



Washington State Building Code Council

Improving the built environment by promoting health, safety and welfare

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STATE BUILDING CODE OPINION NO. 20-01

CODE: 2015 International Mechanical Code
2015 International Building Code

SECTION: IMC Chapter 4
IBC 1109

QUESTION: Are air inlets installed within exterior windows (aka trickle vents) in Accessible, Type A, and Type B residential dwelling units “environmental controls,” and therefore, required to be accessible?

ANSWER: Yes.

Air inlet controls are considered environmental controls. They permit the occupant to control the amount of outside air being introduced into a dwelling unit. The outside air is being provided to comply with the requirement for ventilation air. The amount of outside air being introduced into the unit will affect the environment of the unit, in terms of temperature and air quality.

As such, air inlet controls are required to be accessible, in accordance with 2009 ICC/ANSI A117.1 (A117.1), Section 309, Operable Parts, as follows:

- The air inlet controls are required by the Washington State amendments to 2015 IMC Section 403.4.6.1, Item 1.2, which then points to the requirement that environmental controls be accessible (2015 IBC Section 1109.13).
- Separately, the exception to IBC Section 1109.1 requires Accessible, Type A, and Type B units to comply with A117.1 Chapter 10. Sections 1002.9, 1003.9, and 1004.9 require environmental controls to be accessible.
 - ICC/ANSI A117.1 Section 309 requires controls to be:
 - Provided with a 30”x48” clear floor space compliant with A117.1 Section 305 (ref. Section 309.2);
 - Located within one of the reach ranges listed in A117.1 Section 308 (ref. Section 309.3); and
 - Operable with one hand without any tight grasping, pinching, or twisting of the wrist and with 5 pounds maximum operable force (ref. Section 309.4)

Additionally, they would need to be accessible even if air inlets (aka trickle vents) are voluntarily provided and operable windows are the code compliant make-up air path for the whole house exhaust system.

SUPERSEDES: None

REQUESTED BY: City of Seattle