

## ADMINISTRATIVE BULLETIN

- NO. AB-011** :
- DATE** : March 4, 1998 (Updated 01/01/0811 for code references)
- SUBJECT** : Disabled Access
- TITLE** : **Use of Powered Door Operators in Lieu of Exterior and Interior Door Side Clearances**
- PURPOSE** : To detail an equivalency which may be administratively approved for the use of powered door operators in lieu of clearances adjoining exterior and interior doors of existing buildings which are required to be made accessible to persons with disabilities.
- REFERENCES** : 200710 San Francisco Building Code  
- Section 202, Unreasonable Hardship, defined  
- Section 1126A.3, Maneuvering Clearances at Doors  
- Section 1105B, Exception 1, Equivalent facilitation for Group B occupancies  
- Section 1133B.1.1.1.1 exception 3, Entrances and exterior ground floor exit doors  
- Section 1133B.2.3.2, Automatic and power-assisted doors  
- Sections 1133B.2.4.2 and 1133B.2.4.3, Maneuvering clearances at doors  
- Figures 11A-8A through 11A-8F, Level Maneuvering Clearances at Doors  
- Figures 11B-30, 11B-26A, 11B-26B, 11B-26C door side clearance requirements
- DISCUSSION** : Clearance is required adjacent to the pull side and, in some cases, the push side of doors used in accessible paths-of-travel to allow wheelchair users to approach and open doors. The current minimum required clearances are 18 inch strike side clearance for interior doors, 24 inch strike side clearance for exterior doors and 12" push side clearance for doors equipped with both latches and closers. These clearances frequently cannot be reasonably provided due to existing structural constraints or other fixed obstructions. This Administrative Bulletin outlines circumstances under which a Documentation of Unreasonable Hardship may be administratively approved for such conditions when equivalent facilitation is provided through the use of power operated doors. A door which complies with this bulletin will be considered to be accessible to and usable by persons with disabilities.

Submittal of a Documentation of Unreasonable Hardship form must be accompanied by information which documents that strict compliance with code requirements cannot be met without creating an unreasonable hardship as defined under San Francisco Building Code, Section 202. Where the cost of alterations over a three-year period exceeds the valuation threshold, this equivalency may be reconsidered as part of an Unreasonable Hardship Request accompanying subsequent remodeling permits.

Administrative approval may be granted for the use of powered door operators in lieu of side clearances if the following conditions, as applicable, are met:

1. The powered door operator is to be supplementary to manual door(s) which meet other code requirements.
2. Powered door operator is to be maintained in operating condition.
3. Powered door operator shall be operational whenever door is unlocked.
4. Powered door operator controls (~~door operator button, photocell, or other device~~ sensing devices, push plates, vertical actuation bars or other similar operating devices complying with Section 1117B.6) are to be located in a conspicuous location at both push side and pull side of the door.
5. Door operator ~~button~~ push plates shall be a minimum of 4 inches in diameter or a minimum of 4 inches by 4 inches ~~square size to be at least 9 (nine) square inches~~ and display include the International Symbol of Accessibility (ISA) complying with Section 1117B.5.8.1.
6. At each location where push plates are provided there shall be two push plates; the centerline of one push plate shall be 7 inches minimum and 8 inches maximum above the floor or ground surface and the centerline of the second push plate shall be 30 inches minimum and 44 inches maximum above the floor or ground surface. Powered door operator controls are to be mounted between 36 inches and 44 inches above the finished floor.
7. At each location where vertical actuation bars are provided the operable portion shall be located so the bottom is 5 inches maximum above the floor or ground surface and the top is 35 inches minimum above the floor or ground surface. The operable portion of each vertical actuation bar shall be a minimum of 2 inches wide and shall display the International Symbol of Accessibility (ISA) complying with Section 1117B.5.8.1.
78. Powered door operator ing devices ~~control buttons~~ shall be outside the swing of the operated door and located in an area as level as reasonable based on the existing topography and path-of-travel layout. Where there is a pair of doors with only one operated leaf, the operator should be, whenever possible, on the strike side of the operated door leaf and as close to the operated door leaf as reasonably possible.
89. A clear floor space of 30" x 48" is to be provided adjacent to each door ~~operator button~~ operating device. Objects adjacent to and below door ~~operator button~~ ing devices ~~controls~~ shall not project more than 4" from the wall.
910. The minimum time from door opening to the start of door closing shall be as indicated in the following table:

DISTANCE (feet)	TIME (seconds)
0 to 5	4
5+ to 15	7
15+ to 20	10
20+	13

The distance shall be established from the farthest operator control.

