

## STATE BUILDING CODE INTERPRETATION NO. I-15-10

February 3, 2011

The following is being offered in response to your letter dated December 1, 2010 in which you seek a formal interpretation. The question would apply to Section 1103.2.2 and 3409.3 of the 2003 International Building Code portion of the 2005 State Building Code.

### Scenario:

"I would like to convert the garages of two townhouse units into a sales office at Timber Oak, which is a townhouse project (Currently all type 'B' units that have been built are sold and occupied). The townhouses units are and will remain our model units until we sell out."

### Question:

"Would I be required to have a handicapped ramp from the sales office into the main level model units themselves once I turn the garages into a sales office. I have also enclosed a copy of the plans for you to look at."

### Answer:

The proposed scope of work changes a portion each of the existing townhouse residence garages to a business use. To evaluate this scenario, the code path begins with Section 1103.2.2, which states in part that *"Existing buildings shall comply with Section 3409."* Section 3409.3 addresses existing buildings or portions thereof that undergo a change of group or occupancy. This section states nine minimum required accessible features.

Each of the townhouse floor plans show an existing interior door that directly enters into the residence, (two different models), from the garage space. The existing door connects both spaces. Section 3409.3, item #2 requires that *"At least one accessible route from an accessible building entrance be provided to the primary function areas."* In this scenario, both the sales office and the model residential dwelling units are considered primary function areas, and therefore an accessible route from the sales office area to the remainder of the building is required.