

Lofts and Sleeping Lofts proposed changes. Compare side-by-side to IRC Existing Amendments Report to appreciate changes as compared to 2021. See also Tiny House report as some of these changes affect Appendix BB and cannot be made without changes there.

Language to remove (model code or state) is ~~struck through~~. Existing state amendment language appears in **red**, new/added state language appears in **bold**. New model code language as compared to 2021 appears in **blue**.

Section 202 Definitions

~~**EGRESS ROOF ACCESS WINDOW.** A skylight or roof window designed and installed to satisfy the *Emergency Escape and Rescue Opening* requirements of Section R310.2.~~

~~**LANDING PLATFORM.** A landing provided as the topstep of a stairway accessing a loft.~~

~~**LOFT.** A space on an intermediate level or levels between the floor and ceiling of a dwelling or sleeping unit, open on one or more sides to the room or space in which the loft is located, and in accordance with Section R333.~~

~~**A space designated for sleeping on an intermediate level or levels between the floor and ceiling of a story, open on one or more sides to the room in which the space is located, and in accordance with Section R315.**~~

~~**[RB] SLEEPING LOFT.** A space designated for sleeping on an intermediate level or levels between the floor and ceiling of a story, open on one or more sides to the room in which the space is located, and in accordance with Section R315.~~

Chapter 3

R310.3 Location.

Smoke alarms shall be installed in the following locations:

1. In each sleeping room.
2. Outside each separate sleeping area in the immediate vicinity of the bedrooms.
3. On each additional *story* of the dwelling *unit*, including *basements* and *habitable attics* and not including *crawl spaces* and *uninhabitable attics*. In *dwelling units* with split levels and without an intervening door between the adjacent levels, a smoke alarm installed on the upper level shall suffice for the adjacent lower level provided that the lower level is less than one full *story* below the upper level.

Commented [JE1]: Compare to IBC to stay consistent (they may need an amendment for lower guard)

Commented [JE2]: Leave in Appendix BB, or alternatively modify R319.2 so egress roof access windows can work, such as including the additional language in BB105.1.

Commented [MB3R2]: I think that we should repeal this amendment in Ch 2 and continue to strike it in the Appendix.

Since this is an exception in AQ105.1, that indicates that the ERAW does not explicitly meet EERO requirements, but is allowed anyway in Tiny Houses.

Since Tiny House Lofts require an EERO when they are used for sleeping, but WA amendment Lofts do not (even when used for sleeping), this exception is not needed.

Commented [MB4R2]: However, if we DO require EERO in lofts (to align w/ 2024 IRC R319.1, then I think we may want to bring this into Ch 2 and modify R319.2 to bring in the exception.

Commented [JE5]: Only used in Appendix BB, move it back there. New R315 Sleeping Lofts has its own section about landings.

Commented [MB6R5]: Agreed

Commented [MB7]: I think this works. Model code language for sleeping loft w/ sleeping references struck. Modify existing amendment.

Commented [JE8]: Ensure this will work for tiny houses too

Commented [MB9R8]: I think it works fine for tiny houses. I think "used as living/sleeping" isn't necessary, ceiling height is taken care of in AQ103.1. So the only other thing is that the floor is >30" above the main floor. I think our "intermediate level" thing is good enough.

4. ~~Smoke alarms shall be installed not less than 3 feet (914 mm) horizontally from the door or opening of a bathroom that contains a bathtub or shower unless this would prevent placement of a smoke alarm required by this section.~~

5. ~~In napping areas in a family home child care.~~

6. ~~5.~~In the hallway and in the room open to the hallway in *dwelling units* where the *ceiling height* of a room open to a hallway serving bedrooms exceeds that of the hallway by 24 inches (610 mm) or more.

7. ~~6.~~Within the room to which a *steeping loft* is open, in the immediate vicinity of the *steeping loft*.

Commented [MB10]: WA amendment needs to be modified. This location was already an amendment to the WA code, but is added in 2024 IRC. WA to strike "sleeping".

SECTION R314 MEZZANINES

INSIGHTS (1)

R314.1 General.

Mezzanines shall comply with Sections R314.2 through R314.5.

Exception: ~~Sleeping~~ *Lofts* in *dwelling units* and *sleeping units* shall be permitted to comply with Section R315, subject to the limitations in Section R315.2.

SECTION R315 ~~SLEEPING LOFTS~~

R315.1 ~~Sleeping~~ *Lofts*.

~~Where provided in dwelling units or sleeping units, steeping lofts shall comply with this code as modified by Sections R315.2 through R315.5. Steeping~~ *Lofts* ~~constructed in compliance with this section shall be considered a portion of the story below. Such steeping lofts shall not contribute to the number of stories as regulated by this code.~~

~~Exceptions: Steeping~~ *Lofts* ~~need not comply with Section R315 where they meet any of the following conditions:~~

- ~~1. The steeping loft has a depth of less than 3 feet (914 mm).~~
- ~~2. The steeping loft has a floor area of less than 35 square feet (3.3 m²).~~
- ~~3. The steeping loft is not provided with a permanent means of egress.~~

R315.2 ~~Sleeping~~ *Loft* limitations.

Sleeping ~~Lofts~~ shall comply with the following conditions:

1. The **sleeping** ~~loft~~ floor area shall be less than 70 square feet (6.5 m²).
2. The **sleeping** ~~loft~~ ceiling height shall not exceed 7 feet (2134 mm) for more than one-half of the **sleeping** ~~loft~~ floor area.

R315.3 **Sleeping** ~~Loft~~ ceiling height.

The clear height below the **sleeping** ~~loft~~ floor construction shall not be less than 7 feet (2134 mm). The ceiling height above the finished floor of the **sleeping** ~~loft~~ shall not be less than 3 feet (914 mm). ~~Spaces adjacent to Portions of the~~ **sleeping** ~~loft~~ with a sloped ceiling measuring less than 3 feet (914 mm) from the finished floor to the finished ceiling shall not contribute to the **sleeping** ~~loft~~ floor area.

R315.4 **Sleeping** ~~Loft~~ area.

The aggregate area of all **sleeping** ~~lofts~~ and *mezzanines* within a room shall comply with Section R314.3.

Exception: The area of a single **sleeping** ~~loft~~ located within a *dwelling unit* or *sleeping unit* equipped with an automatic sprinkler system in accordance with Section P2904 shall not be greater than two-thirds of the area of the room in which it is located, provided that no other **sleeping** ~~lofts~~ or *mezzanines* are open to the room in which the **sleeping** ~~loft~~ is located.

R315.5 Permanent egress for **sleeping** ~~lofts~~.

~~A permanent means of egress shall be provided for sleeping lofts. The~~ Where a permanent means of egress is provided for ~~a loft~~, ~~the means of egress shall comply with Section R318 as modified by Sections R315.5.1 through R315.5.3.~~

R315.5.1 Ceiling height at **sleeping** ~~loft~~ means of egress.

A ceiling height of not less than 3 feet (914 mm) shall be provided for the entire width of the means of egress from the **sleeping** ~~loft~~.

R315.5.2 Stairways.

Stairways providing egress from **sleeping** ~~lofts~~ shall be permitted to comply with Sections R315.5.2.1 through R315.5.2.3.

R315.5.2.1 Width.

Commented [MB11]: WA amendment continues this #2 by saying R315.3 - 315.5 don't apply to lofts that don't meet items #1 and #2 above.

This language is trying to solve the "what do we do when a loft doesn't meet these requirements" question. But I'm not sure this is the best place for that.

Commented [MB12R11]: Maybe we add a WA amendment to add R315.1, exception 4 "The loft does not meet the limitations in R333.2" or something like that?

Commented [MB13]: I prefer WA amendment language "Portions of the loft" instead of "Spaces adjacent to the loft"

Commented [MB14]: I don't have a strong opinion on which version this should be. R315.1, exception 3 already says if there isn't permanent egress, then lofts don't need to comply with this section.

Commented [JE15]: Was plural, should be singular

Commented [MB16]: The remainder of the Loft section is IRC language and was not in the WA amendment. Instead, WA Res Code sent folks back to the Egress section where lofts (since they are <200sf) are exempt from these requirements.

Commented [MB17R16]: This is very prescriptive. Do we want to keep all this language in here? Or strike it? I'm not sure how/why this language got in here.

Stairways providing egress from a ~~steeping~~ loft shall not be less than 17 inches (432 mm) in clear width at or above the *handrail*. The width below the *handrail* shall be not less than 20 inches (508 mm).

R315.5.2.2 Treads and risers.

Risers for stairs providing egress from a ~~steeping~~ loft shall be not less than 7 inches (178 mm) and not more than 12 inches (305 mm) in height. Tread depth and riser height shall be calculated in accordance with one of the following formulas:

- 1.The tread depth shall be 20 inches (508 mm) minus four-thirds of the riser height.
- 2.The riser height shall be 15 inches (381 mm) minus three-fourths of the tread depth.

R315.5.2.3 Landings.

Landings at stairways providing egress from ~~steeping~~ lofts shall comply with Section R318.7.6, except that the depth of landings in the direction of travel shall be not less than 24 inches (610 mm).

R315.5.3 Ladders.

Ladders used as a means of egress from ~~steeping~~ lofts shall comply with Sections R315.5.3.1 and R315.5.3.2.

R315.5.3.1 Size and capacity.

Ladders providing egress from ~~steeping~~ lofts shall have a rung width of not less than 12 inches (305 mm), and 10-inch (254 mm) to 14-inch (356 mm) spacing between rungs. Ladders shall be capable of supporting a 300-pound (136 kg) load on any rung. Rung spacing shall be uniform within $\frac{3}{8}$ inch (9.5 mm).

R315.5.3.2 Incline.

Ladders shall be inclined at 70 to 80 degrees from horizontal.

R316 Habitable Attics

R316.1 General. Habitable attics shall comply with Sections **R316.2** through **R316.4**.

Exception: *Lofts in dwelling units and sleeping units* shall be permitted to comply with Section ~~R333~~ **R315**, subject to the limitations in Section ~~R333.1~~ **R315.1**.

Commented [JE18]: Errata was submitted to ICC to correct this

R318.7.12 Alternating tread devices.

Alternating tread devices shall not be used as an element of a means of egress. *Alternating tread devices* shall be permitted provided that a required means of egress *stairway or ramp* serves the same space at each adjoining level or where a means of egress is not required. The clear width at and below the *handrails* shall be not less than 20 inches (508 mm).

Exception: ~~Alternating tread devices are allowed to be used as an element of a means of egress for lofts, mezzanines and similar areas of 200 gross square feet (18.6 m²) or less where such devices do not provide exclusive access to a kitchen or bathroom.~~ **Not adopted.**

R318.7.13 Ship's ladders.

Ship's ladders shall not be used as an element of a means of egress. Ship's ladders shall be permitted provided that a required means of egress *stairway or ramp* serves the same space at each adjoining level or where a means of egress is not required. The clear width at and below the *handrails* shall be not less than 20 inches (508 mm).

Exception: ~~Ship's ladders are allowed to be used as an element of a means of egress for lofts, mezzanines and similar areas of 200 gross square feet (18.6 m²) or less that do not provide exclusive access to a kitchen or bathroom.~~ **Not adopted.**

R319.1 Emergency escape and rescue opening required.

Basements, habitable attics, the room to which a sleeping loft is open, and every sleeping room shall have not less than one operable *emergency escape and rescue opening*. Where *basements* contain one or more sleeping rooms, an *emergency escape and rescue opening* shall be required in each sleeping room. *Emergency escape and rescue openings* shall open directly into a *public way*, or to a *yard or court* that opens to a *public way*.

Exceptions:

1. **Basements** used only to house mechanical *equipment* not exceeding a total floor area of 200 square feet (18.58 m²).
2. Storm shelters constructed in accordance with [ICC 500](#).
3. Where the dwelling *unit* or *townhouse unit* is equipped with an automatic sprinkler system installed in accordance with [Section P2904](#), sleeping rooms

Commented [MB19]: Do we want to adopt this model code change? It does make sense to have an EERO in the room to which a SLEEPING loft is open, but doesn't make sense to have an EERO in the room to which a storage loft is open.

I think we'd still get an EERO in a bedroom w/ a loft used for sleeping since I think the definition of loft would combine the (sleeping) loft+bedroom and call the combo a sleeping room.

in *basements* shall not be required to have *emergency escape and rescue openings* provided that the *basement* has one of the following:

3.1. One means of egress complying with [Section R318](#) and one *emergency escape and rescue opening*.

3.2. Two means of egress complying with [Section R318](#).

4. A *yard* shall not be required to open directly into a *public way* where the *yard* opens to an unobstructed path from the *yard* to the *public way*. Such path shall have a width of not less than 36 inches (914 mm).

R321.1.2 Guards

R321.1.2 Height. Required guards at open-sided walking surfaces, including [floors](#), [mezzanines](#), [lofts in accordance with Section ~~R333~~ R315](#), stairs, porches, balconies or landings, shall be not less than 36 inches (914 mm) in height as measured vertically above the adjacent walking surface or the line connecting the nosings.

EXCEPTIONS:

1. Guards on the open sides of stairs shall have a height of not less than 34 inches (864 mm) measured vertically from a line connecting the nosings.
2. Where the top of the guard serves as a handrail on the open sides of stairs, the top of the guard shall be not less than 34 inches (864 mm) and not more than 38 inches (965 mm) as measured vertically from a line connecting the nosings.
3. In areas with ceiling heights of 7 feet (2134 mm) or less in *lofts* constructed in accordance with [Section ~~R333~~ R315](#), guards shall not be less than 36 inches (914 mm) in height or one-half of the clear height from the *loft* floor to the *loft* ceiling, whichever is less.

~~R333~~ Lofts

Repeal entire section, as it has been replaced with very similar R315 Sleeping Lofts.