



Issue Date:	March 2, 2023
Code/Section:	2012 IBC sections 202, 1103.2.9, 1104.3.2, 1104.4, 1109.8, 3411.3, 3411.4, 3411.5, 3411.6, 3411.7, 3411.8
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Issue:

- When is an elevator required to basements, upper levels and mezzanines in multilevel buildings?
- What are the requirements for the various design scenarios based on IBC exceptions?
- What are the applicable code sections?
- Note that the levels that have an accessible route to them are not included in the 3,000 SF, IBC 1104.4 exception 1. The 3,000 SF is the combined area of all levels that do not have an accessible route to them.

Interpretation:

New construction

1. Basements, upper level(s) or mezzanine(s) with an aggregate area > 3000 SF: An elevator is required. (IBC section 1104.4)
2. Basements, upper level(s) or mezzanine(s) with an aggregate area equal or < 3000 SF: An elevator is not required. This exception may not be used for malls (multi-tenant mercantile), doctors or dentists' offices (offices of health care providers) or bus stations, train stations or airports (passenger transportation facilities). (IBC section 1104.4)
3. Upper level(s) or mezzanine(s) with an aggregate area > 3000 SF but equal or < 3000 SF after equipment spaces (or other exempt areas per IBC 1103.2) are subtracted: An elevator is not required. (IBC sections 1103.2, 1104.4)
4. Catwalks with an aggregate area equal or < 3000 SF between storage racks. An elevator is not required. (IBC section 1104.4)
5. Raised press boxes: See exceptions for elevators to press boxes in bleachers and raised freestanding press boxes. (IBC section 1104.3.2)

Additions within existing walls of existing buildings:

1. New basement(s), upper level (s) and mezzanine(s) > 3000 SF: An elevator or platform lift is required. It may extend to the addition only and not to the existing non-accessible level(s). (IBC sections 1104.4, 3411.5, 3411.8.3)
2. New basements, upper level (s) and mezzanine(s) equal or < 3000 SF but sum of existing basements, upper level and addition(s) > 3000 SF: (This includes cases where the aggregate of the existing non-accessible levels were already > 3000 SF.) An elevator or platform lift is required unless the cost of the elevator or platform lift exceeds 20% of the construction cost of the additional levels (IBC 3411.7 exception 1). If an elevator or platform lift is required, it can extend to just the addition and not the existing upper level. (IBC sections 1104.4, 3411.7, 3411.8.2, 3411.8.3)
3. Where the new basement(s), upper level(s) or mezzanine(s) have an accessible route provided by an elevator in the existing building, a new elevator is not required (IBC sections 1104.4, 3411.3).
4. Sum of existing basement(s), upper level(s) or mezzanine(s) and new basement(s), upper level(s) or mezzanine(s) equal or < 3000 SF: An elevator is not required. (IBC sections 1104.4, 3411.3, 3411.5)

Additions to existing buildings, constructed beyond the existing buildings exterior walls:

1. New basement(s), upper level(s) and mezzanine(s) > 3000 SF: An elevator or platform lift is required. It can extend to the addition only and not to the existing non-accessible level(s). (IBC sections 1104.4, 3411.5, 3411.8.2, 3411.8.3)
2. Sum of existing basement(s), upper level(s) or mezzanine(s) and new basement(s) upper level(s) or mezzanine(s) equal or < 3000 SF: An elevator is not required. (IBC sections 1104.4, 3411.3, 3411.5)
3. New basement(s), upper level (s) and mezzanine(s) equal or < 3000 SF: An elevator is not required, regardless of the size of any existing basements, upper levels and mezzanines within the existing building, as long as the existing and new levels are not physically connected (with communicating circulation). (IBC sections 1104.4, 3411.5)

Existing buildings, but no increase in upper level SF

1. No alterations: Where there are no alterations, the ADA may require barrier removal.
2. Alterations where the area being altered is in a basement, upper level or mezzanine that has an area of > 3,000 SF: An elevator or platform lift is required unless technically infeasible or the cost of the elevator or platform lift (along with the other improvements to the accessible route and bathrooms) exceeds 20% of the construction cost of the alteration. The accessible route should be improved until either the building is fully accessible or the 20% is spent. (IBC sections 1104.4, 3411.3, 3411.6, 3411.7, 3411.8.2, 3411.8.3)
3. Alterations where the area being altered is in a basement, upper level or mezzanine that has an area of equal or < 3,000 SF: An elevator or platform lift is not required. (IBC sections 1104.4, 3411.3)

4. Partial change of occupancy: The requirements are the same as those for buildings with no change of occupancies - see items 1, 2 and 3 above. (IBC sections 1104.4, 3411.3, 3411.4.1, 3411.6, 3411.7, 3411.8)
5. Complete change of occupancies: The requirements are the same as those for buildings with no change of occupancies - see items 1, 2 and 3 above. (Although the requirements for complete change of occupancies appear to be more restrictive IBC section 3411.4.2 references section 3411.4.1, which in turn references 3411.7. The accessible features listed in IBC 3411.4.2 are in the order of priority when choosing which elements of the accessible route to upgrade in the case of an alteration. Note that the 2010 ADA Standards does not have specific requirements for change of occupancies.) (IBC section 1104.4, 3411.3, 3411.4.1, 3411.4.2, 3411.7, 3411.8)

Definitions:

1. Aggregate area- sum of the whole