

ADMINISTRATIVE BULLETIN

NO. AB-015 :
DATE : September 16, 1998 (Updated 01/01/14 for code references)
SUBJECT : Disabled Access
TITLE : **Allowable Temporary Interruptions to Disabled Access**

PURPOSE : The purpose of this bulletin is to establish guidelines for approval of conditions which might pose temporary interruptions in disabled access to certain areas in new or existing buildings. This bulletin further defines required maintenance of disabled access features.

REFERENCE : 2013 San Francisco Building Code
- Section 1.9, Application of Access Compliance Regulations
- Section 11B, 108, #2, Maintenance of Accessible Features
- Section 1.1.7, Order of Precedence of Codes
- Section 3401.2, Maintenance of Existing Buildings and Devices

DISCUSSION : It is the intent of this bulletin to identify specific conditions which might permit temporary, isolated interruptions in disabled access due to maintenance and repair and in testing or emergency conditions. Such permissible interruptions in access do not supersede requirements for the installation and maintenance in good working order of features and devices necessary to provide access to persons with disabilities.

Certain construction and features which typically comply with all access requirements may result in decreased access when testing or emergency conditions arise or when normal or unanticipated maintenance is required. Typical of these conditions is fire doors which are on magnetic, smoke-detector-actuated hold-opens which close upon testing of fire alarm systems or the operation of emergency systems. It is the intent of this bulletin to permit the use of devices which provide normal accessible features without requiring full access under emergency conditions.

Where the following specific conditions are met, the Department of Building Inspection will allow routine approval of normally accessible features with the understanding that in times of emergency or isolated temporary interruption such features may not provide full compliance with all access regulations.

Specific allowable temporary interruptions in access include but are not limited to the following features and conditions, which may be incorporated into the design of buildings and facilities:

1. Elevator lobby smoke doors and corridor, lobby, and other doors on permanently-installed "hold-open" devices when, during activation due to testing, service, or emergency, such doors do not provide full strike-side clearances.
2. During the normal maintenance or repair of accessible features as required by the San Francisco Building and Housing Codes. If access is to be interrupted for an extended period of time, the length of interruption shall be posted and, where possible, alternative means of access shall be provided.

The Department of Building Inspection may administratively grant unreasonable hardship requests for permanent construction that might limit access to persons with disabilities during such periods as described. Project applicant should submit the necessary Unreasonable Hardship Form and indicate the specific nature of the request for review by the Department of Building Inspection.

Originally Signed By:

Frank Y. Chiu, Director
November 12, 1998

Approved by the Building Inspection Commission on September 16, 1998