BC BUILDING CODE INTERPRETATION COMMITTEE

A joint committee with members representing AIBC, EGBC, BOABC

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Interpretation Date:	April 16, 2024
Building Code Edition:	BC Building Code 2024
Subject:	Power door operators for entry doors
Keywords:	Accessibility, power door operators, entrance
Building Code Reference(s):	Div B: 3.8.2.2.(1); 3.8.2.2.(2); 3.8.2.7.(1)(a)

Question:

- 1. Clause 3.8.2.7.(1)(a) requires an accessible entrance referred to in Article 3.8.2.2.(1) be equipped with power door operators. Do all required accessible entrances of a building require power door operators?
- 2. If the accessible entrance(s) in question 1 meets the accessible door clearances in Sentence 3.8.3.6.(11), is a power door operator still required?
- 3. Do exterior doors leading to/from an exterior space that is part of the building such as a restaurant patio or an outdoor play space for a daycare require a power door operator?

Interpretation:

1. Yes (with exceptions).

Sentence 3.8.2.2.(1) requires all pedestrian entrances to an accessible storey to be accessible except service entrances and entrances to residential suites described in Clause 3.8.2.3.(2)(I). If there are multiple entrances to an accessible storey of a building this requirement applies to all entrances.

Sentence 3.8.2.2.(2) requires an accessible entrance required by Sentence (1) shall be designed in accordance with Subsection 3.8.3. Even though Sentence (2) indicates a singular entrance by using the word "an" but it means to cover each of those accessible entrances required by Sentence (1).

Clause 3.8.2.7.(1)(a) requires doors located in an entrance referred to in Article 3.8.2.2. be equipped with power door operators. Such requirement shall apply to every accessible entrance even though "an entrance" is being referred to.

Similarly, Clause 3.8.2.7.(1)(b) refers to an accessible path of travel. That applies to every accessible path of travel.

Patrick Shek, P.Eng., CP, FEC, Committee Chair

The views expressed are the consensus of the joint committee with members representing AIBC, EGBC and BOABC, which form the BC Building Code Interpretation Committee. The Building and Safety Standards Branch, Province of BC and the City of Vancouver participate in the committee's proceedings with respect to interpretations of the BC Building Code. The purpose of the committee is to encourage uniform province wide interpretation of the BC Building Code. These views should not be considered as the official interpretation of legislated requirements based on the BC Building Code, as final responsibility for an interpretation rests with the local *Authority Having Jurisdiction*. The views of the joint committee should not be construed as legal advice.

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Sentence 3.8.2.2.(3) only requires one of the doorways at an accessible entrance that includes more than one doorway, to be designed in accordance with Subsection 3.8.3. Sentence 3.8.2.7.(3) only requires one doorway to be equipped with a power door operator where more than one doorway is provided at an accessible entrance.

Notes to Sentence 3.8.2.7.(3) provides clarification: "In selecting which doorway to equip with a power door operator as required by Sentence 3.8.2.7.(3), consideration should be given to the location of accessible paths of travel, to ease of access, and to minimizing congestion."

2. Yes.

Clause 3.8.2.7.(1)(a) requires entrance doors to be equipped with a power door operator regardless if they meet the door clearances in Sentence 3.8.3.6.(11). Sentence 3.8.3.6.(6) provides specific clearances for doors equipped with a power door operator and references Sentence 3.8.2.7.(1) for entrances.

3. No (with conditions).

Doors to exterior areas of a facility such as a restaurant patio and outdoor play spaces are likely within an accessible path of travel and therefore are required to have door clearances specified in Sentence 3.8.3.6.(11). If the doors are equipped with a power door operator, then the door clearance may conform to Sentence 3.8.3.6.(6).

Note A-3.8.2.2. clarifies that "doors that open onto exterior facilities that are only accessible from inside the building (e.g., hotel pools) are not considered entrances in the context of Article 3.8.2.2."

Power door operators are not required for self-contained exterior areas where the required door clearances are provided.

However, if such door is also served as a normal entrance to the suite, such as a restaurant in a shopping mall, even though there may be another entrance to the suite from inside the mall, such entrance would be considered as a pedestrian entrance to the suite and a power door operator is required. It is also because the restaurant may still be open while the mall entrance is closed.

Patrick Shek, P.Eng., CP, FEC, Committee Chair

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