

STATE BUILDING CODE INTERPRETATION I-06-07

March 9, 2007

The following is offered in response to your February 23 and 28, 2007 letters to me in which you seek formal interpretations of the provisions of the ICC/ANSI A117.1-2003 Standard as adopted and amended by the 2005 State Building Code. Your questions have to do with turning space closets and bathrooms Type A and B dwelling units, regulated by Sections 1003.3.2 and 1004.3.3.

Question 1: Is it the intent of the code to require a turning space within a walk-in closet, and how does one determine when a closet is a walk-in rather than a deep, traditional closet?

Answer 1: It is the intent of the code to require a turning space within all rooms served by an accessible route (this is spelled out for Type A units in Section 1003.3.2 but Section 1004.3.3, which regulates Type B units inadvertently substituted the word “spaces” for “rooms”, thus being more restrictive than the Type A requirements – this disparity is being addressed in the 2007 Amendments). Since a closet, walk-in or otherwise, is not a room, it is not the intent of the standard to require a turning space in a walk-in closet. The code does, however, have other requirements that would apply, such as maneuvering clearances at doors and the height of shelves, rods and light switches.

How one determines if a closet is indeed a walk-in is more than just a question of its depth. The typical nominal 24 inch depth of a closet is in many cases insufficient to properly store bulky items of clothing. Rather than use depth of the closet to determine its walk-in status, one must evaluate the layout and functional use of the closet. If one can reach through the door opening and get the items stored, the closet is not a walk-in. If, however, one must travel through the door opening to reach the items stored, it is considered a walk-in.

Question 2: In a Type B dwelling unit that utilizes Option B for the toilet and bathing rooms, do the toilet and bathing rooms that are not required to have accessible fixtures have to have a wheelchair turning space?

Answer 2: No. When one follows Option B in a Type B dwelling unit only one bathroom must meet the Option B requirements. The accessible fixtures must, however, be located in a single toilet/bathing area such that travel between fixtures does not require travel through other parts of the unit.