

STATE BUILDING CODE INTERPRETATION NO. I-74-00

December 26, 2000

The following is offered in response to your letter in which you request a formal interpretation of sections 1110.2.1 and 3404.2 of the BOCA National Building Code/1996 portion of the 1999 State Building Code.

Question: A partial renovation of a tenant space in an existing multi-tenant office building is taking place. Does the code require that the existing door hardware, on doors not being renovated and in areas not affected by the renovation, be changed to accessible hardware?

Answer: Existing door hardware must be changed to code compliant accessible hardware only if the doors are in the area undergoing renovation or in the required accessible path of travel to the primary function area that is being renovated. The code states, at section 3404.2, that alterations to any structure must conform to code requirements for new construction, but that portions of the structure not altered and not affected by the alteration are not required to comply with code requirements for a new structure. Using this general rule, one sees that all doors altered or within the altered area must be made code compliant, and therefore, accessible, but that doors outside the altered area and not affected by the alteration need not be made code compliant. A more specific requirement applies to this situation, however, that is found at section 1110.2.1. This section states that when an alteration affects the usability or access to, an area containing a primary function (in this case, the primary function of an office building is the offices themselves and all appurtenant spaces used by employees or visitors), an accessible route to the primary function area shall be provided if none exists. Simply put, a disabled individual must be able to travel from the accessible parking spaces to the area of primary function being altered without encountering any non-accessible barriers or building features, including restrooms and drinking fountains. In the scenario you describe, if the hardware on any doors along the required accessible route between the area being renovated and the accessible parking spaces is not accessible, such hardware must be changed to be made code compliant. Note that exception 1 limits the expenditure on providing the accessible route to 20 percent of the cost of the alteration to the primary function area, but requires that up to 20 percent be expended.