
FIRE PREVENTION AND BUILDING SAFETY COMMISSION
Department of Homeland Security**Interpretation #: CEB-2021-32-2014 IBC-1007.1****Building or Fire Safety Law Interpreted****675 IAC 13-2.6 2014 Indiana Building Code Section 1007.1**

Accessible means of egress required. *Accessible means of egress shall comply with this section. Accessible spaces shall be provided with not less than one accessible means of egress. Where more than one means of egress are required by Section 1015.1 or 1021.1 from any accessible space, each accessible portion of the space shall be served by not less than two accessible means of egress. [Exceptions have been omitted for lack of relevance to the request.]*

Issue

Does Section 1007.1 of the 2014 Indiana Building Code (IBC) include a general requirement that all provided means of egress in a structure be accessible?

Interpretation of the State Building Commissioner

No, Section 1007.1 of the 2014 IBC does not include a general requirement that all provided means of egress in a structure be accessible.

Rationale

Section 1007.1 sets the minimum required numbers of accessible means of egress. It contains basic requirements for two distinct conditions: 1) accessible spaces must have no fewer than one accessible means of egress; and 2) where either Section 1015.1 or Section 1021.1 requires more than one means of egress from an accessible space, then each accessible portion of the space must have no fewer than two accessible means of egress. It is important to note that nowhere in this section does it tie the need for accessibility to the fact that a given means of egress is *required*, and nowhere does it state that *all* provided means of egress must be accessible. This is seen when examining each requirement in detail:

The first stated requirement is simple: each accessible space must have at least one accessible means of egress. Put simply, if there is an accessible space, it must have no fewer than one accessible means of egress. It is important not to read more into that statement than is there. No mention is made of "required means of egress" needing to be accessible. Whatever means of egress a designer provides from an accessible space, she or he must make at least one of them accessible. It says nothing more than that.

The second requirement is not much more complex than the first: if an accessible space is required by Sections 1015.1 or 1021.1 to have *more* than one means of egress, then each accessible portion of the space must have no fewer than two accessible means of egress. Again, there is no statement about which of the various means of egress must be accessible – only that there can be no fewer than two that are.

As a result of this examination, we find two key concepts contained in the regulation: 1) the minimum number of required accessible means of egress is *limited*, the final necessary number being dependent on the size and design of the structure; and 2) it does not specify which of the provided means of egress are the ones that must be made accessible.

Potential ancillary issues: maximum travel distances and accessible building components

This could lead some to raise a follow-up issue regarding maximum allowable travel distance, namely, if a building is large enough that multiple means of egress must be provided to maintain compliance with exit access travel distance regulations, then making only the minimum required number of them accessible (as directed by Section 1007.1) can potentially or will even likely lead to a situation in which the exit access travel distances for those accessible means of egress are considerably greater than the maximum travel distances allowed by Section 1016.2.

The code anticipates this and addresses it in Section 1007.6, the only place in the code in which maximum exit access travel distance is discussed in the context of accessible means of egress. It states that in accessible means of egress, the maximum exit access travel distance *to areas of refuge* must not exceed the maximums specified in Section 1016.2. It follows then that if the structure is not required to include areas of refuge, such as structures without exit stairs, or those that are sprinklered throughout in accordance with Sections 903.3.1.1 or 903.3.1.2, then there is no maximum exit access travel distance for accessible means of egress. This is confirmed

in ICC commentary, which states, ". . .there are no disbursement requirements specific to accessible means of egress *or travel distance limitations* where there is no area of refuge requirement. . ." (emphasis added).

Further, 2014 IBC accessibility requirements, including building component requirements located in ICC/ANSI A117.1-2009, do not apply to any means of egress that is not designated or intended to be an accessible means of egress.

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