

## Comments for 2017 A117.1 draft for Final Resolution

42 ballots were returned. One ballot was abstain. The remainder were approve all committee actions with the following exceptions.

Comments were received on E-01(3), E-11, 3-04, 3-09(2), 4-19, 4-24, 5-10, 5-13 (2, 1 editorial), 5-18, 5-24, 6-05, 6-07, 6-11, 6-25 (editorial), 6-28, 6-32, 06-40, 06-84, 7-08, 7-19, 9-05.

Editorial comments were sent to the Editorial work group and are not shown.

At this time, further technical changes are not permitted. Option are to 1) keep the text as approved; 2) strictly editorial clean up; or 3) return back to the 2017 A117.1 text and work on the item next cycle.

Staff has not made a determination as to if the comments are editorial or technical. Please make sure that you look at staff notes where provided at the end of a comment. Information there is relevant to the comment.

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### EDITORIAL

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#### **E-01-23**

**Committee action:** *Approved as Submitted*

**Committee action Final ballot:** *Approved as Submitted (no change)*

**Approved text:**

#### **06-61-21 AM/AM BC1 mod, BC3. PC1; E-01-2023 AM**

**608.2.2.3 Seat.** A seat complying with Section 610 shall be provided that can be secured at varying distances from the control wall. At least one of the positions will locate the back of the seat 35 inches (889 mm) minimum and 37 inches (940 mm) maximum from the control wall.

**Exception:** A seat is not required to be installed in a shower for a single occupant accessed only through a private office and not for common use or public use, provided reinforcement has been installed in walls and located so as to permit the installation of a shower seat.

**Commenter:** Dain, AIA

**Vote:** Negative

**Proposed resolution:** Need a figure, how do you locate the back of the seat 35-37" from the control wall. The control wall is the entire back wall of the shower. Is this text intended to locate the seat from the centerline of the controls?

**Staff Note:** Section 608.2.2 is the Alternate transfer shower compartment. Per Section 608.4.2, the control wall is the side wall, not the rear wall.

**Committee Vote:**

- Agree with the current committee action
- Agree with the comment
- Abstain

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## **E-01-23**

**Committee action:** *Approved as Submitted*

**Committee action Final ballot:** *Approved as Submitted (no change)*

**Approved text:**

### **E-01-2023 AM**

**404.2.2 Clear opening width.** Doorways shall have a clear opening width of 32 inches (815 mm) minimum. Clear opening width of doorways with swinging doors shall be measured between the face of door and stop, with the door open 90 degrees. Openings more than 24 inches (610 mm) in depth at doors and doorways without doors shall provide a clear opening width of 36 inches (915 mm) minimum. There shall be no projections into the clear opening width lower than 34 inches (865 mm) above the floor. Projections 34 inches (865 mm) minimum and 80 inches (2030 mm) maximum into the clear opening width above the floor shall not exceed 4 inches (100 mm).

**Exceptions:**

1. Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the floor.
2. In alterations, a projection of 5/8 inch (15.9 mm) maximum into the required clear opening width shall be permitted for the latch side stop.

**Commenter:** Roeper, BHMA

**Vote:** Negative

**Proposed resolution:** As modified, the language is not correct. “Projections 34 inches minimum and 80 inches maximum into the clear width...” describes a 34” to 80” projection, not a vertical location.

Replace the last sentence as follows –

Projections into the clear opening width shall not exceed 4 inches where measured vertically above the floor between 34 inches and 80 inches.

**Staff note:** The editorial work group is proposing to revise the last sentence as follows:

Projections shall not exceed 4 inches (100 mm) into the clear opening width 34 inches (865 mm) minimum and 80 inches (2030 mm) maximum into the clear opening width above the floor shall not exceed 4 inches (100 mm).

**Committee Vote:**

Agree with the current committee action  
 Agree with the comment  
 Abstain

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**E-01-23**

**Committee action:** *Approved as Submitted*

**Committee action Final ballot:** *Approved as Submitted (no change)*

**Approved text:**

**03-09-2021 AM/AFM BC5 & PC3; E-01-2023 AM; E8-2024 AS**

**307.4 Headroom clearance.** Headroom clearance shall be 80 inches (2030 mm) high minimum. Rails or other barriers shall be provided where the headroom clearance is less than 80 inches (2030 mm) high. The leading edge of such rails or barrier shall be located 10 inches (255 mm) minimum and 27 inches (685 mm) maximum above the floor.

**Exception:** Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the floor.

**E-01-2023 AM**

**404.2.2 Clear opening width.** Doorways shall have a clear opening width of 32 inches (815 mm) minimum. Clear opening width of doorways with swinging doors shall be measured between the face of door and stop, with the door open 90 degrees. Openings more than 24 inches (610 mm) in depth at doors and doorways without doors shall provide a clear opening width of 36 inches (915 mm) minimum. There shall be no projections into the clear opening width lower than 34 inches (865 mm) above the floor. Projections 34 inches (865 mm) minimum and 80 inches (2030 mm) maximum into the clear opening width above the floor shall not exceed 4 inches (100 mm).

**Exceptions:**

1. Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the floor.
2. In alterations, a projection of 5/8 inch (15.9 mm) maximum into the required clear opening width shall be permitted for the latch side stop.

**E-01-2023 AM**

**602.2.5 Water flow.** The spout shall provide a flow of water 4 inches (100 mm) minimum in height. The angle of the water stream from spouts within 3 inches (75 mm) of the front of the drinking fountain shall be 30 degrees maximum, and 3 inches (75 mm) minimum and 5 inches (125 mm) maximum spouts to the front of the drinking fountain shall be 15 degrees maximum, measured horizontally relative to the front face of the drinking fountain.

**06-61-21 AM/AM BC1 mod, BC3. PC1; E-01-2023 AM**

**608.2.2.3 Seat.** A seat complying with Section 610 shall be provided that can be secured at varying distances from the control wall. At least one of the positions will locate the back of the seat 35 inches (889 mm) minimum and 37 inches (940 mm) maximum from the control wall.

**Exception:** A seat is not required to be installed in a shower for a single occupant accessed only through a private office and not for *common use* or public use, provided reinforcement has been installed in walls and located so as to permit the installation of a shower seat.

**Commenter:** Gilliland, WABO

**Vote:** Affirmative

**Proposed resolution:** Inconsistent description of ranges in proposals Leave the word "between" and eliminate min and max in other code change proposals. Not consistent through out this ballot.

**307.4 Headroom clearance.** Headroom clearance shall be 80 inches (2030 mm) high minimum. Rails or other barriers shall be provided where the headroom clearance is less than 80 inches (2030 mm) high. The leading edge of such rails or barrier shall be located between 10 inches (255 mm) ~~minimum~~ and 27 inches (685 mm) ~~maximum~~ above the floor.

**404.2.2 Clear opening width.** Doorways shall have a clear opening width of 32 inches (815 mm) minimum. Clear opening width of doorways with swinging doors shall be measured between the face of door and stop, with the door open 90 degrees. Openings more than 24 inches (610 mm) in depth at doors and doorways without doors shall provide a clear opening width of 36 inches (915 mm) minimum. There shall be no projections into the clear opening width lower than 34 inches (865 mm) above the floor. Projections between 34 inches (865 mm) ~~minimum~~ and 80 inches (2030 mm) ~~maximum~~ into the clear opening width above the floor shall not exceed 4 inches (100 mm).

**Exceptions:**

1. Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the floor.
2. In alterations, a projection of 5/8 inch (15.9 mm) maximum into the required clear opening width shall be permitted for the latch side stop.

**602.2.5 Water flow.** The spout shall provide a flow of water 4 inches (100 mm) minimum in height. The angle of the water stream from spouts within 3 inches (75 mm) of the front of the drinking fountain shall be 30 degrees maximum, and from spouts between 3 inches (75 mm) ~~minimum~~ and 5 inches (125 mm) ~~maximum from spouts to~~ the front of the drinking fountain shall be 15 degrees maximum, measured horizontally relative to the front face of the drinking fountain.

**608.2.2.3 Seat.** A seat complying with Section 610 shall be provided that can be secured at varying distances from the control wall. At least one of the positions will locate the back of the seat between 35 and inches (889 mm) ~~minimum~~ and 37 inches (940 mm) ~~maximum~~ from the control wall.

**Exception:** A seat is not required to be installed in a shower for a single occupant accessed only through a private office and not for common use or public use, provided reinforcement has been installed in walls and located so as to permit the installation of a shower seat.

**Staff note:** E1 removed 'between' in section 307.4, 404.2.2, 602.2.5, 602.3.4, 608.2.2.3. A list of other sections this should include for ranges was not indicated.

**Committee Vote:**

- Agree with the current committee action
- Agree with the comment
- Abstain

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## E-11-23

**Committee action: Approved as Submitted**

**Committee action Final ballot: As modified by 2nd Ballot Comment 1**

**Approved text:**

**301.2 Building blocks.** The *building blocks*, where required by this standard, shall comply with the following:

1. *Floor surfaces* shall comply with Section 302.
2. Changes in level in *floor surfaces* shall comply with Section 303.
3. *Turning spaces* shall comply with Section 304.
4. *Clear floor spaces* shall comply with Section 305.
5. *Knee and toe clearance* shall comply with Section 306
6. *Protruding objects* on *circulation paths* shall comply with Section 307.
7. *Reach ranges* shall comply with Section 308.
8. *Operable parts* shall comply with Section 309.

**Commenter:** Gilliland, WABO

**Vote:** Affirmative

**Proposed resolution:** Why are maneuvering clearances not a building block. Is this a oversight. Add the words building block to 301.1 and defined term maneuvering clearance.

**Staff note:** E11 is about using the defined terms for building blocks in Chapter 3 throughout the standard. Maneuvering clearance is a defined term. This is not a 'building block' since it is not an item specifically address in Chapter 3, but is specific for each element.

**maneuvering clearance:** The minimum space for a person using a wheelchair or other mobility device to access an *accessible element*.

**Committee Vote:**

- Agree with the current committee action
- Agree with the comment
- Abstain

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## CHAPTER 3 BUILDING BLOCKS

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### **3-09-2021– see 9-6-22 ballot**

**Committee action 1st ballot:** *Approved as Modified*

**Committee action 2<sup>nd</sup> ballot:** *Approval as further modified by Ballot Comment 5 and Public Comment 3 (See E-01)*

**Committee action Final ballot:** *Approval as further modified by 1<sup>st</sup> Ballot Comment 5 and Public Comment 3 (See E-01) (no change)*

**Approved text:**

### **03-09-2021 AM/AFM BC5 & PC3; E-01-2023 AM; E8-2024 AS**

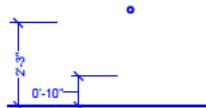
**307.4 Headroom clearance.** Headroom clearance shall be 80 inches (2030 mm) minimum in height. Rails or other barriers shall be provided where the headroom clearance is less than 80 inches (2030 mm) high. The leading edge of such rails or barrier shall be located 10 inches (255 mm) minimum and 27 inches (685 mm) maximum above the floor.

**Exception:** Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the floor.

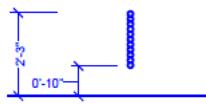
**Commenter:** Dain, AIA

**Vote:** Affirmative

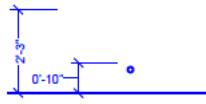
**Proposed resolution:** Agree with new min. of 10". It's important everyone understands that this requires a portion of the leading edge to be located 10 inches minimum and 27 inches maximum above the floor, which means you can also have a portion of the leading edge above or below (wall, bench, platform) but a portion of it must be detected in this range. This may need a new figure(s) to indicate the acceptable conditions.



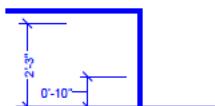
Rail above 27"



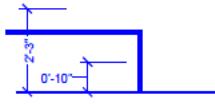
Rail at or  
between 10''  
and 27"



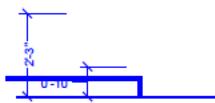
Rail below 10"



Platform  
above 27"



Platform b/w  
10" and 27"



Platform  
below 10"

#### Committee Vote:

Agree with the current committee action  
 Agree with the comment  
 Abstain

#### 3-09-2021– see 9-6-22 ballot

**Committee action 1<sup>st</sup> ballot:** Approved as Modified

**Committee action 2<sup>nd</sup> ballot:** Approval as further modified by Ballot Comment 5 and Public Comment 3 (See E-01)

**Committee action Final ballot:** Approval as further modified by 1<sup>st</sup> Ballot Comment 5 and Public Comment 3 (See E-01) (no change)

#### Approved text:

#### 03-09-2021 AM/AFM BC5 & PC3; E-01-2023 AM; E8-2024 AS

**307.4 Headroom clearance.** Headroom clearance shall be 80 inches (2030 mm) minimum in height. Rails or other barriers shall be provided where the headroom clearance is less than 80 inches (2030 mm) high. The leading edge of such rails or barrier shall be located 10 inches (255 mm) minimum and 27 inches (685 mm) maximum above the floor.

**Exception:** Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the floor.

**Commenter:** Paarlberg, ICC

**Vote:** Negative

I am requesting a move back to 2017 language. This needs to be held for next cycle so that this can be addressed in a manner that is more comprehensive.

While I agree the extra height is a good idea for under stairways, making this universally required does not work for many other protruding objects. While this says 'headroom height', this literally applies to anything that is above 27" because if Section 307.2, Protruding objects.

I think any of the following configurations pictured below would stop someone from walking into them, but would not comply with the way we have the new language written. An alternative means would not comply with 10" minimum.

Also, 'headroom' instead of what was 'vertical' is misleading. It seems to only apply to objects above your head, but that is not accurate. This could be read as only applying to something that you could walk under, so what is that limit? And what is the requirement for something detectable between 27" and that height?

This was brought up before, but we were unable to come to a consensus or terminology. I have received many questions on the approved language. User are very confused by what is approved.

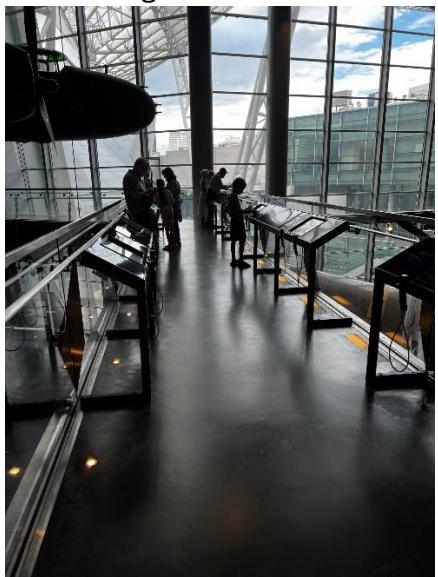
Following are many examples that do work that would not meet the current requirements.



Table at 36" height with 3" high bottom rail.



Beach lifeguard station overhang on beam platform.



Accessible displays with 4" side bottom rails.



Order kiosks with 2" high bottom plates



4" high barriers for truss systems to the side of the circulation path



Garden under stairway

2017 text is as follows:

**307.4 Vertical clearance.** Vertical clearance shall be 80 inches (2030 mm) minimum. Rails or other barriers shall be provided where the vertical clearance is less than 80 inches (2030 mm). The leading edge of such rails or barrier shall be located 27 inches (685 mm) maximum above the floor.

**Exception:** Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the floor.

**Committee Vote:**

- Agree with the current committee action
- Agree with the comment
- Abstain

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## CHAPTER 4 ACCESSIBLE ROUTES

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## 4-19-2021– see 9-6-22 ballot

**Committee action 1<sup>st</sup> ballot:** *Disapproval*

**Committee action 2<sup>nd</sup> ballot:** *Approval as modified by BC1*

**Committee action Final ballot:** *Disapproval*

**Approved text:**

### 04-19-21 D/AM BC1/D

**405.1 General.** Ramps along accessible routes shall comply with Section 405.

**Exception:** In assembly areas, aisle ramps adjacent to seating and not serving elements required to be on an accessible route shall not be required to comply with Section 405.

**Commenter:** Anderson, AHLA

**Vote:** Abstain

**Proposed resolution:** This issue requires resolution in the future even though we were unable to find the correct solution this cycle.

This needs to be revised in the next cycle. It would be nice to include this as a reserved line item in the exceptions.

**Staff Note:** This comment was disapproved, approved, and then disapproved. The original proposal for 04-19 was as follows:

**405.1 General.** Ramps along accessible routes shall comply with Section 405.

**EXCEPTIONS:**

1. In assembly areas, aisle ramps adjacent to seating and not serving elements required to be on an accessible route shall not be required to comply with Section 405.
2. Exterior sidewalks that connect elements on a site and that are a minimum of 48 inches wide and slope with grade are not required to comply with Section 405.

The comment approved in the 2<sup>nd</sup> round:

**405.1 General.** Ramps along accessible routes shall comply with Section 405.

**Exception Exceptions:**

1. In assembly areas, aisle ramps adjacent to seating and not serving elements required to be on an accessible route shall not be required to comply with Section 405.
2. Exterior sidewalks that connect elements on a site and that are 48 inches (1220 mm) minimum in width and slope with grade of an existing road or street are not required to comply with Section 405.

**Committee Vote:**

Agree with the current committee action

Agree with the comment

Abstain

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#### **4-24-2021 see 9-6-22 ballot**

Committee action 1st ballot: Approved as Submitted

Committee action 2nd ballot: Approved as Submitted by committee action

Committee action Final ballot: Approved as modified by 2nd ballot comment 1 and 2

#### **Approved text:**

#### **04-24-2021 AS, E4-2023 AS**

**407.2.3.4 Audio output.** Upon activation of the accessibility function button, the audio output shall provide verbal announcements of operating instructions and information such as, user input confirmation, announcement of the elevator assignment designation, direction to the assigned elevator and, where applicable, error messages. Audio output shall be recorded, digitized human, or synthesized speech and shall be delivered through a loudspeaker. Auditory volume, measured 35 inches (890 mm) in front of the console, shall be maintained at a minimum of 10 dBA above ambient. The volume shall not exceed 80 dBA.

#### **04-24-2021 AS/AS 2-BC1 and AS 2-BC2**

**407.2.4.4.1 Verbal Announcement.** When the accessibility function button is pressed, verbal announcements such as the car designation shall be provided at the elevator car entrance upon arrival. Audio output shall be recorded digitized human or synthesized speech and shall be delivered through a loudspeaker. The verbal annunciator shall have a frequency of 300 Hz minimum and 3000 Hz maximum. Auditory volume, measured 35 inches (890 mm) in front of the elevator entrance and at 48 inches (1220 mm) above the floor, shall be maintained at a minimum of 10 dBA above ambient. The volume shall not exceed 80 dBA.

**Commenter:** Gilliland, WABO

**Vote:** Affirmative with comment

**Proposed resolution:** May not be descriptive enough.

Add 'sound' after 'ambient'.

**Staff note:** It was not clear which section the proponent was concerned about. This is the text associated with 04-24. Ambient appears in the standard 11 times.

#### **Committee Vote:**

Agree with the current committee action

Agree with the comment

Abstain

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## CHAPTER 5 GENERAL SITE AND BUILDING ELEMENTS

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### 5-08-2021- see 9-6-22 ballot

**Committee action 1st ballot:** Approved as Submitted

**Committee action 2<sup>nd</sup> ballot:** Approval as modified by public comment 1

**Committee action Final ballot:** Approval as modified by 1<sup>st</sup> ballot public comment 1; 2<sup>nd</sup> ballot comments 1 and 2

#### Approved text:

**05-08-2021 AS/AM PC1; AS 2-BC1 & 2-BC2** editorial coordination with definitions; E11 coordination

**503.1.4.5 Floor surfaces.** *EV charging spaces* and access aisles shall comply with *floor surfaces* and shall not have surface slopes steeper than one unit vertical in 48 inches horizontal (2 percent slope) measured along their length and width. Access aisles shall be at the same level as the *EV charging spaces* they serve.

**Commenter:** Hall, ASID

**Vote:** Affirmative

#### Proposed resolution:

Wording placement in the first line of the first sentence is incorrect.

Have first sentence read as follows:

**503.1.4.5 Floor Surfaces.** *EV charging spaces* and access aisles shall comply with *floor surfaces* and shall not have surface slopes steeper than one unit vertical in 48 inches horizontal (2 percent slope) measured along their length and width."

**Staff note:** I am not seeing any difference between the comment and what is in the draft.

#### Committee Vote:

- Agree with the current committee action
- Agree with the comment
- Abstain

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### 5-10-2021- see 9-6-22 ballot

**Committee action 1st ballot:** Approved as Modified

**Committee action 2<sup>nd</sup> ballot:** Approved as further Modified by public comments 1, 2 and 3

**Committee action Final ballot:** Approved as further Modified by 1st ballot public comments 1, 2 and 3 (no change)

#### Approved text:

## 05-10-2021 AM/AFM PC2

**landing:** That portion of a walking surface required for direct access to or from, an adjacent stair, flight of stairs, ramp run, or elevator.

**Commenter:** Gilliland, WABO

**Vote:** Affirmative with comment

**Proposed resolution:** Floors can be landings and this is not included in definition of landing. Look at next cycle.

### **Committee Vote:**

- Agree with the current committee action
- Agree with the comment
- Abstain

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## 5-13-2021– see 7-31-23 ballot

**Committee action 1st ballot:** *Disapproval*

**Committee action 2<sup>nd</sup> ballot:** *Approved as Modified by public comments 2, 4, 5, 6 and 7*

**Committee action Final ballot:** *Approved as Modified by public comments 2, 4, 5, 6 and 7 (no change)*

### **Approved text:**

**505.10 Visual contrast marking.** Visual contrast markings shall comply with either 1 or 2:

1. The leading 1 to 2 inches (25 to 51 mm) of every tread and *landing*, measured horizontally from the leading edge of the *nosing*, shall consist of a solid color contrasting marking complying with Section 505.10.1. The visual contrast marking shall be uniform at each tread and *landing*, and consistent throughout the *stairway*. The contrasting marking shall be durable and shall extend from one side of each tread to the other side of each tread.
2. Distinctive warning markings including, but not limited to, photoluminescent markings as approved by the *administrative authority*.

**505.10.1 Contrast.** The percentage of visual contrast between the marking and its background shall be 65% minimum as determined by the following equation:

$$\text{Contrast} = [(B1 - B2)/B1] \times 100$$

where B1 = *light reflectance value (LRV)* of the *light* surface; and  
B2 = *light reflectance value (LRV)* of the *dark* surface.

**Exceptions:** The following shall be permitted to have markings that have a contrast of dark-on-light or light-on-dark from its background:

1. Exterior *stairways*.
2. *Stairways* where the *LRV* of a background material cannot be accurately measured, including, but not limited to a naturally variegated material.

**505.10.1.1 Compliance.** Compliance with Section 505.10.1 shall be determined by at least one of the following:

1. Documentation provided by the *stair* manufacturer or builder.
2. Documentation of compliance by a testing agency.
3. Field measurement.

**Commenter:** Anderson, AHLA

**Vote:** Abstain

**Proposed resolution:** I felt the committee did not achieve the level of support necessary for this type of change.

This requires revisions in the next version of the standard.

**Committee Vote:**

Agree with the current committee action  
 Agree with the comment  
 Abstain

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#### 5-18-2021 - see 9-6-22 ballot

**Committee action 1st ballot:** *Approved as Submitted*

**Committee action 2<sup>nd</sup> ballot:** *Disapproval*

**Committee action Final ballot:** *Disapproval (no change)*

**Approved text:**

**506.5 Clearance.** Clearance between handrail gripping surface and adjacent surfaces shall be 1<sup>1/2</sup> inches (38 mm) minimum.

**Commenter:** Dain, AIA

**Vote:** Negative

**Proposed resolution:**

If this language below is what is approved then it is not clear what the inside face is referring to. Which side of the handrail is the inside face?

Language to remain as is in 2017.

**Staff note:** This proposal was disapproved. There were no successful changes to this section. The proposed language was not added to the standard. The proposal read as follows:

**505.5 Clearance.** Clearance between handrail gripping surface and adjacent surfaces shall be 1 1/2 inches (38 mm) minimum. The space between the handrail and projecting objects above the handrail shall be 18 inches (455 mm) minimum. A projecting object shall not project further than the inside face of the handrail.

No action is required on this item.

**Committee Vote:**

- Agree with the current committee action
- Agree with the comment
- Abstain

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**5-24-2021 - see 9-6-22 ballot**

**Committee action 1st ballot:** *Approved as Submitted*

**Committee action 2<sup>nd</sup> ballot:** *Approved as Submitted*

**Committee action Final ballot:** *Approved as Submitted (no change)*

**Approved text:**

**508.1 General.** Where accessible routes pass through parking *facilities*, they shall be physically protected from vehicular traffic.

**Exceptions:**

1. Accessible routes crossing drive aisles shall not be required to comply with Section 508.
2. Accessible routes only from parking spaces complying with Section 502 and passenger loading zones complying with Section 503 to accessible entrances shall not be required to comply with Section 508.

**Commenter:** Anderson, AHLA

**Vote** Abstain

**Proposed resolution:** Language still falls short of providing specific guidance needed by designers to reasonably assure compliance with this requirement.

The requires additional work in the next version of the Standard.

**Staff note:** The change was in the first sentence – “separated” to “protected”.

**Committee Vote:**

- Agree with the current committee action
- Agree with the comment
- Abstain

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## CHAPTER 6 PLUMBING ELEMENTS AND FACILITIES

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### 6-05-2021- see 9-6-22 ballot

**Committee action 1st ballot:** *Approved as Submitted*

**Committee action 2<sup>nd</sup> ballot:** *Approved as Modified by ballot comments 1*

**Committee action Final ballot:** *Approved as Modified by 1<sup>st</sup> ballot comments 1; 2<sup>nd</sup> ballot comments 1 and 2*

#### Approved text:

**06-05-2021 AS/AM BC1/AS 2-BC1 & 2-BC2; 06-06-2021 AM/D; E7 and E11 coordination**

**603.5 Diaper changing tables.** Diaper changing tables shall comply with *operable parts* and with Section 902. Diaper changing tables shall not be located in wheelchair accessible toilet compartments. Diaper changing tables located in single-user or family or companion toilet rooms-shall not overlap the *maneuvering clearance* around the water closet or the accessible route to the transfer space when in the useable position.

#### Exceptions:

1. Self-closing diaper changing tables shall be permitted to be measured in the stowed position.
2. In alterations diaper changing tables shall be permitted outside the maneuvering clearance around the water closet in wheelchair accessible toilet compartments.

**Commenter:** Dain, AIA

**Vote:** Negative

**Proposed resolution:** Too restrictive, result is they will not be provided.

Keep existing A117.1-2017 language.

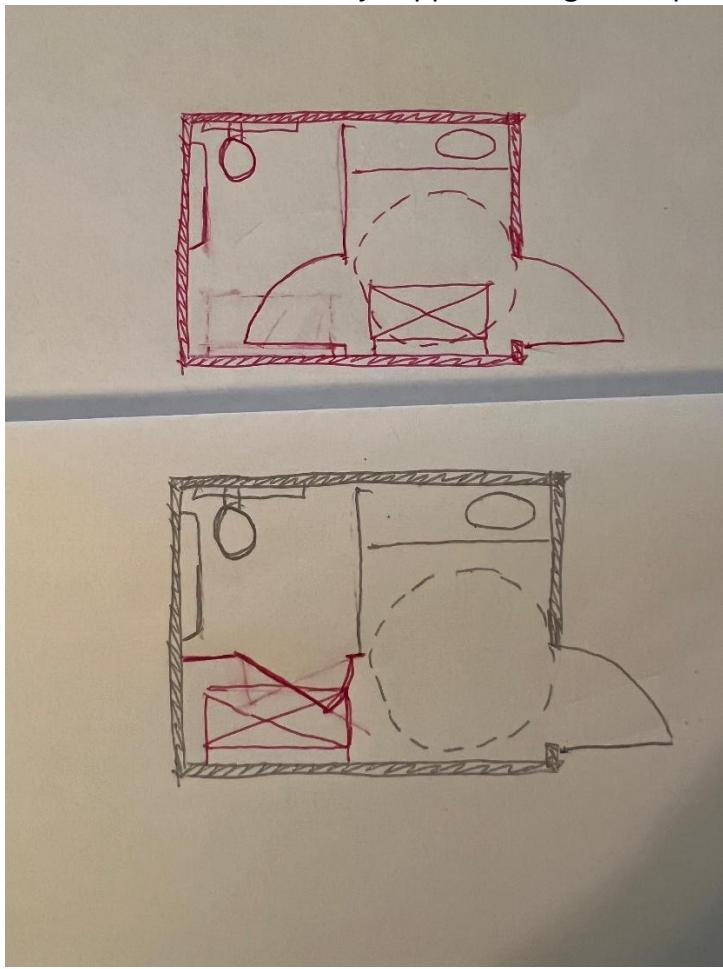
**Commenter:** Paarlberg, ICC

**Vote:** Negative

**Proposed resolution:** The issue is for the one and two compartment toilet rooms. By forcing the baby changing table out of the accessible compartment into the room it will most likely adversely affect accessibility by either losing the large stall, or obstructing access for everyone. Please revert to the 2017 text so that we can address this more completely next cycle. Below is a picture that was sent to me illustrating the issue in a two compartment toiler room.



This is what will most likely happen in single compartment bathrooms.



Of, if not required, the baby changing station will be removed totally. I found information no the web that only 5 states have laws that require baby changing stations. The A117.1 requires that the same amenities be provided in the men's and women's bathrooms, so this could not even be provided in just one bathroom.

2017 A117.1 text is as follows:

**603.5 Diaper changing tables.** Diaper changing tables shall comply with *operable parts* and Section 902.

**Staff note:** Diaper changing tables are not permitted to overlap the water closet clearances in a compartment or in a toilet room per Section 604.3.3.

**Committee Vote:**

- Agree with the current committee action
- Agree with the comment
- Abstain

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**6-07-2021- see 9-6-22 ballot**

**Committee action 1st ballot:** *Disapproval*

**Committee action 2<sup>nd</sup> ballot:** *Disapproval*

**Committee action Final ballot:** *Approved as Modified by 2<sup>nd</sup> ballot comment 1*

**Approved text:**

**Proposals 06-07-2021 AS 2-BC1**

**603.6 Operable parts.** *Operable parts* on at least one towel dispensers and hand dryers serving lavatories complying with Section 606 shall comply with Table 603.6. At least one towel dispenser and one hand dryers serving the required accessible lavatory shall comply with *operable parts*.

**Commenter:** Dain, AIA

**Vote:** Affirmative

**Proposed resolution:**

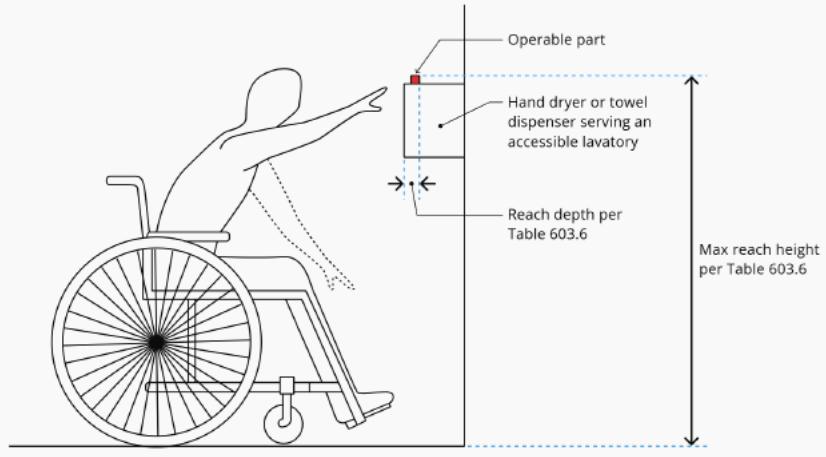
Agree with mod I suppose, but we're typically not providing a mix of PT or HD units with different operable part depths. It's typically the same unit in 2 or more locations, but the reason statements are maybe misinterpreting this table. Is the reach depth the operable part on the unit itself or the reach depth over a counter. If it is supposed to be indicating the reach depth over a counter than please provide clarification, a figure to assist, and someone tell Upcodes to revise their figure below.

I'm not sure this table is necessary or makes sense on its own, but there needs to be a figure like below to eliminate misinterpretation.

Towel Dispensers and Hand Dryers: Operable Parts

Building Code   Accessibility Code   Access   Construction Docs

MAX REACH DEPTH AND HEIGHT						
Max reach depth	0.5 inch	2 inches	5 inches	6 inches	9 inches	11 inches
Max reach height	48 inches	46 inches	42 inches	40 inches	36 inches	34 inches



**Staff note:** The issue seems to be more with the current text rather than the revised text. The figure is not correct.

Editorial was asked to review this change for clarification. Technically the sentences deal with different requirements. Operable parts on one towel dispenser/hand dryer has to meet the enhanced reach table, and one could meet the standard reach over an obstruction.

**Committee Vote:**

- Agree with the current committee action
- Agree with the comment
- Abstain

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**6-11-2021 – see 3-6-2023 ballot**

**Committee action 1<sup>st</sup> ballot:** *Approved as Submitted*

**Committee action 2<sup>nd</sup> ballot:** *Approved as Modified by ballot comments 1*

**Committee action Final ballot:** *Approved as Modified by 1<sup>st</sup> ballot comments 1; As submitted 2<sup>nd</sup> ballot comments 1*

**Approved text:**

**06-11-2021 AS/AM BC1/AS 2-BC1**

**603.8 Changing space.** Where shower compartments include adjacent space for changing clothes, that include benches, coat hooks or shelves, the changing space serving the accessible shower compartment shall comply with Section 803.

**Commenter:** Dain, AIA

**Vote:** Negative

**Proposed resolution:** Stating that the accessible shower compartment or even the area adjacent to the compartment shall comply with 803 doesn't require you to provide said bench, hook or shelf. Is this trying to be scoping and not just technical, i.e. where provided?

Revise text as follows:

**603.8 Changing space.** Where shower compartments include adjacent changing compartments with elements regulated by this standard space for changing clothes, that include benches, coat hooks or shelves, the changing space serving, the accessible shower shall be provided with an accessible changing compartment with equivalent elements in compliance shall comply with Section 803, as applicable.

**Committee Vote:**

- Agree with the current committee action
- Agree with the comment
- Abstain

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**6-28-2021 – see 3-6-2023 ballot**

**Committee action 1st ballot:** *Disapproval*

**Committee action 2<sup>nd</sup> ballot:** *Approved as Modified by public comment 1*

**Committee action Final ballot:** *Approved as Modified by 1<sup>st</sup> ballot public comment 1 (no change)*

**Approved text:**

**06-28-2021 AS/AMPC1; E10-24 AS**

**604.9.6 Identification.** The wheelchair *accessible* compartment shall be identified with the International Symbol for Accessibility complying with Section 703.6.2.1.

**Commenter:** Dain, AIA

**Vote:** Negative

**Proposed resolution:** Identifying the accessible stalls is simple and long overdue, especially as we will see more unisex group restrooms with full height partitions and a series of doors that all look the same where you can't necessarily identify the stall size or assume which are the accessible or ambulatory compartments.

Original As Submitted.

**604.9.7 Identification.** The wheelchair accessible compartment shall be identified with the International Symbol for Accessibility complying with Section 703.6.3.1.

**Staff note:** The ballot comment agrees with the committee action. No additional action is needed.

**Committee Vote:**

- Agree with the current committee action
- Agree with the comment
- Abstain

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**6-32-2021 – see 3-6-2023 ballot**

**Committee action 1<sup>st</sup> ballot:** *Approved as Submitted*

**Committee action 2<sup>nd</sup> ballot:** *Approved as Modified by 1<sup>st</sup> ballot comment 2 public comment 1*

**Committee action Final ballot:** *Approved as Modified by 1<sup>st</sup> ballot comment 2 public comment 1; As submitted 2<sup>nd</sup> ballot comment 1*

**Approved text:**

**06-32-2021 AS/AFM BC2/AS 2-BC1; 06-34-2021 AM/AFM BC2**

**605.3 Clear floor space.** A clear floor space complying with Section 305.3, positioned for forward approach, shall be provided measured from the front edge of the urinal rim. Where the clear floor space is confined on opposing sides for a depth exceeding 24 inches (610 mm), the clear floor space shall comply with Section 305.7.2.

**Commenter:** Dain, AIA

**Vote:** Negative

**Proposed resolution:** By changing the reference to clear floor space to specifically 305.3 you lose the rest of 305. Urinals section is also missing the reference to 306 which is including in drinking fountains 602.2.1 and sinks and lavs in 606.2. The urinal is allowed and should overlap the clear floor space in the same manner. Trying to set the clear floor space to the urinal lip would allow an obstruction under the urinal.

Restore 2017 language. If you are referencing the entirety of 305 by simply requiring a clear floor space you don't need a special callout to 305.3 and 305.7.2. In doing so you miss 305.2 essentially saying a urinal area can exceed 1:48.

2017 A117.1 reads as follows:

**605.3 Clear floor space.** A clear floor space positioned for forward approach shall be provided.

**Committee Vote:**

- Agree with the current committee action

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Agree with the comment  
 Abstain

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### **6-40-2021 – see 3-6-2023 ballot**

**Committee action 1st ballot:** Approved as Modified

**Committee action 2nd ballot:** Approval as further modified by Ballot comment 3 and Public Comment 1

**Committee action Final ballot:** Approval as further modified by 1st Ballot comment 3 and Public Comment 1; As submitted 2nd ballot comment 2 and 3

#### **Approved text:**

None. The addition of extra toe clearance at bathtub controls was disapproved.

**Commenter:** Pace, HUD

**Vote:** Negative

#### **Proposed resolution:**

HUD supported the addition of the toe clearance whereas the final committee action removed this requirement completely. As such, the Department recommends that the proposal as modified on the 1st and 2nd ballots be reconsidered in the next cycle of the standard's development.

#### **Committee Vote:**

Agree with the current committee action  
 Agree with the comment  
 Abstain

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### **6-84-2021- see 9-6-22 ballot**

**Committee action 1st ballot:** Approved as Submitted

**Committee action 2nd ballot:** Approval as modified by public comment 1 and 2

**Committee action Final ballot:** Approval as modified by public comment 1 and 2; As modified by 2nd ballot comment 1 and 2

#### **Approved text:**

**06-84-2021 AS/PC1 AS, PC2 AM/ 2-BC1 AM, 2-BC2-AM this whole section**

**611.5.3 Maneuvering clearance overlap.** The required maneuvering clearance around the water closet shall be permitted to overlap the water closet, associated grab bars accessible routes, clear floor space or *maneuvering clearance* at other fixtures and the turning space. In addition, paper dispensers, trash receptacles, coat hooks, shelves, and

emergency alert devices shall be permitted to overlap the maneuvering clearance around the water closet. No other fixtures or obstructions shall be located in the required maneuvering clearance around the water closet.

**Exceptions:**

1. Towel bars that meet the strength requirements of Section 609.8 shall be permitted to overlap the maneuvering clearance around the water closet.
2. Floor mounted support posts for swing up grab bars complying with Section 611.5.6.

**Commenter:** Gilliland, WABO

**Vote:** Affirmative with comment

**Proposed resolution:** Some of the terms can be read multiple ways. Example: Trash receptacle: built in or stand alone in a corner: Proposed resolution: add "built in".

**611.5.3 Maneuvering clearance overlap.** The required maneuvering clearance around the water closet shall be permitted to overlap the water closet, associated grab bars accessible routes, clear floor space or *maneuvering clearance* at other fixtures and the turning space. In addition, paper dispensers, built in trash receptacles, coat hooks, shelves, and emergency alert devices shall be permitted to overlap the maneuvering clearance around the water closet. No other fixtures or obstructions shall be located in the required maneuvering clearance around the water closet.

**Exceptions:**

1. Towel bars that meet the strength requirements of Section 609.8 shall be permitted to overlap the maneuvering clearance around the water closet.
2. Floor mounted support posts for swing up grab bars complying with Section 611.5.6.

**Staff note:** This section is assisted toileting. Adult changing tables uses 'waste receptacles', but not built in (06-90). 06-15 added trash receptacles to water closet clearances.

**Committee Vote:**

Agree with the current committee action  
 Agree with the comment  
 Abstain

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## CHAPTER 7 COMMUNICATION ELEMENTS AND FEATURES

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### 7-08-2021– see 7-31-23 ballot

Committee action 1st ballot: *Disapproval*

Committee action 2<sup>nd</sup> ballot: *Approval as modified by public comment 3*

**Committee action Final ballot: Approval as modified by 1<sup>st</sup> ballot public comment 3;  
As modified 2<sup>nd</sup> ballot comment 2**

**Approved text:**

07-08-2021 D/AMPC3/AM 2-BC2

**703.2.10.2 Contrast.** Contrast for signs shall comply with Section 703.2.10.2.1 or 703.2.10.2.2, as applicable.

**703.2.10.2.1 Dark and light signs.** For the following *sign* types, visual *characters* shall contrast with their background, with either *light characters* on a *dark* background, or *dark characters* on a *light* background.

1. Inserts that are placed behind a translucent protective cover or signage graphics applied to the subsurface, also known as the second surface of translucent material.
2. Signage with colors, graphics, and images applied onto the subsurface of transparent or translucent *sign* material.
3. Signage with colors, graphics, and images produced with Cyan Magenta, Yellow, Black (CMYK) or process color printing processes.
4. Maps.
5. Directional signs with color coded information.
6. Signage installed on naturally variegated material.

**703.2.10.2.2 High contrast signs.** Visual *characters* on all other signs shall have high contrast of 65 percent minimum with their background as determined by the following equation:

$$\text{Contrast} = [(B1 - B2)/B1] \times 100$$

where B1 = *light reflectance value (LRV)* of the *light* surface; and

B2 = *light reflectance value (LRV)* of the *dark* surface.

**703.2.10.2.2.1 Compliance.** Compliance with Section 703.2.10.2.2 shall be determined by at least one of the following:

1. Documentation provided by the signage manufacturer based on information from the supplier of the material.
2. Documentation of compliance by a testing agency
3. Field measurement.

**Commenter:** Toji, HLAA

**Vote:** Negative

**Proposed resolution:** I find the division of visual signs into two types to be of no assistance to sign designers or to those who are interested in visual accessibility for signs. Colors used should be measured by the designer for Light Reflectance Value. The minimum standard should be what the blindness community has long requested and what the International Standards Organization has determined, a minimum of 70 percent. The Weber formula can

be used, but must always be accompanied by a requirement for a minimum LRV for the lighter of the two colors. An easy way to determine this is, to merely require a difference of 65 LRV points between the two colors, the color of the characters and that of the background for those characters. The resulting contrast, using the Weber formula, will always be at least 70 percent (rounded up from 69.5 or higher).

Certainly it is helpful to have a definition for light and dark, but many inspectors will not check the definitions. The easiest way is to require the licensed architect or engineer to merely submit the LRV of the two colors used, the character color, and the color of its background, and determine the difference in points.

Using the Weber formula without such a requirement will guarantee such ridiculous color choices as black letters on a dark brown background. Without the requirement, this combination will get a very high score using the Weber formula.

The British Standards Association uses a similar method, and they require that a square of material is measured at a number of points, and the result is then averaged. This accounts for four-color printed signs, variegated materials, etc.

This complicated two-part item to determine sign contrast just adds confusion to one of the most important determining factors for the accessibility of signs for people with low vision. With the increase in the population of elderly people, it is time to stop catering to the wishes of the small number of designers who want subtle differences between the characters and backgrounds of signs, and write a simple and meaningful sign standard for contrast.

Revise as follows:

**703.2.10.2 Contrast.** Contrast for visual signs shall comply with Section 703.2.10.2.1 ~~or 703.2.10.2.2, as applicable.~~

**703.2.10.2.1 Dark and light signs.** ~~For the following sign types, visual characters shall contrast with their background, with either light characters on a dark background, or dark characters on a light background.~~

- ~~1. Inserts that are placed behind a translucent protective cover or signage graphics applied to the subsurface, also known as the second surface of translucent material.~~
- ~~2. Signage with colors, graphics, and images applied onto the subsurface of transparent or translucent sign material.~~
- ~~3. Signage with colors, graphics, and images produced with Cyan Magenta, Yellow, Black (CMYK) or process color printing processes.~~
- ~~4. Maps.~~
- ~~5. Directional signs with color coded information.~~
- ~~6. Signage installed on naturally variegated material.~~

**703.2.10.2.2 703.2.10.2.1** **High contrast signs.** Visual *characters* on all other signs shall have high contrast of 65 70 percent minimum with their background as determined by the following equation:

$$\text{Contrast} = [(B1 - B2)/B1] \times 100$$

where B1 = *light reflectance value (LRV)* of the *light* surface; and

B2 = *light reflectance value (LRV)* of the *dark* surface.

There shall be a difference of 65 points between the two LRVs.

**703.2.10.2.2.1 703.2.10.1.1** **Compliance.** Compliance with Section 703.2.10.2.2 703.2.10.2.1 shall be determined by at least one of the following:

1. Documentation provided by the signage manufacturer based on information from the supplier of the material.
2. Documentation of compliance by a testing agency
3. Field measurement.

**Committee Vote:**

Agree with the current committee action  
 Agree with the comment  
 Abstain

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**7-19-2021 see 7-31-23 ballot**

**Committee action 1st ballot:** Disapproval

**Committee action 2nd ballot:** Approval as modified by ballot comment 2 and public comment 2

**Committee action Final ballot:** Approval as modified by ballot comment 2 and public comment 2; As modified 2nd ballot comment 1

**Approved text:**

**07-19-2024 D/AMBC2 & PC2/AM 2-BC1**

**705.3 Color.** *Detectable warning surfaces* shall be yellow as indicated for Color ID 33538 (Yellow International) of SAE AMS-STD-595A listed in Section 106.2.1 to the maximum extent practicable or other color designated by the administrative authority. Where the color is other than yellow, detectable warning surfaces shall contrast visually with adjacent surfaces, either light-on-dark or dark-on-light.

**Commenter:** Gilliland, WABO

**Vote:** Affirmative with comment

**Proposed resolution:** Don't think "as indicated for" is necessary, Proposed resolution:  
Strike "as indicated for"

**705.3 Color.** *Detectable warning surfaces* shall be yellow ~~as indicated for~~ Color ID 33538 (Yellow International) of SAE AMS-STD-595A listed in Section 106.2.1 to the maximum

extent practicable or other color designated by the administrative authority. Where the color is other than yellow, detectable warning surfaces shall contrast visually with adjacent surfaces, either light-on-dark or dark-on-light.

**Committee Vote:**

- Agree with the current committee action
- Agree with the comment
- Abstain

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## CHAPTER 9 FURNISHINGS AND EQUIPMENT

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**9-05-2021- see 9-6-22 ballot**

**Committee action 1st ballot:** Approved as Submitted

**Committee action 2nd ballot:** Approved as modified by 1st ballot comment 1 with editorial,

As modified public comment 2, As submitted reconsideration public comment 3

**Committee action Final ballot:** Approved as modified by 1st ballot comment 1 with editorial, 2 as modified public comment 2, As submitted reconsideration public comment 3 (no change)

**Approved text:**

09-05-2021 AS

### SECTION 908 TRASH OR LINEN CHUTES

**908.1 General.** Waste, recycling and linen chutes serving are required to be on an *accessible* route and comply with Section 908.

**908.2 Doors.** Doors to rooms that provide access to chutes shall comply with Section 404. Where a corridor door that is not for user passage conceals an access panel for the chute, the door shall comply with Section 404 on the corridor side and, shall have a magnetic hold open that allows for automatic closing upon the detection of smoke.

Figure 908.2 DOOR AND ACCESS PANEL

**908.3 Chute access panels.** Access panels for chutes shall have hardware complying with 404.2.6. The access panel opening forces shall have the minimum opening force allowable by the scoping provisions adopted by the *administrative authority*.

**908.4 Room requirements.** Where there is a room in front of the access panel for waste, recycling or linen chutes, a *turning space* shall be provided in the room and *maneuvering clearances* shall be provided on both sides of the door.

**Commenter:** Gilliland, WABO

**Vote:** Affirmative with comment

**Proposed resolution:** Section should be added after 404.2.6

**Staff Note.** Section 404.2.6 is Door and gate hardware

**Committee Vote:**

Agree with the current committee action

Agree with the comment

Abstain