

STATE BUILDING CODE INTERPRETATION NO. I-14-06

June 9, 2006

The following is offered in response to your May 31, 2006 letter to me in which you seek an official interpretation of the provisions of Sections R310.1, R310.3 and R311.5.8.2 of the 2003 International Residential Code portion of the 2005 State Building Code.

Question 1: In new construction where a sleeping room is provided in the basement, does the code allow a typical pre-cast bulkhead stairway (which does not meet the code's requirements for egress stairway riser height, tread depth, handrails and headroom) to be used as the only emergency escape and rescue opening in the sleeping room?

Answer 1: Yes. Section R310.1 of the referenced code allows the use of a bulkhead enclosure complying with Section R310.3 as the required emergency escape and rescue opening from basements with habitable space and from basement sleeping rooms. Section R310.3 requires that the bulkhead enclosure provide direct access to the basement, provide the required net clear opening with the doors in the open position and comply with Section R311.5.8.2. Section R311.5.8.2 states that bulkhead enclosures that are not part of the required building egress are exempt from the requirements of R311.4.3 (landings at exterior doors) and R311.5 (stairway width, headroom, treads and risers, landings, walking surface, handrails and illumination) as long as the maximum height from the basement floor to the grade adjacent to the hatchway does not exceed 8 feet. Since Section R310.1 requires an emergency and escape *opening* rather than an egress, as long as the maximum height limitation of Section R311.5.8.2 is not exceeded, a typical pre-cast bulkhead enclosure is allowed to fulfill the requirements of R310.1.

Question 2: In new construction with habitable space without sleeping rooms in the basement is the typical pre-cast bulkhead stairway described in Question 1 acceptable as one of the two code compliant stairways required in Section R310.1, Exception 1?

Answer 2: No. However, given that the response to Question 1 indicates that the bulkhead enclosure by itself fulfills the requirements of Section R310.1, there is no need to go to the exceptions with regard to the bulkhead enclosure. The intent of Exception 1 is that when a basement with habitable space without sleeping rooms is equipped with two remote stairs that both comply with Section R311.5, there is no requirement to provide additional emergency escape and rescue openings. The justification is that without sleeping rooms, occupants are awake and aware and that it is unlikely for both stairs to be compromised by a single fire event so a means of egress path would always be available.