



## **ICC (ASC A117) CONSENSUS COMMITTEE ON ACCESSIBLE AND USABLE BUILDINGS AND FACILITIES**

**A117.1 Committee Minutes #64  
Thursday, Sept. 26, 2024  
12-4 Eastern**

**Chair:** Ken Schoonover

**Vice-chair:** Gina Hilberry

**Secretariat:** Karl Aittaniemi; kaittaniemi@iccsafe; 888-422-7233, Ext. 4205

Please send requests for accommodations to Karl at least 5 business days before the call.

**Committee members:**

Angeline Aradanas-Hall, ASID, Alternate

Tara Barthelmess, NCOSFM, Principal

Billie Louise (Beezy) Bentzen, AERBVI, Principal

Gene Boecker, NATO alt

Kevin Brinkman, NEII

Wayne Broadfield, Paralyzed Veterans of America- Architecture (Principal)

Kevin Carr, NFPA, principal

Bill Conner ASTC, alternate, voting today

David Cooper, SMA, Principal

Daniel Dain, AIA – Principal

Glenn Dea, International Sign Association, Principal

Tony Gambrell, BHMA, Alternate

Brad Gaskins, NACS, Principal

Alan Gettelman, Individual Member

Jenifer Gilliland WABO, principal

John S. Gonzalez: ICC (Alternate)

Kim Goss, Accessibility Professionals Association, Alternate

Greg Guarnaccia, Illuminating Engineering Society (Principal)

Cody Gunn, TGT, Alternate

Dennis J. Hall, CSI, Principal

Sandy Hanebrink, AOTA Principal

Glenn Hedman, RESNA, Alternate

Gina Hilberry, UCP Principal, Vice-Chair (chair for this meeting)

Matt Lescher, NATO, principal

Carolyn Majowka, VBCOA, Alternate

Debra Martins, US Access Board, Alternate

Marsha Mazz, United Spinal, Principal

Jeffrey Munsterteiger, NAHB, Alternate

Dot Mynahan, NEII Alternate

Kimberly Paarlberg, ICC, Principal

Daniel O’Gorman, ASPE, Principal

Rex Pace, HUD, Principal

Barbara Padilla, AHLA, Alternate  
Jake Pauls, Individual Member  
Kenny Peskin, Int'l Sign Association (Alternate)  
Hope Reed, NMGCD Alternate  
Kurt Roeper – principal Builders Hardware Manufacturers Association  
Ed Roether, Individual Member  
Nathan Roether, United Spinal, Alternate  
Stan Ross NM GCD Principal  
Pam Schooler, PE – NC OSFM (Alternate)  
Josh Schorr, US Access Board, Principal  
Jessica Schrader, SEGD, Principal  
Leslie Shankman-Cohn, ASID, Principal  
Pat Sheehan, ACB, Principal  
Koni Sims, ACB, Alternate  
Sharon Toji, HLAA, Principal  
Dorothy Ally Watts, HLAA Alternate  
Richard Williams, WABO Alternate  
R Duane Wilson, ASTC, Principal  
Scott Windley, HUD, Alternate  
Mary Winkler, ASSP, alternate

**Interested parties:**

Maggie Calkins, PhD, EDAC, FGSA, IDEAS Institute and SAGE  
Alicia Chavez, California Division of the State Architect  
Ronald Crouch, AIA – Moseley Architects  
Thomas Hirsch, FAIA HIRSCH GROUP ARCHITECTURE  
Hoyt Jeter City of Tacoma Principal Engineer  
Tami Kump, AIA, Knothe Bruce Architects  
Larry M Schneider AIA – Individual  
Laurel W. Wright, NCOSFM, Ret.  
Tom Zuzik Jr, Railingcodes.com, representing NOMMA.org (National Ornamental & Miscellaneous Metals Association)

**Logistics**

- 1) Minutes for 9-12-2024, Agenda for 9-26-2024 were approved
- 2) Work groups –
  - Terminology/Editorial – task group approved by consensus vote. Marsha Mazz to chair. Meeting Sept. 7, 21, Oct. 5, 19, Nov. 2, 16, 30, Dec. 14, 2023; Jan. 11, 25, Feb. 8, 22, March 7, 21, April 4, 18, May 2, 16, 30, June 13, 27, July 11, 25, August 8, 22, Sept. 5, 19, Oct. 3, 17, 31, Nov. 14, 2024

**B. Administrative items**

- The revised proposals are available at - [A117.1 Public proposals 2-8-2022](#)
- Information on the meetings and development of the 2023 edition of the standard will be posted at [A117.1 webpage](#)

- Ballots for proposals heard through July 28, 2022 were sent to the committee. Deadline for the ballot was **Sept. 6, 2022.**
- Ballots for proposals heard through January 19, 2023 were sent to the committee. Deadline for the ballot was **March 6, 2023.**
- Ballots for proposals heard through May 11, 2023 and public comment agenda were sent to the committee. Deadline for the ballot was **July 31, 2023.**
- Ballots for 2017 A117.1 supplement for 06-90-2021 were due **Nov. 13, 2023.**
- Meeting dates for the 2024 are: Jan. 4, 18, Feb. 1, 15, 29, March 14, 28, April 11, 25, May 9, 23, June 6, 20, July 18, August 1, 15, 29, Sept. 12, 26, Oct. 10, 24, Nov. 7, 21, Dec. 5, 19, 2024.
- Ballots for comments heard from 9-14-2023 to 9-12-2024 and public comment agenda were sent to the committee. Deadline for ballot 2 is **Nov. 18, 2024.**

### C. ICC A117.1 development procedures –

Review of work plan – next steps including final ballots, public posting, requirements for comments, work on the appendix

- Discussion of topics for the upcoming meetings. We will proceed with review of the appendix while the ballot and public review of the 2<sup>nd</sup> draft is in process.
- Laurel asked scoping for adult changing tables.
- Gina asked for new topics to be submitted so they could be added to the agenda as new proposals for the appendix.
- Ballot information. The deadline will be Nov. 25, 2024. Kim showed the ballot explanation letter, ballot, the committee action report, the clean draft, and the legislative draft were shown to the committee.
- The committee asked that the Laurie Rich work with Pat Sheehan and Koni Simms to improve the accessibility of the documents.
- ICC is working on alternate text for the figure. The editorial committee is working with Kim and the ICC draftsman to update figures in the standard.
- Sharon Toji would like to submit a graphic for signage. Gina asked for figures revisions to be sent to the editorial committee.
- Marsha Mazz explained the editorial committee report. This will be available for committee comment and review once their work is completed.

### D. Review of Proposals:

The Scoping appendix was first discussed by the ICC A117.1 during meetings #32 through 39, May 11, 2023 through August 24, 2023.

The following proposals were discussed during the calls. See the report for any official committee reasons and final actions. Any items remaining on the agenda will roll to the next agenda – this is a running meeting minutes during the discussion of the Appendix.

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## Appendix

### Meeting #32 - 5-11-2023 Meeting

A-01 – The following are discussion points during the meeting –

Discussion of Appendix –

- That the overall goal is to harmonize as much as possible with existing scoping (IBC, ADA Standards, etc.) and not increase existing scoping.
- That the Committee structure may need to be adjusted to achieve efficiency and adequacy of representation by interested parties.
- That the IBC is not the only user of the Standard. Scoping is necessary for the Standard to be adopted by entities that do not use the building codes – such as universities or other non-governmental agencies.
- That this would be duplicative of existing scoping in the IBC and in some state codes and cause confusion for architects, builders, code officials who prefer one set of rules and more work for jurisdictions in their adoption process.
- That it is not known how this would affect HUD’s review for ‘safe harbor’?
- That the proposal may not cover all of the IBC scoping.
- That the proposal would not be adequate solely as a substitute for IBC Chapter 11 because of the interrelationship of accessibility provisions in the other I-Codes.
  
- Maintenance –
  - That there could be a problem with coordination between A117, IBC and ADA over time given the different timing of their revision cycles.
  - That this would substantially increase the work load of the committee and the people who participate in all forums.
  - Whether scoping is necessary in the Standard given the successful treatment of scoping in the IBC.
  - That this committee is the only forum in which people with disabilities have a significant voice and a vote. Advocates generally do not have the resources to participate in the ICC Code Development Process. The industry reps that participate in the IBC Chapter 11 process are largely the same who are members of or participate in this process.

Adoption ordinance –

- Errata for title of ordinance.
- This is a sample adoption ordinance. Scoping is addressed in the new appendix.
- Effective date, if not at time of adoption?

**Item A201.1 –**

- Issue with ‘newly designed’ when it relates to a building code.
  - While under ADA you can submit a complaint on a building that has not been built yet, this should be deleted here.
  - Newly designed is addressed during the review process – so it should stay.

- New construction and existing building scoping is addressed later in the appendix. This could be more generic. It may be sufficient to just say “New construction and alterations”.
- Is this intended to be enforced by the building department? A code official cannot address operational concerns addressed in civil rights laws.
- Look at IBC Section 102.2 Other laws. While this is in the sample ordinance in Item 10, this may be needed in the text.
- Should ‘elements’ be included to address previously constructed items such as signs.

Tabled to continue discussion at the next meeting.

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### **Meeting #33 - 5-25-2023 Meeting**

#### **General concerns –**

- Why do we need to do this if we have a scoping document?
- Could an appendix be just elements that exceeded the IBC and IEBC?
- If a jurisdiction adopts this separately from the building codes, who will be the person enforcing or making interpretations on these requirements.
- Is the intent to say ‘comply if provided’ for everything in the standard, or just what was in the current scoping document?

#### **A201.1 –**

Should the exceptions for the entire standard be located under this section – example A203.1. Dan Buuck to submit modification.

It was requested that a comparison matrix should be provided to the committee for reasoning.

The chair for the working group, Gina Hilberry, stated that the committee started with a matrix, but it was split up and not recombined during the work group development process. There were multiple iterations.

The document does pull criteria from the 2010 ADA Standard, IBC and NFPA 101/5000 as well as new items in the standard.

#### **A201.2 –**

- ‘Assisted use’ is not used in the assisted living provisions. Some additional definitions from IBC are needed to clearly state what assisted living and nursing homes are quantified.
- Exceptions are included in the definitions (e.g. transient lodging). These should be moved to
- Some of the definitions include what something is not, vs. what it is (e.g. transient lodging).
- Additions – an occupied roof is not an addition floor area. Why is a mezzanine not included.
- Occupant load uses ‘means of egress’ which is not defined in the standard.
- Some definitions include technical requirements (e.g. limited access spaces, machinery space) – these need to be removed.

- Alterations – are the exceptions for controls, or just the items hidden in the wall?
- Alterations – is this only for jurisdictions that do not use IBC or as a replacement for IBC Chapter 11? Definitions should correlate with the I-codes as much as possible to reduce conflicts.
- Alterations - This is a substantial expansion. Is this trying to get the exceptions for improvements to the route into the definition.
- The codes may change the definitions – how would we keep up so that we don't create conflicts.
- There are too many laundry lists.
- Definitions are a description of terminology – they should not contain requirements. An alteration would be different for each element (e.g. elevators).
- Alteration – this appears to be trying to match A204.7 – why not address it there instead. Defined term not used in text.
- Mezzanines – this is primarily IBC definitions with the height intended to make it not a raised platform
- Maybe we should come back to the definitions when we are dealing with the topic.
- Entrance –
  - different types of entrances should be grouped in definitions
  - this should include ingress requirements – why not steps included?
  - Is this not address by the three types – public, service, restricted
  - This appears to be describing the accessible route into the building – that would cause confusion with entrance doors
- Clusters – if this is for bathrooms (also sauna and steam rooms), there could be back to back items that are accessed from different tenants. This should be addressed in the exception and the definition removed – or come up with a different approach.
- Change of occupancy is treated the same as an alteration, so this definition should be removed and A204.5 can be revised same as IEBC.
- Change of occupancy – what happens if this changes in the IEBC over time.
- Employee work area is important to the scoping – should it be included in Appendix A? The work group responded that if it was in Section 107.5, it did not need to be repeated.
- Historic Buildings – IEBC has moved this definition forward. This needs to be updated. However, this will be a continuing issue with liability and cost concerns.
- Limited access space – the exception is in A202.2.3 General exception, not in a definition. Delete
- Machinery space - the exception should be in A202.2.4 General exception, not in a definition. Delete
- Public use areas
  - – ‘elements’ is confusing. How is this used in the text. Gene said this came from the 2010 standard.
  - Is ‘exterior room’ accessed from the outside or is it open to the outside air?
- Primary function area.
  - Locker rooms and bathrooms should be considered primary function spaces.
  - It is important to look at how this is used in context – this is only a break for improvements to the route, not to providing accessibility in the space.

- Restricted entrance – is there a way to make the definition consistent with the Access Board guidance
- Story –
  - IBC says to the top of the roof rafters, not the top of the roof. This fix could be here to reduce potential conflict with no change to accessibility requirements
  - The last sentence is about a mezzanine, so it should not be under the definition for story
  - It must be clear the changes in levels are not a story
- Technically infeasible – additional clarification would be helpful
- Transient lodging –
  - ‘guestrooms’ are a type of sleeping unit – better to use the defined terms
  - 2<sup>nd</sup> sentence is a list of what this is not
  - The exception should be in the general exceptions
- We need to define Accessible and Type C units if the intent is to scope those types of units – as a requirement or as a where provided
- Work area equipment – 2<sup>nd</sup> sentence is requirement, 3<sup>rd</sup> sentence is what this is not included.

## **A202 Accessibility Required**

### **A202.1 –**

- Should ‘structure’ be added? That could result in including retaining walls, fences, etc.
- ‘Facility’ is a term that is not person centered – However, this is needed for a group of buildings that operate together as one facility or several tenants/facilities in the same. Facility is defined in the ICC A117.1.

### **A202.2.3 General exceptions**

- Why are some of the other exceptions in the IBC not in this list – places or religious worship, day care facilities?
- Why does the exceptions exempt the elements from accessibility and the route. The route provisions say connect accessible elements – so this is redundant. It could be implied that everything other non-accessible element does not have to be on a route. Marsha explained that the route is a separate requirement, so these spaces needed to be exempt from both.

A202.2.3 – Limited Access – delete definition in favor of text here.

A202.2.4 – Machinery spaces - delete definition in favor of text here.

A202.2.5 – Single occupant structures – change to match IBC toll booths. Better understanding and compliance.

Start next meeting with A202.2.8 and any proposed modifications.

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## **Meeting #34 - 6-08-2023 Meeting**

Reviewed 14 modifications to Definitions. – see report of committee actions

Modification 1 Addition

Mod to add back in gross AM 19-4-0  
AM 24-3-1

Modification 2 Alteration

Original modification 5-19-2  
Replacement 21-3-1

Modification 3 – Assisted use - Tabled till related package for assisted living

Modification 4 – Change in occupancy – AM 24-0-1

Modification 5 – Cluster – replacement AM 29-0-1

Modification 6 – Entrance – AM 12-11-3

Modification 7 – Limited Access Spaces – AM 24-2-3

Modification 8 – Machinery spaces, A202.2.4 – replacement 20-2-3

Modification 9 – split proposal

Mezzanine – AM 22-2-3

Story – AM 14-9-4

Modification 10 – Public Use Areas – AM 26-0-3

Modification 11 – Social service center establishment – AM 23-0-3

Modification 12 – Transient lodging – AM 24-1-3

Modification 13 – Accessible unit – AM 24-1-3

Modification 14 – Type C unit –

Chair ruled A203.9.17 should be proposed with Residential requirements

Definition AM 18-0-2

Start next meeting with A202.2.8.

- The chair indicated that discussion will proceed in sequence from beginning to end rather than jumping around in the proposal and instructed the meeting participants to prepare for the next meeting by looking ahead and being prepared to discuss the next block(s) of subject matter. It would be preferable (not required, just preferable) to wait to submit modifications until after a block of text has been discussed and develop and submit modifications to that text at the following meeting. Provide modifications to staff using the modification [form](#) posted on ICC A117.1 webpage under Administration.
- The chair requested that the agenda identify blocks of portions of the proposal in sections to limit the scope of discussion by topic.

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**Meeting #35 - 06-22-2023 Meeting:**

No comment on A202.2.8 through A202.2.11

A202.2 Exceptions - There are some exceptions located in the uses – they may need to be located either at the front of the use, or have a reference in the exceptions so they are not missed.

A202.3.2.1 and A202.3.2.2 Site arrival points– Exception – clarify where the route requirement is for housing



A202.3.2.3 – Why ‘level’ instead of ‘story’ in the first sentence? How would this stop changes less than a story height with no route to them? This should cover occupied roofs.

Exception 1 – uses ‘stories’ instead of ‘levels’ so may be confusing with main text; need a 1.5 to not allow for 4 or more dwelling units on a story.

Exception 2 – how are basements addressed? Is this covered in a 2 story building.

#### **A202.3.2.4 Dwelling and Sleeping Units. –**

There seems to be some exceptions missing

Where are the requirements for the site arrival points – why are they not located with this section?

Exception 1 – ‘legal restrictions’ could be read to allow no route to the 2<sup>nd</sup> floor if zoning wanted only mercantile with apartments above

Exception 2 – Would this conflict with Section 1102 that requires a route to all floors?

Use the defined term of ‘transient lodging’.

#### **A202.3.2.5 Security Barriers. – no comments**

#### **A202.3.2.6 Spaces and Elements.**

There is an exception that was moved to a use

Exception 2: text is confusing – already covered in main text; but there is confusion with designated aisle seats; maybe move to assembly and address there

Exception 1 – ‘if appropriate’, ‘without requiring substantial reconstruction of the space’ is very subjective

#### **A202.3.2.7 Restaurants**

The title could be misread to not have this apply to bars, lunch rooms, etc. – maybe ‘dining and drinking areas’. This might be easier if we used IBC use groups. Opposite side – groups are based on risk and may not work with accessibility.

Exception 2 – ‘décor’ is way to open for interpretation

Exception 4 – why is this needed – this is employees areas that are within a dining or drinking area, like the area behind a bar or in front of a check out stations/table bussing station.

#### **A202.3.2.8 Performance areas. –**

The last sentence for raised platforms is limited to banquet rooms? Need to address the platform platforms more generally?

What about a platform that is brought in as furniture for events?

What about when a platform is not a performance area – like a head table at a wedding?

#### **A202.3.2.9 Employee Work Areas. – none**

#### **A202.3.2.10 Walkways adjoining construction and demolition sites. –**

Location confusing. Move after 202.3.2.2 for outside; conflict with construction site exemption?

Is this not only for existing sidewalks? Covered in DOT/PROWAG? What about multi-building sites?

#### **A202.3.3 Location of Accessible Route.**

With the requirements for accessible means of egress, the no allowance for ‘kitchen’ and ‘storage room’ can be prohibitive. Maybe make this along the common circulation path – or defined paths.

#### **A202.4 Accessible Means of Egress**

**A202.4.1 General.** – are the exceptions needed? Already covered in the IBC, so not needed here.

What about existing buildings (see Section 204.7.1)?

Should we also reference the fire and safety plans in the IFC? Lock-down plans?

### **A202.5 Stairways**

#### **A202.5.1 General.**

The IBC now calls all stairways means of egress stairways. The reference to ICC Section 504 for ‘means of egress’ would prohibit solid risers would effectively prohibit open stairways and spiral stairways (access to catwalks, equipment platforms). Many exterior stairways are open to limit the accumulation of snow and water.

Should there be additional exception for areas not required to be accessible.

Should this be limited to accessible means of egress stairways?

Would the stairway provisions conflict with residential stairway allowances for within individual dwellings? Including newel posts on handrails and handrail extensions.

This would also pick up the lighting requirements? Stripes?

### **A202.6 Operable parts**

#### **A202.6.1 General.**

IBC has an update for locks at pools

### **A202.7 Entrances, Doors and Gates**

**A202.7.1 Entrances.** Don’t need to repeat requirements for routes every time – already addressed. Chair indicated that there can be correlative pieces that appear in other sections.

For counting doors for entry, should there be an exception for doors that are exit only, or service entrances other than A202.7.1.8? Would that clarify how to qualify and entrance vs. all doors?

**A202.7.1.1 Public entrances.** Questions on to what is a public entrance, especially if the entrances are secured or indicated as limited (e.g. key pad or marked ‘employee only’). Would this exceed FHA by requiring 60% for access to the building? Think two entrance building that leads to individual dwellings on the hallway.

**A202.7.1.2 Parking garage entrances.** – none

**A202.7.1.3 Entrances from tunnels or elevated walkways.** – none

**A202.7.1.4 Transportation Facilities.** – none

**A202.7.1.5 Tenant spaces, dwelling units and sleeping units.** – none

**A202.7.1.6 Restricted Entrances.**

This needs to be more carefully separated from public entrances. The language repeats itself. See Access Board/DOJ guidance. Much more limited that people think.

**A202.7.2 Doors, Doorways and Gates**– none

#### **A202.7.2.1 General.**

Is using ‘providing user passage’ expanding the scope instead of ‘on an accessible route’ to comply? This would pick up two doors to the same room with only one on an

accessible route? Maybe needs to say both for accessible spaces? Do not want this to apply to exempted spaces?

### **A202.7.2.2 Entrances.**

Should we address vestibules?

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### **Meeting #36 - 07-13-2023 Meeting:**

Modifications for the following were sent to the committee:

- A202.2 General exceptions.
- A202.3 Accessible Routes
- A202.4 Accessible Means of Egress
- A202.5 Stairways
- A202.6 Operable parts

### **Modifications for –**

**A202.2 General exceptions** – see report of committee actions.

Modification 1 – A202.2.1; AS 24-0-1

Modification 2 – A202.2.4; AS 27-0-0

Modification 3 – A202.2.5; AS 25-2-0

Modification 4 – A202.2.12, A203.9.1; tabled

Modification 5 – A203.10; AS 18-6-2

Modification 6 – A203.2.8; AS 20-1-1

Modification 7 – A203.7.2; AM 23-2-0

Mod to A202.2.12 - delete first sentence and add ‘only’ – Approved 24-1-0

Modification 8 – B n B exception; AS 20-0-0

Modification 9 – withdrawn

Modification 10 - withdrawn

### **Modifications for**

#### **A202.3 Accessible Routes**

Modification 1 – split into 3 parts

Level vs. story – modification to delete ‘including’ 23-0-0; AM 20-0-0

Occupiable roofs – AS 24-1-0

1.5 4 or more dwellings - tabled

Modification 2 – withdrawn; addressed by Modification 1

Modification 3 – withdrawn

Modification 4 – AM 20-0-0

Modification to Exception 4 to move phrase to front – 23-0-0

Modification to delete ‘dormitory’ in Exception 4 – 20-1-0

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### **Meeting #37 - 07-27-2023 Meeting:**

Modifications for the following were sent to the committee:

- A202.2 General exceptions.
- A202.3 Accessible Routes
- A202.4 Accessible Means of Egress
- A202.5 Stairways

## A202.6 Operable parts

### **Modifications for –**

**A202.2 General exceptions** – see report of committee actions.

A202.2 Mod 4 revised – taken off table; Mod – 23-2-2; AM 26-2-2

A202.2 Mod 11 – AS 27-1-2

**A202.3 Accessible Routes**– see report of committee actions.

A202.3 Mod 1 revised – AM 26-0-1

A202.3 Mod 5 – split question –

Part 1 AS – 11-13-2; D – 22-3-3

Part 2 AS – 5-19-1; D 26-0-1

Part 3 AS 27-0-1

A202.3 Mod 6 – AS 24-0-0

A202.3 Mod 7 – Mod 10-14-1; AS 22-2-1

A202.3 Mod 8 – Mod 22-0-2; AM 25-0-0

A202.3 Mod 9 – AS 9-13-1; D 20-2-0

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### **Meeting #38 - 08-10-2023 Meeting:**

Modifications for the following were sent to the committee:

A202.3 Accessible Routes – starting with Mod 10

A202.4 Accessible Means of Egress

A202.5 Stairways

A202.6 Operable parts

### **Modifications for –**

**A202.3 Accessible Routes**– see report of committee actions.

A202.3.2.8 Mod 10 – AS 9-14-1 (Chair stated if modification fails we do not need to ask for Disapproval)

A202.3.2.10 Mod 11 – AS 18-3-3

A202.3.20 Mod 12 – AS 12-11-3

A202.3.3 Mod 13 mod -20-5-1 – AM 25-2-0

### **A202.4 Accessible Means of Egress**

A202.4 Mod 1 – AS 22-1-1

A202.5 Mod 3 – Mod 25-0-0 AM 23-2-0

A202.5 Mod 4 – mod1 alternating tread 23-1-0; mod 2 delete Exp. 6 22-1-1; mod 3 delete Exp 4 (spiral should not be only way off accessible floor) 14-8-2; AM 20-1-2

A202.5 Mod 2 – AS 11-7-3

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### **Meeting #39 - 08-24-2023 Meeting:**

Modifications for the following were sent to the committee:

A202.6 Operable parts –

PC2 AS 25-3-1

PC1 was withdrawn

## A202.7.2 Doors, Doorways and Gates

A202.7.2.1 – ‘user passage’ too broad; add ‘on an accessible route’; Doors to non-accessible areas should also be clearly exempted?

A202.7.2.2 – duplicate of 202.7.2.1?; this is one door on a multiple door entry

A202.7.2.3 – exception is addressed in Chapter 6 – should stay with showers and added for saunas. What about doors in non-accessible toilet compartments or other doors in non-accessible hotel rooms? What about non-accessible units in other occupancies. Exception is in bad location and confusing.

A202.7.2.4 –

missing text at end of section.

Table uses IBC use groups. Improvements in 2024 edition of IBC should be added.

It should be noted that this all public entrances – which is several locations on these buildings. ‘Public entrances’ definition needs to be clarified so this is applied properly. ‘restricted entrances’ can be read as just being locked.

Energy code requires vestibules – so this will tend to require two doors. Need to clarify that these doors are not required to open simultaneously.

What is the justification for the occupant load and/or these occupancies

## A202.8 Elevators and Lifts

A202.8.1 Elevators.

A202.8.2 – A202.8.3 Platform Lifts.

A202.8.2 – where are the allowances for existing buildings – it is in A204.

A202.8.3 – Accessible means of egress was deleted from the scope the last meeting. This should also be deleted. If AMOE ends back in the appendix, this should be moved into those requirements.

A202.9 – A202.9.1 Parking, Passenger Loading, Bus Boarding and Alighting, and EV Charging – the title should match the order of the requirements and be totally separate sections – not mixed.

A202.9.2 – A202.9.3 Minimum Number. – Exception 1 and 2 are requirements, not exceptions; Exception 3 is in A202.9.4.1, Exception 4 belongs with van spaces (editorial to always say Accessible, Type A or Type B units)

A202.9.2.1 – leading text is not followed by requirements for subsections; delete day care and change long term medical care; add requirements in subsection for long term medical care.

A202.9.3 – add exception from 202.9.9 Exp. 4

A202.9.4 – A202.9.5 Location.

A202.9.4 and A202.9.4.1 should be one section (editorial)

A202.9.6 Electrical vehicle charging stations. – what is the rationale of the exception?

There needs to be an exception for storage lots, busses and trucks similar to parking exceptions

A202.9.6.1 – ‘type’ needs to be clarified; (reference is 503, not 502.11 – editorial); title is misleading; lots of questions on the correlation of EV charging stations and accessible parking space – one is a service, and one is a parking space.

A202.9.7 Passenger Loading Zones and Bus Boarding and Alighting Areas – combination of passenger loading zones and bus boarding is confusing – separate.

Medical facility passenger drop off should be here – not in A203.7.3.1

A202.9.9 mechanical access parking garage – what do you do with self-park mechanical garages? Option to put in accessible parking spaces in self park.

A202.10 –

A202.10.1 Toilet and Bathing. First sentence is difficult to read. Upper or lower floors would not have “an accessible entrance”. Needs to be revised for clarity. Many committee members felt it was unclear that all bathrooms

A202.10.2 – A202.10.6 Toilet Rooms and Bathing Rooms.

A202.10.2

Exception 2 reference should be 703.6.2.1; should this be in code since this is portable; 2<sup>nd</sup> sentence is hidden signage requirement – remove or reference from signage

Exception 3 – why not allow for clustered women’s or men’s – change to each type

Exception 4 – why not allow for clustered women’s or men’s – change to each type; why are bathing rooms traded off at three?

A202.10.3 Plumbing fixtures and accessories

Should there be more information on accessories in A202.10.4

A202.10.4.1 – Question about number - 5% is in Section A202.10.5

A202.10.4.5 – two sentences are too long and confusing

A202.10.5.1 – conflicts with A202.10.4.3.1; take out ambulatory – too rare – leave it out as too confusing; Gene brought up gender neutral with sinks in the stalls.

A202.10.7 Family or assisted-use toilet and bathing rooms.

Can we explain better what constitutes a recreational facility – e.g. not in school gym locker room

A202.10.7.1.1 – should check to see if we need to add changing tables; if you put in a child size water closet, would that child height toilet or sink have to be accessible?

Gene’s answer is no – so this needs to be clarified.

A202.11 Saunas and Steam Rooms – one of each type will address separate sex saunas.

A202.12 Dressing, Fitting and Locker Rooms – first two sentences are long and confusing – rework (same as stalls); back reference to A202.12.1 is confusing – just make subsection and get rid of reference

A202.13 Drinking Fountains and Bottle Filling Stations – some discussion on

A202.14-A202.14.3 Kitchens, Kitchenettes, and Sinks -

‘Kitchenettes’ are not used in Chapter 6. Coordinate with standard. Kitchenettes are kitchens without cook top or range. Editorial needs to look at this. Concern for this not be covered in the standard – needs clarification for counters with/without sinks and wet bars.

A202.14.3 Sinks – Pull out into separate sections since sinks are all over the place. Exception 2 is addressed now in standard, so this can be removed.

A202.14.4 Washing Machines and Clothes Dryers – this should have been a separate section? (editorial); laundry sinks need to be included in this section if sinks are not addressed separately.

A202.14.4.1 – editorial to exception address shared laundry rooms in apartment buildings with Type B unit.

**A202.14.4.1 General.** Where provided, washing machines and clothes dryers shall comply with Section 611.

**EXCEPTION:** ~~For~~ Within Type B units, washing machines and clothes dryers shall be permitted to comply with Section 1104.

A202.15 Service Facilities and Equipment

A202.15.1 – editorial – make one section; add language to bins serving or associated

A202.15.2.2 – first sentence is out of order, put table first; take requirement out of table title; in exception, selling space maybe should be ‘sales floor’; don’t need ‘where provided’ at beginning of sentence.

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#### **Meeting #64 – Sept. 26, 2024**

A202.15.2.2 Exception – The suggestion was to change ‘selling space’ should be changed to ‘sales floor’ to be more easily understood. The reason ‘selling space’ is used in the ADA to make sure that storage, bathrooms, entry vestibules, would not be counted in the 5,000 sq.ft.

#### **Modification – AS 24-0-2**

**A202.15.2.2 Check-Out Aisles.** Where check-out aisles are provided, check-out aisles complying with 904.3 shall comply with Table A202.15.2.2. Where check-out aisles serve different functions, check-out aisles complying with Section 904.3 shall comply with Table A202.15.2.2 for each function. Where check-out aisles are dispersed throughout the building or facility, check-out aisles complying with Section 904.3 shall be dispersed.

**EXCEPTION:** Where the ~~selling-space~~ sales floor is under 5000 square feet (465 m<sup>2</sup>) no more than one check-out aisle complying with Section 904.3 shall be required.

**A202.15.3 Sales and service counters and windows** – referenced to Section 308 could be an editorial change to ‘reach ranges’ – send to editorial for general discussion.

**A202.15.4 Queues and Waiting Lines** – should this include service windows/ticket windows?

#### **Modification – AS 22-1-3**

**A202.15.5 Queues and Waiting Lines.** Queues and waiting lines servicing sales and service counters and windows, or check-out aisles required to comply with Section 904.3 or Section 904.4 shall comply with Section 403.

**A202.15.6 Fuel-dispensing system.** – The exception for 5 lbs. force is in 309.4, but not the height exception for existing pumps on curbs. Is this in a later in the existing portion of the Appendix? This is written to apply to all pumps. How does this work with an access aisle to get out of a vehicle as well as access to the pump? Commenters said that would not be part of the requirement – all this asks for is the clear floor space at the vehicle. Does the standard address the screens.

**A202.1.5.7 Depositories, vending machines, change machines and similar equipment** – Question as to if anything other than depositories are drive ups and should be in the exception. The Access Board approved this as a comment from the banking industry.

**A202.15.8 Gaming machines and gaming tables** – Question about what would constitute a type of gaming machine. Suggestion was by value, not by game. Change ‘front’ to ‘forward’ – editorial. Should ‘in each location’ be added? Need to involve gaming industry if this needs further clarification.

**A202.15.9 Mailboxes.**

Modification - Change ‘served’ to ‘assigned to’ in exception 2.

Add new exception 3 for drive-up mailboxes.

**Exception 2 – AS 15-0-0** – consistency with Item 1

**Exception 3 – AS 14-3-1 – Reasonable allowance consistent with ATM,**  
Depository and telephone concepts. However, questions about the phase for this being so different from other exceptions.

**Further modify –**

**A202.15.9 Mailboxes.** Where provided, mailboxes shall comply with Section 309.

**EXCEPTIONS:**

1. In residential and institutional facilities where Type B units are required by Section A203.9.1, mailbox locks assigned to Type B units shall be permitted to be no higher than 54 inches (metric #) above the floor where side reach is unobstructed and the bottom shelf of the lowest box shall be no lower than 15 inches (metric #) above the floor. Where side reach is obstructed by an object greater than 20 inches in depth, the mailbox locks assigned to Type B units shall be no higher than 46 inches (metric #) above the floor.
2. Mailboxes servicing assigned to Type C units and units not covered by any accessibility requirement are not required to be accessible.
3. Receptacles for outgoing mail located along a vehicular way not providing pedestrian access are not required to be accessible.

**Table discussion on Mailboxes till next meeting.**



**F. New business:** Committee will receive information on the ballot, drafts, and review of comments. Deadline will most likely be mid November.

**G. Future meetings:**

1. Calls will be every other Thursday, from Noon to 4:00 pm Eastern.
  - The meeting dates for 2022 are:  
March 10, 24; April 7, 21; May 5, 19; June 2, 16, 30; July 14, 28; August 11, 25; Sept. 8, 22; Oct. 6, 20; Nov. 3, 17; Dec. 1, 15, 2022.
  - Meeting dates for 2023 are:  
Jan. 5 and 19, Feb. 2 and 16, March 2, 16 and 30, April 13 and 27, May 11 and 25, June 8 and 22, July 13, 27, August 10, 24, Sept. 14, 28, Oct. 12, 26, Nov. 9 (not the 23<sup>rd</sup> since this is Thanksgiving), Dec. 7 and 21, 2023
  - Meeting dates for the 2024 are:  
Jan. 4, 18, Feb. 1, 15, 29, March 14, 28, April 11, 25, May 9, 23 and June 6, 20, July 18, August 1, 15, 29, Sept. 12, 26, Oct. 10, 24, Nov. 7, 21, Dec. 5, 19, 2024.
2. Information on the meetings and development of the 2023 edition of the standard will be posted at [ICC A117.1 webpage](#)
3. Any questions contact Karl Aittaniemi; kaittaniemi@iccsafe; 888-422-7233, Ext. 4205

**H. Adjourn** – Meeting was adjourned at 4:30