

Accessibility Code 1341 TAG

Meeting Notes

Date: Wednesday, May 8, 2024

Meeting Location: DLI Isanti Room/WebEx Event

Call to order:

Karen Gridley

Attendance:

TAG Members attending: Dori Dufresne, David Fenley, Chris Machmer, Lee Gladitsch, Karen Gridley, Dave Mathews, Mara Peterson, Haidee Tan

TAG Members not attending:

Guests attending: Scott Anderson, Allison Eastham, Alan Gettelman Alexis Johnson, Michael Johnson, Matt Peterson, Wendy Rannenberg, Chris Rosival, Michele Severson, Amanda Spuckler, John Woestman

Worksheet and Code Change Proposal Review:

Reviewed Worksheet items listed below constituting the more impactful changes in Chapter 11 of the 2024 IBC, and the 2017 edition of ICC A117.1 Standard.

IBC Worksheet Item 12 - IBC 1107.2, 1107.2.2, and Code Change Proposal Acc-02.1. Accessible Electric Vehicle (EV) Charging Equipment for residential structures, and dispersion requirement.

TAG members reviewed updates to Code Change Proposal Acc-02 (updated to Acc-02.1) as a follow-up to the previous meeting discussion on this item and proposed change. There were two updates discussed:

- 1) The TAG consensus is to accept the proposed modification of Section 1107.2 Exception 1 limiting the exemption from EV charging equipment requirements to residential structures with fewer than four dwelling units or sleeping units. The modification is necessary because MN Statutes require certain residential structures to provide EV charging equipment so a full exemption for Group R-3 and R-4 occupancies is not appropriate. The Accessibility Code currently exempts R-3 and R-4 structures with fewer than four dwelling units or sleeping units from accessibility requirements, so this same exemption should apply to accessible electric vehicle charging equipment only in structures with fewer than four dwelling or sleeping units.
- 2) Section 1107.2.2 Vehicle Space Size language is deleted from Chapter 11 because it is addressed in the A117.1 Standard. However, this section will be modified to address Dispersion requirements for accessible electric vehicle charging stalls. The TAG could not come to consensus on what the dispersion language should be and agreed that the proposed language needs additional work. It may also need to

involve changes to how the accessible quantity of charging stalls is calculated. Chair Gridley will work on additional edits based on comments received and bring the revisions to a future TAG meeting for review.

IBC Worksheet Item 24 – IBC 1109.2 and 1109.2.6, and Proposed Change Acc-04. Assembly area seating.

The TAG consensus is to accept the model code language as modified by Proposed Change Acc-04 to include requirements for fixed bleacher and grandstand seating as well as an accessible route to non-fixed lawn seating. The current MN rule already requires an accessible route to non-fixed seating areas so adding “lawn seating” clarifies this section applies to outdoor venues.

IBC Worksheet Item 37 – IBC 1110.14 – 1110.14.3. Seating and standing spaces at dining and work surfaces.

The TAG consensus is to accept the model code language for this section that clarifies surface types and separates quantity requirements for dining surfaces and work surfaces into two subsections. The new model code language also eliminates the term “counters” to alleviate confusion with service counter requirements, which are not surfaces addressed by this section. If a counter is provided as a specific work surface, then it must comply with work surface requirements.

IBC Worksheet Item 39 – IBC 1110.18. Operable parts.

The TAG consensus is to accept the model code language for this section. Most exceptions to this section are relocated to A117.1 because they are technical criteria. Exception 3 directs readers to A117 for the relocated exception language.

IBC Worksheet Item 40 – MN Rules, part 1341.0011, subpart 8, item K. ATM and fare vending machines.

The TAG consensus is to delete this MN amendment that adds section 1109.16. TAG members discussed that the model code has not included requirements for ATMs and fare vending machines for several code cycles because these pieces of equipment are not regulated by building code unless part of the building. Code officials do not have training or background on these pieces of equipment. Units that are built into the wall of a building or space must comply with building code requirements for clear floor space, operable parts, and reach range to ensure accessibility. TAG members also discussed that the federal ADA requirements address all types of ATMs and fare machines and equipment elements that cannot be regulated by the building code such as software functionality and screen angle. The ATM and fare vending machine industry must comply with the ADA requirements for equipment design and functionality and these industries are more appropriately regulated by that law.

IBC Worksheet Item 41 – MN Rules, part 1341.0011, subpart 8, item. Public telephones.

The TAG consensus is to delete this MN amendment that adds section 1109.17. TAG members discussed that the model code has not included requirements for public telephones for several code cycles because they are rarely provided with the advent of personal mobile phone devices and other two-way communication systems in buildings. Building code requirements for clear floor space, operable parts and reach range can be applied to any built-in public courtesy and pay phones provided to ensure accessibility. The TAG members also discussed that the federal ADA applies to all types of public phones and addresses device elements that are not addressed by the building code, such as software functionality or volume settings. The telephone/telecommunications industry must comply with ADA requirements for equipment design and functionality and the industry is more appropriately regulated by the federal law.

IBC Worksheet Item 46 - IBC 1111 4.15. Shooting facilities.

The TAG consensus is to accept the model code language for this section. The TAG discussed that the exception is limited to shooting facilities raised over 12 feet and that are smaller than 500 square feet.

IBC Worksheet Item 47 – IBC 1112 and Proposed Change Acc-05. Signage.

The TAG consensus is to delete the MN Rules, part 1341.0011, subpart 9, in its entirety and replace with the model code section 1112 as modified by proposed change Acc-05. The TAG consensus is to also accept Acc-05 to modify section 1112 to maintain specific MN requirements for signs at rooms, locker rooms, fitting and dressing rooms, and amusement ride load and unload areas and signage requirements for instructions for the operation of exit doors. Most of the IBC model code language for signage requirements is substantially similar to the current MN rules language, so it is no longer necessary to carry forward the MN amendments in the current rule.

Code Change Proposal Acc-06 – IBC Section 202. Definition of Restricted Entrance.

The TAG consensus is to accept this proposed change that clarifies the meaning of restricted entrance. This change was also approved at the ICC hearings for inclusion in the 2027 IBC model code.

Code Change Proposal Acc-07 – A117.1 403.5.1. Exterior clear width exception.

The TAG consensus is to accept this proposed change which adds an allowance to permit an exterior accessible route to be reduced to 32” clear width at a pinch point for a maximum distance of 24”. This is the same allowance that is permitted for interior accessible routes and is applied at framed doors and pinch points at columns. TAG members discussed that if a fixed door frame at 32” clear width is accessible, then any other similar interior or exterior pinch point should be accessible. This is necessary to clarify that at access aisles adjacent to accessible parking stalls, it is acceptable for the accessible route to have a reduced clearance adjacent to the sign bollard, provided the reduction is not less than 32”. The previous language was unclear as to whether the allowance applied to exterior routes as well as interior routes. The modification provides clarification of the intent for accessible routes.

Code Change Proposal Acc-08 – IBC 1105.1.1. Power-operated doors.

The TAG consensus is to accept this proposed change which adds the word “building” in front of the term “public entrance” to clarify that the power-operated door requirement only applies to building entrance doors and does not apply to interior entrance doors. It is reasonable to limit the application of the requirement to exterior building entrance doors because they are typically more difficult to open without a power-operation due to environmental conditions such as wind, and building pressures that push doors open when they are set with too low of an opening force.

A117.1 Worksheet Item 2 – Section 102.2. Applicability of the A117.1 Standard and Scoping authority.

The TAG consensus is to accept the model code language which clarifies that the requirements of the A117.1 Accessibility Standard only apply if scoping language has been adopted by the administrative authority to require compliance with the design criteria of the A117.1 Standard. Minnesota adopts IBC Chapter 11 and IEBC Section 306 as the scoping criteria which references the A117.1 Standard.

A117.1 Worksheet Item 5 – Section 105.3. Dimensions.

The TAG consensus is to modify the model code language with the current MR Rules chapter 1341 language that clarifies dimensions are absolute unless stated as a minimum or maximum. This carries forward a current MN amendment.

A117.1 Worksheet Item 7 – Section 304.3.1. Circular turning space size.

The TAG consensus is to accept the model code language which increases the size of the turning circle for new buildings to 67" minimum. However, the model code also adds an exception permitting alterations to existing buildings to have a 60" turning circle. It also adds a new allowance for overlap. The A117.1 increased the turning circle space based on a study conducted by the Center for Inclusive Design and Environmental Access (IDeA) at The State University of New York (SUNY). Turning spaces are only REQUIRED in the following locations: vestibules, passing spaces, ramp landings at lockable doors, saunas and steam rooms, dressing and fitting rooms, jail cells, jury boxes and witness stands, toilet rooms (not in toilet compartments), rooms in Accessible and Type A dwelling units, and firing positions in shooting facilities. The model standard permits a T-shaped turning space to be substituted at any location where a turning circle is required. The A117 revised the sizes for t-shaped turning spaces as well (to be discussed at an upcoming meeting). The revised T-shape sizes may fit in a smaller footprint of space than the turning circle, which may reduce the impact of the increased turning circle size.

An interested party expressed some concern that the definition of existing building may allow designers and building owners to avoid compliance with the turning circle requirements for new buildings. The definition of "existing building" includes buildings for which a legal building permit has been issued. Potentially, a designer or building owner could construct a shell of a building and at a later date apply for another permit to finish construction of the interior with 60" turning circles. TAG members discussed that other scoping sections of the code would supersede to prevent the potential scenario of a perpetual cycle of pulling new building permits for fit outs of the existing building to avoid providing a larger turning circle. Since the A117.1 is a standard, the scoping language will always supersede when there are differences (Minnesota Rules, part 1300.0030, subpart 2B). The scoping language that supersedes the A117.1 definition is IEBC Section 306.7 Alterations, which requires existing facilities that are altered to comply with the applicable provisions in Chapter 11 of the IBC for new construction.

Next Meeting:

Date: May 22, 2024

Time: 9:00 AM

Location: DLI Isanti Room

Meeting Adjourned: 12:00 PM

Prepared by: Karen Gridley