



Office of the State Building Inspector

October 15, 2020

Brian Worsham
Pelletier Builders, Inc.
138 Main Street
Coventry, CT 06238

I-20-09

Request for Formal Interpretation of the 2018 Connecticut State Building Code

Dear Mr. Worsham,

You have requested a formal interpretation of sections 1103 and 1104 of the 2018 Connecticut State Building Code.

Question #1:

In a two-story building where each floor is greater than 3,000 SF where an interior convenience stairway connects the two stories, is an interior accessible route, i.e. ramp or elevator, required even if both levels are at grade and have accessible entrances?

Answer #1:

Yes, per Section 1104.5 of the 2015 International Building Code where a circulation route is provided, a coincident accessible route must also be provided. In this case an interior circulation path (the stairway) is provided therefore an interior accessible route must also be provided.

1104.5 Location. Accessible routes shall coincide with or be located in the same area as a general circulation path. Where the circulation path is interior, the accessible route shall also be interior. Where only one accessible route is provided, the accessible route shall not pass through kitchens, storage rooms, restrooms, closets or similar spaces.

Question #2:

In relation to the building described in question #1, could section 1103.2.2 Employee Work Areas be applied to an entire story of this building to eliminate the need for an accessible interior route?

Answer #2:

No. This section applies to elements within discrete work areas such as a laboratory station or cubicle. An accessible means of egress and an accessible circulation path must still be provided to these work areas under this section.

Sincerely,

Joseph V. Cassidy, P.E.
State Building Inspector

C: Darren Hobbs, Deputy State Building Inspector