

ADVISORY COMMITTEE COMMENT FORM
FOR PROPOSED CODE CHANGES
(This form must be submitted electronically)

IRC-97, R311.7 (REV 2-17-2012)

Author/requestor: **1309 Committee (2-14-2012 meeting)**

Email address:

Telephone number:

Firm/Association affiliation, if any:

Proposed Code Change - Language

R311.7 Stairways. All stairways serving a dwelling or accessory structure or any part thereof shall comply with this section. This shall include exterior stairs from a dwelling or garage to grade and those stairs serving decks, porches, balconies, sun rooms, and similar structures.

Exceptions:

1. Stairs serving attics or crawl spaces.
2. Stairs that only provide access to plumbing, mechanical, or electrical equipment.
3. ~~Stairs that serve structures or spaces used by children as play areas.~~

Proposed Code Change – Need and Reason

When reading Section R311 of the IRC regarding stairs, the language supports only two interpretations on how stairs are regulated. Those two interpretations are that either all stairs must comply with the section or only those stairs that are a part of the means of egress should comply. There is no other language that allows vacillation between those interpretations.

The title of the section is “Means of Egress”. R311.1 requires a means of egress from “all portions of the dwelling to the exterior of the dwelling...” R311.4 qualifies the charging language by stating that every habitable level including basements must either have an exterior exit door meeting the requirements of R311.2 or have a stair or ramp connecting that level to a level that has such a door. Note that it does not say “stairs” or “ramps” but “stair” or “ramp” (singular).

The text of the code does not support regulating stairs that are not a part of the “means of egress”. This theory is apparently wide spread because many building officials are of the opinion that stairs used in landscaping are not regulated. Also, attempts to submit code changes to the ICC IRC Committee to give relief for stairs to attics and crawl spaces have been met with resistance from the Committee with the statement that they are already exempt. One can come to that conclusion only if you interpret the stair rules to apply to the means of egress and only one means of egress is required and that is only required from the dwelling, not attics, crawl spaces, and garages.

But if you take the position that the section only regulates those stairs that are part of the means of egress, stairways serving attics and crawl space and landscaping stairs would not be regulated but also stairs serving decks and the stairs commonly found serving as a path or travel from a dwelling to a garage would not be. In fact, R311.1 specifically prohibits a means of egress from traveling through a garage.

So there is confusion as to whether or not the code does regulate or intends to regulate certain stairs. This proposal makes it clear that all stairs are required to comply with the code unless specifically exempted. If this proposal is supported, stairs that are part of landscaping would be exempt. Stairs from a deck or from one level or a deck to another would be regulated. Stairs between a dwelling and garage would be regulated. Stairs serving an attic or crawl space would not be regulated. The current text already exempts stairs to crawl spaces by Section R311.4 but not directly. It exempts them because it does not list crawl spaces as a location where compliant stairs are required. But this also supports the possibility that the code does not regulate stairs serving a deck.

It is necessary to eliminate the confusion and inconsistency that exists in the enforcement of stair requirements that this language be approved. The proposal is reasonable because it puts into written format what is commonly accepted to be code language even if it cannot be supported by that text.

The following is for informational purposes only.

**SECTION R311
MEANS OF EGRESS**

R311.1 Means of egress. All *dwellings* shall be provided with a means of egress as provided in this section. The means of egress shall provide a continuous and unobstructed path of vertical and horizontal egress travel from all portions of the *dwelling* to the exterior of the *dwelling* at the required egress door without requiring travel through a garage.

And,

R311.4 Vertical egress. Egress from habitable levels including habitable attics and *basements* not provided with an egress door in accordance with Section R311.2 shall be by a ramp in accordance with Section R311.8 or a stairway in accordance with Section R311.7.

Proposed Code Change – Cost/Benefit Analysis

This proposal will reduce the cost of construction.

Other Factors to Consider Related to Proposed Code Change

1. Is this proposed code change meant to:

change language contained in a published code book? If so, list section(s).
2012 IRC section **R311.7**

change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

delete language contained in a published code book? If so, list section(s).

delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

neither; this language will be new language, not found in the code book or in Minnesota Rule.

2. Is this proposed code change required by a Minnesota Statute or new legislation? If so, please provide the citation to the Statute or legislation.

No

3. Will this proposed code change impact other sections of a published code book or of an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.

No

4. Will this proposed code change impact other parts of the Minnesota State Building Code? If so, please list the affected parts of the Minnesota State Building Code.

No

5. Who are the parties affected or segments of industry affected by this proposed code change?

Code officials, building designers, contractors, building owners

6. Can you think of other means or methods to achieve the purpose of the proposed code change? If so, please explain what they are and why your proposed change is the preferred method or means to achieve the desired result.

No

7. Are you aware of any federal requirement or regulation related to this proposed code change? If so, please list the regulation or requirement.

No