

## E118-21

### ***Proposed Change as Submitted***

**Proponents:** David Renn, PE, SE, City and County of Denver, representing Code Change Committee of ICC Colorado Chapter (david.renn@denvergov.org)

## **2021 International Building Code**

### **Revise as follows:**

**1105.1.1 Automatic doors.** In facilities with the occupancies and building *occupant loads* indicated in Table 1105.1.1, *public entrances* that are required to be *accessible* shall have one door be either a full *power-operated door* or a *low-energy power-operated door*. Where the *public entrance* includes a vestibule, at least one door into and one door out of the vestibule shall meet the requirements of this section.

**Exception:** For the purpose of determining *power-operated door* requirements, a tenant space with its own exterior *public entrance* shall be considered a separate facility and building.

**TABLE 1105.1.1 PUBLIC ENTRANCE WITH POWER-OPERATED DOOR<sup>a</sup>**

OCCUPANCY	BUILDING OCCUPANT LOAD GREATER THAN
A-1, A-2, A-3, A-4	300
B, M, R-1	500

a. In mixed-use facilities where the total sum of the building occupant load is greater than those listed, the most restrictive building occupant load shall apply.

**Reason:** This proposal is intended to clarify how the power-operated door requirement is applied to a tenant space that has its own exterior public entrance. When a tenant space has its own exterior public entrance it functions as a facility that is separate from the building as a whole and should be treated as such for power-operated door requirements. This proposal requires these tenant spaces to be considered a separate facility and building for power-operated door requirements (note that the terms facility and building are both used since this section and associated table use both terms). Following are three scenarios with requirements as this section is currently written and as proposed:

**Scenario 1: Tenant space does not exceed occupant limits in Table 1105.1 and remainder of building does not exceed limits, but total building does exceed limits.** As currently written, public entrances to the tenant space and the remainder of the building are required to have power-operated doors based on the total building occupant load. As proposed, no power-operated doors are required.

**Scenario 2: Tenant space exceeds occupant limits in Table 1105.1 and remainder of building does not exceed limits.** As currently written, public entrances to the tenant space and the remainder of the building are required to have power-operated doors based on the total building occupant load. As proposed, tenant space is required to have power-operated doors but remainder of building is not.

**Scenario 3: Tenant space does not exceed occupant limits in Table 1105.1 and remainder of building does exceed limits.** As currently written, public entrances to the tenant space and the remainder of the building are required to have power-operated doors based on the total building occupant load. As proposed, tenant space is not required to have power-operated doors, but remainder of building is.

**Cost Impact:** The code change proposal will decrease the cost of construction  
 This proposal will result in power-operated doors being required at fewer locations, so the cost of construction will decrease.

**Staff note:** E117-21 and E118-21 addresses requirements in a different or contradicting manner. The committee is urged to make their intentions clear with their actions on these proposals.

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## **Public Hearing Results**

**Committee Action:**

**As Submitted**

**Committee Reason:** This proposal was approved as it was preferred over E117-21. This would allow for strip malls to not require automatic doors for every small tenant space. There was a concern that this is confusing by using "separate facility or building" when you are not limited by exterior walls or fire walls. (Vote: 14-0)

**Staff Analysis:** E117-21 and E118-21 addresses requirements in a different or contradicting manner. The committee is urged to make their intentions clear with their actions on these proposals.

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## **Individual Consideration Agenda**

### **Public Comment 1:**

**IBC: 1105.1.1**

**Proponents:** Mike Nugent, representing ICC Building Code Action Committee (bcac@iccsafe.org) requests As Modified by Public Comment

**Modify as follows:**

## 2021 International Building Code

**1105.1.1 Automatic doors** . In facilities with the occupancies and building *occupant loads* indicated in Table 1105.1.1, *public entrances* that are required to be *accessible* shall have one door be either a full *power-operated door* or a *low-energy power-operated door*. Where the *public entrance* includes a vestibule, at least one door into and one door out of the vestibule shall meet the requirements of this section.

**Exception:** For the purpose of determining *power-operated door* requirements, a tenant space with ~~its own~~ a direct exterior public entrance shall be considered and without interior public access to building areas other than the tenant space shall be considered separately a separate facility and building.

**Commenter's Reason:** This public comment reflects the intent of the original proponents of Section 1105.1.1.

The purpose of this proposed modification is to improve clarity and address concerns brought up during the testimony for E117-21 and E118-21. The current exception as written would, for a mixed use building with interior and exterior doors to each tenant space, allow for each tenant space to be evaluated separately instead of the building as a whole – thus possibly allowing for a space like an interior mall to not have to have automatic doors.

There is also an issue with “considered a separate ...building”, when the IBC says a building is defined by exterior walls and fire walls, not tenant separation walls. This could be confusing.

This public comment clarifies that an individual tenant space without interior public access to other building areas is to be considered separately regarding applicability of 1105.1.1. An example would be a strip mall with separate tenant entrances. The result is if such an individual tenant space (which does not have public access to areas of the building other than the individual tenant space) does not have occupancy and occupant loads greater than Table 1105.1.1, then that individual tenant space would not be required to comply with the power-operated door requirements of 1105.1.1 – and the occupancies and occupant load of such an individual tenant space would not be included in the determination of the applicability of 1105.1.1 to the building.

On the other hand, if an individual tenant space does have interior public access to areas of the building other than the individual tenant space, the occupancies and occupant load of the individual tenant space would be included in the determination of the applicability of 1105.1.1 to the entire building. An example would be an interior mall – where the building should be considered in it's entirety.

The as submitted text would only require automatic doors at the anchor store for the strip mall in the top example and would exempt the mall at the bottom example in total. The proposed public text would treat the strip mall the same, but would also pick up automatic doors in the mall in the bottom example since there are interior corridors as well as exterior doors.