

NC ACCESSIBILITY CODE

2012 NC Bldg Code Ch. 11

2009 ICC/ANSI A117.1

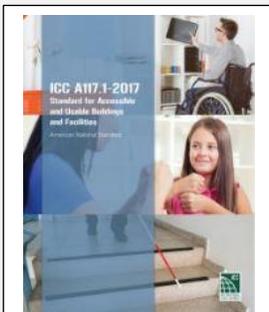
Mandatory: 1 Jun 2012

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2010 ADA STANDARDS:

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



2017 ANSI A117.1

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Use of 2017 ANSI A117.1 Early

Since the **2017 ANSI A117.1** is available, several questions have come recently regarding its use.

- Q1.** I have not read the **2017 ANSI A117.1** yet, but would a difference between the **2009** and **2017** versions ever be judged on the merits of one code being more stringent than the other code and more applicable?
- a. Applicable *standards* are based initially on which *standard* is referenced by **Ch. 35** in the model building code adopted by the state in which you are practicing.
 - b. As an ICC sponsored code, **Ch. 35** lists it under **ICC A117.1** rather than **ANSI A117.1**.
- Q2.** Or would the designer simply have the option to use either code and the most stringent discussion is never considered?
- a. Use of any *standard*, other than the one referenced by the model code being used, would require approval by the local AHJ.
 - b. Typically, this is done as an alternate method under **NC Admin Code 105.1** which states that approval is per the local code official.
- Q3.** If a designer chooses to follow the **2017 ANSI A117.1** code, is the designer required to follow the entire code for a single project or can the designer pick and choose portions of the **2009** code and portions of the **2017** code to follow on a single project?
- a. This depends.
 1. Usually when an alternate standard is used, the intent is that the standard works together as a whole. For example, **ANSI A117.1** is set up so that the later chapters reference **Chapter 3 – Building Blocks** rather than repeating the same requirements over and over again.
 2. On the other hand, there are certain areas now addressed in the **2017** edition that were not addressed in earlier editions, such as drinking fountains with water bottle fillers. The requirements associated with those are relatively stand alone. So while 'picking and choosing' has never been a recommended action, there may be select features where the **2017** language is equivalent to what is being proposed or followed now anyway. So it makes sense to design to the language in the 'future' standard.
 3. If you use the **2017** standard, be careful that the newer standard is not less restrictive than the standard currently in effect.
 4. There is also the issue of designing to a standard where the reviewing authority (typically, the local AHJ) and the remainder of the design team may not have the standard or be familiar with the new design concepts. Confusion may lead to mistakes in design, which can be critical – and not in a good way.

Now, having gone through the answers, let's consider some of the revisions in the **2017 ANSI A117.1** standard:

- 60' turning circle becomes 67". [This affects some items but not all.]
- 30" x 48" wheelchair space becomes 30" x 50" wheelchair space. [This affects some items but not all.]
- Portions of the standard are divided into **NEW BUILDINGS** and **EXISTING BUILDINGS**.
- 48" exterior accessible route. [Similar to NC's **NCBC 1104.1 + 1104.2** provision.]
- Accessible routes through parking facilities shall be physically separated.
- **Ch. 10** and **11** are reversed to coordinate with the **2010 ADA Chapters**.

Some of the above are major changes. If you are designing exterior to a building, there may be less impact. If you are designing anything interior, there may be a major difference. If you envision using the newer standard, be certain to get both the **2017 Commentary** and the accompanying **Significant Changes** books from **ICC**.



NCBC 1104.1; 1104.2; 1104.5 Site Accessibility

Q: . **NCBC 1104.1** and **1104.2** both provide a list of items which require an accessible site path: public transportation stops, accessible parking, accessible passenger loading zones, and public streets or sidewalks to the accessible building entrance served (**1104.1**); accessible buildings, accessible facilities, accessible elements, and accessible spaces (**1104.2**). Does this section, or other sections in or referenced from the **NC Building Code**, require a sidewalk serving non-accessible parking spaces - or other element that is not required to be accessible - to be accessible?

A: **NCBC 1104.1** and **1104.2** are individual sections that, while related, are enforced separately. It may help to look first at the **IBC Commentary** for both code sections. [**bolded** or underlined text is mine]

The **IBC Commentary** for **NCBC 1104.1** states *The intent of this section is to require an accessible route from the point at which one enters the site to any buildings or facilities that are required to be accessible on the site. It is presumed that people with disabilities are capable of gaining access to the site from such locations as accessible parking, public transportation stops, loading zones, public streets or sidewalks.*

- This means that an accessible route is required from off-site to any on-site building required to be accessible. The building code is applicable to all commercial buildings within the state, with few exceptions. The items (or elements) not required to be accessible in the building code are limited to those specifically identified in NCBC 1103.2.3 through 1103.2.15. in many cases, these are not complete exceptions, but instead identify limitations to access.

The **IBC Commentary** for **NCBC 1104.2** states *Developments may include several buildings on the same site. The intent of this section is to require an accessible route to all facilities offered on a site. Often sites are designed such that the only way to reach a building or facility is by automobile. If there are multiple, separated parking areas serving one or more buildings on a site, an accessible route is required between all such parking facilities and the buildings they serve. If there is an exterior feature, such as a swimming pool, located on the site containing multiple buildings, an accessible route is required from each building to the swimming pool. The exception clarifies that an accessible route is not required where no pedestrian access is otherwise intended or provided to a particular building or feature on the site. For special considerations in residential developments, with recreational facilities, see the commentary to Sections **1107.3** and 1109.14.*

- Circulation on a site is addressed by **NCBC 1104.2**, and by **NCBC 1104.3**, which has some exceptions for common circulation paths within employee work areas. **NCBC 1104.5** clarifies that the circulation path *shall coincide with or be located in the same area as a general circulation path*.

Your specific questions regarding the above were as follows:

Q1: Does this section, or other sections in or referenced from the **NC Building Code**, require a sidewalk serving non-accessible parking spaces - or other element that is not required to be accessible - to be accessible?

A1: Yes. The **IBC Commentaries** for both sections indicate that an accessible route is required to serve any building or facility that is required to be accessible. Unless, the feature or element in question is listed (and exempted) in **NCBC 1103.2.3** through **1103.2.15**, it is required to be accessible. **NCBC 1106** requires parking to be accessible. So anywhere a sidewalk is provided that serves a parking space, it shall comply with requirements for an accessible route. It may help to remember that not everyone with a disability has a handicapped placard (or drives).

Q2: If not, is the sidewalk serving such spaces required to be labelled as "non-accessible" or be otherwise distinguished?

A2: Addressed by #1 above. In specific cases such as where greenways or trails are accessible to a certain point and not after (per Conditional Exceptions), signage is required indicating details regarding the route, slope, etc. [**NC Admin 105.1; OAG 1017.10**]

Q3: Also, if more than one path to a public way is provided from an accessible path on the site, must all paths be made accessible to the extent feasible or only one?

A3: Since persons with disability may enter the site at any path from a public way, all paths from a public way are required to be accessible. [**IBC Commentary language for Section 1104.1.**]

NCBC 1104.5

Q: **NCBC 1104.5** requires that accessible routes shall coincide with or be in the same area as a general circulation path. Does this section preclude requiring the general circulation path to be accessible if an accessible route is provided in the immediate area?

A: No, the provision of a code-complying accessible route per **NCBC 1104** does not permit the adjacent general circulation path to be inaccessible. Depending on the extent and type of mobility-impairment, some individuals prefer the use of stairs over ramps. Not all types of disabilities are mobility-related. For this reason, there are specific handrail and handrail extension requirements on stairs.