

STATE BUILDING CODE INTERPRETATION NO. I-10-03

June 9, 2003

The following is offered in response to your June 3, 2003 letter to me in which you request several formal interpretations regarding various accessibility provisions of the 1999 State Building Code.

BOCA National Building Code/1996:

Question 1: In exception 1 to section 1108.2, does the term "single occupant" refer to a single specific individual who will use the toilet room or does it refer to use of the toilet room by several different people, one at a time?

Answer 1: For the purposes of this section, the controlling phrase is "nonpublic". The intent of this exception is that a toilet facility that accommodates only one person at a time that is accessed directly off a private office, rather than from a public space, hallway or corridor is permitted to be adaptable rather than accessible.

Question 2: Does the term "adaptable" refer to the future enlargement of the room for proper clear floor circulation, or is adaptability simply adding grab bars to a room pre-sized for use by persons with disabilities?

Answer 2: The concept of adaptability refers to minor changes to a space that may be required to be fully accessible in the future, and does not allow for demolition or relocation of partitions, doors, etc. to provide additional space. An adaptable space must be constructed initially with all required clearances and floor spaces, as well as having the minimum reach ranges being met for operational controls. An adaptable space may be lacking required grab bars, but the blocking must be in place. An adaptable toilet facility may likewise have a toilet seat that is too low, but can be raised; and may have a vanity under the sink that can be removed. While Type A dwelling units do not apply in this situation, the philosophy incorporated is similar to the concept of adaptability.

ICC/ANSI A 117.1 – 1998:

Question 3: Are portions of the lavatory and water closet in an accessible toilet room permitted to be within the 60 inch turning circle when the 9 inch toe height and 11 inch toe depth are met?

Answer 3: Yes. Section 304.3.1 of the referenced standard specifically states that the circular wheelchair turning space shall be permitted to include knee and toe clearance complying with Section 306.

Question 4: Is the front edge of a lavatory in an accessible toilet room permitted to extend within the 2'-0" clear dimension from the latch side of the door?

Answer 4: No. Although other provisions of the code take knee and toe space into account, the door maneuvering clearances set forth in Section 404.2.4 do not allow any portion of any element to be located within the required minimum clearances of Table 404.2.4.1.

1997 International Plumbing Code:

Question 5: Do Sections 403.4 and 403.6 of the 1997 IPC permit toilet facilities that are not accessible to persons with disabilities to be located within tenant spaces when accessible facilities are located within common areas of the same building?

Answer 5: No. The 1997 International Plumbing Code only specifies where employee and customer facilities must be located – it does not contain scoping requirements for accessibility. Section 1108.2 of the BOCA National Building Code/1996 portion of the 1999 State Building Code states, in part, that toilet rooms shall be accessible and that at least one of each type fixture or element in each accessible toilet room shall be accessible. So, unless one of the two exceptions to this section is met; every toilet room, required by the code or not, must have at least one of each fixture accessible to persons with disabilities, regardless of the number or proximity of other toilet facilities elsewhere in the building.