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This is a summary of the requirements for adding accessible handrails to existing monumental stairs, as adopted by the State of Oregon and the City of Portland. The interpretation provided below is not a substitute for a review of specific circumstances under the current building code which is updated periodically.

The main entries of many existing schools were built with a set of monumental stairs raising the building entries above the main sidewalk. In some cases the stairs included ornamental metal handrails, but in many cases the outer edges of the stairs were enclosed with stone banisters not of a graspable size, location and height that would have been required if the stair were built today under current building code. The Oregon Structural Specialty Code (OSSC) includes language about the requirements and exceptions for existing stairs, entries and historic structures that is consistent with the intent 2010 ADA Standards for Accessible Design (2010 ADA).

OSSC 1103.2.2 Existing buildings. Existing buildings shall comply with Section 3411.

OSSC 3411.5 Additions. Provisions for new construction shall apply to additions. An addition that affects accessibility to, or contains an area of, a primary function shall comply with the requirements of Section 3411.7.

OSSC 3411.6 Alterations. A building, facility or element that is altered shall comply with the applicable provisions in Chapter 11 of this code and ICC A117.1, unless technically infeasible. Where compliance with this section is technically infeasible, the alteration shall provide access to the maximum extent technically feasible.

Exceptions:

1. The altered element or space is not required to be on an accessible route, unless required by 3411.7.
2. Accessible means of egress required by Chapter 10 are not required to be provided in existing buildings and facilities.

OSSC 3411.7 Alterations affecting an area containing a primary function. Where an alteration affects accessibility to, or contains an area of primary function, the route to the primary function area shall be accessible.

4. This provision does not apply to alterations undertaken for the primary purpose of increasing the accessibility of an existing building, facility or element.

OSSC 3411.8.1 Entrances. Accessible entrances shall be provided in accordance with Section 1105.

Exception: Where an alteration includes alterations to an entrance, and the building or facility has an accessible entrance, the altered entrance is not required to be accessible, unless required by Section 3411.7. Signs complying with Section 1110 shall be provided.

OSSC 3411.14 Thresholds. The maximum height of thresholds at doorways shall be 3/4 inch. Such thresholds shall have beveled edges at each side.

OSSC 3411.9 Historic buildings. These provisions shall apply to buildings and facilities designated as historic structures that undergo alterations or a change in occupancy, unless technically infeasible. Where compliance with the requirements for accessible routes, entrances or toilet facilities would threaten or destroy the historic significance of the building or facility, as determined by the building official after consultation with the appropriate historic preservation officer, the alternative requirements of Sections 3411.9.1 through 3411.9.4 for that element shall be permitted.

OSSC 3411.9.1 Site arrival points. At least one accessible route from a site arrival point to an accessible entrance shall be provided.

OSSC 3411.9.2 Multilevel buildings and facilities. An accessible route from an accessible entrance to public spaces on the level of the accessible entrance shall be provided. Where an accessible route is technically infeasible to all levels then displays, written information, and documents shall be located where they can be seen by a seated person.

OSSC 3411.9.3 Entrances. At least one main entrance shall be accessible.

Exceptions:

1. If a main entrance cannot be made accessible, an accessible nonpublic entrance that is unlocked while the building is occupied shall be provided; or
2. If a main entrance cannot be made accessible, a locked accessible entrance with a notification system or remote monitoring shall be provided.

Signs complying with Section 1110 shall be provided at the primary entrance and the accessible entrance.

In summary, OSSC and 2010 ADA do not require modifications to existing monumental stairs provided that an alternative accessible entry is provided. PPS may choose to add handrails to the existing monumental stairs of any school for the purpose of increasing accessibility to non-

wheelchair users with disabilities without being required to implement additional modifications. The handrails should be of a size, height and length to be graspable. Unless historic handrails are being replicated as part of building maintenance, the new handrails should meet accessible requirements. Handrails should be located 1-1/2 inches away from the existing stone balusters of either side of the monumental stairs in order to minimize the impact to the historical integrity of the building and to avoid causing a conflict with the existing egress path out of the building.

The accessible modifications required to any particular building entry are dependent on the features of the other entries, and the strategy for the building as a whole. If an entry other than the monumental (main) entry is closest to public transportation or parking, and it is closer to grade level, that entry might have been modified to be accessible because it was more readily achievable. If one entry is accessible, including notification system with remote monitoring if the entry is not supervised, then modifications to the monumental entry are voluntary.

If the addition of a ramp or replacement of the existing monumental stairs is proposed, the new construction would be required to be fully accessible. Additionally, the new construction would be required to meet chapter 10 egress requirements. If the calculated occupant load (as opposed to the actual number of students and staff) exiting the building at the monumental stairs is greater than 200 persons, then intermediate handrails 5 feet apart may be required. Since the existing door placement relative to stair handrails affects the egress path, latitude is given to the building official to review both egress and historical significance before determining final requirements.