

By Laurel W. Wright, Chief Accessibility Code Consultant, NC Dept of Ins/OSFM (919) 647-0014 Laurel.Wright@ncdoi.gov

NC ACCESSIBILITY CODE

2012 NC Bldg Code Ch. 11
2009 ICC/ANSI A117.1

Mandatory: 1 Jun 2012

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2010 ADA STANDARDS:

- Mandatory 3/15/12
- Copy available: www.ada.gov

Individual Highlights

NCBC 1108.3 Self-Storage 2

AU Mar 2017 V711 Clarification 2



NCBC 1108.3 Self-Storage Units + Doors

The questions below go [with the article on the back page](#) that addresses self-storage and the acceptable doors for the accessible storage units.

Q: There are manufacturers who state that the ADA has not set standards for roll-up doors. What if a manual pull-up door meets all the reach range and pull force requirements? Thank you.

A: After review of many 'ADA Compliant packages' on the manufacturers' websites, the weblinks typically lead to an additional ADA Compliance Sheet that addresses *swinging door compliance* with the **2010 ADA**. On the Janus International sheet [\[click here\]](#), there are italicized comments with arrows in the margins stating the following:

 *Note: This section is included for reference in that Janus swing doors comply with ADA standards both with and without added kick plates.*

Q1: Would the 3'-0" door be acceptable instead of providing the automatic door opener?

A1: No. The door opening size to allow storage within a self-storage unit is typically a minimum of 7'-0". The same door clearance capability shall be provided in all similar size storage units. The provision of the 3'-0" door is to allow someone with a disability to be able to exit the unit if the automatic door, without battery backup, closes on loss of power.

 *Note: Janus offers as an option electric motor operators which fit inside the barrel, utilizing no additional side room. Manual control boxes comply with ADA standards in both height and operation.*

SC Use of the 2017 ANSI A117.1

Q: Occasionally our design firm does similar projects in both **North** and **South Carolina**. Do you know what year editions of the code and accessibility standard that **South Carolina** uses?

A: Yes – like **North Carolina**, **South Carolina** has recently adopted the **2015 edition of the International Building Code**. [\[Click here for link to Bldg Codes in Effect for South Carolina\]](#)

The effective date of the **2015 South Carolina Building Code**, based on the **2015 International Building Code**, was July 1, 2016. While the **2015 IBC** references the **2009 edition of ANSI A117.1**, **South Carolina** has an Accessibility Act that adopts the latest edition of **ICC/ANSI A117.1**. This means that any **South Carolina** projects will be required to comply with

- the **2015 SC Building Code** (the **2015 IBC with SC Amendments**) along with
- the **2017 edition of ANSI A117.1**.

Any changes to the above would require legislative changes made by the SC legislature. They are not scheduled to entertain any new legislation until Spring of 2019.





NCBC 1108.3 Self-Storage Units + Doors [cont'd]

NCDOI recently spoke with a designer who reported that enforcement across the state differs regarding self-storage units and the methods of opening the doors of the accessible units. The designers and owners prefer the use of straps with a loop on the end, stating that these are 'ADA-approved'. After reviewing many manufacturers' webpages claiming ADA-compliance, a thorough review discovers that the compliance is typically based on the provision of a swinging door with the storage unit. This research led to a discussion with a senior deputy section chief at **USDOJ** who stated that it was not acceptable to use a strap to open/close a door on a self-storage unit for several reasons.

1. The door opening force required on the shoulder, when using the strap, far exceeded the forces required to open a swinging door.
2. Plus, not everyone with shoulder injuries/deficiencies is able to make the strap work. The movements and force required to both open and close the door were never researched when the original ADA was adopted.

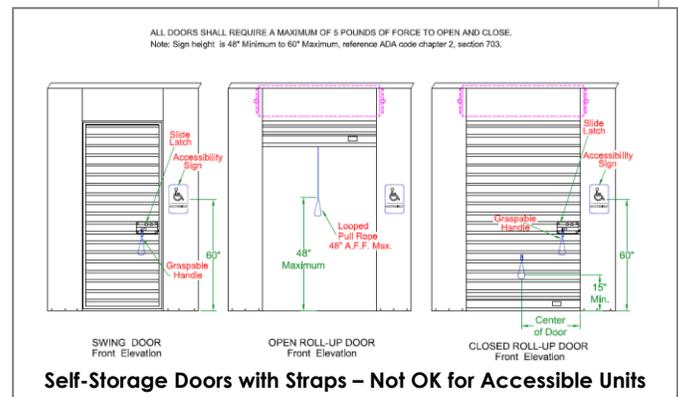
USDOJ stated that an automatic door opening device, similar to a garage door opener, is what is required to open the door for an accessible self-storage unit. The opener was required to be mounted within accessible reach ranges.

NCBC 1108.3 addresses the requirements for self-storage units when either newly constructed or added-on to an existing building.

1. **NCBC 1108.3** does permit the accessible self-storage units to be grouped within a single building when there are multiple self-storage buildings or units on a site.
2. If the accessible storage units are provided in a *new addition* to an *existing set of storage units*:
 - a. All new accessible units shall be grouped and located as close to the building's main entrance as possible; storage units are not required to be dispersed throughout a building.
 - b. Travel distance is a concern when mobility-impairments are involved.
3. If all accessible storage units are planned to be relocated to an existing building:
 - a. Such an action may segregate the accessible self-storage units to a non-sprinklered building with a lower degree of protection than provided in a sprinklered new addition.
 - b. This could result in potential litigation that may arise if only the accessible units were relocated to the existing building and no accessible units are maintained in the new building, i.e., there is a lower level of protection being provided for the accessible unit storage.
4. The accessible units, whether in the existing or the new building, are required to have automatic opening doors with door openers mounted within accessible reach ranges per **ANSI 308**. The door openers shall be provided with battery back-up in the event of loss of power. An alternate to the battery back-up is to provide a minimum 3'-0" door from each unit in addition to the automatic opening door.
5. In the event that accessible units are not provided and someone files a complaint with the **US Department of Justice**, and the complaint is picked up by them, the initial civil monetary penalty for non-compliance is \$75,000. It is NCDOI's understanding that a second related-complaint doubles the penalty amount.



Typical Interior Storage Door - Locked



Typo

CORRECTED MAR 2016 V712 NEWSLETTER:

- The final paragraph of the 1st article on **Accessible Units in Condominiums** should be deleted since the article is **not** relevant to parking. Thanks!

NCBC 1108.3 Self-Storage Summary

Accessible self-storage units require:

1. Garage door-type openers
 - a. Mounted per **ANSI 309**
 - b. Within **ANSI 308** reach ranges
2. Provide battery back-up for door opener
 - a. As alternate, may provide 3'-0" side-swinging door