

STATE BUILDING CODE INTERPRETATION NO. I-19-02

September 23, 2002

The following is offered in response to your letter to me dated September 10, 2002 in which you seek a formal interpretation of the provisions of section 1107.2.3 of the BOCA National Building Code/1996 portion of the 1999 State Building Code as it pertains to wheelchair space dispersion.

Background: A renovation that included replacement of seating is being undertaken in a high school auditorium. The total number of seats is 1007, 314 of which are located in a mezzanine of less than 3000 square feet that is three steps above the second floor of the building, and thus, not on an accessible route.

Question: Does the code require that wheelchair spaces be provided in the mezzanine or that an accessible route be provided to the mezzanine?

Answer: No. Section 1107.2.3 of the BOCA National Building Code/1996 portion of the 1999 State Building Code states in part: "Dispersion of wheelchair locations shall be based on the availability of accessible routes to various seating areas, including seating at various levels in multilevel facilities." The mezzanine in this facility is not on an accessible route in that it is raised three risers above the nearest accessible floor. In view of exception #9 to section 1103.1 of the referenced code, the mezzanine is not required to be accessible since it is less than 3000 square feet in area and provides the same services (ie: seating) available in accessible areas. In view of the fact that the mezzanine is lawfully not located on an accessible route, the code does not require that wheelchair spaces be located in the mezzanine.