

STATE BUILDING CODE INTERPRETATION NO. I-21-06

October 23, 2006

The following is offered in response to your October 19, 2006 letter to me in which you seek an official interpretation of the requirements of Section 606.5 of the ICC/ANSI A117.1-2003 standard and Section 1109.2.5 of the 2003 International Building Code (IBC). Both documents are portions of the 2005 State Building Code.

Question: Section 606.5 of the ICC/ANSI standard and Section 1109.2.5 of the IBC appear to conflict with one another in that the ICC/ANSI standard requires a maximum reach depth of 11 inches where enhanced reach range is required, while the IBC requires a maximum of 13 inches from the face of the fixture or vanity to the faucet and control in at least one lavatory per gender per bathroom. Which requirement is to be followed?

Answer: The IBC controls this issue for two reasons: First, although the ICC/ANSI standard provides dimensional requirements for accessibility issues such as reach ranges, it contains no scoping requirements to tell the user when such a reach range is required. Scoping requirements come from the building code; and Chapter 11 of the IBC contains no scoping requirements for lavatories with "enhanced reach range". Thus, when used in combination with the IBC, Section 606.5 is in effect, non-existent, since there is no code path to get to that particular reach range requirement.

Secondly, Section 102.4 of the IBC clearly states that where differences occur between the provisions of the code and referenced standards (such as the ICC/ANSI standard), the provisions of the code shall apply. Bottom line is, when designing accessible lavatories, the provisions of Section 1109.2.5 of the IBC shall be followed and the provisions of Section 606.5 of the ICC/ANSI standard shall be ignored.