



**LEE'S SUMMIT**  
MISSOURI

**CODE MODIFICATION REQUEST**  
(COMMERCIAL)

BUILDING/STRUCTURE NAME: Paragon Star – Building 2 Shell

PREMISE ADDRESS: 3201 NW Paragon Pkwy Lee's Summit, MO

PERMIT NUMBER (if applicable): PRCOM20192646

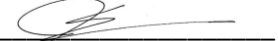
OWNER'S NAME: Paragon Star

TO: Director of Development Services

In accordance with the Lee's Summit Building Code, I wish to apply for a modification to one or more provisions of the code as I feel that the spirit and intent of the Lee's Summit Building Code are observed the public health, welfare and safety are assured. The following articulates my request for your review and action. (NOTE: ATTACH ANY ADDITIONAL INFORMATION NECESSARY)

Our request is for an alternate interpretation of 2018 IBC 1015.2 Guardrail Height. Guardrails are required to prevent falls from 30" or more above the adjacent floor surface. The guardrails shown on Sheets A6.02 and A6.03 start no more than 12" above the adjacent floor surface. We've included images of stairs recently constructed in other local jurisdictions that have a similar guardrail detail (see Exhibits A and B). We have also included an excerpt from the ICC Code Commentary for 2018 IBC 1015.2 (Exhibit C). We have also included an official code interpretation from the ICC (Exhibit D) supporting our request.

SUBMITTED BY:

NAME: Jessica Reed-Shultz ( ) OWNER (X) OWNER'S AGENT  
ADDRESS: 8787 Renner Blvd, Ste 100 Tel.# 913-498-1550 x 112  
CITY, STATE, ZIP: Lenexa, KS 66219 SIGNATURE: 

TRACY DEISTER – MANAGER OF CODES ADMINISTRATION: ( ) APPROVAL ( ) DENIAL

SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

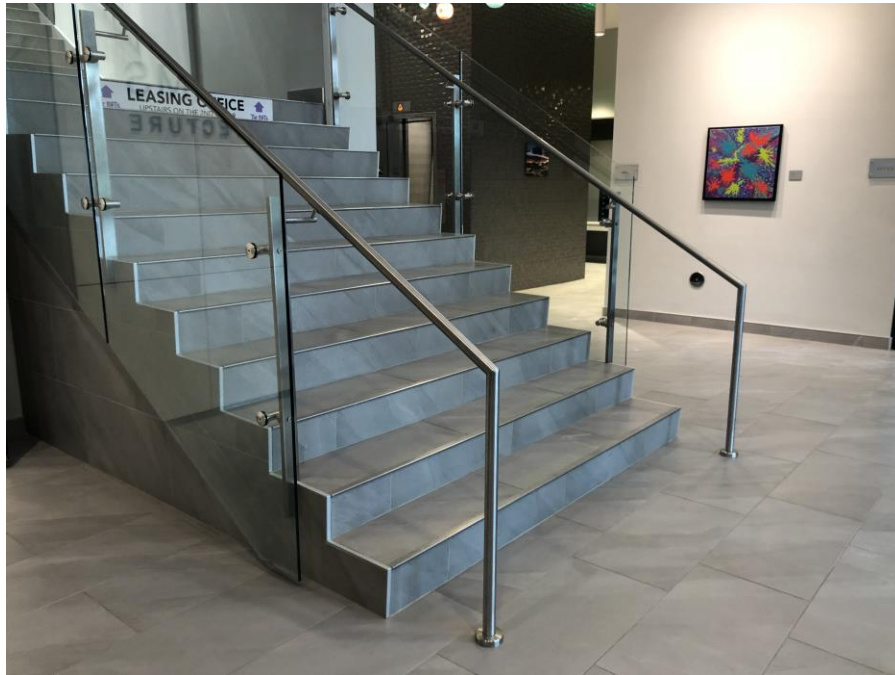
RYAN ELAM – DIRECTOR OF DEVELOPMENT SERVICES: ( ) APPROVED ( ) DENIED

SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

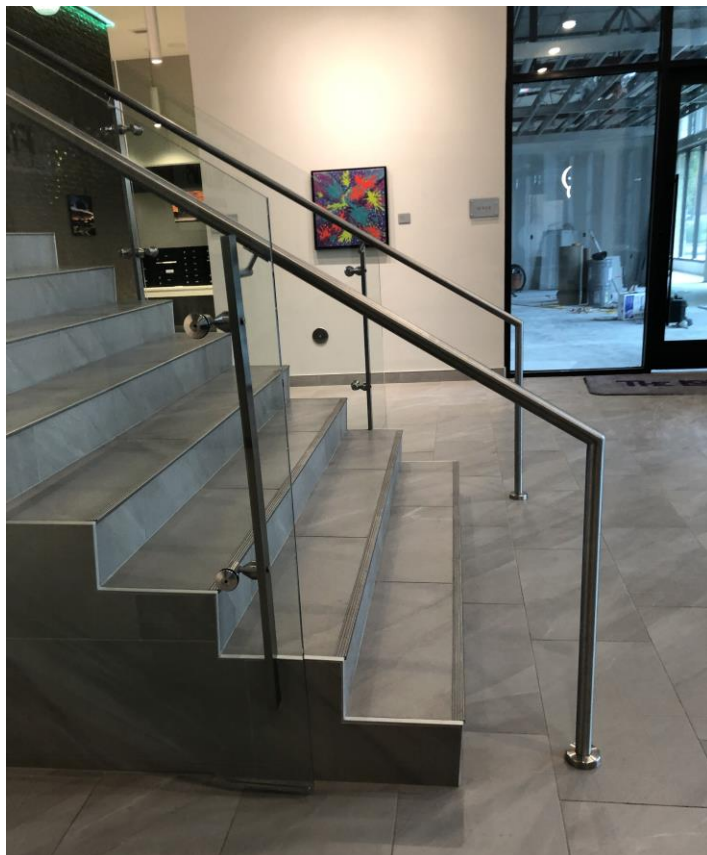
COMMENTS: \_\_\_\_\_

**A COPY MUST BE ATTACHED TO THE APPROVED PLANS ON THE JOB SITE**

**EXHIBIT A** (mixed-use building completed in 2020 in Lenexa, KS):



**EXHIBIT B** (mixed-use building completed in 2020 in Lenexa, KS):



**EXHIBIT C** (excerpt from the 2018 IBC Code Commentary Vol. 1 for Section 1015.2):

❖ Where one or more sides of a walking surface are open to the floor level or grade below, a guard system must be provided to minimize the possibility of occupants accidentally falling to the surface below. A guard is required only where the difference in elevation between the higher walking surface and the surface below is greater than 30 inches (762 mm). Where the ground slopes away from the edge, the vertical distance from the walking surface to the grade or floor below must also be more than 30 inches (762 mm) on the lowest point within a 36-inch (914 mm) radius measured horizontally from the edge of the open-sided walking surface (see Commentary Figure 1015.2).

The loads for guard design are addressed in Section 1607 and are typically 50 plf (0.73 kN/m) along the top with a 200-pound (0.89 kN) concentrated force. If glazing is used as part of a guard system, or windows are located adjacent to stairways or ramps, the guard must also comply with Section 1015.2.1 (see Sections 1015.2.1, 1607.8 and 2407).

**EXHIBIT D** (official code interpretation from the International Code Council received on June 14, 2022):

**Ellen Foster**

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**From:** John Gonzalez <jgonzalez@iccsafe.org>  
**Sent:** Tuesday, June 14, 2022 4:34 PM  
**To:** Ellen Foster  
**Cc:** Chris Reeves  
**Subject:** RE: 2018 IBC Section 1015.2

June 14, 2022

Dear Ms. Foster:

Re: Section 1015.2 of the *2018 International Building Code* (IBC)

This e-mail is in response to your submitted ICC-online staff opinion request, with attachment of two stairway photos, regarding the above referenced code section. (See the e-mail thread below, as well as the attachment link, for the specifically asked question.)

**ANSWER:** Section 1015.2 indicates that a guard is required along an open-sided stairway where the walking surface is more than 30 inches, measured vertically, above the floor or grade below. The provision further indicates that the vertical measurement shall be taken at any point within 36 inches horizontally to the edge of the open side. The provisions do not indicate that an entire stairway must be provided with guard protection where a portion of an open-sided stairway has a drop off of more than 30 inches. As such, and as depicted in the two submitted photographs, a required guard can terminate towards the bottom of the flight of stairs once there is no longer an open-sided walking surface condition which is more than 30 inches above the floor or grade below. In other words, the code does not necessarily require that a guard extend to the bottommost tread of an open-sided stairway.

Code opinions issued by ICC staff are based on ICC-published codes and do not include local, state or federal codes, policies or amendments. This opinion is based on the information which you have provided. We have made no independent effort to verify the accuracy of this information nor have we conducted a review beyond the scope of your question. This opinion does not imply approval of an equivalency, specific product, specific design, or specific installation and cannot be published in any form implying such approval by the International Code Council. As this opinion is only advisory, the final decision is the responsibility of the designated authority charged with the administration and enforcement of this code.

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Sincerely,

**John S. Gonzalez**  
**ICC Senior Technical Staff**  
Central Regional Office (Chicago)  
4051 West Flossmoor Road  
Country Club Hills, IL 60478  
888-ICC-SAFE (422-7233), x4232 phone  
[jgonzalez@iccsafe.org](mailto:jgonzalez@iccsafe.org)

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**From:** Chris Reeves <creeves@iccsafe.org>  
**Sent:** Thursday, June 2, 2022 3:55 PM  
**To:** efoster@finklewilliams.com  
**Cc:** John Gonzalez <jgonzalez@iccsafe.org>  
**Subject:** 2018 IBC Section 1015.2

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