wide; this change would increase total width to 13'-7" wide. This may conflict with existing approved site plans, increase impervious coverage and be difficult to implement.

This proposed change relates to the anthropometric study of mobility device users by The Center for IDeA at the University at Buffalo, SUNY which questions decades of universally accepted accessibility clearances and maneuverability contained within

Chapter 3: Building Blocks. This revision is based on this single study and should be researched further before such changes occur in the standard.

Pennsylvania Builders Association opposes any change to the ANSI 117.1 building blocks for numerous reasons. The requirements within Chapter 3: Building Blocks are the standard and precedent for the development of decades of accessibility required clearances, maneuverability and reach ranges both in ANSI A117.1 and federal accessibility laws and their standards (ADA/FHA/ ABA/ UFAS, etc).

Any changes will conflict with and be more stringent than these accepted laws and standards and contradictory to the efforts of the ADA/A117 Harmonization Task Group (HTG) to provide consistent language with the ADA. Residual unforeseen consequences and conflicts with these laws and within the ANSI 117.1 standard itself due to the vast references to this chapter will require extensive future coordination, revisions and clarifications and create a financial burden for residential communities.

These changes are predicated on the anthropometric study of mobility device users by The Center for IDeA at the University at Buffalo, SUNY which predominantly addresses the potential need to accommodate existing electric mobility devices. The Committee's and Wheeled Mobility Task Group's (WMTG) supporting documentation and comments contained in the Background Report raises serious questions to the study's testing methods, criteria and results and clearly acknowledges the unforeseen residual impact and consequences.

Instead of changing the Building Blocks, a more prudent approach would be to require mobility device manufacturers to comply with the decades of accepted standards, particularly taking in consideration future technology and advances in design. Stringent changes to the requirements in the ANSI 117.1 standards make private residential communities more handicap accessible than public, institutional and commercial buildings and sites including USPS postal centers, hospitals, schools, retail, office, recreational and cultural establishments. A substantial disparity and financial burden is placed on residential communities, homeowners and builders by requiring residential buildings to comply with stricter standards. In addition, any change to these basic building blocks may also set a precedent for a re-evaluation of all other clearances and requirements not currently included in these proposed changes, particularly dwelling unit bathroom and kitchens.

Pennsylvania adopts the accessibility provisions of the newest triennial revisions to the ICC Family of Codes that have been adopted in PA, which includes the IBC, IRC, IMC, IPC and IEBC. without modification. This includes the references to ICC/ANSI A117.1. Mandatory adoption in Pennsylvania, without modification, has unforeseen consequences to the building industry, both commercial and residential communities.

3-6C-12 PC5

Tony Ewalt, representing Sletten Construction of Nevada, Inc.; Michael Gentille, representing Philip Chun North America, Inc.; Michael McGettigan, representing Terracon Consultant; Robert W. Potter, Construction Company, representing Affordable Concepts; Eric J. Rowland, representing Rowland Design;

Disapprove the change. Return the text to that found in existing standard.

Reason: In review of the 2014 Final Draft of the ICC A117.1 document, it has come to my attention that several of the proposed changes (ratified by this Committee) will have a significantly negative impact to the design/built environment of buildings designed under the 2015 IBC. Further, it is my understanding that the overwhelming majority of these changes have been derived from a single uncorroborated report which has neither been properly vetted nor adopted by any other credible agency or (similar) jurisdictional body.

As I do not feel these dramatic and substantial changes have been given proper and appropriate consideration by all interested stakeholders in this process, and I question the authenticity of the underlying premise used to make such changes, I respectfully request they either be removed entirely from consideration in this draft, or that the entire draft adoption process be held in abeyance for a minimum of 12-months.

If the Committee opts to delay this process for 12-months, it will be in keeping with the mission of the ICC, and best assure that all parties can be provided with the opportunity to reasonably participate in this process.

3-6C-12 PC6

Karen Gridley, representing Target Corporation

Disapprove the change. Return the text to that found in existing standard.

Reason: Since we are proposing in 3-6 – 12 that the size of the circular turning space should remain at the current dimension of 60 inches, and not be increased to 67 inches. We are also proposing that the width of the car and van access aisles remain at 60 inches. The reasoning is similar to our comment provided on proposal 3-6 – 12, as follows.

During the July 2013 Committee Action Meeting we heard comments by committee members wondering if there is data available regarding how the size of the current turning space works in "real world" applications as compared to findings in the study completed by Dr. Steinfeld.

In response, Target can offer some data that will help add real world context to the discussion. For reference, Dr. Steinfeld's study, which lead the committee to propose a new 67" wide access aisle space, included 500 participants from a localized geographic area, as we understand it.

Target's data is based on feedback from people across the nation who visit our stores, totaling nearly 36 million transactions *per week*, on average. Keeping in mind that often the person making the transaction has another person with them so there are well into the multi-millions of guests at Target stores every week. Of these guests, many share comments of all sorts with Target (not just access related) through various channels. We find that of the guests who contacted us in 2012, the percentage of comments

related to accessibility of the building (which includes our parking facilities) was limited to an extremely small fraction of less than 1%. (Less than .0003% of 1%.). Of that fraction of 1%, an even smaller fraction of those comments were related to concerns about turning space for wheeled mobility devices. This tells us that the current sizes and dimensions in the existing Standard work for circular turning space, as-is, for the greater majority of guests using wheeled mobility devices. The data presents no compelling evidence or reason to change the existing dimension.

Additional Information:
During the July 2013 Committee Action Meeting, members of the committee commented that the committee's only job was to look at the A117.1 Standard and implement changes to increase access through that document. In response, we urge the committee to consider that 'more and bigger is not always better, sometimes it's just more and bigger'.

Supporting this would be the observation that the committee has not done its due diligence in evoking or investigating the Wheeled Mobility Device Manufacturing Industry to see what can be accomplished to improve maneuvering through existing engineering practices in 'Like' industry trends and innovation in designs on their end, as that industry as a whole is changing too. Like the automotive industry that went from large cars, trucks and vans to smaller frame vehicles to achieve sustainable efficiencies throughout their redesign all while maintaining safety and functionality.

From an architectural perspective, designers and building owners do not have the luxury of looking at a building in isolation through only a single Standard or Regulation when we design buildings. We must consider many regulations and standards, each having an impact and interplay with other requirements that ultimately drive the size, shape and design of the spaces we provide for people. Considering this interplay, Target respectfully submits that increasing the width of the access aisle for cars and vans will actually result in decreased accessibility when applied in conjunction with forces in place from other codes and standards.

For example: Zoning regulations drive design, layout and quantity of parking stalls required on a site. The increase to the proposed odd dimension of 67 inches at access aisles would increasingly put us in violation of zoning regulations for loosing stalls in order to accommodate the wider access aisle width, Parking lots in most cases do not have space to expand or grow; they are bounded and constricted by property lines that are fixed.

It is true that designers can adjust, tweak, push and pull designs of the physical facilities to meet these conflicting requirements. However, the cost comes in what will subsequently be able to fit within in these facilities that are experiencing a compound squeeze (squeezed smaller in footprint on the outside, but interior spaces pushed larger from within). This will reduce capacity for parking stalls overall, which in turn reduces the required quantity of accessible parking stalls, limiting access to parking availability for person with disabilities, and ultimately reducing access in the larger picture. What was once able to be provided may no longer be available due to compromised available space, having a negative impact on guest's shopping trips. Considering the effort it takes to travel to shopping destinations for many persons with disabilities, it is a disservice to them to not be able to offer enough available parking stalls due to reduced ratios, making the trip as a whole inaccessible all together.

We encourage the committee to reconsider the proposals that would increase the width of the access aisle space, and other building block sizes, and instead maintain the current sizes. At least until such time as more investigation of the Wheeled Mobility Device Manufacturing Industry can take place to identify what can be done to improve design of those devices via engineering and technology advancements, towards improved access.

3-6C-12 PC7

Jeffrey T. O'Neill, AIA, ACHA – representing self

Disapprove the change. Return the text to that found in existing standard.

Reason: In review of the 2014 Final Draft of the ICC A117.1 document, it has come to my attention that several of the proposed changes (ratified by this Committee) will have a significantly negative impact to the design/built environment of buildings designed under the 2015 IBC. Further, it is my understanding that the overwhelming majority of these changes have been derived from a single uncorroborated report which has neither been properly vetted, peer-reviewed, nor adopted by any other credible agency or (similar) jurisdictional body.

I respectfully request they either be removed entirely from consideration in this draft, or that the entire draft adoption process be held in abeyance for a minimum of 12-months, to give time for these proposed changes to be properly discussed and vetted. If the Committee opts to delay this process for 12-months, it will be in keeping with the mission of the ICC, and best assure that all parties can be provided with the opportunity to reasonably participate in this process.

3-6C-12 PC8

Kimberly Paarlberg,– representing ICC

Disapprove the change. Return the text to that found in existing standard.

Reason: The access aisle is not confined. Since it is at the same level, there will always be an overlap with the adjacent parking space. Even more so if this is a shared access aisle. In addition, this should be consistent with the access aisle recommended by DOT for street parking and approved by this committee in 5-1-12.

3-6C-12 PC9

Robin Roberts, Chair, Technical Standards Committee, representing Accessibility Professionals Association

Disapprove the change. Return the text to that found in existing standard.

Comment: Many of the comments provided in the background reports expressed reservations regarding the study upon which the proposals are based.

Because the proposed changes would have an enormous impact on the design and construction community, further investigation is necessary.

3-6C-12 PC10

Minh N. Vu – representing American Hotel and Lodging Association

Disapprove the change. Return the text to that found in existing standard.

Reason: See comment under 3-6-12.

3-6D – 12

Revise as follows:

503.3.2 Width. Access aisles serving vehicle pull-up spaces shall be ~~60~~ 67 inches (~~1525~~ 1700 mm) minimum in width.

3-6D-12 PC1

Ron Burton, PTW Advisors LLC, representing Building Owners and Managers Association, International; David S. Collins, The Preview Group, representing American Institute of Architects (AIA); Ron Nickson, representing the National Multi-housing Council; Steve Orlowski, representing the National Association of Home Builders; Kim Paarlberg, representing International Code Council

See comment under 3-6-12 PC2

3-6D-12 PC2

Chad Beebe, – representing American Society for Healthcare Engineering (ASHE)

Disapprove the change. Return the text to that found in existing standard.

Reason: In review of the 2014 Final Draft of the ICC A117.1 document, it has come to our attention that several of the proposed changes will have a significantly negative impact to the healthcare industry design/built environment of buildings designed under the 2015 IBC. Further, it is our understanding that the overwhelming majority of these changes have been derived from a single uncorroborated report which has neither been properly vetted nor adopted by any other credible agency or (similar) jurisdictional body.

As we do not feel these dramatic and substantial changes have been given proper and appropriate consideration by all interested stakeholders in this process, and since we question the authenticity of the underlying premise used to make such changes, we respectfully request they either be removed entirely from consideration in this draft, or that the entire draft adoption process be held in abeyance for a minimum of 12-months so that further collaboration can be conducted with all interested parties. If the Committee opts to delay this process for 12-months, it will be in keeping with the mission of the ICC, and best assure that all parties can be provided with the opportunity to reasonably participate in this process.

3-6C-12 / 3-6D-12 – The increasing of the accessible parking aisles being changed from 60-inches wide to 67-inches wide at both regular and van accessible spaces, an increase of 12 square feet for every required accessible parking aisles.

These new requirements would add thousands of required square feet to a new hospital and significantly impact any renovations to an existing hospital by requiring increased patient room sizes to meet the new requirements and thus, due to the fixed square footage within the building foot print, will reduce the number of allowable beds the hospital can maintain. With hospital construction cost averaging around $300.00 per square foot these additional increases in square footage will significantly impact the cost of construction. Thank you for your consideration of this request, and in keeping alive the goals and mandates of the entire ICC organization and membership.

3-6D-12 PC3

Larry Eberly – representing Pennsylvania Builders Association

Disapprove the change. Return the text to that found in existing standard.

Reason: This proposed change relates to the anthropometric study of mobility device users by The Center for IDeA at the University at Buffalo, SUNY which questions decades of universally accepted accessibility clearances and maneuverability contained within Chapter 3: Building Blocks. This revision is based on this single study and should be researched further before such changes occur in the standard.

Pennsylvania Builders Association opposes any change to the ANSI 117.1 building blocks for numerous reasons. The requirements within Chapter 3: Building Blocks are the standard and precedent for the development of decades of accessibility required clearances, maneuverability and reach ranges both in ANSI A117.1 and federal accessibility laws and their standards (ADA/ FHA/ ABA/ UFAS, etc).

Any changes will conflict with and be more stringent than these accepted laws and standards and contradictory to the efforts of the ADA/A117 Harmonization Task Group (HTG) to provide consistent language with the ADA. Residual unforeseen consequences and conflicts with these laws and within the ANSI 117.1 standard itself due to the vast references to this chapter will require extensive future coordination, revisions and clarifications and create a financial burden for residential communities.

These changes are predicated on the anthropometric study of mobility device users by The Center for IDeA at the University at Buffalo, SUNY which predominantly addresses the potential need to accommodate existing electric mobility devices. The Committee's and Wheeled Mobility Task Group's (WMTG) supporting documentation and comments contained in the Backround Report raises serious questions to the study's testing methods, criteria and results and clearly acknowledges the unforeseen residual impact and consequences.

Instead of changing the Building Blocks, a more prudent approach would be to require mobility device manufacturers to comply with the decades of accepted standards, particularly taking in consideration future technology and advances in design.

Stringent changes to the requirements in the ANSI 117.1 standards make private residential communities more handicap accessible than public, institutional and commercial buildings and sites including USPS postal centers, hospitals, schools, retail, office, recreational and cultural establishments. A substantial disparity and financial burden is placed on residential communities, homeowners and builders by requiring residential buildings to comply with stricter standards. In addition, any change to these basic building blocks may also set a precedent for a re-evaluation of all other clearances and requirements not currently included in these proposed changes, particularly dwelling unit bathroom and kitchens.

Pennsylvania adopts the accessibility provisions of the newest triennial revisions to the ICC Family of Codes that have been adopted in PA, which includes the IBC, IRC, IMC, IPC and IEBC. without modification. This includes the references to ICC/ANSI A117.1.Mandatory adoption in Pennsylvania, without modification, has unforeseen consequences to the building industry, both commercial and residential communities.

3-6D-12 PC4

Tony Ewalt, representing Sletten Construction of Nevada, Inc.; Michael Gentille, representing Philip Chun North America, Inc.; Michael McGettigan, representing Terracon Consultant; Robert W. Potter, Construction Company, representing Affordable Concepts; Eric J. Rowland, representing Rowland Design;

Disapprove the change. Return the text to that found in existing standard.

Reason: In review of the 2014 Final Draft of the ICC A117.1 document, it has come to my attention that several of the proposed changes (ratified by this Committee) will have a significantly negative impact to the design/built environment of buildings designed under the 2015 IBC. Further, it is my understanding that the overwhelming majority of these changes have been derived from a single uncorroborated report which has neither been properly vetted nor adopted by any other credible agency or (similar) jurisdictional body.

As I do not feel these dramatic and substantial changes have been given proper and appropriate consideration by all interested stakeholders in this process, and I question the authenticity of the underlying premise used to make such changes, I respectfully request they either be removed entirely from consideration in this draft, or that the entire draft adoption process be held in abeyance for a minimum of 12-months.

If the Committee opts to delay this process for 12-months, it will be in keeping with the mission of the ICC, and best assure that all parties can be provided with the opportunity to reasonably participate in this process.

3-6D-12 PC5

Jeffrey T. O'Neill, AIA, ACHA – representing self

Disapprove the change. Return the text to that found in existing standard.

Reason: In review of the 2014 Final Draft of the ICC A117.1 document, it has come to my attention that several of the proposed changes (ratified by this Committee) will have a significantly negative impact to the design/built environment of buildings designed

under the 2015 IBC. Further, it is my understanding that the overwhelming majority of these changes have been derived from a single uncorroborated report which has neither been properly vetted, peer-reviewed, nor adopted by any other credible agency or (similar) jurisdictional body.

I respectfully request they either be removed entirely from consideration in this draft, or that the entire draft adoption process be held in abeyance for a minimum of 12-months, to give time for these proposed changes to be properly discussed and vetted. If the Committee opts to delay this process for 12-months, it will be in keeping with the mission of the ICC, and best assure that all parties can be provided with the opportunity to reasonably participate in this process.

3-6D-12 PC6

Kimberly Paarlberg,– representing ICC

Disapprove the change. Return the text to that found in existing standard.

Reason: The access aisle is not confined. Since it is at the same level, there will always be an overlap with the adjacent pull-up space. Even more so where there is a blended transition to the adjacent sidewalk (common at entrances).

3-6D-12 PC7

Robin Roberts, Chair, Technical Standards Committee, representing Accessibility Professionals Association

Disapprove the change. Return the text to that found in existing standard.

Comment: Many of the comments provided in the background reports expressed reservations regarding the study upon which the proposals are based.

Because the proposed changes would have an enormous impact on the design and construction community, further investigation is necessary.

3-6D-12 PC8

Minh N. Vu – representing American Hotel and Lodging Association

Disapprove the change. Return the text to that found in existing standard.

Reason: See comment under 3-6-12.

3-6E – 12

Revise as follows:

804.2.2 U-Shaped Kitchens. In kitchens enclosed on three contiguous sides, clearance between all opposing base cabinets, countertops, appliances, or walls within kitchen work areas shall be ~~60~~ 67 inches (~~1525~~ 1700 mm) minimum.

3-6E-12 PC1

Tim Larson, representing self, Fritz Rasmussen, representing Kwik Trip, Inc

Comment:: -OK- 304.3.1 Circular Spaces. This better defines the rules for circular turning spaces. It keeps the diameter at 60".

Staff note. The comments of Mr. Larson and Mr. Rasmussen seem to be misplaced by them.

3-6E-12 PC2

Ron Burton, PTW Advisors LLC, representing Building Owners and Managers Association, International; David S. Collins, The Preview Group, representing American Institute of Architects (AIA); Ron Nickson, representing the National Multi-housing Council; Steve Orlowski,

representing the National Association of Home Builders; Kim Paarlberg, representing International Code Council

See comment under 3-6-12 PC2

3-6E-12 PC3

Kimberly Paarlberg, representing International Code Council

Further revise as follows:

804.2.2 U-Shaped Kitchens. In kitchens enclosed on three contiguous sides, clearance between all opposing base cabinets, countertops, appliances, or walls within kitchen work areas shall be 67 inches (1700 mm) minimum.

EXCEPTIONS:

1. U-shaped kitchens with an island shall be permitted to comply with Section 804.2.1.
2. U-shaped kitchens shall be permitted to clearances shall be permitted to be 60 inches (1525 mm) minimum where a T-turn is provided at either the accessible work surface or at the sink.

Reason: Several items have resulted in changes for kitchens. All rooms within an Accessible unit are required to have the larger turning space. Due to the changes for the alcove provisions now limited to 20", the space under the kitchen and work surface will already be required to have a width of 36". The larger clear floor space is required at all appliances. For sinks and cooktops, the requirement for centering will force these items further from corners.

The new exception is intended to allow for some design options in kitchens. If that turning space is provided in U-shaped kitchen under the sink or work surface, then the provisions to access each side of the kitchen is addressed through the alcove provisions (which the committee decided to leave at 60".) It a T-turn is not provided because the work surface or sink is near a corner, then the space between the counter will provide a circular space. See figures for examples. In addition, this will maintain the 15 step work triangle which is important to the efficiency of a kitchen for standing persons.

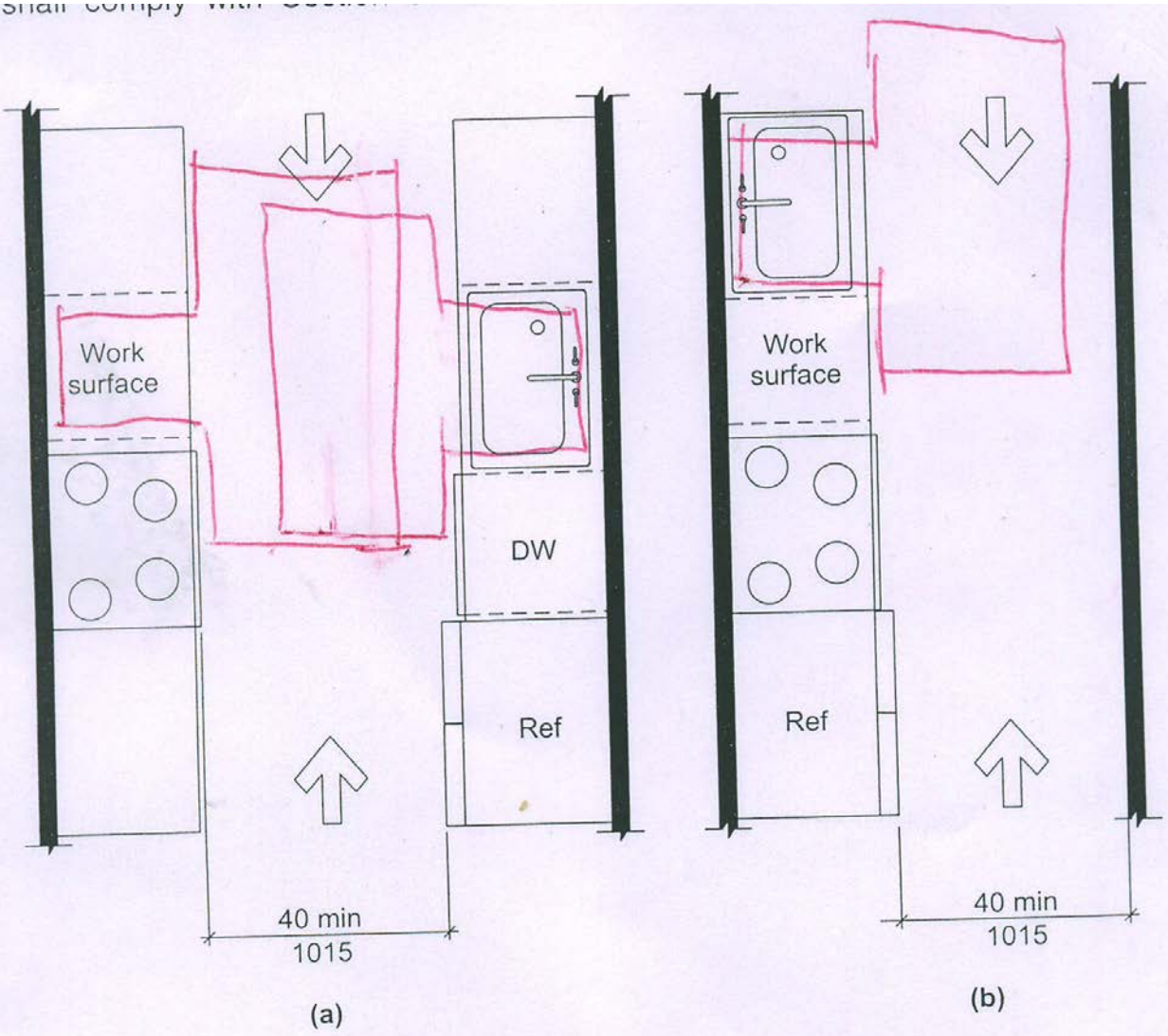


FIG. 804.2.1
PASS-THROUGH KITCHEN CLEARANCE

3-6E-12 PC4

Larry Eberly, representing Pennsylvania Builders Association

Disapprove the change. Return the text to that found in existing standard.

Reason: This proposed change relates to the anthropometric study of mobility device users by The Center for IDeA at the University at Buffalo, SUNY which questions decades of universally accepted accessibility clearances and maneuverability contained within Chapter 3: Building Blocks. This revision is based on this single study and should be researched further before such changes occur in the standard.

Pennsylvania Builders Association opposes any change to the ANSI 117.1 building blocks for numerous reasons. The requirements within Chapter 3: Building Blocks are the standard and precedent for the development of decades of accessibility required clearances, maneuverability and reach ranges both in ANSI A117.1 and federal accessibility laws and their standards (ADA FHA/ ABA/ UFAS, etc).

Any changes will conflict with and be more stringent than these accepted laws and standards and contradictory to the efforts of the ADA/A117 Harmonization Task Group (HTG) to provide consistent language with the ADA. Residual unforeseen consequences and conflicts with these laws and within the ANSI 117.1 standard itself due to the vast references to this chapter will require extensive future coordination, revisions and clarifications and create a financial burden for residential communities. These changes are predicated on the anthropometric study of mobility device users by The Center for IDeA at the University at Buffalo, SUNY which predominantly addresses the potential need to accommodate existing electric mobility devices. The Committee's and Wheeled Mobility Task Group's (WMTG) supporting documentation and comments contained in the Backround Report raises serious questions to the study's testing methods, criteria and results and clearly acknowledges the unforeseen residual impact andconsequences.

Instead of changing the Building Blocks, a more prudent approach would be to require mobility device manufacturers to comply with the decades of accepted standards, particularly taking in consideration future technology and advances in design. Stringent changes to the requirements in the ANSI 117.1 standards make private residential communities more handicap accessible than public, institutional and commercial buildings and sites including USPS postal centers, hospitals, schools, retail, office, recreational and cultural establishments. A substantial disparity and financial burden is placed on residential communities, homeowners and builders by requiring residential buildings to comply with stricter standards. In addition, any change to these basic building blocks may also set a precedent for a re-evaluation of all other clearances and requirements not currently included in these proposed changes, particularly dwelling unit bathroom and kitchens.

Pennsylvania adopts the accessibility provisions of the newest triennial revisions to the ICC Family of Codes that have been adopted in PA, which includes the IBC, IRC, IMC, IPC and IEBC. without modification. This includes the references to ICC/ANSI A117.1.
Mandatory adoption in Pennsylvania, without modification, has unforeseen consequences to the building industry, both commercial and residential communities.

3-6E-12 PC5

Tony Ewalt, representing Sletten Construction of Nevada, Inc.; Michael Gentille, representing Philip Chun North America, Inc.; Michael McGettigan, representing Terracon Consultant; Robert W. Potter, Construction Company, representing Affordable Concepts; Eric J. Rowland, representing Rowland Design;

Disapprove the change. Return the text to that found in existing standard.

Reason: In review of the 2014 Final Draft of the ICC A117.1 document, it has come to my attention that several of the proposed changes (ratified by this Committee) will have a significantly negative impact to the design/built environment of buildings designed under the 2015 IBC. Further, it is my understanding that the overwhelming majority of these changes have been derived from a single uncorroborated report which has neither been properly vetted nor adopted by any other credible agency or (similar) jurisdictional body.

As I do not feel these dramatic and substantial changes have been given proper and appropriate consideration by all interested stakeholders in this process, and I question the authenticity of the underlying premise used to make such changes, I respectfully request they either be removed entirely from consideration in this draft, or that the entire draft adoption process be held in abeyance for a minimum of 12-months.

If the Committee opts to delay this process for 12-months, it will be in keeping with the mission of the ICC, and best assure that all parties can be provided with the opportunity to reasonably participate in this process.

3-6E-12 PC6

Robin Roberts, Chair, Technical Standards Committee, representing Accessibility Professionals Association

Disapprove the change. Return the text to that found in existing standard.

Reason: Many of the comments provided in the background reports expressed reservations regarding the study upon which the proposals are based.

Because the proposed changes would have an enormous impact on the design and construction community, further investigation is necessary.

3-8 – 12

Revise as follows:

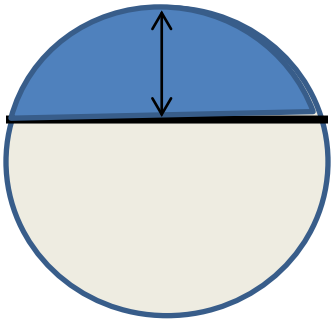
304.3.1 Circular Space. The turning space shall be a circular space with a 60-inch (1525 mm) minimum diameter. The turning space shall be permitted to include knee and toe clearance complying with Section 306. Where the turning space includes knee and toe clearances under an obstruction, the overlap shall comply with all of the following:

1. The depth of the overlap shall not be more than 10 inches (255 mm), and

2. The depth shall not exceed the depth of the knee and toe clearances provided, and

3. The overlap shall be permitted only within the turning circle area shown shaded in Figure 304.3.1.

Figure 304.3.1



3-8-12 PC1

Ron Burton, PTW Advisors LLC, representing Building Owners and Managers Association, International; David S. Collins, The Preview Group, representing American Institute of Architects (AIA); Ron Nickson, representing the National Multi-housing Council; Steve Orlowski, representing the National Association of Home Builders; Kim Paarlberg, representing International Code Council

See comment under 3-6-12 PC2

3-8-12 PC2

Harold Kiewel, representing self

Further revise as follows:

304.3.1 Circular Space. The turning space shall be a circular space with a 60-inch (1525 mm) minimum diameter. The turning space shall be permitted to include ~~knee and~~ toe clearance complying with Section 306. Where the turning space includes ~~knee and~~ toe clearances under an obstruction, the overlap shall comply with all of the following:

1. The depth of the overlap shall ~~not be more than 10 inches (255 mm)~~ be 4 inches (100 mm), maximum, and
2. ~~The depth shall not exceed the depth of the knee and toe clearances provided, and~~ The turning space shall encounter a maximum of two such obstructions, and
3. ~~The overlap shall be permitted only within the turning circle area shown shaded in Figure 304.3.1.~~ The combined cord-lengths of the obstructions shall be less than 30-percent of the circumference of the turning-space as shown in Figure 304.3.1.

Reason: See 1-1-12

3-8-12 PC3

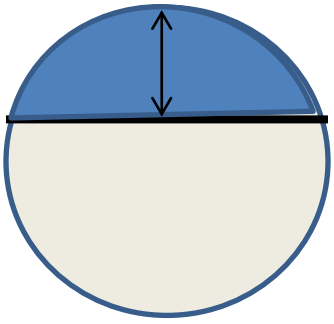
Kimberly Paarlberg, representing ICC

Further revise as follows:

304.3.1 Circular Space. The turning space shall be a circular space with a ~~60~~-67 inch (~~1525~~ 1700 mm) minimum diameter. The turning space shall be permitted to include knee and toe clearance complying with Section 306. Where the turning space includes knee and toe clearances under an obstruction, the overlap shall comply with all of the following:

~~1. The depth of the overlap shall not be more than 10 inches (255 mm), and~~
~~2~~ 1.. The depth shall not exceed the depth of the knee and toe clearances provided, and
~~3~~ 2. The overlap shall be permitted only within the turning circle area shown shaded in Figure 304.3.1.

Figure 304.3.1



Reason: The intent of the original proposal was to eliminate the 'donut' effect currently permitted with the turning circle. However, in order to be consistent with the T-turn in Section 304.3.2, the depth on that one side should be permitted to be the same depth as the knee and toe clearance provided.

The discussions were more about what might be considered best design practices, and not minimum code requirements. Since the provisions allow for someone to use either turning space, there would be no way to force someone to use a circular space. There is nothing in the current text that says use circular where you want someone to turn 360 degrees and a T-turn to turn 180 degrees.

3-8-12 PC4

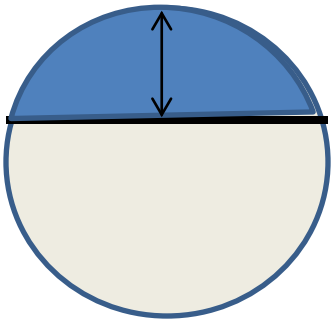
Robin Roberts, Chair, Technical Standards Committee, representing Accessibility Professionals Association

Further revise as follows:

304.3.1 Circular Space. The turning space shall be a circular space with a 60-inch (1525 mm) minimum diameter. The turning space shall be permitted to include knee and toe clearance complying with Section 306. Where the turning space includes knee and toe clearances under an obstruction, the overlap shall comply with all of the following:

1. The depth of the overlap shall not be more than 10 inches (255 mm), and
~~2. The depth shall not exceed the depth of the knee and toe clearances provided, and~~
~~3~~ 2. The overlap shall be permitted only within the turning circle area shown shaded in Figure 304.3.1.

Figure 304.3.1



3-8-12 PC5

Jean Tessmer, representing self

Further revise as follows:

304.3.1 Circular Space. The turning space shall be a circular space with a 60-inch (1525 mm) minimum diameter. The turning space shall be permitted to include knee and toe clearance complying with Section 306. Where the turning space includes knee and toe clearances under an obstruction, the overlap shall comply with all of the following:

1. The depth of the overlap shall not be more than 10 inches (255 mm)~~, and~~
~~2. The depth shall not exceed the depth of the knee and toe clearances provided, and~~
~~3. The overlap shall be permitted only within the turning circle area shown shaded in Figure 304.3.1.~~

~~**Figure 304.3.1**~~

Reason: 1. States overlap not more than 10". 2. Conflicts with #1 since knee clearance would b 18 or 19-inch depth which exceeds the 10-inch limit sates in #1 and #3 increases the confusion by referring to the nearly 50% shaded area in the Figure 304.3.1. Delete #2 and #3 and the figure and leave #1 as that is clear on what a designer should do.

3-8-12 PC6

Larry Eberly, representing Pennsylvania Builders Association

Disapprove this change. Return the text to that found in existing standard.

Reason: Due to the multitude of conditions where toe and knee clearances occur, variations in manufacturers' products and specifications particularly plumbing fixtures, piping and installation, the implementation of this requirement is complicated, confusing and difficult to execute and coordinate.

Pennsylvania Builders Association opposes any change to the ANSI 117.1 building blocks for numerous reasons. The requirements within Chapter 3: Building Blocks are the standard and precedent for the development of decades of accessibility required clearances, maneuverability and reach ranges both in ANSI A117.1 and federal accessibility laws and their standards (ADA/FHA/ ABA/ UFAS, etc).

Any changes will conflict with and be more stringent than these accepted laws and standards and contradictory to the efforts of the ADA/A117 Harmonization Task Group (HTG) to provide consistent language with the ADA. Residual unforeseen

consequences and conflicts with these laws and within the ANSI 117.1 standard itself due to the vast references to this chapter will require extensive future coordination, revisions and clarifications and create a financial burden for residential communities.
These changes are predicated on the anthropometric study of mobility device users by The Center for IDeA at the University at Buffalo, SUNY which predominantly addresses the potential need to accommodate existing electric mobility devices. The Committee's and Wheeled Mobility Task Group's (WMTG) supporting documentation and comments contained in the Background Report raises serious questions to the study's testing methods, criteria and results and clearly acknowledges the unforeseen residual impact and consequences.
Instead of changing the Building Blocks, a more prudent approach would be to require mobility device manufacturers to comply with the decades of accepted standards, particularly taking in consideration future technology and advances in design.

Stringent changes to the requirements in the ANSI 117.1 standards make private residential communities more handicap accessible than public, institutional and commercial buildings and sites including USPS postal centers, hospitals, schools, retail, office, recreational and cultural establishments. A substantial disparity and financial burden is placed on residential communities, homeowners and builders by requiring residential buildings to comply with stricter standards. In addition, any change to these basic building blocks may also set a precedent for a re-evaluation of all other clearances and requirements not currently included in these proposed changes, particularly dwelling unit bathroom and kitchens.

Pennsylvania adopts the accessibility provisions of the newest triennial revisions to the ICC Family of Codes that have been adopted in PA, which includes the IBC, IRC, IMC, IPC and IEBC. without modification. This includes the references to ICC/ANSI A117.1.
Mandatory adoption in Pennsylvania, without modification, has unforeseen consequences to the building industry, both commercial and residential communities.

3-8-12 PC7

David Hall, representing self

Disapprove this change. Return the text to that found in existing standard.

Reason: This is very confusing and will be hard for people in the building community to understand. If you want to keep this then I would suggest much better figures to explain exactly how this is to be achieved.

I have particular issue with #3 above as there are no dimensions listed in the text or on the figure proposed. This change will not make understanding the circular space better . . . just more confusing.

As a building plan examiner, I cannot tell you how many code officials call my office with questions about accessibility issues because the code is vague or too hard to understand. I cannot tell you how many builders and building owners call my office complaining about these types of issues. These people do not deal with accessibility issues in a regular basis like you do. Building owners are extremely adverse to taking up valuable square footage in a building for issues they don't see as being necessary and/or lucrative to their bottom line. Especially when a disabled person rarely, if ever enters their building/property.

3-8-12 PC8

Hope Reed, representing New Mexico Governor's Commission on Disability (NMGCD)

Disapprove this change. Return the text to that found in existing standard.

Reason: Do not adopt 67" turning circle and other increased clear floor areas. ANSI Section 304.3 should remain consistent with 2010 ADA Standards.

The **2010 ADA Standards for Accessible Design** became effective just 21 months ago. The 2010 ADA requires a 60 inch turning circle. Why would anyone choose to use this stricter requirement in ANSI-2014? Many jurisdictions will not adopt the ANSI-2014 and will just use the 2010 ADA Standards.

At this time people already have a hard time getting the turning circle and door clearances correct, but at least all the dimensions are logical and similar so we can easily understand what is required and we don't have to argue about a few inches. Changing the current basic clearances will throw out all the progress we have earned to this point.

Adopting larger turning and maneuvering clearances in ANSI-2014 negates all the careful progress the Committee has made toward harmonization. There are too many variations in the proposed floor clearances. No one will remember these tiny variations in the field, and it is difficult to figure out and explain with contractors under a deadline.

The larger turning circle and clearances should go in the **Appendix** with good diagrams and rationale supporting the increased areas. Designers need to understand the reason for larger areas and be encouraged to choose them for airports, convention centers, stadiums, theaters, shopping malls, and similar.

Placing these larger clearances in the **Appendix** will prepare us for the time when the ADA adopts them. Then implementation will be easy and understandable.

3-8-12 PC9

Minh N. Vu, representing American Hotel & Lodging Association

Disapprove this change. Return the text to that found in existing standard.

Reason: See comment 3-6-12.

3-9 – 12

Revise as follows:

~~**304.3.2 T-Shaped Space.** The turning space shall be a T-shaped space within a 60-inch (1525 mm) minimum square with arms and base 36 inches (915 mm) minimum in width. Each arm of the T shall be clear of obstructions 12 inches (305 mm) minimum in each direction, and the base shall be clear of obstructions 24 inches (610 mm) minimum. The turning space shall be permitted to include knee and toe clearance complying with Section 306 only at the end of either the base or one arm.~~

304.3.2 T–Shaped Space. The turning space shall be a T–shaped space complying with one of the following:

1. A T-shaped space, clear of obstruction, that fits within an area 68 inches (1730 mm) wide and 60 inches (1525 mm) deep, with two arms and one base that are all 36 inches (915 mm) minimum in width. Each arm shall extend 16 inches (405 mm) minimum from each side of the base located opposite the other, and the base shall extend 24 inches (610 mm) minimum from the arms. At the intersection of each arm and the base, the interior corners shall be chamfered for 8 inches (205 mm) minimum along both the arm and along the base.

2. A T-shaped space, clear of obstruction, that fits within an area 64 inches (1625 mm) wide and 60 inches (1525 mm) deep, with two arms 38 inches (965 mm) minimum in width and a base 42 inches (1065 mm) minimum in width. Each arm shall extend 11 inches (280 mm) minimum from each side of the base, located opposite the other, and the base shall extend 22 inches (560 mm) minimum from each arm.

3. A T-shaped space, clear of obstruction, that fits within an area 64 inches (1625 mm) wide and 60 inches (1525 mm) deep, with two arms and one base 40 inches (1015 mm) minimum in width. Each arm shall be 16 inches (405 mm) minimum in each direction from the base and the base shall extend 24 inches (610 mm) minimum from each arm.

3-9-12 PC1

Ron Burton, PTW Advisors LLC, representing Building Owners and Managers Association, International; David S. Collins, The Preview Group, representing American Institute of Architects (AIA); Ron Nickson, representing the National Multi-housing Council; Steve Orlowski, representing the National Association of Home Builders; Kim Paarlberg, representing International Code Council

See comment under 3-6-12 PC2

3-9-12 PC2

Karen Gridley, representing Target Corporation

Further revise as follow:

304.3.2 T–Shaped Space. The turning space shall be a T–shaped space complying with one of the following:

1. A T-shaped space, clear of obstruction, that fits within an area 68 inches (1730 mm) wide and 60 inches (1525 mm) deep, with two arms and one base that are all 36 inches (915 mm) minimum in width. Each arm shall extend 16 inches (405 mm) minimum from each side of the base located opposite the other, and the base shall extend 24 inches (610 mm) minimum from the arms. At the intersection of each arm and the base, the interior corners shall be chamfered for 8 inches (205 mm) minimum along both the arm and along the base.

2. A T-shaped space, clear of obstruction, that fits within an area 64 inches (1625 mm) wide and 60 inches (1525 mm) deep, with two arms 38 inches (965 mm) minimum in width and a base 42 inches (1065 mm) minimum in width. Each arm shall extend 11 inches (280 mm) minimum from each side of the base, located opposite the other, and the base shall extend 22 inches (560 mm) minimum from each arm.

3. A T-shaped space, clear of obstruction, that fits within an area 64 inches (1625 mm) wide and 60 inches (1525 mm) deep, with two arms and one base 40 inches (1015 mm) minimum in width. Each arm shall be ~~16~~ 12 inches (405 mm) minimum in each direction from the base and the base shall extend ~~24~~ 20 inches (610 mm) minimum from each arm.

Reason: This comment is editorial in nature.

In Section 304.3.2(3) the dimensions listed for arm and base lengths of 16 inches and 24 inches do not add up with their partner dimensions to equal the overall width and depth dimensions.

If the intent is to have a 64 inch overall width and a 60 inch overall depth, the 16 inch dimension should be changed to 12 inches to achieve an overall 64 inch width (12" arm + 40" base + 12" arm), and the 24 inch dimension should be changed to 20 inches to achieve the 60 inch depth (40" arm + 20" base extension).

3-9-12 PC3

Kimberly Paarlberg, representing ICC

Further revise as follow:

304.3.2 T–Shaped Space. The turning space shall be a T–shaped space complying with one of the following:

1. A T-shaped space, clear of obstruction, that fits within an area 68 inches (1730 mm) wide and 60 inches (1525 mm) deep, with two arms and one base that are all 36 inches (915 mm) minimum in width. Each arm shall extend 16 inches (405 mm) minimum from each side of the base located opposite the other, and the base shall extend 24 inches (610 mm) minimum from the arms. At the intersection of each arm and the base, the interior corners shall be chamfered for 8 inches (205 mm) minimum along both the arm and along the base.

2. A T-shaped space, clear of obstruction, that fits within an area 64 inches (1625 mm) wide and 60 inches (1525 mm) deep, with two arms 38 inches (965 mm) minimum in width and a base 42 inches (1065 mm) minimum in width. Each arm shall extend 11 inches (280 mm) minimum from each side of the base, located opposite the other, and the base shall extend 22 inches (560 mm) minimum from each arm.

3. A T-shaped space, clear of obstruction, that fits within an area 64 inches (1625 mm) wide and 60 inches (1525 mm) deep, with two arms and one base 40 inches (1015 mm) minimum in width. Each arm shall be 16 inches (405 mm) minimum in each direction from the base and the base shall extend 24 inches (610 mm) minimum from each arm.

T-TURN DIMENSIONS

Rectangular Space	Widths	Chamfer	Length Clear of Obstructions

	Width	Depth	Arms	Base		Arms	Base
1	68	60	36	36	8	16	24
2	64	60	38	42		11	22
3	64	60	40	40		12	20

305.7.2 Forward Approach. Where the clear floor space is positioned for a forward approach, the alcove shall be 36 inches (915 mm) minimum in width where the depth exceeds 20 inches (510 mm). Where used as a turning space, the alcove shall also comply with Section 304.3.2.

Reason: The change to T-turn is not coordinated with the alcove provisions. This will be constantly missed if we do not put in a reference. While turns are not always required at alcoves, I could not think of a situation where I would not want to be able to turn around to go back the way I came (i.e., drinking fountains, T-turns in bathrooms and kitchens under counters).

3-9-12 PC4

Chad Beebe, – representing American Society for Healthcare Engineering (ASHE)

Disapprove this change. Return the text to that found in existing standard.

Reason: In review of the 2014 Final Draft of the ICC A117.1 document, it has come to our attention that several of the proposed changes will have a significantly negative impact to the healthcare industry design/built environment of buildings designed under the 2015 IBC. Further, it is our understanding that the overwhelming majority of these changes have been derived from a single uncorroborated report which has neither been properly vetted nor adopted by any other credible agency or (similar) jurisdictional body.

As we do not feel these dramatic and substantial changes have been given proper and appropriate consideration by all interested stakeholders in this process, and since we question the authenticity of the underlying premise used to make such changes, we respectfully request they either be removed entirely from consideration in this draft, or that the entire draft adoption process be held in abeyance for a minimum of 12-months so that further collaboration can be conducted with all interested parties. If the Committee opts to delay this process for 12-months, it will be in keeping with the mission of the ICC, and best assure that all parties can be provided with the opportunity to reasonably participate in this process.

3-19-12 - This increase of the T-shaped turning space having an overall long dimension of 60 inches wide to 68 inches wise an increase of 1.25 square feet for every required T-shaped turning space.

These new requirements would add thousands of required square feet to a new hospital and significantly impact any renovations to an existing hospital by requiring increased patient room sizes to meet the new requirements and thus, due to the fixed square footage within the building foot print, will reduce the number of allowable beds the hospital can maintain. With hospital construction cost averaging around $300.00 per square foot these additional increases in square footage will significantly impact the cost of construction. Thank you for your consideration of this request, and in keeping alive the goals and mandates of the entire ICC organization and membership.

3-9-12 PC5

Larry Eberly, representing Pennsylvania Builders Association

Disapprove this change. Return the text to that found in existing standard.

Reason: Three different alternative sizes, shapes and configurations of a T-shaped turnaround is complicated, confusing and difficult to document, implement and verify particularly when the shape is complicated with chamfered interior corners. The current accepted standard is simplistic in shape and configuration and consistent with the overall dimension (60") of its alternate circular space turning space counterpart. In addition the current requirement permitting the inclusion of knee and toe clearances at the end of either the base or one arm has been deleted and to be consistent should be included.

Pennsylvania Builders Association opposes any change to the ANSI 117.1 building blocks for numerous reasons. The requirements within Chapter 3: Building Blocks are the standard and precedent for the development of decades of accessibility required clearances, maneuverability and reach ranges both in ANSI A117.1 and federal accessibility laws and their standards (ADA/FHA/ ABA/ UFAS, etc).

Any changes will conflict with and be more stringent than these accepted laws and standards and contradictory to the efforts of the ADA/A117 Harmonization Task Group (HTG) to provide consistent language with the ADA. Residual unforeseen consequences and conflicts with these laws and within the ANSI 117.1 standard itself due to the vast references to this chapter will require extensive future coordination, revisions and clarifications and create a financial burden for residential communities.

These changes are predicated on the anthropometric study of mobility device users by The Center for IDeA at the University at Buffalo, SUNY which predominantly addresses the potential need to accommodate existing electric mobility devices. The Committee's and Wheeled Mobility Task Group's (WMTG) supporting documentation and comments contained in the Background Report raises serious questions to the study's testing methods, criteria and results and clearly acknowledges the unforeseen residual impact and consequences.

Instead of changing the Building Blocks, a more prudent approach would be to require mobility device manufacturers to comply with the decades of accepted standards, particularly taking in consideration future technology and advances in design.

Stringent changes to the requirements in the ANSI 117.1 standards make private residential communities more handicap accessible than public, institutional and commercial buildings and sites including USPS postal centers, hospitals, schools, retail, office, recreational and cultural establishments. A substantial disparity and financial burden is placed on residential communities, homeowners and builders by requiring residential buildings to comply with stricter standards. In addition, any change to these basic building blocks may also set a precedent for a re-evaluation of all other clearances and requirements not currently included in these proposed changes, particularly dwelling unit bathroom and kitchens.

Pennsylvania adopts the accessibility provisions of the newest triennial revisions to the ICC Family of Codes that have been adopted in PA, which includes the IBC, IRC, IMC, IPC and IEBC. without modification. This includes the references to ICC/ANSI A117.1. Mandatory adoption in Pennsylvania, without modification, has unforeseen consequences to the building industry, both commercial and residential communities.

3-9-12 PC6

Tony Ewalt, representing Sletten Construction of Nevada, Inc.; Michael Gentille, representing Philip Chun North America, Inc.; Michael McGettigan, representing Terracon Consultant; Robert W. Potter, Construction Company, representing Affordable Concepts; Eric J. Rowland, representing Rowland Design;

Disapprove this change. Return the text to that found in existing standard.

Reason: In review of the 2014 Final Draft of the ICC A117.1 document, it has come to my attention that several of the proposed changes (ratified by this Committee) will have a significantly negative impact to the design/built environment of buildings designed under the 2015 IBC. Further, it is my understanding that the overwhelming majority of these changes have been derived from a single uncorroborated report which has neither been properly vetted nor adopted by any other credible agency or (similar) jurisdictional body.

As I do not feel these dramatic and substantial changes have been given proper and appropriate consideration by all interested stakeholders in this process, and I question the authenticity of the underlying premise used to make such changes, **I** respectfully request they either be removed entirely from consideration in this draft, or that the entire draft adoption process be held in abeyance for a minimum of 12-months.

If the Committee opts to delay this process for 12-months, it will be in keeping with the mission of the ICC, and best assure that all parties can be provided with the opportunity to reasonably participate in this process.

3-9-12 PC7

Douglas Kantor, Steptoe & Johnson, LLP, representing National Association of Convenience Stores

Disapprove this change. Return the text to that found in existing standard.

Reason: NACS is not in favor of this proposed change. We believe that the impact of this change could be significantly negative to the convenience and fuel retailing industry.

This proposed change would increase the floor area required for a turning space by up to 13% or 3.3 SF. We anticipate that this change would primarily impact the size of the toilet rooms creating the necessity of larger toilet rooms. This increase in size of the toilet rooms would therefore lead to a loss in selling space or an increase in store size which will have significant impact to our members. It is estimated that this change would have a negative impact on sales of $310 per month, based upon 2 toilet rooms per store, which is a significant change considering the average monthly sales of our. While this has less impact on the store size than that provided in proposal3-6-12 it is not known or certain that this T-shaped space could successfully be utilized in our members facilities in lieu of the turning circle.

Based upon this negative impact to sales NACS is not in favor of this proposal without evidence that this proposal is absolutely necessary for the accessibility of persons with disabilities. While we recognize that the research provided indicates that wheeled mobility devices are becoming larger we do not see any research or reason provided for the increase in size in wheeled mobility devices. Should we, as an industry, be required to pay this cost or increased size out of the choice for bigger devices or should the necessity of larger devices be provided prior to requiring larger spaces.

3-9-12 PC8

Jeffrey T. O'Neill, representing self

Disapprove this change. Return the text to that found in existing standard.

Reason: See comment at 3-6-12.

3-9-12 PC9

Fritz Rasmussen, representing Kwik Trip Inc.

Disapprove this change. Return the text to that found in existing standard.

Reason: **Bad-** 304.3.2 T-Shaped Space. This eliminates the knee, toe clearance in the T- turn space. It also creates (3) different T-turn options which will be confusing to everyone.

3-9-12 PC10

Robin Roberts, Chair, Technical Standards Committee, representing Accessibility Professionals Association

Disapprove this change. Return the text to that found in existing standard.

Reason: Many of the comments provided in the background reports expressed reservations regarding the study upon which the proposals are based.

Because the proposed changes would have an enormous impact on the design and construction community, further investigation is necessary.

3-9-12 PC11

Minh N. Vu, representing American Hotel & Lodging Association.

Disapprove this change. Return the text to that found in existing standard.

Reason: See comment 3-6.

3-13 – 12

Revise as follows:

305.3 Size. The clear floor space shall be ~~48 inches (1220 mm)~~ 52 inches (1320 mm) minimum in length and 30 inches (760 mm) minimum in width.

305.7.2 Forward Approach. Where the clear floor space is positioned for a forward approach, the alcove shall be 36 inches (915 mm) minimum in width where the depth exceeds ~~24~~ 20 inches (~~610~~ 508 mm).

3-13-12 PC1

Brian Black, BDBlack & Associates, representing self

Revise as follows:

305.3 Size. The clear floor space shall be 52 inches (1320 mm) minimum in length and 30 inches (760 mm) minimum in width.

305.7.2 Forward Approach. Where the clear floor space is positioned for a forward approach, the alcove shall be 36 inches (915 mm) minimum in width where the depth exceeds 20 inches (508 mm).

> **Exception:** In existing buildings and facilities a clear floor space 48 inches (1220 mm) minimum in length shall be shall be permitted.

Reason: The 2012 *International Existing Building Code* (IEBC) states:

> **705.2 Alterations affecting an area containing a primary function.** Where an *alteration* affects the accessibility to a, or contains an area of, *primary function*, the route to the *primary function* area shall be accessible. The accessible route to the *primary function* area shall include toilet facilities or drinking fountains serving the area of *primary function*.
>
> **Exceptions:**
>
> 1. The costs of providing the accessible route are not required to exceed 20 percent of the costs of the alterations affecting the area of *primary function*.
> 2. This provision does not apply to *alterations* limited solely to windows, hardware, operating controls, electrical outlets and signs.
> 3. This provision does not apply to *alterations* limited solely to mechanical systems, electrical systems, installation or *alteration* of fire protection systems and abatement of hazardous materials.
> 4. This provision does not apply to *alterations* undertaken for the primary purpose of increasing the accessibility of a *facility*.
> 5. This provision does not apply to altered areas limited to Type B dwelling and sleeping units.

Consider a building constructed in 2013 under the 2012 *International Building Code* that complies with all of the accessibility requirements of that code and its referenced ICC A117.1-2009 standard. If a primary function area of that building is altered under a future edition of the IEBC that references ICC A117.1-2014, and if that future edition of the IEBC retains language similar to that cited above, the building owner may be required to make significant modifications to the primary function area and toilet facilities serving that area to comply with the increased turning and clear floor space requirements of the 2014 standard. A minimal increase in accessibility may result even where costs and structural changes are significant. Adding exceptions for existing buildings and facilities that permit the turning and clear floor spaces that are considered accessible under the 2009 edition of the standard would resolve this problem.

I appreciate there has been a continuing "technical *vs*. scoping" tension between the A117.1 accessibility standard and the model building codes, and that some may argue that these exceptions belong in the model codes, not the accessibility standard. I believe the technical expertise needed to determine where exceptions for existing buildings are appropriate is in the A117 Accredited Standards Committee and not the committees or voting memberships of the model code groups. This committee should decide whether exceptions are warranted and, if so, where they should be permitted.

The 2009 edition of ICC A117.1 has at least 23 exceptions that can be applied in existing buildings and facilities, making allowances for side reaches, door thresholds, ramp slopes, LU/LA sizes, shower thresholds, play areas and boat slips. There are 11 exceptions for existing passenger elevators alone. All of these exceptions belong in the standard and not a building code to ensure that the A117 Accredited Standards Committee retains control of what are essentially technical access considerations. Adding additional exceptions for the larger floor spaces of the 2014 standard would merely continue this policy.

3-13-12 PC2

Ron Burton, PTW Advisors LLC, representing Building Owners and Managers Association, International; David S. Collins, The Preview Group, representing American Institute of Architects (AIA); Ron Nickson, representing the National Multi-housing Council; Steve Orlowski, representing the National Association of Home Builders; Kim Paarlberg, representing International Code Council

See comment under 3-6-12 PC2

3-13-12 PC3

Karen Gridley, representing Target Corporation

Revise as follows:

305.3 Size. The clear floor space shall ~~52 inches (1320 mm)~~ 48 inches (1220 mm) minimum in length and 30 inches (760 mm) minimum in width.

305.7.2 Forward Approach. Where the clear floor space is positioned for a forward approach, the alcove shall be 36 inches (915 mm) minimum in width where the depth exceeds 20 inches (508 mm).

Reason: The size of the clear floor space should remain at the current dimension of 48 inches in length, and not be increased to 52 inches. Several reasons are noted here to demonstrate that the increase to 52 inches will ultimately result in a reduction of access from a broader perspective.

During the July 2013 Committee Action Meeting we heard comments by committee members wondering if there is data available regarding how the size of the current turning space works in "real world" applications as compared to findings in the study completed by Dr. Steinfeld.

In response, Target can offer some data that will help add real world context to the discussion.
For reference, Dr. Steinfeld's study, which lead the committee to propose a new 52" long clear floor space dimension, included 500 participants from a localized geographic area, as we understand it.

Target's data is based on feedback from people across the nation who visit our stores, totaling nearly 36 million transactions *per week*, on average. Keeping in mind that often the person making the transaction has another person with them so there are well into the multi-millions of guests at Target stores every week. Of these guests, many share comments of all sorts with Target (not just access related) through various channels. We find that of the guests who contacted us in 2012, the percentage of comments related to accessibility of the building was limited to an extremely small fraction of less than 1%. (Less than .0003% of 1%.). Of that fraction of 1%, an even smaller fraction of those comments were related to concerns about clear floor space for wheeled mobility devices. This tells us that the current sizes and dimensions in the existing Standard work, as-is, for the greater majority of guests using wheeled mobility devices. The data presents no compelling evidence or reason to change the existing dimension.

Additional Information:
During the July 2013 Committee Action Meeting, members of the committee commented that the committee's only job was to look at the A117.1 Standard and implement changes to increase access through that document. In response, we urge the committee to consider that 'more and bigger is not always better, sometimes it's just more and bigger'.

Supporting this would be the observation that the committee has not done its due diligence in evoking or investigating the Wheeled Mobility Device Manufacturing Industry to see what can be accomplished to improve maneuvering through existing engineering practices in 'Like' industry trends and innovation in designs on their end, as that industry as a whole is changing too. Like the automotive industry that went from large cars, trucks and vans to smaller frame vehicles to achieve sustainable efficiencies throughout their redesign all while maintaining safety and functionality.

From an architectural perspective, designers and building owners do not have the luxury of looking at a building in isolation through only a single Standard or Regulation when we design buildings. We must consider many regulations and standards, each having an impact and interplay with other requirements that ultimately drive the size, shape and design of the spaces we provide for people. Considering this interplay, Target respectfully submits that increasing the size of the clear floor space, and other building block sizes, will actually result in decreased accessibility when applied in conjunction with forces in place from other codes and standards.

For example: Green codes and standards are increasingly challenging us to "reduce our carbon footprint", and be responsible stewards of the environment, which includes making buildings smaller in order to achieve compliance with those standards and newly developing regulations. While at the same time, the proposed increases in size of accessibility building blocks within the A117.1 standard would have us increasing our building size.

It is true that designers can adjust, tweak, push and pull designs of the physical buildings to meet these conflicting requirements. In the past we've had the luxury of being able to make buildings larger. However that luxury is increasingly limited in today's environment. The cost comes in what will subsequently be able to fit within in these buildings that are experiencing a compound squeeze (squeezed smaller in footprint on the outside, but interior spaces pushed larger from within). From a retail perspective, this will reduce capacity for merchandise offerings. What was once able to be provided on store shelves may no longer be available due to compromised available space for shelving to house merchandise, having a negative impact on guest's shopping trips.

From a product perspective, of the guest comments received in 2012, approximately 12% were related to product, as compared to the less-than 1% of comments related to building accessibility. Product availability is already of greater concern to guests than building access. Thus, increasing the building blocks of accessibility would drive product concern even higher, since the very things that persons with disabilities might travel to a store to purchase could no longer be available. Considering the effort it takes to travel to shopping destinations for many persons with disabilities, it is a disservice to them for retailers to not be able to offer the items that they currently go there for, forcing them to extend strenuous shopping trips to additional stores in search of what they are looking for, and for some, making the shopping trip as a whole inaccessible all together.

We encourage the committee to reconsider the proposals that would increase the size of the 52" long clear floor space dimension, and other building block sizes, and instead maintain the current sizes. At least until such time as more investigation of the Wheeled Mobility Device Manufacturing Industry can take place to identify what can be done to improve design of those devices via engineering and technology advancements, towards improved access.

3-13-12 PC4

Kimberly Paarlberg, representing ICC

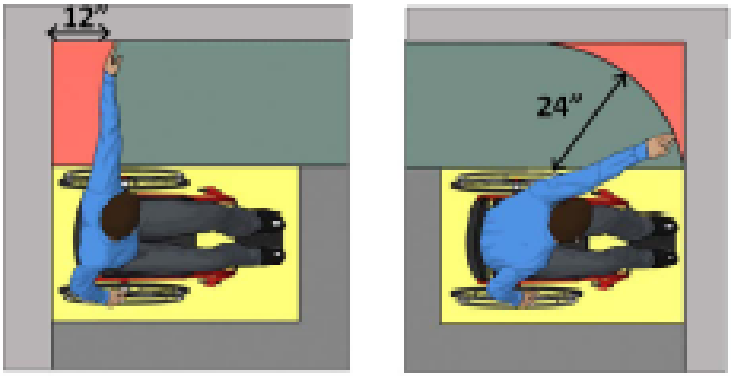
Revise as follows:

305.3 Size. The clear floor space shall be 52 inches (1320 mm) minimum in length and 30 inches (760 mm) minimum in width.

305.7.2 Forward Approach. Where the clear floor space is positioned for a forward approach, the alcove shall be 36 inches (915 mm) minimum in width where the depth exceeds 20 inches (508 mm).

> **Exception:** Alcoves in a kitchen or bathroom, formed by cabinets or appliances and providing for access to a sink, lavatory or accessible work surface, shall be 36 inches (915 mm) minimum in width where the depth exceeds 24 inches (610 mm).

Reason: The change in the alcove provisions will force all openings under sinks, lavatories and work surfaces to be at least 36" wide. There are already requirements for specific requirements for kitchens and bathrooms that should not be overridden. In addition, this could force sinks farther from the wall than required by the International Plumbing Code, thus creating another conflict.



Elements in corners can be hard to reach from side

3-13-12 PC5

Kim Paarlberg, representing ICC

Further revise as follows:

606.2 Clear Floor Space. A clear floor space complying with Section 305.3, positioned for forward approach, shall be provided. Knee and toe clearance complying with Section 306 shall be provided. The dip of the overflow shall not be considered in determining knee and toe clearances.

EXCEPTIONS:

1. A parallel approach complying with Section 305 ~~and centered on the sink,~~ shall be permitted to a kitchen sink in space where a cook top or conventional range is not provided.
2. (unchanged)
3. A knee clearance of 24 inches (610 mm) minimum above the floor shall be permitted at lavatories and sinks used primarily by children ages 6 through 12 where the higher of the rim or counter surface is 31 inches (785 mm) maximum above the floor.
4. A parallel approach complying with Section 305 ~~and centered on the sink,~~ shall be permitted at lavatories an sinks used primarily by children ages 5 and younger.
5. (unchanged)
6. A parallel approach complying with Section 305 ~~and centered on the sink,~~ shall be permitted at wet bars.

Reason: Side reach allows for reach at the shoulder and forward. If the side approach is permitted, the sink should be at least 12" from the wall for optimum reach, not centered on the space. The International Plumbing Code required sinks to have a minimum center line 15" from the wall. The current requirement for centering, along with the new clear floor space approved in 3-13 forces the center line of the sink to be 27 inches from the wall. This does not improve access. Side approach is permitted in sinks in kitchenettes, wet bars and sinks for children under the age of 5**.**

3-13-12 PC6

Larry Perry, representing self

Revise as follows:

305.3 Size. The clear floor space shall be 52 inches (1320 mm) minimum in length and 30 inches (760 mm) minimum in width.

1102.3.2 Turning Space. All rooms served by an accessible route shall provide a turning space complying with Section 304.

EXCEPTIONS:

1. A turning space shall not be required in toilet rooms and bathrooms that are not required to comply with Section 1102.11.2.
2. A turning space is not required within closets or pantries that are ~~48 inches (1220 mm)~~ 52 inches (1320 mm) maximum in depth.

1103.3.2 Turning Space. All rooms served by an accessible route shall provide a turning space complying with Section 304.

EXCEPTIONS:

1. A turning space is not required in toilet rooms and bathrooms that are not required to comply with Section 1103.11.2.
2. A turning space is not required within closets or pantries that are ~~48 inches (1220 mm)~~ 52 inches (1320 mm) maximum in depth.

Reason: As part of the change to increase the wheelchair clear floor space length from 48" to 52", two sections in the dwelling unit chapter were overlooked.

The exceptions for closets in Accessible Units and Type A units not requiring turning space (which by separate action is increased from 60" to 67") were based on the fact that a closet not deep enough for someone to fully enter and close the door would not require a turning space. If the length of the wheelchair space is increasing from 48" to 52", the depth of the closet before a turning space is required should also be increased, to maintain the original concept for the exceptions.

3-13-12 PC7

Jean Tessmer, representing self

Revise as follows:

305.3 Size. The clear floor space shall be 52 inches (1320 mm) minimum in length and 30 inches (760 mm) minimum in width.

305.7.2 Forward Approach. Where the clear floor space is positioned for a forward approach, the alcove shall be ~~36~~ 60 inches (915 mm) minimum in width where the depth exceeds ~~20~~ 24 inches (~~508~~ 610 mm).

Reason: If the alcove is more than 20 inches deep, the 36 inch minimum does not allow any turning space for a wheel chair and more than 20 inches could be a 200 inch deep alcove dead end which would require more skill to back out of deeper alcove spaces only 36 inches wide.

3-13-12 PC8

Chad Beebe, – representing American Society for Healthcare Engineering (ASHE)

Disapprove this change. Return the text to that found in existing standard.

Reason: In review of the 2014 Final Draft of the ICC A117.1 document, it has come to our attention that several of the proposed changes will have a significantly negative impact to the healthcare industry design/built environment of buildings designed under the 2015 IBC. Further, it is our understanding that the overwhelming majority of these changes have been derived from a single uncorroborated report which has neither been properly vetted nor adopted by any other credible agency or (similar) jurisdictional body.

As we do not feel these dramatic and substantial changes have been given proper and appropriate consideration by all interested stakeholders in this process, and since we question the authenticity of the underlying premise used to make such changes, we respectfully request they either be removed entirely from consideration in this draft, or that the entire draft adoption process be held in abeyance for a minimum of 12-months so that further collaboration can be conducted with all interested parties. If the Committee opts to delay this process for 12-months, it will be in keeping with the mission of the ICC, and best assure that all parties can be provided with the opportunity to reasonably participate in this process.

3-13-12 - The increasing of the standard size for clear floor spaces being changed from (30" x 48") to (30" x 52"), an increase of 1.25 square feet for every required clear floor space area which occurs in many places throughout all types of rooms/spaces.

These new requirements would add thousands of required square feet to a new hospital and significantly impact any renovations to an existing hospital by requiring increased patient room sizes to meet the new requirements and thus, due to the fixed square footage within the building foot print, will reduce the number of allowable beds the hospital can maintain. With hospital construction cost averaging around $300.00 per square foot these additional increases in square footage will significantly impact the cost of construction. Thank you for your consideration of this request, and in keeping alive the goals and mandates of the entire ICC organization and membership.

3-13-12 PC9

Larry Eberly, representing Pennsylvania Builders Association

Disapprove this change. Return the text to that found in existing standard.

Reason: Pennsylvania Builders Association opposes any change to the ANSI 117.1 building blocks for numerous reasons.

The requirements within Chapter 3: Building Blocks are the standard and precedent for the development of decades of accessibility required clearances, maneuverability and reach ranges both in ANSI A117.1 and federal accessibility laws and their standards (ADA/ FHA/ ABA/ UFAS, etc).

Any changes will conflict with and be more stringent than these accepted laws and standards and contradictory to the efforts of the ADA/A117 Harmonization Task Group (HTG) to provide consistent language with the ADA. Residual unforeseen consequences and conflicts with these laws and within the ANSI 117.1 standard itself due to the vast references to this chapter will require extensive future coordination, revisions and clarifications and create a financial burden for residential communities.

These changes are predicated on the anthropometric study of mobility device users by The Center for IDeA at the University at Buffalo, SUNY which predominantly addresses the potential need to accommodate existing electric mobility devices. The Committee's and Wheeled Mobility Task Group's (WMTG) supporting documentation and comments contained in the Backround Report raises serious questions to the study's testing methods, criteria and results and clearly acknowledges the unforeseen residual impact and consequences.

Instead of changing the Building Blocks, a more prudent approach would be to require mobility device manufacturers to comply with the decades of accepted standards, particularly taking in consideration future technology and advances in design.

Stringent changes to the requirements in the ANSI 117.1 standards make private residential communities more handicap accessible than public, institutional and commercial buildings and sites including USPS postal centers, hospitals, schools, retail, office, recreational and cultural establishments. A substantial disparity and financial burden is placed on residential communities, homeowners and builders by requiring residential buildings to comply with stricter standards. In addition, any change to these basic building blocks may also set a precedent for a re-evaluation of all other clearances and requirements not currently included in these proposed changes, particularly dwelling unit bathroom and kitchens.

Pennsylvania adopts the accessibility provisions of the newest triennial revisions to the ICC Family of Codes that have been adopted in PA, which includes the IBC, IRC, IMC, IPC and IEBC. without modification. This includes the references to ICC/ANSI A117.1. Mandatory adoption in Pennsylvania, without modification, has unforeseen consequences to the building industry, both commercial and residential communities.

3-13-12 PC10

Tony Ewalt, representing Sletten Construction of Nevada, Inc.; Michael Gentille, representing Philip Chun North America, Inc.; Michael McGettigan, representing Terracon Consultant; Robert W. Potter, Construction Company, representing Affordable Concepts; Eric J. Rowland, representing Rowland Design;

Disapprove this change. Return the text to that found in existing standard.

Reason: **:** In review of the 2014 Final Draft of the ICC A117.1 document, it has come to my attention that several of the proposed changes (ratified by this Committee) will have a significantly negative impact to the design/built environment of buildings designed under the 2015 IBC. Further, it is my understanding that the overwhelming majority of these changes have been derived from a single uncorroborated report which has neither been properly vetted nor adopted by any other

credible agency or (similar) jurisdictional body.

As I do not feel these dramatic and substantial changes have been given proper and appropriate consideration by all interested stakeholders in this process, and I question the authenticity of the underlying premise used to make such changes, I respectfully request they either be removed entirely from consideration in this draft, or that the entire draft adoption process be held in abeyance for a minimum of 12-months.

If the Committee opts to delay this process for 12-months, it will be in keeping with the mission of the ICC, and best assure that all parties can be provided with the opportunity to reasonably participate in this process.

3-13-12 PC11

Douglas Kantor, Steptoe & Johnson, LLP, representing National Association of Convenience Stores

Disapprove this change. Return the text to that found in existing standard.

Reason: NACS is not in favor of this proposed change. We believe that the impact of this change could be significantly negative to the convenience and fuel retailing industry.

This proposed change would increase the clear floor space required at accessible elements up to 13% or 0.8 SF. This impact, while individually small, could have multiple impact points within our small facilities. There are potentially 30 to 40 or more impact points for this change within the facilities of our members. The sales space within our members' facilities could be reduced by up to 32 SF or more which is a significant negative impact on sales estimated at up to $1,500 per month.

Based upon this negative impact to sales NACS is not in favor of this proposal without evidence that this proposal is absolutely necessary for the accessibility of persons with disabilities. While we recognize that the research provided indicates that wheeled mobility devices are becoming larger we do not see any research or reason provided for the increase in size in wheeled mobility devices. Should we, as an industry, be required to pay this cost or increased size out of the choice for bigger devices or should the necessity of larger devices be provided prior to requiring larger spaces.

3-13-12 PC12

Jeffrey T. O'Neill, representing self

Disapprove this change. Return the text to that found in existing standard.

Reason: See reason statement for 3-6-12.

3-13-12 PC13

Minh N. Vu, representing American Hotel & Lodging Association

Disapprove this change. Return the text to that found in existing standard.

Reason: See comment 3-6-12.

3-13B – 12

Revise as follows:

409.4.1 Inside Dimensions. Elevator cars shall provide a clear floor area 36 inches (915 mm) minimum in width and ~~48~~ 52 inches (~~1220~~ 1322 mm) minimum in depth.

3-13B-12 PC1

Ron Burton, PTW Advisors LLC, representing Building Owners and Managers Association, International; David S. Collins, The Preview Group, representing American Institute of Architects (AIA); Ron Nickson, representing the National Multi-housing Council; Steve Orlowski, representing the National Association of Home Builders; Kim Paarlberg, representing International Code Council

See comment under 3-6-12 PC2

3-13B-12 PC2

Larry Eberly, representing Pennsylvania Builders Association

Disapprove this change. Return the text to that found in existing standard.

Reason: Private Residential Elevators are typically installed in Single Family Homes; many are retrofits or within remodels with limited space available. Facilitating circulation and wheelchair access to multiple floor levels for an individual homeowner should be encouraged and not complicated. Increased size requirements may also make such a necessity infeasible and/or pose a financial burden due to limitation of available area or the increased cost for a larger elevator or customization.

This proposed change relates to the anthropometric study of mobility device users by The Center for IDeA at the University at Buffalo, SUNY which questions decades of universally accepted accessibility clearances and maneuverability contained within Chapter 3: Building Blocks. This revision is based on this single study and should be researched further before such changes occur in the standard.

Pennsylvania Builders Association opposes any change to the ANSI 117.1 building blocks for numerous reasons. The requirements within Chapter 3: Building Blocks are the standard and precedent for the development of decades of accessibility required clearances, maneuverability and reach ranges both in ANSI A117.1 and federal accessibility laws and their standards (ADA/ FHA/ ABA/ UFAS, etc).

Any changes will conflict with and be more stringent than these accepted laws and standards and contradictory to the efforts of the ADA/A117 Harmonization Task Group (HTG) to provide consistent language with the ADA. Residual unforeseen consequences and conflicts with these laws and within the ANSI 117.1 standard itself due to the vast references to this chapter will require extensive future coordination, revisions and clarifications and create a financial burden for residential communities.

These changes are predicated on the anthropometric study of mobility device users by The Center for IDeA at the University at Buffalo, SUNY which predominantly addresses the potential need to accommodate existing electric mobility devices. The Committee's and Wheeled Mobility Task Group's (WMTG) supporting documentation and comments contained in the Backround Report raises serious questions to the study's testing methods, criteria and results and clearly acknowledges the unforeseen residual impact and consequences.

Instead of changing the Building Blocks, a more prudent approach would be to require mobility device manufacturers to comply with the decades of accepted standards, particularly taking in consideration future technology and advances in design. Stringent changes to the requirements in the ANSI 117.1 standards make private residential communities more handicap accessible than public, institutional and commercial buildings and sites including USPS postal centers, hospitals, schools, retail, office, recreational and cultural establishments. A substantial disparity and financial burden is placed on residential communities, homeowners and builders by requiring residential buildings to comply with stricter standards. In addition, any change to these basic building blocks may also set a precedent for a re-evaluation of all other clearances and requirements not currently included in these proposed changes, particularly dwelling unit bathroom and kitchens.

Pennsylvania adopts the accessibility provisions of the newest triennial revisions to the ICC Family of Codes that have been adopted in PA, which includes the IBC, IRC, IMC, IPC and IEBC. without modification. This includes the references to ICC/ANSI A117.1. Mandatory adoption in Pennsylvania, without modification, has unforeseen consequences to the building industry, both commercial and residential communities.

3-13B-12 PC3

Robin Roberts, Chair, Technical Standards Committee, representing Accessibility Professionals Association

Disapprove this change. Return the text to that found in existing standard.

Reason: Many of the comments provided in the background reports expressed reservations regarding the study upon which the proposals are based.

Because the proposed changes would have an enormous impact on the design and construction community, further investigation is necessary.

3-13C – 12

Revise as follows:

410.5.1 Lifts with Single Doors or Doors on Opposite Ends. Platform lifts with a single door or doors on opposite ends shall provide a clear floor width of 36 inches (915 mm) minimum and a clear floor depth of ~~48~~ 52 inches (~~1220~~ 1322 minimum).

> **Exception**: Incline platform lifts with passenger restraining arms, shall be permitted to provide a clear floor width of 36 inches (915 mm) minimum and a clear floor depth of 48 inches (1220) mm.

3-13C-12 PC1

Ron Burton, PTW Advisors LLC, representing Building Owners and Managers Association, International; David S. Collins, The Preview Group, representing American Institute of Architects (AIA); Ron Nickson, representing the National Multi-housing Council; Steve Orlowski, representing the National Association of Home Builders; Kim Paarlberg, representing International Code Council

See comment under 3-6-12 PC2

3-13C-12 PC2

Harold Kiewel, representing self

Further revise as follows:

410.5.1 Lifts with Single Doors or Doors on Opposite Ends. Platform lifts with a single door or doors on opposite ends shall provide a clear floor width of 36 inches (915 mm) minimum and a clear floor depth of 52 inches (1322 minimum).

> **Exception**: Incline-traveling platform lifts with passenger restraining arms, shall be permitted to provide a clear floor width of 36 inches (915 mm) minimum and a clear floor depth of 48 inches (1220) mm.

Reason: For clarity, change the opening phrase of the Exception to read, "*Incline-traveling, platform lift . . .*

3-13C-12 PC3

Larry Eberly, representing Pennsylvania Builders Association

Disapprove this change. Return the text to that found in existing standard.

Reason: Platform lifts provide handicap accessibility in Single Family Homes particularly in garages with limited space as a retrofit or remodel to access the home, providing access where existing conditions or site constraints make the use of a ramp infeasible. Facilitating circulation and wheelchair access to a home for an individual homeowner should be encouraged and not complicated. Increased size requirements may also make such a necessity infeasible and/or pose a financial burden due to limitation of available area or the increased cost for larger lifts.

This proposed change relates to the anthropometric study of mobility device users by The Center for IDeA at the University at Buffalo, SUNY which questions decades of universally accepted accessibility clearances and maneuverability contained within Chapter 3: Building Blocks. This revision is based on this single study and should be researched further before such changes occur in the standard.

Pennsylvania Builders Association opposes any change to the ANSI 117.1 building blocks for numerous reasons.

The requirements within Chapter 3: Building Blocks are the standard and precedent for the development of decades of accessibility required clearances, maneuverability and reach ranges both in ANSI A117.1 and federal accessibility laws and their standards (ADA/ FHA/ ABA/ UFAS, etc).

Any changes will conflict with and be more stringent than these accepted laws and standards and contradictory to the efforts of the ADA/A117 Harmonization Task Group (HTG) to provide consistent language with the ADA. Residual unforeseen consequences and conflicts with these laws and within the ANSI 117.1 standard itself due to the vast references to this chapter will require extensive future coordination, revisions and clarifications and create a financial burden for residential communities.

These changes are predicated on the anthropometric study of mobility device users by The Center for IDeA at the University at Buffalo, SUNY which predominantly addresses the potential need to accommodate existing electric mobility devices. The Committee's and Wheeled Mobility Task Group's (WMTG) supporting documentation and comments contained in the Backround Report raises serious questions to the study's testing methods, criteria and results and clearly acknowledges the unforeseen residual impact and consequences.

Instead of changing the Building Blocks, a more prudent approach would be to require mobility device manufacturers to comply with the decades of accepted standards, particularly taking in consideration future technology and advances in design.

Stringent changes to the requirements in the ANSI 117.1 standards make private residential communities more handicap accessible than public, institutional and commercial buildings and sites including USPS postal centers, hospitals, schools, retail, office, recreational and cultural establishments. A substantial disparity and financial burden is placed on residential communities, homeowners and builders by requiring residential buildings to comply with stricter standards. In addition, any change to these basic building blocks may also set a precedent for a re-evaluation of all other clearances and requirements not currently included in these proposed changes, particularly dwelling unit bathroom and kitchens.

Pennsylvania adopts the accessibility provisions of the newest triennial revisions to the ICC Family of Codes that have been adopted in PA, which includes the IBC, IRC, IMC, IPC and IEBC. without modification. This includes the references to ICC/ANSI A117.1. Mandatory adoption in Pennsylvania, without modification, has unforeseen consequences to the building industry, both commercial and residential communities.

3-13C-12 PC4

Robin Roberts, Chair, Technical Standards Committee, representing Accessibility Professionals Association

Disapprove this change. Return the text to that found in existing standard.

Reason: Many of the comments provided in the background reports expressed reservations regarding the study upon which the proposals are based.

Because the proposed changes would have an enormous impact on the design and construction community, further investigation is necessary.

3-13C-12 PC5

Minh N. Vu representing American Hotel & Lodging Association

Disapprove this change. Return the text to that found in existing standard.

Reason: See Comment 3-6.

3-13D – 12

Revise as follows:

802.5.1 Overlap. A wheelchair space location shall not overlap the required width of an aisle.

Exception: The depth of the wheelchair space shall be permitted to overlap the required aisle width a maximum of 4 inches (100 mm).

3-13D-12 PC1

Ron Burton, PTW Advisors LLC, representing Building Owners and Managers Association, International; David S. Collins, The Preview Group, representing American Institute of Architects (AIA); Ron Nickson, representing the National Multi-housing Council; Steve Orlowski, representing the National Association of Home Builders; Kim Paarlberg, representing International Code Council

See comment under 3-6-12 PC2

3-13D-12 PC2

Harold Kiewel, representing self

Further revise as follows:

802.5.1 Overlap. A wheelchair viewing-space ~~location~~ shall not ~~overlap~~ reduce the required exit-width of the ~~an~~ aisle that serves it, by more than 4-inches (100 mm).

> **Exception:** The depth of the wheelchair space shall be permitted to overlap the required aisle width a maximum of 4 inches (100 mm).

Reason: Revise Article 802.5.1 to read, "*Overlap. A wheelchair viewing-space location shall not reduce overlap the required exit-width of the aisle that serves it, by more than 4-inches (100mm).*'

3-13D-12 PC3

Robin Roberts, Chair, Technical Standards Committee, representing Accessibility Professionals Association

Disapprove this change. Return the text to that found in existing standard.

Reason: Allowing any overlap of wheelchair space into required aisle width would create a hazard for egress.

3-13E – 12

Revise as follows:

802.7.2 Companion Seat Alignment. In row seating, the companion seat shall be located to provide shoulder alignment with the wheelchair space occupant. The shoulder of the wheelchair space occupant is considered to be 36 inches (915 mm) from the front or ~~12~~ 16 inches ~~(305~~ 405 mm) from the rear of the wheelchair space. The floor surface for the companion seat shall be at the same elevation as the wheelchair space floor surface.

3-13E-12 PC1

Gene Boecker, Code Consultants, Inc, representing National Association of Theatre Owners

Further revise as follows:

802.7.2 Companion Seat Alignment. In row seating, the companion seat shall be located to provide shoulder alignment with the wheelchair space occupant. The shoulder of the wheelchair space occupant is considered to be 36 inches (915 mm) from the front or 16 inches (405 mm) from the rear of the wheelchair space. The floor surface for the companion seat shall be at the same elevation as the wheelchair space floor surface.

> **EXCEPTION**: In existing facilities, the companion seat shall be permitted to be positioned 12 inches (305 mm) from the rear of the wheelchair space.

Reason: Many of the existing theaters are designed for the existing 12 inch alignment. For example, where the wheelchair space is provided at the rear of the cross aisle, the wheelchair space will now project 4 inches further. While this is addressed by the proposal in 3-13D it does not address the adjoining companion seats. With the proposal, when seats are upgraded, they would need to be moved forward by 4 inches to provide shoulder alignment according to the new requirements. In many auditoriums, the cross aisle width is already the minimum allowed. While the seat typically retracts, the arms of the seat do not and may end up projecting into the aisle. The result would be that the seats in that part of the theater may need to be changed to be something smaller than the rest of the auditorium since moving the entire seating in front of the aisle is cost prohibitive. Providing different chairs for the cross aisle seats would result in an unequal experience for the companion; not in keeping with the spirit of the standard.

3-13E-12 PC2

Ron Burton, PTW Advisors LLC, representing Building Owners and Managers Association, International; David S. Collins, The Preview Group, representing American Institute of Architects (AIA); Ron Nickson, representing the National Multi-housing Council; Steve Orlowski, representing the National Association of Home Builders; Kim Paarlberg, representing International Code Council

See comment under 3-6-12 PC2

3-13E-12 PC3

Kimberly Paarlberg, representing ICC

Further revise as follows:

802.7.2 Companion Seat Alignment. In row seating, the companion seat shall be located to provide shoulder alignment with the wheelchair space occupant. The shoulder of the wheelchair space occupant is considered to be 36 inches (915 mm) from the front or 16 inches (405 mm) from the rear of the wheelchair space. The floor surface for the companion seat shall be at the same elevation as the wheelchair space floor surface.

EXCEPTIONS:

1. Companion seat alignment is not required in tiered seating that includes dining surfaces or work surfaces.
2. For wheelchair spaces with front access, the shoulder alignment shall be permitted to be measures 12 inches (305 mm) from the rear of the space.
3. For wheelchair spaces with side access, the should alignment shall be permitted to be measured 12 inches (305 mm) from the rear of the space.

Reason: While the committee made concessions for the overlap (802.5.1) and the shoulder alignments (802.7.2) in consideration of line of site and to maintain current studies on assembly seating, this solution only totally works for rear approach seats off the cross aisle. It definitely does not work for when a space is located at the rear of a cross aisle since it will force the companion seat an additional 4" forward.

Neither concession leaves the side access seat the same since the wheelchair space now needs additional room.

3-13E-12 PC4

Robin Roberts, Chair, Technical Standards Committee, representing Accessibility Professionals Association

Disapprove this change. Return the text to that found in existing standard.

Reason: Many of the comments provided in the background reports expressed reservations regarding the study upon which the proposals are based.

Because the proposed changes would have an enormous impact on the design and construction community, further investigation is necessary.

3-13F – 12

Revise as follows:

805.2.2 Dimensions. Bus stop boarding and alighting areas shall have a ~~96~~ 100-inch (~~2440~~ 2540 mm) minimum clear length, measured perpendicular to the curb or vehicle roadway edge, and a 60-inch (1525 mm) minimum clear width, measured parallel to the vehicle roadway.

3-13F-12 PC1

Ron Burton, PTW Advisors LLC, representing Building Owners and Managers Association, International; David S. Collins, The Preview Group, representing American Institute of Architects (AIA); Ron Nickson, representing the National Multi-housing Council; Steve Orlowski, representing the National Association of Home Builders; Kim Paarlberg, representing International Code Council

See comment under 3-6-12 PC2

3-13F-12 PC2

Robin Roberts, Chair, Technical Standards Committee, representing Accessibility Professionals Association

Disapprove this change. Return the text to that found in existing standard.

Reason: Many of the comments provided in the background reports expressed reservations regarding the study upon which the proposals are based.

Because the proposed changes would have an enormous impact on the design and construction community, further investigation is necessary.

3-13H – 12

Revise as follows:

1107.3.2 Golf Club Reach Range Area. All areas within holes where golf balls rest shall be within 36 inches (915 mm) maximum of a clear floor space 36 inches (915 mm) minimum in width and ~~48~~ 52 inches (1220 mm) minimum in length complying with Section 305 having a running slope not steeper than 1:20. The clear floor space shall be served by an accessible route.

3-13H-12 PC1

Ron Burton, PTW Advisors LLC, representing Building Owners and Managers Association, International; David S. Collins, The Preview Group, representing American Institute of Architects (AIA); Ron Nickson, representing the National Multi-housing Council; Steve Orlowski, representing the National Association of Home Builders; Kim Paarlberg, representing International Code Council

See comment under 3-6-12 PC2

3-13H-12 PC2

Robin Roberts, Chair, Technical Standards Committee, representing Accessibility Professionals Association

Disapprove this change. Return the text to that found in existing standard.

Reason: Many of the comments provided in the background reports expressed reservations regarding the study upon which the proposals are based.

Because the proposed changes would have an enormous impact on the design and construction community, further investigation is necessary.

3-13K – 12

Revise as follows:

1109.2.3 Clear Deck Space. On the side of the seat opposite the water, a clear deck space shall be provided parallel with the seat. The space shall be 36 inches (915 mm) minimum in width and shall extend forward ~~48~~ 52 inches (~~1220~~ 1320 mm) minimum from a line located 12 inches (305 mm) behind the rear edge of the seat. The clear deck space shall have a slope not steeper than 1:48.

3-13K-12 PC1

Ron Burton, PTW Advisors LLC, representing Building Owners and Managers Association, International; David S. Collins, The Preview Group, representing American Institute of Architects (AIA); Ron Nickson, representing the National Multi-housing Council; Steve Orlowski, representing the National Association of Home Builders; Kim Paarlberg, representing International Code Council

See comment under 3-6-12 PC2

3-13K-12 PC2

Robin Roberts, Chair, Technical Standards Committee, representing Accessibility Professionals Association

Disapprove this change. Return the text to that found in existing standard.

Reason: Many of the comments provided in the background reports expressed reservations regarding the study upon which the proposals are based. Because the proposed changes would have an enormous impact on the design and construction community, further investigation seems necessary.

3-13L – 12

Add new text as follows:

1004.3.3 Clear Floor Space. For the purposes of Type B units, the clear floor space shall be 48 inches (1220mm) minimum in length and 30 inches (760 mm) minimum in width.

Revise as follows:

1004.9 Operable Parts. Lighting controls, electrical switches and receptacle outlets, environmental controls, electrical panelboards, and user controls for security or intercom systems shall comply with Sections ~~309.2 and~~ 309.3 and 1004.3.3.

EXCEPTIONS:
(No change to the exceptions)

1004.10.1 Clear Floor Space. A clear floor space complying with Section ~~305.3~~ 1004.3.3 shall be provided. A parallel approach shall be provided for a top loading machine. A forward or parallel approach shall be provided for a front loading machine.

1004.11.2 Clear Floor Space. Clear floor spaces required by Section 1004.11.3.1 (Option A) or 1004.11.3.2 (Option B) shall comply with Sections 1004.11.2 and ~~305.3~~ 1004.3.3.

1004.11.2.1 Doors. Doors shall not swing into the clear floor space or clearance for any fixture.

EXCEPTION: Where a clear floor space complying with Section ~~305.3~~ 1004.3.3, excluding knee and toe clearances under elements, is provided within the room beyond the arc of the door swing.

1004.11.3.1.1 Lavatory. A clear floor space complying with Section ~~305.3~~ 1004.3.3, positioned for a parallel approach, shall be provided at a lavatory. The clear floor space shall be centered on the lavatory.

EXCEPTION:
A lavatory complying with Section 606 and 1004.3.3 shall be permitted. Cabinetry shall be permitted under the lavatory provided the following criteria are met:

(a) The cabinetry can be removed without removal or replacement of the lavatory; and

(b) The floor finish extends under the cabinetry; and

(c) The walls behind and surrounding the cabinetry are finished.

1004.12.2 Clear Floor Space. Clear floor space at appliances shall comply with Sections 1004.12.2 and ~~305.3~~ 1004.3.3.

3-13L-12 PC1

Harold Kiewel, representing self

Further revise as follows:

1004.11.2.1 Doors. Doors shall not swing into the clear floor space or clearance for any fixture.

EXCEPTION: A door may swing into the room or space provided that:

1. That there is a clear floor space complying with Section 1004.3.3, beyond the arc of the door swing, and
2. The clear floor space does not include knee- and toe-clearances provided under accessible fixtures or elements.

Where a clear floor space complying with Section 1004.3.3, excluding knee and toe clearances under elements, is provided within the room beyond the arc of the door swing.

1004.11.3.1.1 Lavatory. A clear floor space complying with Section 1004.3.3, positioned for a parallel approach, shall be provided at a lavatory. The clear floor space shall be centered on the lavatory.

EXCEPTION:
A lavatory complying with Section 606 and 1004.3.3 shall be permitted. Cabinetry shall be permitted under the lavatory provided the following criteria are met:

(a) The cabinetry can be removed without removal or replacement of the lavatory; and
(b) The floor finish extends under the cabinetry; and
(c) ~~The walls behind and surrounding the cabinetry are finished~~ The wall- and cabinet-surfaces exposed by such removal are finished to match similar adjoining surfaces.

(portions of proposal not shown remain unchanged)

Reason: The exception provided under Article 1004.11.2.1, Doors, does not read as a sentence and is therefore unclear. Revise item c under the exception for Article 1004.11.3.1.1, Lavatory, to read as follows.

3-13L-12 PC2

Ron Nickson, – representing National Multi Housing Council

Further revise as follows:

1004.3.3 Clear Floor Space. For the purposes of Type B units, the clear floor space shall be 48 inches (1220mm) minimum in length and 30 inches (760 mm) minimum in width.

Revise as follows:

1004.9 Operable Parts. Lighting controls, electrical switches and receptacle outlets, environmental controls, electrical panelboards, and user controls for security or intercom systems shall comply with Sections ~~309.3~~ 1104.1.1 and 1004.3.3.

EXCEPTIONS:

1. Unobstructed forward reach for operable parts shall be permitted to comply with Section 1004.1.3

~~1.~~ 2. Receptacle outlets serving a dedicated use.

~~2.~~ 3. In a kitchen, where two or more receptacle outlets are provided above a length of counter top that is uninterrupted by a sink or appliance, only one receptacle outlet shall ~~not~~ be required to comply with Sections ~~309.2~~ 1104.1.1 and 309.3.

4. In a kitchen, where a clear floor space for a parallel approach cannot be located at a counter top in a corner between appliances, receptacle outlets over the counter top shall not be required to comply with Sections 1104.1.1 and 309.3 provided that the counter top is 7 square feet (0.65 m^2) maximum.

~~3.~~ 5. Floor receptacle outlets.

~~4.~~ 6 HVAC diffusers.

~~5.~~ 7. Controls mounted on ceiling fans.

~~6.~~ 8. Controls or switches mounted on appliances.

~~7.~~ 9. Plumbing fixture controls.

~~8.~~ 10. Reset buttons and shut-offs serving appliances, piping and plumbing fixtures.

~~9.~~ 11. Where redundant controls other than light switches are provided for a single element, one control in each space shall not be required to be accessible.

~~10.~~ 12. . Within kitchens and bathrooms, lighting controls, electrical switches and receptacle outlets are permitted to be located over cabinets with counter tops 36 inches (915 mm) maximum in height and 25-1/2 inches (650 mm) maximum in depth.

1004.10.1 Clear Floor Space. A clear floor space complying with Section 1004.3.3 shall be provided. A parallel approach shall be provided for a top loading machine. A forward or parallel approach shall be provided for a front loading machine.

1004.11.2 Clear Floor Space. Clear floor spaces required by Section 1004.11.3.1 (Option A) or 1004.11.3.2 (Option B) shall comply with Sections 1004.11.2 and 1004.3.3.

1004.11.2.1 Doors. Doors shall not swing into the clear floor space or clearance for any fixture.

EXCEPTION: Where a clear floor space complying with Section 1004.3.3, excluding knee and toe clearances under elements, is provided within the room beyond the arc of the door swing.

1004.11.3.1.1 Lavatory. A clear floor space complying with Section 1004.3.3, positioned for a parallel approach, shall be provided at a lavatory. The clear floor space shall be centered on the lavatory.

EXCEPTION:

A lavatory complying with Section 606 and 1004.3.3 shall be permitted. Cabinetry shall be

permitted under the lavatory provided the following criteria are met:

(a) The cabinetry can be removed without removal or replacement of the lavatory; and

(b) The floor finish extends under the cabinetry; and

(c) The walls behind and surrounding the cabinetry are finished.

1004.12.2 Clear Floor Space. Clear floor space at appliances shall comply with Sections 1004.12.2 and ~~305.3~~ 1004.3.3.

Reason: The proposed modification address only the Type B dwellings unit. The proposal includes all of the changes approved for the Type B Dwelling Unit acted on during the committee process to develop the next version of the ANSI standard. The changes in the comment are intended to allow the Type B dwelling unit to remain technically as it was in the 2009 version of the standard by not incorporating the changes in the buildings blocks for clear floor space, turning circle and U-turn, etc. that were approved during the committee deliberations.

3-13L-12 PC3

Kimberly Paarlberg, – representing ICC

Further revise as follows:

1103.1 General. Type A units shall comply with Section 1103. Where Type A criteria references other sections in this standard for elements within a Type A dwelling or sleeping unit and requirements for new and existing buildings are provided, new Type A dwelling and sleeping units shall be permitted to use the criteria for existing buildings.

Reason: The references to the building blocks in Type A units are extensive. The Type A unit as is currently stands would be consistent with the 2010 ADA Standard. The Type A is viewed as a compromise between the Accessible and Type B units. FHA has criteria to allow for individuals to modify dwelling units based on their individual needs. Perhaps that justifies looking at this issue again.

3-13L-12 PC4

Larry Perry, – representing self

Further revise as follows:

1004.9 Operable Parts. Lighting controls, electrical switches and receptacle outlets, environmental controls, electrical panelboards, and user controls for security or intercom systems shall comply with Sections 309.3 and 1004.3.3, except that unobstructed low-reach shall be 15-incyes (380 mm) minimum.

EXCEPTIONS:
(No change to the exceptions)

(portions or proposal not shown remain unchanged)

Reason: This section needs to be revised to correct a problem created by a change to chapter 3. Section 308 now has different unobstructed low reach for forward and side approach. Section 308 also refers to Section 305 in numerous locations, making it unclear if the larger clear floor space is somehow applicable.

Recommend establishing a consistent low unobstructed reach range regardless of the clear floor space provided. As currently proposed, outlet height in an apartment would vary, and assumed clear floor spaces will be impacted by furniture once the unit is occupied.

As proposed by this comment, a 15” low reach range would be permitted throughout Type B units.

3-13L-12 PC5

Chad Beebe, – representing American Society for Healthcare Engineering (ASHE)

Disapprove this change. Return the text to that found in existing standard.

Reason: In review of the 2014 Final Draft of the ICC A117.1 document, it has come to our attention that several of the proposed changes will have a significantly negative impact to the healthcare industry design/built environment of buildings designed under the 2015 IBC. Further, it is our understanding that the overwhelming majority of these changes have been derived from a single uncorroborated report which has neither been properly vetted nor adopted by any other credible agency or (similar) jurisdictional body.

As we do not feel these dramatic and substantial changes have been given proper and appropriate consideration by all interested stakeholders in this process, and since we question the authenticity of the underlying premise used to make such changes, we respectfully request they either be removed entirely from consideration in this draft, or that the entire draft adoption process be held in abeyance for a minimum of 12-months so that further collaboration can be conducted with all interested parties. If the Committee opts to delay this process for 12-months, it will be in keeping with the mission of the ICC, and best assure that all parties can be provided with the opportunity to reasonably participate in this process.

3-13L-12 - The addition of a clear floor space requirement in front of EVERY SINGLE: light switch, electrical outlet, thermostat, e-panel, and other user controls for all Type B units which will impact every patient sleeping unit within a hospital.
These new requirements would add thousands of required square feet to a new hospital and significantly impact any renovations to an existing hospital by requiring increased patient room sizes to meet the new requirements and thus, due to the fixed square footage within the building foot print, will reduce the number of allowable beds the hospital can maintain. With hospital construction cost averaging around $300.00 per square foot these additional increases in square footage will significantly impact the cost of construction. Thank you for your consideration of this request, and in keeping alive the goals and mandates of the entire ICC organization and membership.

3-13L-12 PC6

Tony Ewalt, representing Sletten Construction of Nevada, Inc.; Michael Gentille, representing Philip Chun North America, Inc.; Michael McGettigan, representing Terracon Consultant; Robert W. Potter, Construction Company, representing Affordable Concepts; Eric J. Rowland, representing Rowland Design;

Disapprove this change. Return the text to that found in existing standard.

Reason: In review of the 2014 Final Draft of the ICC A117.1 document, it has come to my attention that several of the proposed changes (ratified by this Committee) will have a significantly negative impact to the design/built environment of buildings designed under the 2015 IBC. Further, it is my understanding that the overwhelming majority of these changes have been derived from a single uncorroborated report which has neither been properly vetted nor adopted by any other credible agency or (similar) jurisdictional body.

As I do not feel these dramatic and substantial changes have been given proper and appropriate consideration by all interested stakeholders in this process, and I question the authenticity of the underlying premise used to make such changes, **I** respectfully request they either be removed entirely from consideration in this draft, or that the entire draft adoption process be held in abeyance for a minimum of 12-months.
If the Committee opts to delay this process for 12-months, it will be in keeping with the mission of the ICC, and best assure that all parties can be provided with the opportunity to reasonably participate in this process.

3-13L-12 PC7

Jeffrey T. O'Neill, – representing self

Disapprove this change. Return the text to that found in existing standard.

Reason: See comment at 3-6-12.

3-13L-12 PC8

Minh N. Vu, – representing American Hotel & Lodging Association

Disapprove this change. Return the text to that found in existing standard.

Reason: See comment 3-6-12.

3-20 – 12

Revise as follows:

308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be ~~15~~ 23 inches (~~380~~ 585 mm) minimum above the floor.

3-20-12 PC1

Fritz Rasmussen, – representing Kwik Trip Inc.

Comment: -Bad- 308.2.1 Unobstructed (Forward Reach). This raises the lowest forward reach point from 15" AFF to 23" AFF. *This would raise all electrical outlets that are in public spaces. Baby seats would have to be raised up to meet this requirement*

3-20-12 PC2

Ron Burton, PTW Advisors LLC, representing Building Owners and Managers Association, International; David S. Collins, The Preview Group, representing American Institute of Architects (AIA); Ron Nickson, representing the National Multi-housing Council; Steve Orlowski, representing the National Association of Home Builders; Kim Paarlberg, representing International Code Council

See comment under 3-6-12 PC2

3-20-12 PC3

Larry Eberly, – representing Pennsylvania Builders Association

Disapprove this change. Return the text to that found in existing standard.

Reason: This decrease in reach range necessitates changes in typical construction and installation of electrical outlets and HVAC systems and does not address the implications for Kitchen and bathroom vanity drawers and base cabinets, low shelving, dishwasher racks, refrigerators, range ovens and other appliances, plumbing fixture controls and window hardware typically below 23" above the floor.

Pennsylvania Builders Association opposes any change to the ANSI 117.1 building blocks for numerous reasons.

The requirements within Chapter 3: Building Blocks are the standard and precedent for the development of decades of accessibility required clearances, maneuverability and reach ranges both in ANSI A117.1 and federal accessibility laws and their standards (ADA/FHA/ ABA/ UFAS, etc).

Any changes will conflict with and be more stringent than these accepted laws and standards and contradictory to the efforts of the ADA/A117 Harmonization Task Group (HTG) to provide consistent language with the ADA. Residual unforeseen consequences and conflicts with these laws and within the ANSI 117.1 standard itself due to the vast references to this chapter will require extensive future coordination, revisions and clarifications and create a financial burden for residential communities.

These changes are predicated on the anthropometric study of mobility device users by The Center for IDeA at the University at Buffalo, SUNY which predominantly addresses the potential need to accommodate existing electric mobility devices. The Committee's and Wheeled Mobility Task Group's (WMTG) supporting documentation and comments contained in the Backround Report raises serious questions to the study's testing methods, criteria and results and clearly acknowledges the unforeseen residual impact and consequences.

Instead of changing the Building Blocks, a more prudent approach would be to require mobility device manufacturers to comply with the decades of accepted standards, particularly taking in consideration future technology and advances in design.

Stringent changes to the requirements in the ANSI 117.1 standards make private residential communities more handicap accessible than public, institutional and commercial buildings and sites including USPS postal centers, hospitals, schools, retail, office, recreational and cultural establishments. A substantial disparity and financial burden is placed on residential communities, homeowners and builders by requiring residential buildings to comply with stricter standards. In addition, any change to these basic building blocks may also set a precedent for a re-evaluation of all other clearances and requirements not currently included in these proposed changes, particularly dwelling unit bathroom and kitchens.

Pennsylvania adopts the accessibility provisions of the newest triennial revisions to the ICC Family of Codes that have been adopted in PA, which includes the IBC, IRC, IMC, IPC and IEBC. without modification. This includes the references to ICC/ANSI A117.1. Mandatory adoption in Pennsylvania, without modification, has unforeseen consequences to the building industry, both commercial and residential communities.

3-20-12 PC4

Kimberly Paarlberg, – representing International Code Council

Disapprove this change. Return the text to that found in existing standard.

Reason: The study on reach is not complete. No reach over an obstruction was studied. Reach requirements should not be revised piecemeal.

This will have the most effect on the location of electrical outlets. At 23" above the floor, this will put the outlet above furniture. This is considered a visual eyesore; therefore, outlets that are not required will typically be removed. Is this not decreasing options for everyone?

By reference to 309, and therefore 308, this reach range could adversely effect control panels within elevator cars and on platform lifts. The low reach is needed to fit in emergency phones.

What exactly are we trying to affect?

An alternative –

308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 23 inches (585 mm) minimum above the floor

Exception: The following elements shall be permitted to have a low forward reach of 15 inches (380 mm) minim above the floor:

1. Electrical outlets
2. Emergency equipment in elevator cars

3-20-12 PC5

Robin Roberts, Chair, Technical Standards Committee, representing Accessibility Professionals Association

Disapprove this change. Return the text to that found in existing standard.

Reason: Many of the comments provided in the background reports expressed reservations regarding the study upon which the proposals are based. Because the proposed changes would have an enormous impact on the design and construction community, further investigation seems necessary.

3-20-12 PC6

Minh N. Vu, – representing American Hotel & Lodging Association

Disapprove this change. Return the text to that found in existing standard.

Reason: The ANSI Committee has proposed to change the accessible forward reach range from 15 and 48 inches to 23 and 48 inches above the finished floor ("AFF"). The American Hotel & Lodging Association (AHLA) opposes this change because it is based on the findings of a single study that provides no insight into the reaching capabilities of Wheeled Mobility Device users in the United States and would have far-reaching negative implications for lodging facilities that the ANSI Committee has not considered.

I. The proposed change is based on a single study that provides no empirical data about the reaching ability of WhMD users in the United States.

The proposed change is based on findings from a study conducted by the Center for Inclusive Design and Environmental Access (IdeA) Anthropometry of Wheeled Mobility Project, Final Report (December 31,2010) (hereinafter, the "study') in which none of the study participants could execute a forward reach below 16"-17" AFF. The Study found that 51% of study participants using manual wheelchairs and 36% of study participants in power wheelchairs would be able to execute a forward reach at 23-24 inches AFF. Thus, the ANSI Committee has proposed to raise the minimum height for a forward reach to 23" AFF.

The Study cannot be the basis for setting a nationwide standard because the Study participant pool was not a representative sample of WhMD users in the United States (Study at 13.) In particular:

- The 495 study participants were not randomly selected WhMD users. Instead, they were recruited from Buffalo, NY; Pittsburg, PA and Ithaca NY (Study at 3).
- The Study 'intentionally oversampled powered wheelchair users" who, according to the Study's finding, had the greatest difficulty with executing a forward reach (Study at 13.)
- The Study made no attempt to choose participants whose medical conditions proportionately reflect the medical conditions of WhMD users in the United States (Study at 36). The Study's authors stated that there was 'a higher prevalence of spinal cord injuries' in the Study sample in addition to a larger percentage of participants with 'nervous sstem disorders' relative to the percentage of people with such conditions in the U.S. population. Indeed, 32% of the study participants have 'nervous system disorders,' whereas only 8% of the general population of WhMD users have such conditions (Study at 36). The disproportionately higher percentage of Study participants with spinal cord and central nervous system injuries likely increased the number of people who would have difficulty executing a forward-reach.

In is a basic principle of statistics that a study sample must accurately reflect the overall population in order for the findings to be extended to that population. The Study made no attempt to capture a random sample of WhMD users in the United States in order to study their reach range limitations. Accordingly, the Study provides no information concerning the reach-range of WhMD users in the United States and cannot serve as the basis for a radical change to national accessibility standards.

II. The proposed change would negatively impact lodging facilities in new and renovated facilities.

In addition to having no legitimate justification, the proposed forward reach range change would have very negative impacts on lodging facilities. Outlets, in room safes, closet shelves, kitchen cabinets, storage drawers, controls at individual PTAC units, toilet paper dispensers and bathtub controls would all have to be raised. In new construction, the space in which these items could be placed would be extremely limited. In an accessible guest room with kitchen cabinets, for example, fifty percent of the storage must be within an accessible reach range under the 2010 ADA Standards. If the minimum low reach is raised to 23 inches AFF, none of the lower cabinets would qualify as accessible storage. The upper cabinets, which must be mounted above the counter, would also not qualify because they would be above 48 inches AFF. The result: kitchen cabinets would have to be mounted in a single row at chest height.

The proposed changes would pose even greater challenges in existing lodging facilities that are renovated. All of the elements described above in accessible guest rooms would have to be relocated and there would be no space for some of the elements (e.g. kitchen cabinets) to be placed within the proposed, extremely limited reach range.

III. The proposed change will make the ANSI A117.1 Standard inconsistent with the new 2010 ADA Standards and undermine harmonization and compliance objectives.

As the ANSI Committee is well aware, for the first twenty years of the Americans with Disabilities Act of 1990, the ANSI A117.1 Standard was not the same as the ADA Standards for Accessible Design adopted by the United States Department of Justice. The lack of harmonization caused a great deal of confusion among owners of public accommodations and commercial facilities who had to comply with building code and ADA requirements which differed. In September 2010, the DOJ issued the 2010 Standards which was the culmination of an effort by the ANSI Committee and the Access Board to harmonize the ANSI A117.1 Standard with the 2010 ADA Standards. The 2010 ADA Standards have only been in effect for fewer than two years.

If adopted, the proposed change to the forward-reach range would undo this harmonization effort by introducing an entirely different standard into future editions of the International Building Code which will then be adopted by state governments as their building codes. Owners seeking to comply with both sets of requirements will yet again be thrown into a state of confusion even though, as discussed above, there is no legitimate reason for the change. In AHLA's experience, compliance regimes that are confusing or difficult to understand/implement usually result in less accessibility and operate to the detriment of individuals with disabilities. AHLA, thus, urges the ANSI Committee to reject any rule changes that would conflict with the 2010 ADA Standards, including the proposed minimum forward-reach range.

IV. At a Minimum, the proposed changes should not apply to existing buildings.

As can be seen throughout the preceding discussion, the proposed changes -- once they re adopted by jurisdictions asw part of their building codes -- will be particularly problematic for existing facilities that will have to comply with them in future renovations. In most instances, lodging facility owners will face three unacceptable alternatives: (1) Comply with the new requirements by relocating outlets, PTAC;s, safes, toilet paper dispensers, bathtub controls and storage units; (2) Attempt to seek a variance from local building officials assuming such a process is available; or (3) Not renovate or improve facilities. All options are highly undesirable. The first tw2o options will add substantial cost and uncertainty to renovation projects. The third option would actually undermine accessibility because renovations typically result in improved access. Accordingly, if the ANSI Committee is unwilling to postpone the adoption of the proposal for further study, it should, at a minimum, limit its application to facilities constructed after a jurisdiction adopts the changes.

3-21 – 12

Revise as follows:

308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space complying with Section 305 and knee and toe clearance complying with Section 306 shall extend beneath the element for a distance not less than the ~~required~~ reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum above the floor where the reach depth over the obstruction is 20 inches (510 mm) maximum. Where the reach depth over the obstruction is more than ~~exceeds~~ 20 inches (510 mm) and 25 inches (635 mm) or less, the high forward reach shall be 44 inches (1120 mm) maximum above the floor, ~~and the reach depth shall be 25 inches (635 mm) maximum~~.

3-21-12 PC1

Harold Kiewel, representing self

Revise as follows:

308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space complying with Section 305 and knee and toe clearance complying with Section 306 shall extend beneath the element for a distance not less than the reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum above the floor where the reach depth over the obstruction

is 20 inches (510 mm) maximum. Where the reach depth over ~~the~~ an obstruction is more than 20 inches (510 mm) ~~and 25 inches (635 mm) or less~~, the high ~~forward reach shall be 44 inches (1120 mm) maximum above the floor.~~ reach-limit shall be reduced by 1-inch for each inch of depth, or fraction thereof, over 20 inches; except that there is no reachable area on a surface beyond an obstruction 25-inches or more in depth.

Reason: Revise the last sentence of Article 308.2.2

3-21-12 PC2

Curt Wiehle, Minnesota Construction Codes and Licensing, representing self

Revise as follows:

308.2.2 Obstructed High Reach. Where a high forward reach is over an obstruction, the clear floor space complying with Section 305 and knee and toe clearance complying with Section 306 shall extend beneath the element for a distance not less than the reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum above the floor where the reach depth over the obstruction is 20 inches (510 mm) maximum. ~~Where the reach depth over the obstruction is more than 20 inches (510 mm) and 25 inches (635 mm) or less, the high forward reach shall be 44 inches (1120 mm) maximum above the floor.~~ The high forward reach shall be 44 inches (1120 mm) maximum above the floor where the reach depth over the obstruction is greater than 20 inches (510 mm) and not more than 25 inches (635 mm).

Reason: Editorial change to use consistent language within the provision.

3-23 – 12

Revise as follows:

308.3.1 Unobstructed. Where a clear floor space complying with Section 305 allows a parallel approach to an element and the edge of the clear floor space is 10 inches (255 mm) maximum from the element, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the floor.

EXCEPTION<u>S</u>:

1. Existing elements that are not altered shall be permitted at 54 inches (1370 mm) maximum above the floor.
2. Operable parts on fuel dispensers installed on an existing curbs shall be permitted at 54 inches (1370 mm) maximum above the floor.

3-23-12 PC1

Harold Kiewel, representing self

Revise as follows:

308.3.1 Unobstructed. Where a clear floor space complying with Section 305 ~~allows~~ provides a parallel approach to an element and the edge of the clear floor space is 10 inches (255 mm) maximum from the element, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the floor.

EXCEPTIONS:

1. Existing elements that are not altered shall be permitted at 54 inches (1370 mm) maximum above the floor.
2. Operable parts on fuel dispensers installed on an existing curbs shall be permitted at 54 inches (1370 mm) maximum above the floor.

Reason: No specific reason provided. See Mr. Kiewel's comments found at 1-1-12.

3-24 – 12

Revise as follows:

308.3.1 Unobstructed. Where a clear floor space complying with Section 305 allows a parallel approach to an element and the edge of the clear floor space is 10 inches (255 mm) maximum from the element, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the floor.

EXCEPTION<u>S</u>:

1. Existing elements that are not altered shall be permitted at 54 inches (1370 mm) maximum above the floor.
2. Mailboxes serving Type B dwelling units and complying with Section 1001.2 shall be permitted a high reach range at 54 inches (1370 mm) maximum above the floor.

3-24-12 PC1

Marsha K. Mazz, representing U.S. Access Board (ATBCB)

Revise as follows:

308.3.1 Unobstructed. Where a clear floor space complying with Section 305 allows a parallel approach to an element and the edge of the clear floor space is 10 inches (255 mm) maximum from the element, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the floor.

EXCEPTIONS:

1. Existing elements that are not altered shall be permitted at 54 inches (1370 mm) maximum above the floor.
2. Mailboxes serving Type B dwelling units and complying with Section 1001.2 shall be permitted ~~a~~ <u>an unobstructed</u> high <u>side</u> reach ~~range at~~ 54 inches (1370 mm) maximum above the floor.

Reason: Often shelves or large parcel lockers are located beneath a bank of mailboxes. The modification clarifies that only the "unobstructed" high reach can be 54 inches high. It further clarifies that, in the rare instance where the reach is a forward reach, that the maximum high forward reach is unmodified by the exception.

3-24-12 PC2

Kimberly Paarlberg, representing ICC

Revise as follows:

308.3.1 Unobstructed. Where a clear floor space complying with Section 305 allows a parallel approach to an element and the edge of the clear floor space is 10 inches (255 mm) maximum from the element, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the floor.

EXCEPTIONS:

1. Existing elements that are not altered shall be permitted at 54 inches (1370 mm) maximum above the floor.
2. ~~Mailboxes serving Type B dwelling units and complying with Section 1001.2 shall be permitted a high reach range at 54 inches (1370 mm) maximum above the floor.~~

Reason: The purpose of this proposal is a clarification of what is required for accessible mailboxes. Please keep in mind that mailbox locations are also regulated by the U.S. Post Office.

Mailboxes are only addressed for dwelling and sleeping units. This is a new Section 1101.2. The current requirements to not clarify what makes a mailbox accessible. Therefore, technical requirements similar to storage facilities are provided in a new Section 9063. The exception (already approved by the committee as an exception to Section 308.3.1 for unobstructed high side reach) was relocated to these provisions so that the requirements/allowances can be together. The exception is still needed for facilities such as high rise apartment buildings and dorm facilities. The exception is also clarified/limited to only apply to accessible mail receptacles assigned to Type B units in centralized facilities. Mail receptacles for Type B units in centralized facilities that are not accessible mail receptacles can be at any height approved by the U.S. Post Office. Accessible mail receptacles for Accessible and Type A units cannot use this exception.

There is also an attempt to editorially clean up the language for accessible mail compartments. Mail receptacles are either centralized or individual, so an additional charging paragraph (1101.2.1) is not needed. If mail receptacles are centralized in groups throughout a facility, than 'at each location' is not needed – the language will apply to all centralized facilities. The text and title is revised to 'elevator service' for consistency with the language in the exceptions for Type B units in IBC Section 1107.7. The terms 'mail receptacles', 'mail compartments' and 'mailboxes' appear to be used interchangeably. We need to be consistent. The proposal is written with mail receptacles as room the boxes are located in and mail compartments as the individual boxes.

Below is what I had revised looking at just the original text – this is for committee information only so it is clear what I was looking at. Once I had it cleaned up, it became clear that it would work better within the individual unit requirements, the same way we address other facilities that serve Accessible, Type A or Type B units.

1101 General

1101.1 Scoping. Dwelling units and sleeping units required to be Accessible units, Type A units, Type B units, Type C (Visitable) units or units with accessible communication features by the scoping provisions adopted by the administrative authority shall comply with the applicable provisions of Chapter 11.

1101.2 Mail ~~Receptacles~~ Compartments. Where mail compartments are provided for Accessible, Type A or Type B dwelling and sleeping units, accessible mail ~~receptacles~~ compartments shall be ~~accessible~~ provided in accordance with Section~~s~~1101.2.1 or 1101.2.2. All accessible mail compartments shall comply with Section 1101.2.3. (10-2-12)

~~1101.2.1 Dwelling Units and Sleeping units.~~ ~~Where mail receptacles are provided for Accessible, Type A or Type B dwelling and sleeping units, accessible mail receptacles shall be provided in accordance with Section 1101.2.1.1 or 1101.2.1.2.~~ (10-2-12)

1101.2.1.~~1~~ Centralized Mail Receptacles. Where each individual mail compartment of a centralized mail receptacle is assigned to a ~~specific~~ dwelling unit or sleeping unit, ~~the~~ accessible individual mail compartments shall ~~comply~~ be provided in accordance with Section 1101.2.1.1.~~1~~ or 1101.2.1.~~1.~~2. (10-2-12)

1101.2.1.1.~~1~~ Buildings Without ~~an~~ Elevator Service. In a structure without ~~an~~ elevator service, ~~all~~ individual mail compartments assigned to Accessible units, Type A units and Type B units ~~in each location~~ shall be accessible. (10-2-12)

1101.2.1.1.~~2~~ Buildings With ~~an~~ Elevator Service. In a structure with ~~an~~ elevator service, fifty percent of ~~all~~ individual mail compartments ~~in each~~ shall be accessible. Individual mail compartments assigned to Accessible and Type A units shall be included in the accessible mail compartments ~~mailboxes~~. In addition to the individual mail compartments assigned to dwelling or sleeping units, an additional number of individual mail compartments that is equal to ten percent of the total number of dwelling units and sleeping units, but not less than one, ~~at each location~~ shall be accessible. (10-2-12)

1101.2.~~1~~.2 Individual house-mounted and curbside mail ~~receptacle~~ compartment. Where an individual house-mounted or curbside mail ~~receptacle~~ compartment serves a dwelling unit or sleeping unit that is required to be an Accessible unit, Type A unit or Type B unit, the mail ~~receptacle~~ compartment shall be accessible. (10-2-12)

3-24-12 PC3

Larry Perry, representing self

Disapprove this change. Return the text to that found in existing standard.

Reason: While I support the idea of allowing resident mailboxes at up to 54" above the floor to be considered acceptable where serving Type B units, an exception in the building block provisions is not an appropriate approach.
As noted in several ballot comments, if this exception is included, it should be tied to where an unobstructed side reach is provided.
As written, with the reference to the newly proposed section 1001.2, it is unclear if this 'exception' is applying only to those mailboxes required to be accessible, or to all of the mailboxes provided.

3-24-12 PC4

Larry Eberly, representing Pennsylvania Builders Association

Disapprove this change. Return the text to that found in existing standard.

Reason: The size of a standard Handicap Accessible parking space which is widely accepted, planned in residential communities and consistent with other laws and standards is based on an aisle width of 60" adjacent to a parking space 96" with a typical total width of 13' wide; this change would increase total width to 13'-7" wide. This may conflict with existing approved site plans, increase impervious coverage and be difficult to implement.
This proposed change relates to the anthropometric study of mobility device users by The Center for IDeA at the University at Buffalo, SUNY which questions decades of universally accepted accessibility clearances and maneuverability contained within Chapter 3: Building Blocks. This revision is based on this single study and should be researched further before such changes occur in the standard.

Pennsylvania Builders Association opposes any change to the ANSI 117.1 building blocks for numerous reasons.
The requirements within Chapter 3: Building Blocks are the standard and precedent for the development of decades of accessibility required clearances, maneuverability and reach ranges both in ANSI A117.1 and federal accessibility laws and their standards (ADA/FHA/ ABA/ UFAS, etc).

Any changes will conflict with and be more stringent than these accepted laws and standards and contradictory to the efforts of the ADA/A117 Harmonization Task Group (HTG) to provide consistent language with the ADA. Residual unforeseen consequences and conflicts with these laws and within the ANSI 117.1 standard itself due to the vast references to this chapter will require extensive future coordination, revisions and clarifications and create a financial burden for residential communities.

These changes are predicated on the anthropometric study of mobility device users by The Center for IDeA at the University at Buffalo, SUNY which predominantly addresses the potential need to accommodate existing electric mobility devices. The Committee's and Wheeled Mobility Task Group's (WMTG) supporting documentation and comments contained in the Background Report raises serious questions to the study's testing methods, criteria and results and clearly acknowledges the unforeseen residual impact and consequences.

Instead of changing the Building Blocks, a more prudent approach would be to require mobility device manufacturers to comply with the decades of accepted standards, particularly taking in consideration future technology and advances in design. Stringent changes to the requirements in the ANSI 117.1 standards make private residential communities more handicap accessible than public, institutional and commercial buildings and sites including USPS postal centers, hospitals, schools, retail, office, recreational and cultural establishments. A substantial disparity and financial burden is placed on residential communities, homeowners and builders by requiring residential buildings to comply with stricter standards. In addition, any change to these basic building blocks may also set a precedent for a re-evaluation of all other clearances and requirements not currently included in these proposed changes, particularly dwelling unit bathroom and kitchens.

Pennsylvania adopts the accessibility provisions of the newest triennial revisions to the ICC Family of Codes that have been adopted in PA, which includes the IBC, IRC, IMC, IPC and IEBC. without modification. This includes the references to ICC/ANSI A117.1. Mandatory adoption in Pennsylvania, without modification, has unforeseen consequences to the building industry, both commercial and residential communities.