

Chapter 6

6-2– 12

Revise as follows:

602 Drinking Fountains and Bottle Filling Stations.

602.7 Bottle Filling Stations. Bottle filling stations which shall comply with Sections 602.7.1 and 602.7.2.

Exception: Where bottle filling stations are part of the drinking fountain for standing persons, the bottle filling station is not required to comply with this section provided a bottle filling station is located at the wheelchair accessible drinking fountain.

602.7.1 Clear Floor Space. A clear floor space complying with Section 305, positioned for a forward or side approach, shall be provided.

602.7.2 Controls. Controls for bottle filling stations shall be hand operated or automatic. Hand operated controls shall comply with Section 309.

6-2-12 PC1

John C. Watson, representing Elkay

Further revise as follows:

602 Drinking Fountains and Bottle Filling Stations.

602.7 Bottle Filling Stations. Bottle filling stations which shall comply with Sections 602.7.1 and 602.7.2.

Exception: Where bottle filling stations are part of the drinking fountain for standing persons, the bottle filling station is not required to comply with this section provided a bottle filling station is located at the wheelchair accessible drinking fountain or it complies with obstructed reach range requirements as outlined in Section 308.

602.7.1 Clear Floor Space. A clear floor space complying with Section 305, positioned for a forward or side approach, shall be provided.

602.7.2 Controls. Controls for bottle filling stations shall be hand operated or automatic. Hand operated controls shall comply with Section 309.

Reason: Adds clarity to the language.

6-5– 12

Revise as follows:

604.4 Height. The height of water closet seats shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum above the floor, measured to the top of the seat. Seats shall not be sprung to return to a lifted position.

EXCEPTIONS:

1. An accessible water closet which is adjustable in height by the user is permitted provided that at least one adjustment setting provides a seat within the range specified in Section 604.4.
2. A water closet in a toilet room for a single occupant, accessed only through a private office and not for common use or public use, shall not be required to comply with Section 604.4.

6-5-12 PC1

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

Further revise as follows:

604.4 Height. The height of wheelchair accessible and ambulatory water closet seats shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum above the floor, measured to the top of the seat. Seats shall not be sprung to return to a lifted position.

EXCEPTIONS:

1. An accessible water closet which is adjustable in height by the user is permitted provided that at least one adjustment setting provides a seat within the range specified in Section 604.4.
2. A water closet in a toilet room for a single occupant, accessed only through a private office and not for common use or public use, shall not be required to comply with Section 604.4.

Reason: Ambulatory stalls often do not have a raised seats installed. A raised seat is important for people who use walkers, canes and crutches because they have difficulty bending their knees and may have poor balance. Provide this direct reference. See companion proposal 604.10.3.

6-5-12 PC2

Kimberly Paarlberg, representing ICC

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

Reason: Alternative means are already an option under Section 103, therefore, exception 1 is not needed. In addition, I have serious concerns about safety and sanitary issues with exception. If it is mechanical, is has a high chance of breaking given the wide range of persons weights. If it is something you physically lift on and off, besides the sanitary issue, how do you make sure that piece stays in the bathroom? If a person has a disability, how do you know that they will be able to perform the adjustment? This should be deleted.

6-7-12

Revise as follows:

604.5.1 Fixed Side Wall Grab Bars. Fixed side wall grab bars shall include a horizontal bar complying with Section 605.4.1.1 and a vertical grab bar complying with Section 604.5.1.2. The vertical grab bar at water closets primarily for children's use shall comply with Section 609.4.2

604.5.1.1 Horizontal Grab Bar. ~~A fixed horizontal side-wall grab bars shall be~~ 42 inches (1065 mm) minimum in length, ~~shall be~~ located 12 inches (305 mm) maximum from the rear wall and extending 54 inches (1370 mm) minimum from the rear wall.

604.5.1.2 Vertical Grab Bar. ~~In addition, A vertical grab bar 18 inches (455 mm) minimum in length shall be mounted with the bottom of the bar located 39 inches (990 mm) minimum and 41 inches (1040 mm) maximum above the floor, and with the center line of the bar located 39 inches (990 mm) minimum and 41 inches (1040 mm) maximum from the rear wall.~~

EXCEPTION: ~~The vertical grab bar at water closets primarily for children's use shall comply with Section 609.4.2.~~

6-7-12 PC1

Harold Kiewel, representing self

Further revise as follows:

604.5.1 Fixed Side Wall Grab Bars. Fixed side wall grab bars shall include a horizontal bar complying with Section 605.4.1.1 and a vertical grab bar complying with Section 604.5.1.2. The vertical grab bar at water closets primarily for children's use shall comply with Section 609.4.2

604.5.1.1 Horizontal Grab Bar. ~~A horizontal grab bar 42 inches (1065 mm) minimum in length, shall be located 12 inches (305 mm) maximum from the rear wall and extending 54 inches (1370 mm) minimum from the rear wall. Mount a grab bar horizontally extending from a point 12 inches (305 mm) maximum from the rear wall to a point 54 inches (1370 mm) minimum from the rear wall. Center the bar 10-inches above the finished seat height of the water-closet it serves.~~

604.5.1.2 Vertical Grab Bar. ~~A vertical grab bar 18 inches (455 mm) minimum in length shall be mounted with the bottom of the bar located 39 inches (990 mm) minimum and 41 inches (1040 mm) maximum above the floor, and with the center line of the bar located 39 inches (990 mm) minimum and 41 inches (1040 mm) maximum from the rear wall. Mount a grab bar vertically with 4-inches clearance from the horizontal bar, extending upwards a minimum of 18-inches, and with its center line located 10 inches (990 mm) minimum to 12-inches (1040 mm) maximum in front of the water-closet rim or leading edge of the bench or seat it serves.~~

Reason: I am opposed to changing dimensions to non-modular (odd) numbers. I believe that dimensional requirements of the Standard should, to the maximum extent practicable, be modular in both Imperial and metric (SI) systems. Imperial dimensions should be multiples of 4-inches, and conversion to metric measure should use 4-inches = 100 mm.

As a professional technical writer, I take exception to the modern practice of wasting the first Article of every major sub-part with the phrase "[this work] shall comply with this Standard." If the Standard has a purpose, and the Article has title, the phrase is superfluous. You could save a couple of pages by deleting those lines.

I have not pointed out spelling, tense, or minor grammatical errors. There are some, but I presume that the committee has access to editors who will, in due course, correct those items.

6-10- 12

Revise as follows:

604.5.2 Rear Wall Grab Bars. ~~The fixed rear wall grab bar shall be 36 inches (915 mm) minimum in length and extend from the centerline of the water closet between 12 inches (305) minimum on the side closest to the wall, and 24 inches (610 mm) minimum on the transfer side., located 6 inches maximum (150 mm) from the side wall and extending 42 inches (1065 mm) from the side wall.~~

EXCEPTIONS: *(No change to exceptions)*

6-10-12 PC1

Curt Wiehle, Minnesota Construction Codes and Licensing, representing self

Delete without substitution:

604.5.2 Rear Wall Grab Bars. The fixed rear wall grab bar shall be 36 inches (915 mm) minimum in length located 6 inches maximum (150 mm) from the side wall and extending 42 inches (1065 mm) from the side wall.

EXCEPTIONS:

- ~~1. The rear grab bar shall be permitted to be 24 inches (610 mm) minimum in length, centered on the water closet, where wall space does not permit a grab bar 36 inches (915 mm) minimum in length due to the location of a recessed fixture adjacent to the water closet.~~
- ~~2. Where an administrative authority requires flush controls for flush valves to be located in a position that conflicts with the location of the rear grab bar, that grab bar shall be permitted to be split or shifted to the open side of the toilet area.~~

Reason: Delete the provision in its entirety. As has been pointed out, the proposed change does not comply with the ADA standard. It has also been pointed out that the rear bar has no use and provides no benefit. If the standard is going to conflict with the ADA, it may as well go all the way and eliminate this unnecessary grab bar.

6-14- 12

Further revise as follows:

604.7 Dispensers. Toilet paper dispensers shall comply with Section 309.4. Where the dispenser is located above the grab bar, the outlet of the dispenser shall be located within an area 24 inches (610 mm) minimum and 36 inches (915 mm) maximum from the rear wall. Where the dispenser is located below the grab bar, the outlet of the dispenser shall be located within an area 24 inches (610 mm) minimum and 42 inches (1065 mm) maximum from the rear wall. The outlet of the dispenser shall be located 18 inches (455 mm) minimum and 48 inches (1220 mm) maximum above the floor. Dispensers shall comply with Section 609.3. Dispensers shall not be of a type that control delivery, or do not allow continuous paper flow.

EXCEPTION: Toilet paper dispensers that accommodate a maximum of 2 toilet paper rolls of not more than 5 inch (125 mm) diameter each shall be permitted to be located 7 inches (180 mm) minimum and 9 inches (230 mm) maximum in front the of the water closet measured to the centerline of the dispenser.

604.11.7 Dispensers. Toilet paper dispensers primarily for children's use shall comply with Section 309.4. The outlet of dispensers shall be located within an area 24 inches (610 mm) minimum and 42 inches (1065 mm) maximum from the rear wall. The outlet of the dispenser shall be 14 inches (355 mm) minimum and 19 inches (485 mm) maximum above the floor. There shall be a clearance of 1 1/2 inches (38 mm) minimum below the grab bar. Dispensers shall not be of a type that control delivery or do not allow continuous paper flow.

EXCEPTION: Toilet paper dispensers that accommodate a maximum of 2 toilet paper rolls of not more than 5 inch (125 mm) diameter each shall be permitted to be located 7 inches (180 mm) minimum and 9 inches (230 mm) maximum in front the of the water closet measured to the centerline of the dispenser

6-14-12 PC1

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

Further revise as follows:

604.7 Dispensers. Toilet paper dispensers shall comply with Section 309.4. Where the dispenser is located above the grab bar, the outlet of the dispenser shall be located within an area 24 inches (610 mm) minimum and 36 inches (915 mm) maximum from the rear wall. Where the dispenser is located below the grab bar, the outlet of the dispenser shall be located within an area 24 inches (610 mm) minimum and 42 inches (1065 mm) maximum from the rear wall. The outlet of the dispenser shall be located 18 inches (455 mm) minimum and 48 inches (1220 mm) maximum above the floor. Dispensers shall comply with Section 609.3. Dispensers shall not be of a type that control delivery, or do not allow continuous paper flow.

EXCEPTION: 604.7.1 Multiple roll dispensers. Toilet paper dispensers that accommodate a maximum of 2 toilet paper rolls of not more than 5 inch (125 mm) diameter each shall be permitted to be located 7 inches (180 mm) minimum and 9 inches (230 mm) maximum in front the of the water closet measured to the centerline of the dispenser.

604.11.7 Dispensers. Toilet paper dispensers primarily for children's use shall comply with Section 309.4. The outlet of dispensers shall be located within an area 24 inches (610 mm) minimum and 42 inches (1065 mm) maximum from the rear wall. The outlet of the dispenser shall be 14 inches (355 mm) minimum and 19 inches (485 mm) maximum above the floor. There shall be a clearance of 1 1/2 inches (38 mm) minimum below the grab bar. Dispensers shall not be of a type that control delivery or do not allow continuous paper flow.

EXCEPTION: 504.11.7.1 Multiple roll dispensers. Toilet paper dispensers that accommodate a maximum of 2 toilet paper rolls of not more than 5 inch (125 mm) diameter each shall be permitted to be located 7 inches (180 mm) minimum and 9 inches (230 mm) maximum in front the of the water closet measured to the centerline of the dispenser

Reason: The exception is not really an exception. As written the body of the text does not limit/prohibit multiple roll dispensers, not does it place any restrictions on where the outlets can be of those dispensers. The body of the text gives multiple possible locations for dispenser locations. According to the body of the text, there is nothing to prohibit anyone from placing a half dozen or more dispensers (or a single 4-roll dispenser) on the side wall as long as all of the outlets are within the broad range of locations noted. Since exceptions are optional considerations, it is not necessary to use the exception to place multiple roll dispensers.

There is nothing requiring the outlets of any double roll dispenser from being located according to the exception. The choice can be made to place multiple roll dispensers at the position indicated in the exception or at any of the possible locations. If the intent is to limit where multiple roll dispensers can be placed, then it must be a subsection – not an exception. Keep the main body as it is (which still allows a half dozen dispensers at various locations) but change the exception to a requirement if the dispenser contains multiple rolls.

6-14-12 PC2

Kimberly Paarlberg, representing ICC

Further revise as follows:

604.7 Dispensers. Toilet paper dispensers shall comply with Section 309.4. Dispensers shall comply with Section 609.3. Dispensers shall not be of a type that control delivery, or do not allow continuous paper flow.

~~**604.7 Dispensers.** Toilet paper dispensers shall comply with Section 309.4.~~ **604.7.1 Location.** Where the dispenser is located above the grab bar, the outlet of the dispenser shall be located within an area 24 inches (610 mm) minimum and 36 inches (915 mm) maximum from the rear wall. Where the dispenser is located below the grab bar, the outlet of the dispenser shall be located within an area 24 inches (610 mm) minimum and 42 inches (1065 mm) maximum from the rear wall. The outlet of the dispenser shall be located 18 inches (455 mm) minimum and 48 inches (1220 mm) maximum above the floor. Dispensers shall comply with Section 609.3. ~~Dispensers shall not be of a type that control delivery, or do not allow continuous paper flow.~~

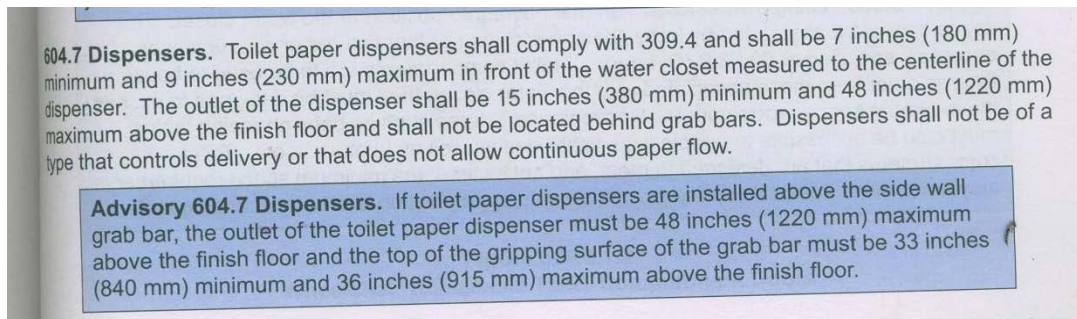
EXCEPTION: Toilet paper dispensers that accommodate a maximum of 2 toilet paper rolls of not more than 5 inch (125 mm) diameter each shall be permitted to be located 7 inches (180 mm) minimum and 9 inches (230 mm) maximum in front the of the water closet measured to the centerline of the dispenser. The outlet of the dispenser shall be 15 inches (380 mm) minimum and 48 inches (1220 mm) maximum above the floor.

604.11.7 Dispensers. Toilet paper dispensers primarily for children's use shall comply with Section 309.4. There shall be a clearance of 1½ inches (38 mm) minimum below the grab bar. Dispensers shall not be of a type that control delivery or do not allow continuous paper flow.

~~604.11.7 Dispensers. Toilet paper dispensers primarily for children's use shall comply with Section 309.4.~~ **604.7.11.7.1 Location.** The outlet of toilet paper dispensers primarily for children's use shall be located within an area 24 inches (610 mm) minimum and 42 inches (1065 mm) maximum from the rear wall. The outlet of the dispenser shall be 14 inches (355 mm) minimum and 19 inches (485 mm) maximum above the floor. ~~There shall be a clearance of 1 1/2 inches (38 mm) minimum below the grab bar. Dispensers shall not be of a type that control delivery or do not allow continuous paper flow.~~

EXCEPTION: Toilet paper dispensers that accommodate a maximum of 2 toilet paper rolls of not more than 5 inch (125 mm) diameter each shall be permitted to be located 7 inches (180 mm) minimum and 9 inches (230 mm) maximum in front the of the water closet measured to the centerline of the dispenser. The outlet of the dispenser shall be 14 inches (355 mm) minimum and 19 inches (485 mm) maximum above the floor.

Reason: For adults - The original intent was to allow for an exception consistent with 2010 ADA. Current organization of text is unclear as to what pieces the exception is applicable too (i.e., just distance forward or also height). Moving the three sentences into a different paragraph would help, but then the height is not clear without the additional sentence in the exception. Would ADA require the toilet paper dispenser to meet the 1-1/2" below and 12" above in 609.3? Child size implies this. The last sentence in 2010 ADA 607.4 is unclear.



For children - Original diagram has errata. The original intent was to allow for an exception consistent with 2010 ADA. Current organization of text is unclear as to what pieces the exception is applicable too (i.e., just distance forward or also height). Moving the three sentences into a different paragraph would help, but then the height is not clear without the additional sentence in the exception.

2010 ADA text

604.9.6 Dispensers. Toilet paper dispensers shall comply with 309.4 and shall be 7 inches (180 mm) minimum and 9 inches (230 mm) maximum in front of the water closet measured to the centerline of the dispenser. The outlet of the dispenser shall be 14 inches (355 mm) minimum and 19 inches (485 mm) maximum above the finish floor. There shall be a clearance of 1½ inches (38 mm) minimum below the grab bar. Dispensers shall not be of a type that controls delivery or that does not allow continuous paper flow.

6-18– 12

Add new text as follows:

604.9.2.3 Alternate Wheelchair Accessible Compartments. Where an alternate wheelchair compartment is required, the minimum area of an alternate wheelchair accessible compartment shall be 60 inches (1525 mm) minimum width measured perpendicular to the side wall, and 82 inches (2085 mm) minimum in depth measured perpendicular to the rear wall.

604.9.3 Doors. Toilet compartment doors, including door hardware, shall comply with Section 404, except if the approach is to the latch side of the compartment door clearance between the door side of the stall and any obstruction shall be 42 inches (1065 mm) minimum. The door shall be self-closing. A door pull complying with Section 404.2.6 shall be placed on both sides of the door near the latch. Toilet compartment doors shall not swing into the required minimum area of the compartment.

Exception: In an alternate wheelchair accessible compartment, the door can swing into the stall where a clear floor space complying with Section 305.3 is provided within the stall beyond the arc of the door swing.

6-18-12 PC1

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

Further revise as follows:

604.9.2.3 Alternate Wheelchair Accessible Compartments. Where an alternate wheelchair compartment is required, the minimum area of an alternate wheelchair accessible compartment shall be 60 inches (1525 mm) minimum width measured perpendicular to the side wall, and 82 inches (2085 mm) minimum in depth measured perpendicular to the rear wall.

604.9.3 Compartment Doors. Toilet compartment doors, including door hardware, shall comply with Section 404, except if the approach is to the latch side of the compartment door clearance between the door side of the stall and any obstruction shall be 42 inches (1065 mm) minimum. The door shall be self-closing. ~~A door pull complying with Section 404.2.6 shall be placed on both sides of the door near the latch.~~ Toilet compartment doors shall not swing into the required minimum area of the compartment.

Exception: In an alternate wheelchair accessible compartment, the door can swing into the stall where a clear floor space complying with Section 305.3 is provided within the stall beyond the arc of the door swing.

604.9.3.1 Door Pulls. Door pulls complying with Section 404.2.6 shall be placed on both sides of the compartment door near the latch.

Reason: The door pull requirement is frequently overlooked and needs to be formatted to stand out as a minimum requirement. A standing person can always reach the top of the stall door and pull it open, but a person with disabilities cannot reach the top or bottom of the stall door.

Door pulls are essential for people with disabilities. To enter the self-closing door must be pulled open. Once inside a person has to hold the stall door tight to align and engage the latch. A door pull is essential for this task. See companion proposals for 604.10.3.

6-18-12 PC2

Curt Wiehle, representing self

Further revise as follows:

604.9.2.3 Alternate Wheelchair Accessible Compartments. Where an alternate wheelchair compartment is required, the minimum area of an alternate wheelchair accessible compartment shall be 60 inches (1525 mm) minimum width measured perpendicular to the side wall, and 82 inches (2085 mm) minimum in depth measured perpendicular to the rear wall.

604.9.3 Doors. Toilet compartment doors, including door hardware, shall comply with Section 404, except if the approach is to the latch side of the compartment door clearance between the door side of the stall and any obstruction shall be 42 inches (1065 mm) minimum. The door shall be self-closing. A door pull complying with Section 404.2.6 shall be placed on both sides of the door near the latch. Toilet compartment doors shall not swing into the required minimum area of the compartment.

Exception: ~~In an alternate wheelchair accessible compartment,~~ The door can swing into the stall compartment where a clear floor space complying with Section 305.3 is provided within the stall compartment beyond the arc of the door swing.

604.9.3.1 Door Opening Location. ~~The farthest edge of toilet compartment door opening shall be located in the front wall or partition or in the side wall or partition as required by Table 604.9.3.1.~~

Table 604.9.3.1 — Door Opening Location

Door Opening Location	Measured From	Dimension
Front Wall or Partition	From the side wall or partition closest to the water closet	56 inches (1420 mm) minimum
		or
	From the side wall or partition farthest from the water closet	5 inches (127mm) maximum
Side Wall or Partition - Wall-Hung Water Closet	From the rear wall	52 inches (1320 mm) minimum
		or
	From the front wall or partition	5 inches (127mm) maximum
Side Wall or Partition - Floor-Mounted Water Closet	From the rear wall	55 inches (1395 mm) minimum
		or
	From the front wall or partition	5 inches (127mm) maximum

(6-20-12)

Toilet compartment doors shall be located in accordance with Section 604.9.3.1.1 or 604.9.3.1.2 as applicable.

604.9.3.1.1 Minimum Sized Compartment. In toilet compartments complying with Sections 604.9.2.1 and 604.9.2.2, the hinge side of the compartment door shall be located in the front partition or in the side partition farthest from the water closet in accordance with one of the following:

1. Door located in front partition, 4 inches (100 mm) maximum from the side wall or partition.
2. Door located in side partition, 4 inches (100 mm) maximum from the front wall or partition.

604.9.3.1.2 Alternate Wheelchair Compartment. In toilet compartments complying with Section 604.9.2.3, a maneuvering clearance within the compartment measuring 18 inches (445 mm) minimum beyond the latch side of the door and 48 inches (1220 mm) minimum perpendicular from the door shall be provided.

Reason: Exception 3 is unnecessarily restrictive by referencing the alternate compartment. Any compartment with a clear floor space clear of the door swing should allow the door to swing in.

As an alternative to exception 3, the charging statement could be modified as follows (exception 3 would be deleted):

604.9.3 Doors. Toilet compartment doors, including door hardware, shall comply with Section 404. The door shall be self-closing. A door pull complying with Section 404.2.6 shall be placed on both sides of the door near the latch. Toilet compartment

doors shall not swing into the required minimum area of the compartment unless a clear floor space complying with Section 305.3 is provided within the compartment beyond the arc of the door swing.

Table 604.9.3.1 was intended to provide more flexibility for door placement in larger compartments. It is still too restrictive in larger compartments as it always requires that the door be located diagonally from the water closet. The new Section 604.9.3.1.1 maintains the 2010 ADA requirement except that it specifically references the hinge side of the door. This is necessary to ensure that the latch is not located in the corner of the compartment. Accessing and operating the latch mechanism can be difficult if it is located in the corner of the compartment. Section 604.9.3.1.2 allows the door in any location provided the stated maneuvering clearance is provided. The maneuvering clearance is intended to provide access to the latch and is required whether the door swings in or out of the compartment.

6-18-12 PC3

Kimberly Paarlberg, representing ICC

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

Reason: I know that A117.1 does not address scoping, but if I do not understand that intent of this provision, I do not see the value of adding technical criteria for the standard. Where is it intended for this to be utilized?

6-19- 12

Revise as follows:

604.9.3 Doors. Toilet compartment doors, including door hardware, shall comply with Section 404, ~~except if the approach is to the latch side of the compartment door clearance between the door side of the stall and any obstruction shall be 42 inches (1065 mm) minimum.~~ The door shall be self-closing. A door pull complying with Section 404.2.6 shall be placed on both sides of the door near the latch. Toilet compartment doors shall not swing into the required minimum area of the compartment.

EXCEPTIONS:

1. Outside of the compartment, where the approach is to the latch side of the compartment door clearance between the door side of the compartment and any obstruction shall be 42 inches (1065 mm) minimum.
2. Within the compartment, maneuvering clearances at the door are not required to comply with Section 404.

604.10.3 Doors. Toilet compartment doors, including door hardware, shall comply with Section 404, ~~except if the approach is to the latch side of the compartment door the clearance between the door side of the compartment and any obstruction shall be 42 inches (1065 mm) minimum.~~ The door shall be self-closing. A door pull complying with Section 404.2.6 shall be placed on both sides of the door near the latch. Compartment doors shall not swing into the required minimum area of the compartment.

EXCEPTIONS:

1. Outside of the compartment, where the approach is to the latch side of the compartment door, clearance between the door side of the compartment and any obstruction shall be 42 inches (1065 mm) minimum.
2. Within the compartment, maneuvering clearances at the door are not required to comply with Section 404.

6-19-12 PC1

Harold Kiewel, representing self

Further revise as follows:

604.9.3 Doors. Toilet compartment doors, including door hardware, shall comply with Section 404. The door shall be self-closing. A door pull complying with Section 404.2.6 shall be placed on both sides of the door near the latch. Toilet compartment doors shall not swing into the required minimum area of the compartment.

EXCEPTIONS:

1. Outside of the compartment, where the approach is to the latch side of the compartment door clearance between the door side of the compartment and any obstruction shall be 42 inches (1065 mm) minimum.
2. Within the compartment, maneuvering clearances at the door are not required to comply with Section 404.
3. Omit the door pull on the exterior of in-swimming doors.

Reason: A door-pull on the exterior of an in-swinging door tells the arriving individual to pull the door to see if the compartment is available for use, but you cannot pull an in-swinging door open - you must push it open. A door pull in this position will give a false "in-use" signal to a disabled person causing at least some frustration, at worst considerable discomfort.

6-19-12 PC2

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

Further revise as follows:

604.9.3 Doors. Toilet compartment doors, including door hardware, shall comply with Section 404. The door shall be self-closing. A door pull complying with Section 404.2.6 shall be placed on both sides of the door near the latch. Toilet compartment doors shall not swing into the required minimum area of the compartment.

EXCEPTIONS:

1. Outside of the compartment, where the approach is to the latch side of the compartment door clearance between the door side of the compartment and any obstruction shall be 42 inches (1065 mm) minimum.
2. Within the compartment, maneuvering clearances at the door are not required to comply with Section 404.

604.10.3 Doors. Ambulatory toilet compartment doors, including door hardware, shall comply with Section 404. The door shall be self-closing. ~~A door pull complying with Section 404.2.6 shall be placed on both sides of the door near the latch.~~ Compartment doors shall not swing into the required minimum area of the compartment.

EXCEPTIONS:

1. Outside of the compartment, where the approach is to the latch side of the compartment door, clearance between the door side of the compartment and any obstruction shall be 42 inches (1065 mm) minimum.
2. Within the compartment, maneuvering clearances at the door are not required to comply with Section 404.

604.10.3.1 Door Pulls. Door pulls complying with Section 404.2.6 shall be placed on both sides of the compartment door near the latch.

Reason: The door pull requirement is frequently overlooked and needs to be formatted to stand out as a minimum requirement. A standing person can always reach the top of the stall door and pull it open, but a person with disabilities cannot reach the top or bottom of the stall door.

Door pulls are essential for people with disabilities. To enter the self-closing door must be pulled open. Once inside a person has to hold the stall door tight to align and engage the latch. A door pull is essential for this task. See companion proposals for 604.9.3.

PROPOSED rewrite of AMBULATORY COMPARTMENTS shown below:

604.10 Ambulatory Accessible Compartments.

604.10.1 General. Ambulatory accessible compartments shall comply with Section 604.10.

(New Comment, no change)

604.10.2 Size. The minimum area of an ambulatory accessible compartment shall be 60 inches (1525 mm) minimum in depth and a width of 35 inches (890 mm) minimum and 37 inches (940 mm) maximum.

(New Comment, proposed revisions)

604.10.3 Doors. Ambulatory Toilet compartment doors shall comply with section 604.9.3., including door hardware, shall comply with Section 404. The door shall be self-closing. ~~A door pull complying with Section 404.2.6 shall be placed on both sides of the door near the latch.~~ Compartment doors shall not swing into the required minimum area of the compartment.

EXCEPTIONS:

1. Outside of the compartment, where the approach is to the latch side of the compartment door clearance between the door side of the compartment and any obstruction shall be 42 inches (1065 mm) minimum.
2. Within the compartment, maneuvering clearances at the door are not required to comply with Section 404.

604.9.3.1 Door Pulls. Door pulls complying with Section 404.2.6 shall be placed on both sides of the compartment door near the latch.

(New Proposal)

604.10.4 Ambulatory Water Closet. The ambulatory accessible water closet shall comply with Sections 604.2 and 604.4.

(New Proposal)

604.10.4.5 Grab Bars. Grab bars shall comply with Section 609. Side wall grab bars, both horizontal and vertical, shall complying with Section 604.5.1 shall be provided on both sides of the compartment.

6-20- 12

Revise Table as follows:

Table 604.9.3.1 – Door Opening Locations

Door Opening Location	Measured From	Dimension
Front Wall or Partition	From the side wall or partition closest to the water closet	56 inches (1420 mm) minimum
	Or	
	From the side wall or partition farthest from the water closet	4-5 inches (402 127 mm) maximum
Side Wall or Partition - Wall-Hung Water Closet	From the rear wall	52 inches (1320 mm) minimum
	Or	
	From the front wall or partition	4-5 inches (402 127 mm) maximum
Side Wall or Partition - Floor-Mounted Water Closet	From the rear wall	55 inches (1395 mm) minimum
	Or	
	From the front wall or partition	4-5 inches (402 127 mm) maximum

6-20-12 PC1

Kim Paarlberg, representing ICC

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

Reason: The committee did a great job last cycle of revising the requirements to allow for larger stalls and the correct placement of the door. The proposal to change the 4" to 5" was based on the proponent saying then needed more than 4" for support. Well, they could already do that under the current provisions by providing a larger stall so they could get any size support they wanted. There was no technical justification for requiring an additional 1" for the inside stall dimension. Other manufacturers have not identified that that the 4" support does not work for them. In addition, this could put bathrooms currently in compliance in violation for no technical reason. This text should be restored to what it says in the 2009 ICC A117.1.

6-22- 12

Revise as follows:

604.9.5 Toe Clearance at Accessible Compartments. Toe clearance for compartments primarily for children's use shall comply with Section 604.9.5.2. Toe clearance for other wheelchair accessible compartments shall comply with Section 604.9.5.1.

604.9.5.1 Toe Clearance at Compartments. The front partition and at least one side partition of compartments shall provide a toe clearance of 9 12 inches (~~230~~ 305 mm) minimum above the floor and extending 6 8 inches (~~450~~ 205 mm) beyond the compartment side face of the partition, exclusive of partition support members.

EXCEPTIONS:

1. Toe clearance at the front partition is not required in a compartment greater than ~~62~~ 64 inches (~~4575~~ 1625 mm) in depth with a wall-hung water closet, or greater than ~~65~~ 67 inches (~~4650~~ 1700 mm) in depth with a floor-mounted water closet.
2. Toe clearance at the side partition is not required in a compartment greater than ~~66~~ 68 inches (~~4675~~ 1730 mm) in width.

604.9.5.2 Toe Clearance at Compartments for Children's Use. The front partition and at least one side partition of compartments primarily for children's use shall provide a toe clearance of 12 inches (305 mm) minimum above the floor and extending 6 8 inches (~~450~~ 205 mm) beyond the compartment side face of the partition, exclusive of partition support members.

EXCEPTIONS:

1. Toe clearance at the front partition is not required in a compartment greater than ~~65~~ 67 inches (~~4650~~ 1700 mm) in depth.
2. Toe clearance at the side partition is not required in a compartment greater than ~~66~~ 68 inches (~~4675~~ 1730 mm) in width.

6-22-12 PC1

Harold Kiewel, representing self

Comment: Most national manufacturers of toilet compartments specify their doors and privacy panels to be set with 14-inches of clearance from the floor so that the tops of doors and panels will be high enough to provide privacy for the average user. Are you asking manufacturers to lower this clearance which would reduce the effective privacy? Or to make larger panels (which would require retooling the whole industry and cause an increase in costs)?

6-24- 12

Revise as follows:

604.10.2 Size. The minimum area of an ambulatory accessible compartment shall be 60 inches (1525 mm) minimum in depth and a width of 35 inches (890 mm) minimum and 37 inches (940 mm) maximum ~~36 inches (915 mm) in width.~~

604.11.2 Location. The water closet primarily for children's use shall be located with a wall or partition to the rear and to one side. The centerline of the water closet shall be 12 inches (305 mm) minimum and 18 inches (455 mm) maximum from the side wall or partition except that the water closet shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum from the side wall or partition in the ambulatory accessible toilet compartment specified in Section 604.10.1. Water closets located in ambulatory accessible toilet compartments specified in Section 604.10 shall be located as specified in Section 604.2.

605.2 Height and Depth. Urinals shall be of the stall type or shall be of the wall hung type with the rim at 17 inches (430 mm) maximum above the floor. ~~Wall hung Urinals shall be 13 ½ inches (345 mm) minimum in depth measured from the outer face of the urinal rim to the wall.~~

6-24-12 PC1

Kimberly Paarlberg, representing ICC

Further revise as follows:

604.10.2 Size. The minimum area of an ambulatory accessible compartment shall be 60 inches (1525 mm) minimum in depth and a width of 35 inches (890 mm) minimum and 37 inches (940 mm) maximum.

604.11.2 Location. The water closet primarily for children's use shall be located with a wall or partition to the rear and to one side. The centerline of the water closet shall be 12 inches (305 mm) minimum and 18 inches (455 mm) maximum from the side wall or partition ~~except that the water closet shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum from the side wall or partition in the ambulatory accessible toilet compartment specified in Section 604.10.1.~~ Water closets located in ambulatory accessible toilet compartments specified in Section 604.10 shall be located as specified in Section 604.2.

605.2 Height and Depth. Urinals shall be of the stall type or shall be of the wall hung type with the rim at 17 inches (430 mm) maximum above the floor. Urinals shall be 13 ½ inches (345 mm) minimum in depth measured from the outer face of the urinal rim to the wall.

Reason: The new language is in bad code form. In addition, it is not needed as it is already permitted by the reference in the last section.

6-24-12 PC2

Curt Wiehle, Minnesota Construction Codes and Licensing, representing self

Further revise as follows:

604.10.2 Size. The minimum area of an ambulatory accessible compartment shall be 60 inches (1525 mm) minimum in depth and a width of 35 inches (890 mm) minimum and 37 inches (940 mm) maximum.

604.11.2 Location. The water closet ~~primarily for children's use~~ in wheelchair accessible toilet compartments shall be located with a wall or partition to the rear and to one side. The centerline of the water closet shall be 12 inches (305 mm) minimum and 18 inches (455 mm) maximum from the side wall or partition ~~except that the water closet shall be 17 inches (430 mm) minimum and 19 inches (485 mm)~~

~~maximum from the side wall or partition in the ambulatory accessible toilet compartment specified in Section 604.10.1.~~ Water closets located in ambulatory accessible toilet compartments specified in Section 604.10 shall be located as specified in Section 604.2.

605.2 Height and Depth. Urinals shall be of the stall type or shall be of the wall hung type with the rim at 17 inches (430 mm) maximum above the floor. Urinals shall be 13 ½ inches (345 mm) minimum in depth measured from the outer face of the urinal rim to the wall.

Reason: The language added in proposal 6-24-12 is redundant with the last sentence in the provision. The revisions here are to clarify the ambulatory and wheelchair provisions.

6-37- 12

Add new text as follows:

606.5 Basin Location. The interior edge of the rim of the lavatory basin shall be located 3 inches (75 mm) maximum from the front edge of the fixture or countertop.

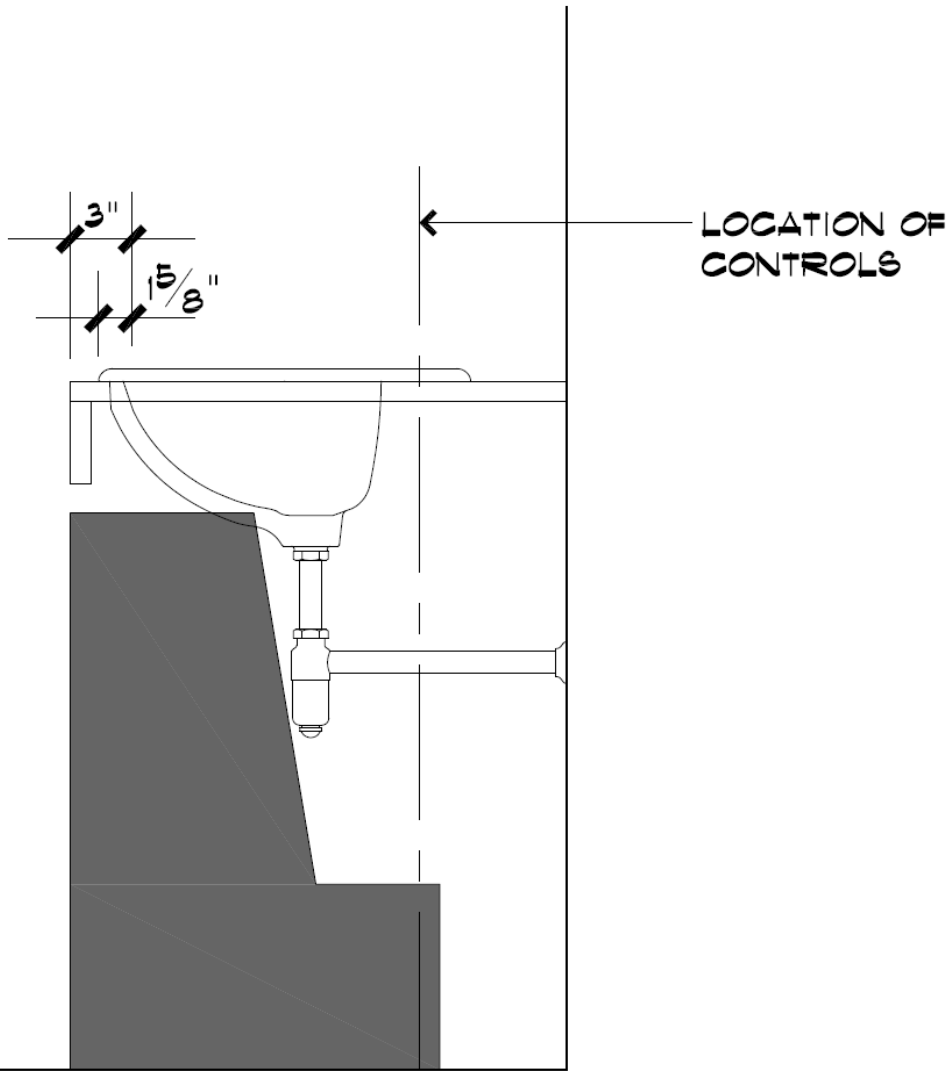
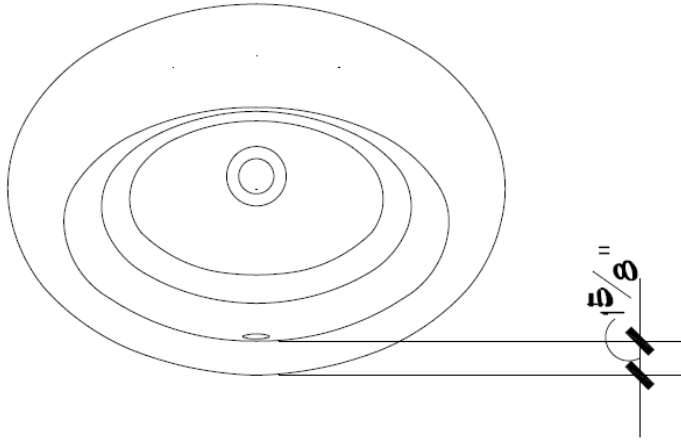
6-37-12 PC1

Brad Gaskins, representing self

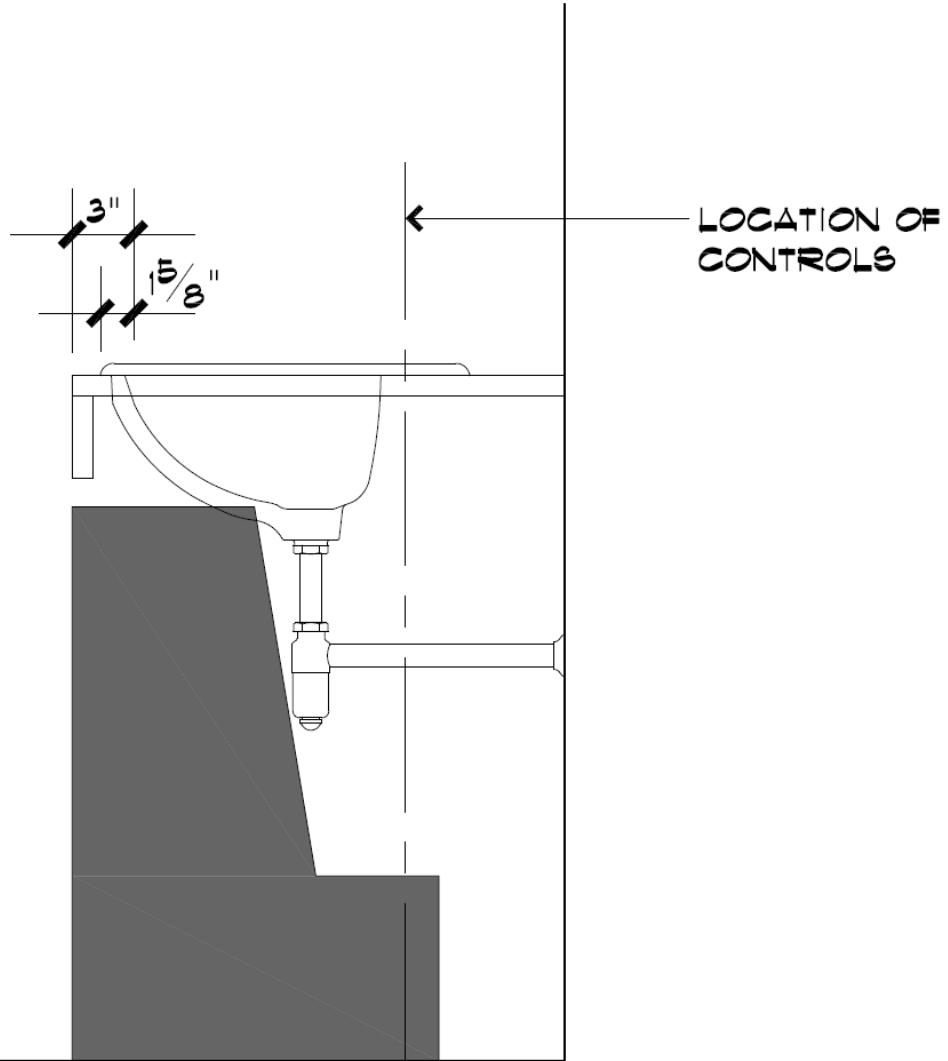
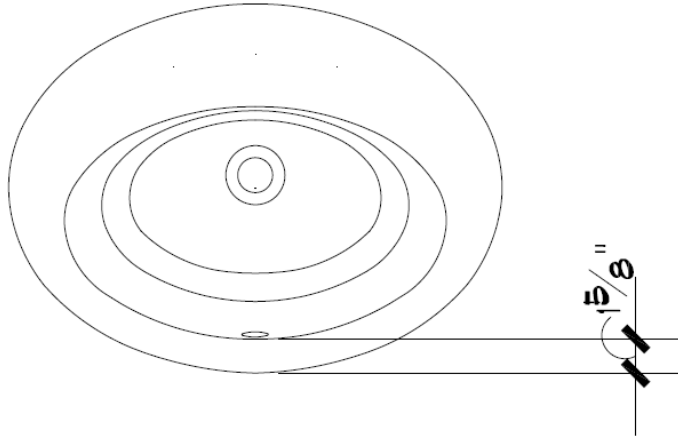
Further revise as follows:

606.5 Basin Location. The interior edge of the rim of the lavatory basin shall be located 3 ½ inches (~~75~~ 90 mm) maximum from the front edge of the fixture or countertop.

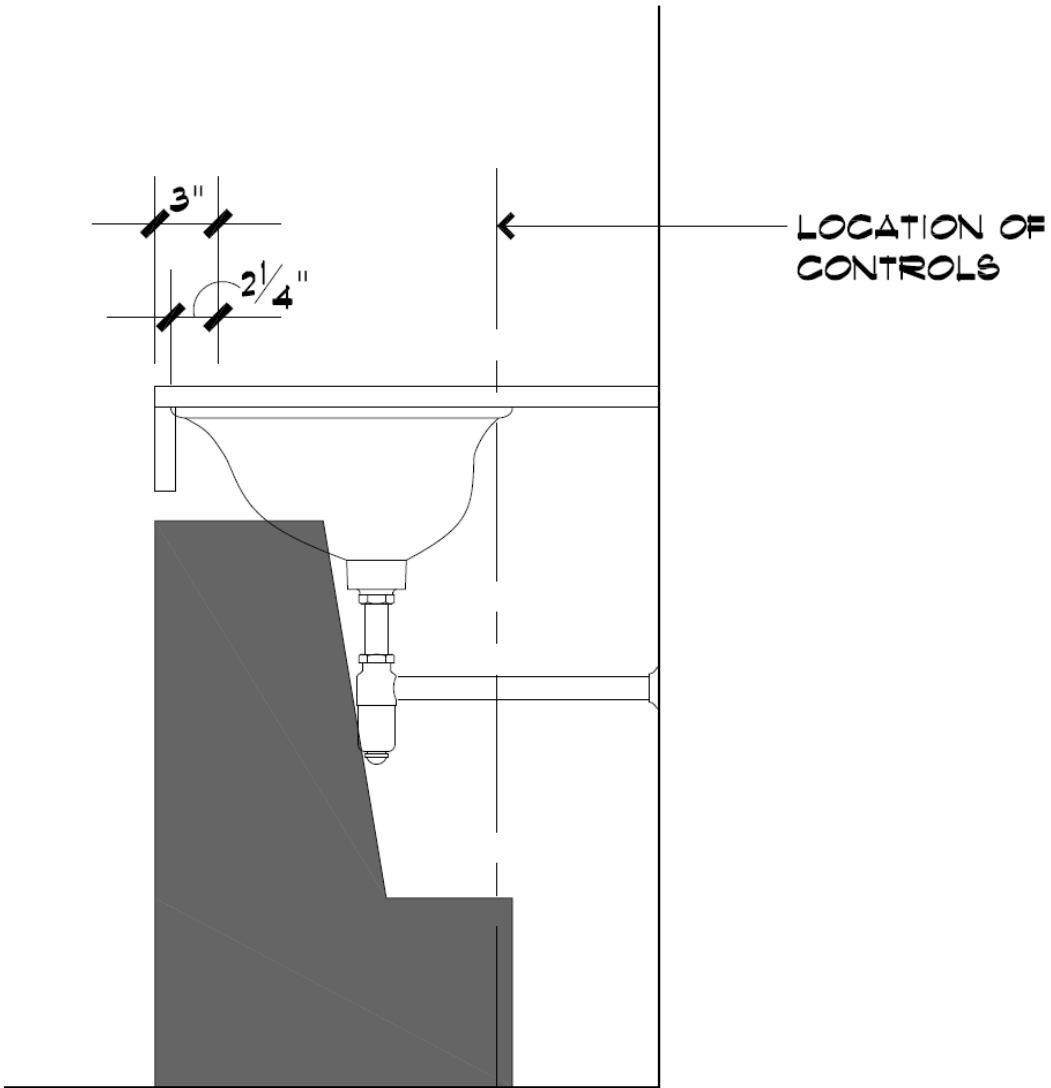
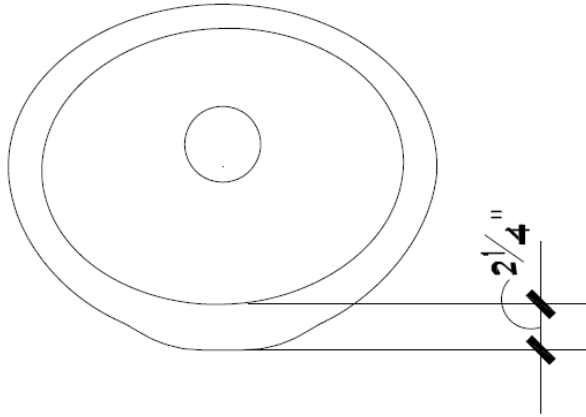
Reason: At the current 3" the from the front edge most sinks would not be able to comply with the required knee clearance. It would be impossible to meet the 8" deep requirement.



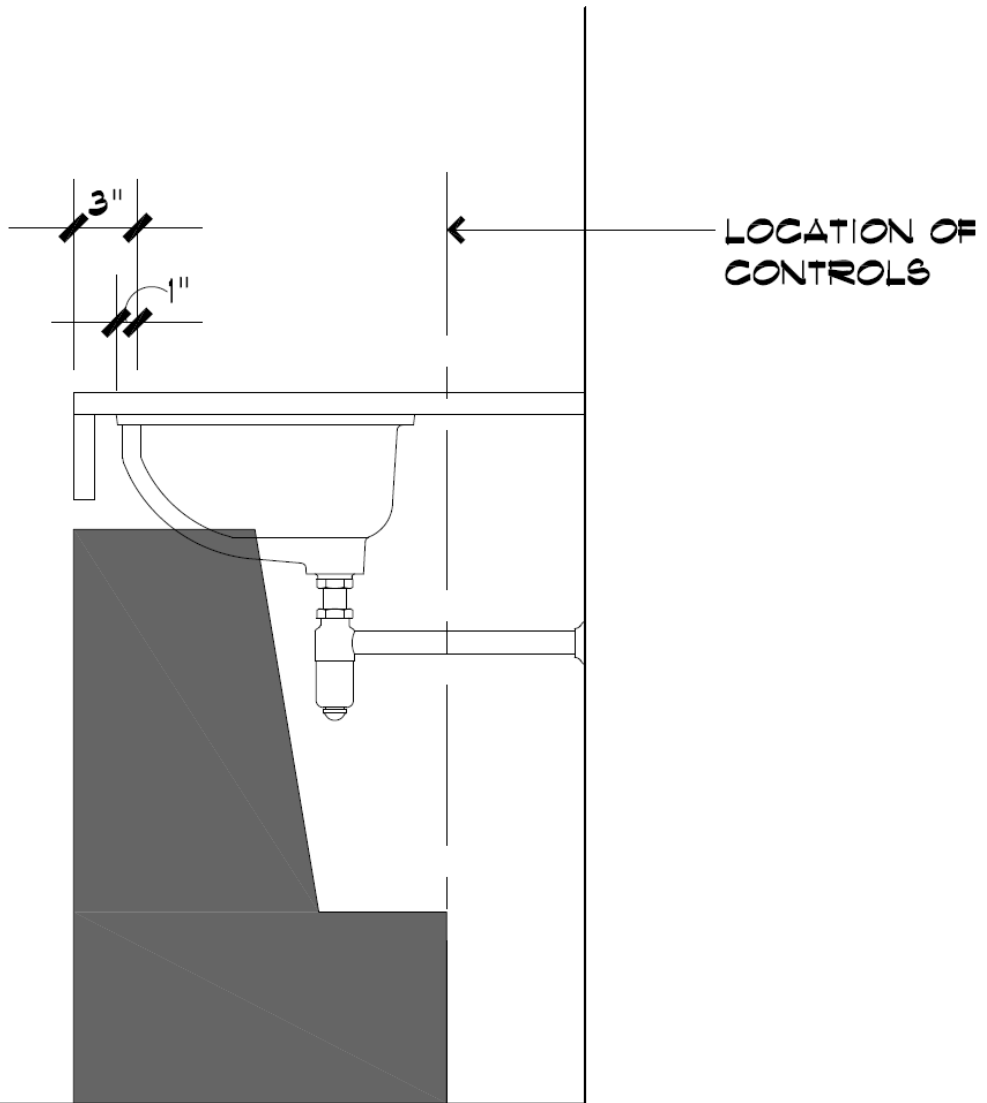
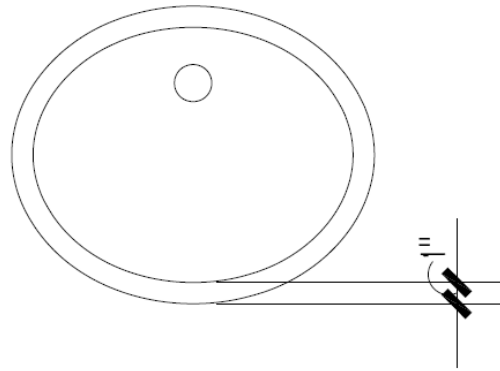
K-2907-1



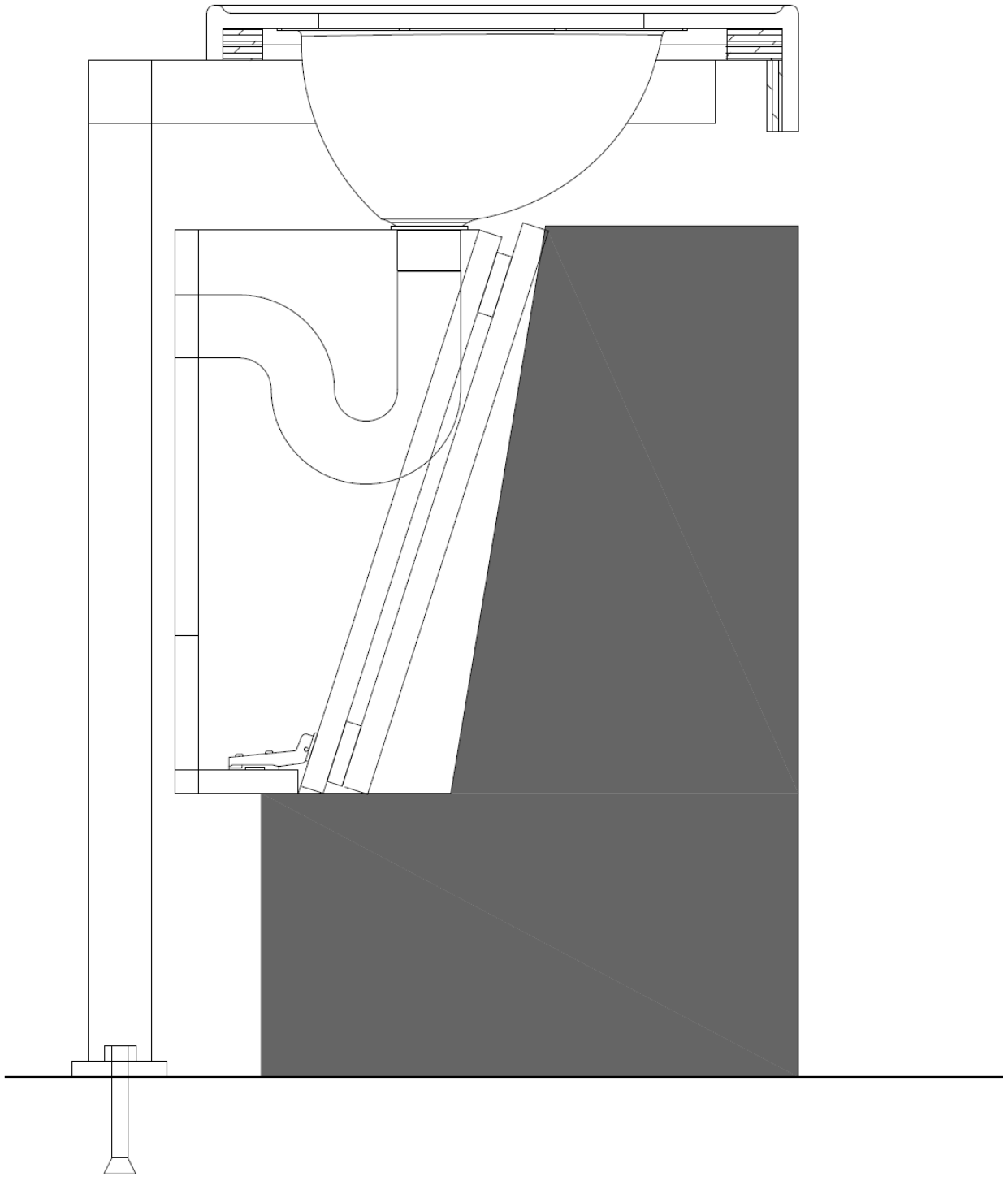
K-2907-4



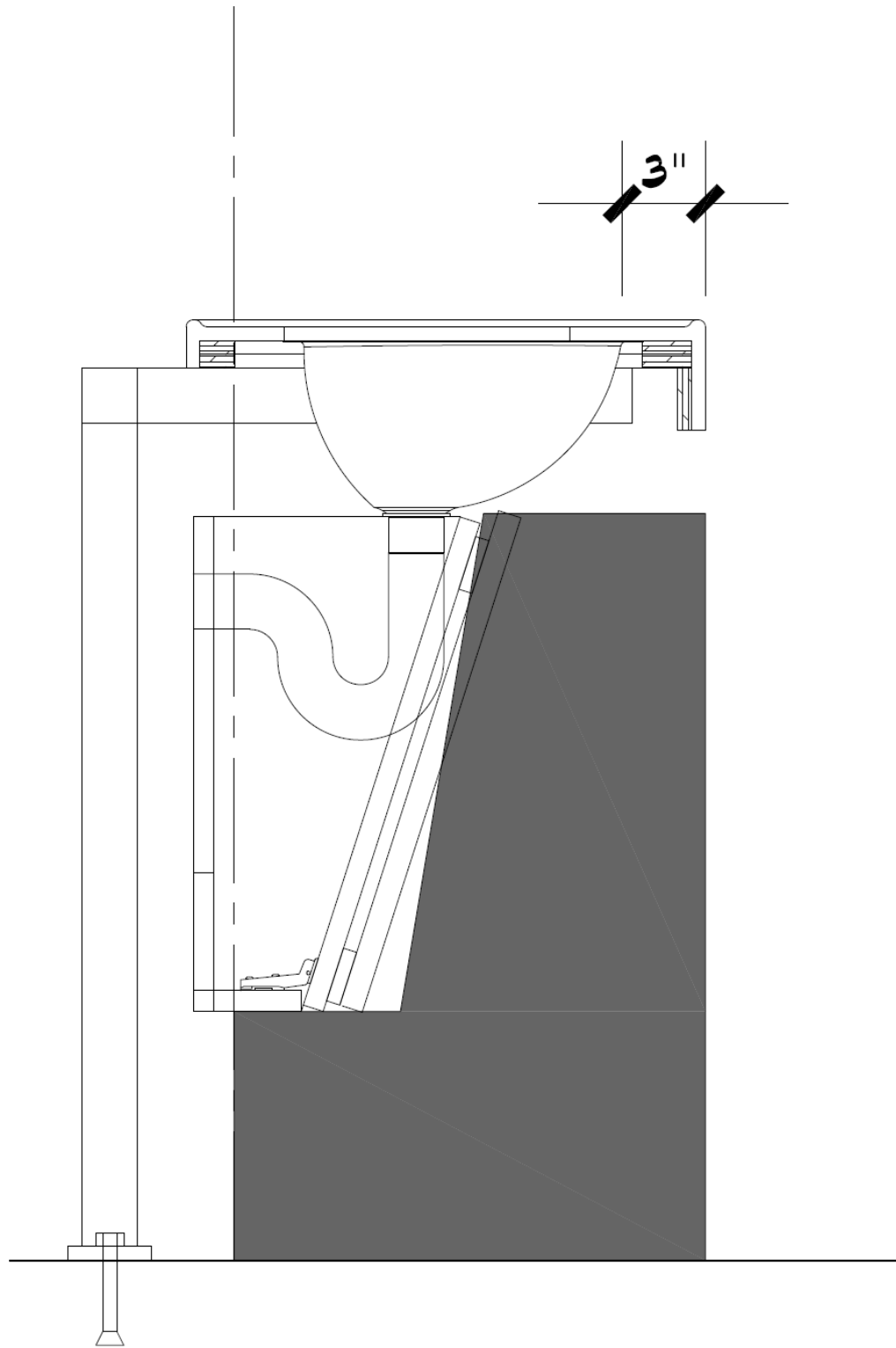
K-2336



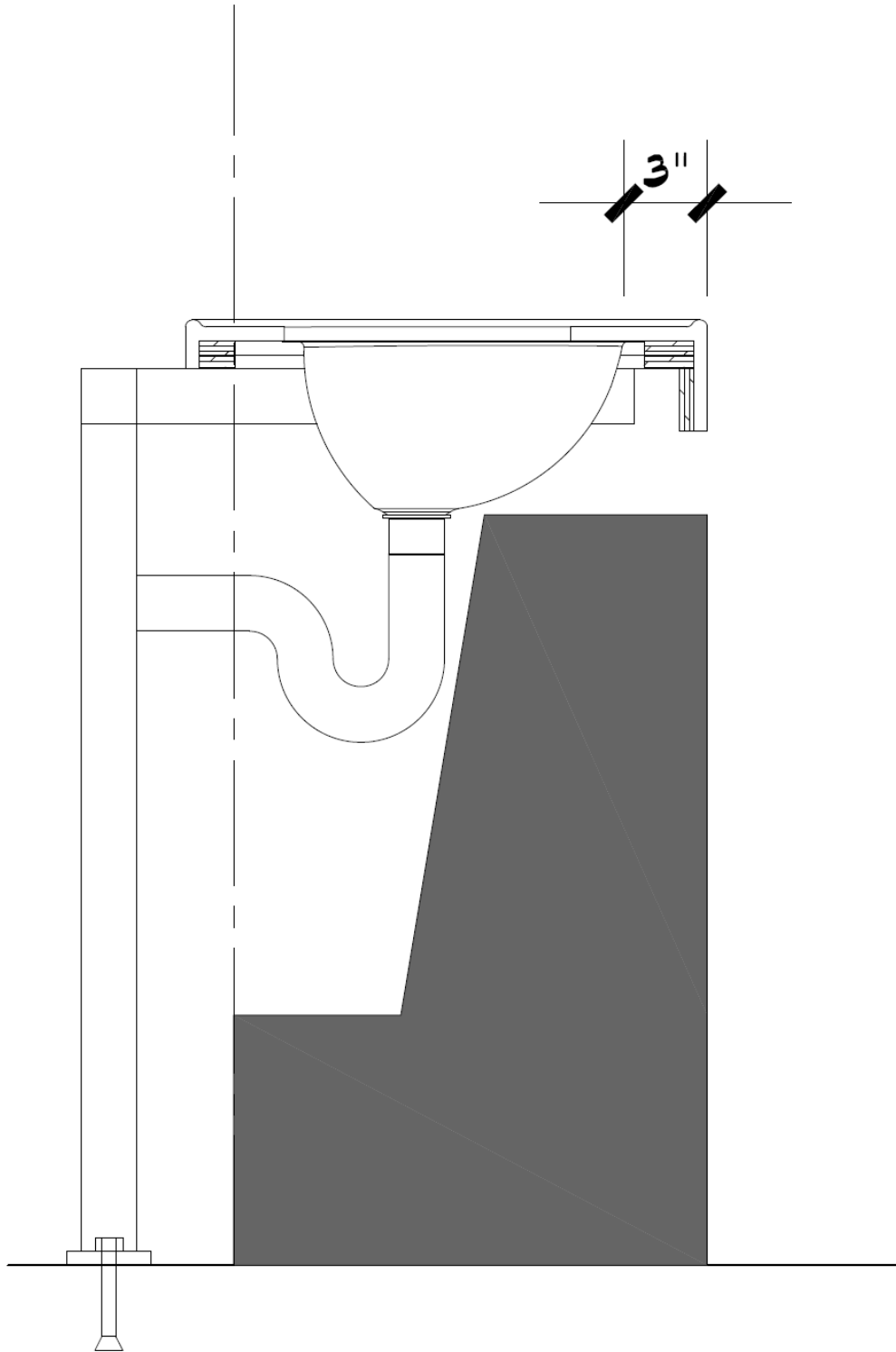
K-221Ø



EXISTING DESIGN



**DESIGN W/ NEW PROPOSED
STANDARD**



**DESIGN W/ NEW PROPOSED STANDARD
(PROTECTIVE SHROUD REMOVED)**

6-37-12 PC2

Kimberly Paarlberg, representing ICC

Delete and substitute as follows:

~~**606.5 Basin Location.** The interior edge of the rim of the lavatory basin shall be located 3 inches (75 mm) maximum from the front edge of the fixture or countertop.~~

1102.11.2.1 Basin Location. The interior edge of the rim of the lavatory basin shall be located 3 inches (75 mm) maximum from the front edge of the fixture or countertop measured at the counter top surface.

Reason: I have checked with some lavatory installers. I have been told that the 3" dimension is not possible to install safely with some undermount lavatories. In addition, the language does not make it clear on how to measure this requirement. If the issue is the ability to brush your teeth, perhaps this would be justifiable in an Accessible hotel room or dorm room bathroom, and is not needed in all public bathrooms as currently indicated – thus the move from 606.5 to 1102.11.2.1.

6-37-12 PC3

Larry Perry, representing self

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

Reason: The added requirement would significantly reduce design options for accessible lavatories. Because of the requirement for knee/toe clearance below accessible lavatories, there The proponent selected a 3" distance as it is similar to what would typically be found at a kitchen sink. Equating a kitchen sink (which is typically made of relatively thin steel, and has vertical interior sides) with a lavatory, which typically is porcelain or other thicker material and has a rounded profile is not appropriate.

This requirement could result in accessible lavatories that would provide a shallow edge where it wouldn't be reached by the flow of water from the faucet.

The proposal will result in a large number of commercial and public/common toilet rooms where there would need to be a single separate accessible lavatory that would be rather 'spartan' compared to that provided at other lavatories.

6-46- 12

Revise as follows:

608.2.1.2 Clearance. A clearance of ~~48~~ 52 inches (~~1220~~ 1360 mm) minimum in length measured perpendicular from 12 inches (305 mm) beyond the control seat wall, and 36 inches (915 mm) minimum in depth shall be provided adjacent to the open face of the compartment.

6-46-12 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 Orlovski, representing the National Association of Home Builders; Kim Paarlberg, representing International Code Council

See comment under 3-6-12 PC2

6-46-12 PC2

Kimberly Paarlberg, representing ICC

Further revise as follows:

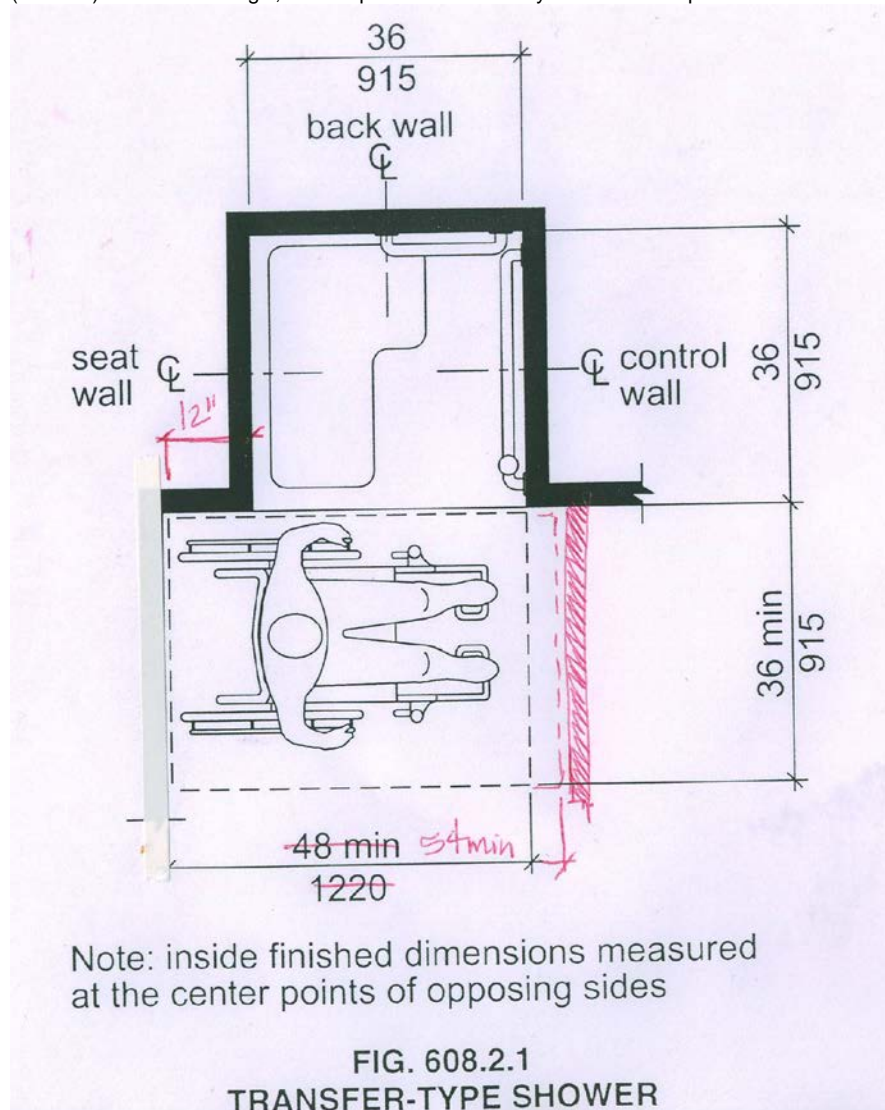
608.2.1.2 Clearance. A clearance of 52 inches (1360 mm) minimum in length measured perpendicular from 42 inches (305 mm) beyond the control seat wall, and 36 inches (915 mm) minimum in depth shall be provided adjacent to the open face of the compartment.

Reason: The increased clear floor space, combined with the change to measure from the seat wall instead of the control wall now prohibits the transfer shower from ever being located in the corner. The shower has to have at least 4" offset (see figure). The study information provided for the increase in clear floor space did not include information on acceptable transfers. The plumbing industry has done these studies. They should be investigated before revising this measurement.

In addition, the transfer location in an alternate roll-in shower does not include the same offset. Therefore, the standard is inconsistent in application.

608.2.3 Alternate Roll-in-Type Shower Compartments. Alternate roll-in-type shower compartments shall comply with Section 608.2.3.

608.2.3.1 Size. Alternate roll-in shower compartments shall have a clear inside dimension of 60 inches (1525 mm) minimum in width, and 36 inches (915 mm) in depth, measured at the center point of opposing sides. An entry 36 inches (915 mm) minimum in width shall be provided at one end of the 60-inch (1525 mm) width of the compartment. A seat wall, 24 inches (610 mm) minimum and 36 inches (915 mm) maximum in length, shall be provided on the entry side of the compartment.



6-46-12 PC3

Larry Perry, representing self

Further revise as follows:

608.2.1.2 Clearance. A clearance of ~~48~~ 52 inches (~~1220~~ 1360 mm) minimum in length measured perpendicular from ~~12 inches (305 mm) beyond the control seat wall~~, and 36 inches (915 mm) minimum in depth shall be provided adjacent to the open face of the compartment.

Reason: If the change to increase the wheelchair clear floor space from 48" to 52" does move forward, the proposed transfer shower language is too complicated and is unclear. If the change survives, the clear floor space should be measured from the control wall, as the current text requires.

As proposed, the text doesn't clearly say that the 12" from the control wall would need to be measured away from the shower compartment.

6-46-12 PC4

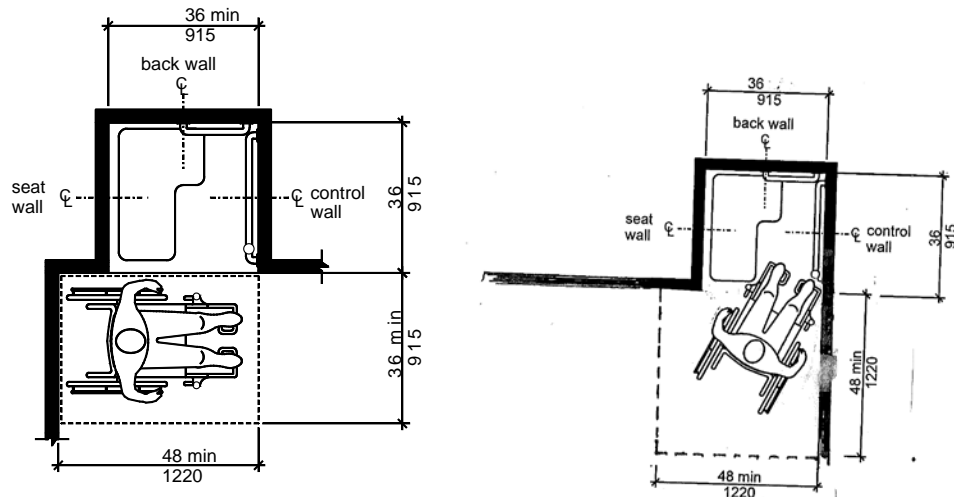
Curt Wiehle, Minnesota Construction Codes and Licensing, representing self

Further revise as follows:

608.2.1.2 Clearance. A clearance of ~~48~~ 52 inches (~~1220~~ 1360 mm) minimum in length measured perpendicular from ~~12 inches (305 mm) beyond the seat the control wall~~, and ~~36~~ 48 inches (~~915~~ 1220 mm) minimum in depth shall be provided adjacent to the open face of the compartment.

Reason: Delete this figure

The existing figure to accompany this provision should be modified because transfers for individuals who are non-weight bearing or non-ambulatory are not linear transfers. The figure implies a transfer position that is non-functional and impossible for non-weight bearing and non-ambulatory individuals to transfer from. This linear figure should not appear anywhere in the standard. Non-weight bearing and non-ambulatory wheelchair users will position the wheelchair anywhere from a 45 degree angle to a 90 degree angle from the shower seat. They will run the front of the wheelchair (feet) into the shower as far as possible and plant their feet and pivot in an arc to the shower seat. Additional floor space beyond the control wall is useless and unnecessary for this type of transfer. To accommodate the larger clear floor space of the wheelchair, additional depth of the clearance is required. This arc type transfer is similar for transferring to any object, water closet, bench, etc.



6-46-12 PC5

Larry Eberly, representing Pennsylvania Builders Association

Disapprove this 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 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.

6-46-12 PC6

Minh V. Vu, representing American Hotel & Lodging Association

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

Reason: See comment 3-6.

6-55 – 12

Please Note: The version of 6-55-12 included in the public review draft was not the final version of 6-55-12 as approved by the committee. The version approved by the committee is a shown in 6-55-12 PC1

6-55-12 as show in public review draft

Revise as follows:

608.3.2 Standard Roll-in-Type Showers. In standard roll-in type showers, a grab bar shall be provided on the back wall beginning at the edge of the seat. The grab bars shall not be provided above the seat. The back wall grab bar shall extend the length of the wall to within 6 inches (150 mm) of the side wall but shall not be required to exceed 48 inches (1220 mm) in length. Where a side wall is provided opposite the seat within 72 inches (1830 mm) of the seat wall, a grab bar shall be provided on the side wall opposite the seat. The side wall grab bar shall extend the length of the wall but shall not be required to exceed 30 inches (760 mm) in length. Grab bars on the side wall shall be 6 inches (150 mm) maximum from the adjacent back wall.

6-55-12 PC1

Kim Paarlberg, representing ICC

Please note: The following reflects the version of 6-55-12 that was approved by the Committee.

608.3.2 Standard Roll-in-Type Showers. Grab bars in standard roll-in showers shall comply with Section 608.3.2.

608.3.2.1 Back wall grab bar. In standard roll-in type showers, a grab bar shall be provided on the back wall beginning at the edge of the seat. The grab bars shall not be provided above the seat. The back wall grab bar shall extend the length of the wall and extend within 6 inches (150 mm) maximum from the adjacent side wall opposite the seat.

Exceptions:

1. The back wall grab bar but shall not be required to exceed 48 inches (1220 mm) in length.
2. The back wall grab bar is not required to extend within 6 inches (150 mm) of the adjacent side wall opposite the seat if it would require the grab bar length to exceed 48 inches (1220 mm) in length.

608.3.2.2 Side wall grab bars. Where a side wall is provided opposite the seat within 72 inches (1830 mm) of the seat wall, a grab bar shall be provided on the side wall opposite the seat. The side wall grab bar shall extend the length of the wall and extend within 6 inches (150 mm) maximum from the adjacent back wall.

Exception: The side wall grab bar but shall not be required to exceed 30 inches (760 mm) in length. Grab bars shall be 6 inches (150 mm) maximum from the adjacent wall.

6-55-12 PC2

Brad Gaskins, representing self

Further revise as follows:

608.3.2.2 Side wall grab bars. Where a side wall is provided opposite the seat within 72 inches (1830 mm) of the seat wall, a grab bar shall be provided on the side wall opposite the seat. The side wall grab bar shall extend the length of the wall and extend within 6 inches (150 mm) maximum from the adjacent back wall.

Exception Exceptions:

1. _____ The side wall grab bar shall not be required to exceed 30 inches (760 mm) in length.
2. The side wall grab bar shall not be required to extend closer than 2 inches (50 mm) from the front edge of the shower.

(portions of proposal not shown remain unchanged)

Reason: This change is for constructability. As the section is currently worded the grab bar could be forced to the absolute edge of the wall.

6-55-12 PC3

Curt Wiehle, Minnesota Construction Codes and Licensing, representing self

Further revise as follows:

608.3.2.1 Back wall grab bar. In standard roll-in type showers, a grab bar shall be provided on the back wall beginning at the edge of the seat. The grab bars shall not be provided above the seat. The back

wall grab bar shall extend the length of the wall and extend within 6 inches (150 mm) maximum from the adjacent side wall opposite the seat.

Exceptions:

1. The back wall grab bar ~~but~~ shall not be required to exceed 48 inches (1220 mm) in length.
2. ~~The back wall grab bar is not required to extend within 6 inches (150 mm) of the adjacent side wall opposite the seat if it would require the grab bar length to exceed 48 inches (1220 mm) in length.~~

Reason: The first exception already limits the length of the bar to 48 inches. Exception 2 is redundant.
