



GROUP A OCCUPANCY WG
OCTOBER 2-3, 2018 - PUBLIC COMMENTS

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G90-18

IBC: , 508.1, 508.5, 508.5.1, 508.5.2, 508.5.3, 508.5.4, 508.5.5, 508.5.6, 508.5.7, 508.5.8, 508.5.9, 508.5.10, 508.5.11

Proposed Change as Submitted

Proponent: Ed Kulik, Chair, representing ICC Building Code Action Committee (bcac@iccsafe.org)

2018 International Building Code

Delete without substitution

~~SECTION 419 LIVE/WORK UNITS~~

Revise as follows

508.1 General. Each portion of a building shall be individually classified in accordance with Section 302.1. Where a building contains more than one occupancy group, the building or portion thereof shall comply with the applicable provisions of Section 508.2, 508.3 or 508.4, 508.5, or a combination of these sections.

Exceptions:

1. Occupancies separated in accordance with Section 510.
2. Where required by Table 415.6.2, areas of Group H-1, H-2 and H-3 occupancies shall be located in a *detached building* or structure.
3. ~~Uses within live/work units, complying with Section 419, are not considered separate occupancies.~~

~~419.1-508.5~~ **General Live/Work Units.** A *live/work unit* shall comply with Sections ~~419.1-508.5~~ through ~~419.9-508.5.11~~.

Exception: Dwelling or sleeping units that include an office that is less than 10 percent of the area of the *dwelling unit* are permitted to be classified as *dwelling units* with accessory occupancies in accordance with Section 508.2.

~~419.1-1508.5.1~~ **Limitations.** All of the following shall apply to live/work areas:

1. The *live/work unit* is permitted to be not greater than 3,000 square feet (279 m²) in area.
2. The nonresidential area is permitted to be not more than 50 percent of the area of each *live/work unit*.
3. The nonresidential area function shall be limited to the first or main floor only of the *live/work unit*.
4. Not more than five nonresidential workers or employees are allowed to occupy the nonresidential area at any one time.

~~419.2-508.5.2~~ **Occupancies.** *Live/work units* shall be classified as a Group R-2 occupancy. Separation requirements found in Sections 420 and 508 shall not apply within the *live/work unit* where the *live/work unit* is in compliance with Section ~~419.508.5~~. Nonresidential uses that would otherwise be classified as either a Group H or S occupancy shall not be permitted in a *live/work unit*.

Exception: Storage shall be permitted in the *live/work unit* provided that the aggregate area of storage in the nonresidential portion of the *live/work unit* shall be limited to 10 percent of the space dedicated to nonresidential activities.

~~419.3-508.5.3~~ **Means of egress.** Except as modified by this section, the *means of egress* components for a *live/work unit* shall be designed in accordance with Chapter 10 for the function served.

~~419.3-1508.5.4~~ **Egress capacity.** The egress capacity for each element of the *live/work unit* shall be based on the occupant load for the function served in accordance with Table 1004.5.

~~419.3-2508.5.5~~ **Spiral stairways.** *Spiral stairways* that conform to the requirements of Section 1011.10 shall be permitted.

~~419.4-508.5.6~~ **Vertical openings.** Floor openings between floor levels of a *live/work unit* are permitted without enclosure.

~~[F]~~ **419-5508.5.7 Fire protection.** The *live/work unit* shall be provided with a monitored *fire alarm* system where required by Section 907.2.9 and an *automatic sprinkler system* in accordance with Section 903.2.8.

~~419-6508.5.8 Structural.~~ Floors within a *live/work unit* shall be designed for the live loads in Table 1607.1, based on the function within the space.

~~419-7508.5.9 Accessibility.~~ Accessibility shall be designed in accordance with Chapter 11 for the function served.

~~419-8508.5.10 Ventilation.~~ The applicable *ventilation* requirements of the International Mechanical Code shall apply to each area within the *live/work unit* for the function within that space.

~~419-9508.5.11 Plumbing facilities.~~ The nonresidential area of the *live/work unit* shall be provided with minimum plumbing facilities as specified by Chapter 29, based on the function of the nonresidential area. Where the nonresidential area of the *live/work unit* is required to be *accessible* by Section 1107.6.2.1, the plumbing fixtures specified by Chapter 29 shall be *accessible*.

Reason: Relocating Section 419 on Live/Work Units to Section 508 Mixed Occupancies provides a clearer description under Mixed Use Occupancies since the unit is not only residential nor business use. An example is a doctor's office occupying part of a detached dwelling, or townhouses with an office, store or restaurant on the first floor and a residence occupying parts or all of upper floors.

This proposal is submitted by the ICC Building Code Action Committee (BCAC). BCAC was established by the ICC Board of Directors in July 2011 to pursue opportunities to improve and enhance assigned International Codes or portions thereof. In 2017 the BCAC has held 3 open meetings. In addition, there were numerous Working Group meetings and conference calls for the current code development cycle, which included members of the committee as well as any interested party to discuss and debate the proposed changes. Related documentation and reports are posted on the BCAC website at: <https://www.iccsafe.org/codes-tech-support/codes/code-development-process/building-code-action-committee-bcac>.

Cost Impact: The code change proposal will not increase or decrease the cost of construction. This is an editorial relocation of existing requirements.

Public Hearing Results

Committee Action:

As Submitted

Committee Reason: The committee approved the change recognizing that live/work units are a method of addressing mixed occupancy in a space and therefore is well placed in Section 508. The Chapter 4 location was felt to be no longer needed as these units have become more mainstream and not 'special' in nature. (Vote: 8-6)

Assembly Action:

None

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Individual Consideration Agenda

Public Comment 1:

Proponent: Stephen Thomas, Colorado Code Consulting, LLC, representing Colorado Chapter ICC (stthomas@coloradocode.net) requests As Modified by This Public Comment.

Modify as follows:

2018 International Building Code

310.3.1 Live/Work Units Live/work units located within townhouses that comply with Section 508.5 are permitted to comply with the International Residential Code provided an automatic sprinkler system is installed in accordance with Section 903.3.1.3 or Section P2904 of the International Residential Code.

508.5 Live/Work Units. A *live/work unit* shall comply with Sections 508.5 through 508.5.11.

Exception-Exceptions:

1. Dwelling or sleeping units that include an office that is less than 10 percent of the area of the *dwelling unit* are permitted to be classified as *dwelling units* with accessory occupancies in accordance with Section ~~508-508.2~~
2. Live/work units located within townhouses that comply with this section are permitted to comply with the International Residential Code provided an automatic sprinkler system is installed in accordance with Section 903.3.1.3 or Section P2904 of the International Residential Code.

Commenter's Reason: It has always been understood that live-work units located in townhouses could be constructed under the International Residential Code (IRC). In fact, the Effective Use of the International Building Code in the Preface states, The IRC can also be used for the construction of live/work units (as defined in Section 419) and small bed and breakfast-style hotels where there are five or fewer guest rooms and the hotel is owner occupied . Although this is not part of the specific code requirements, it does set forth the intent that live/work units could be constructed under the IRC. In addition, Section 101.2 of the IRC includes an exception that allows live/work units to be constructed under that that code. The exception states, "Live/work units located in townhouses and complying with the requirements of Section 419 of the International Building Code". This proposal would provide consistency between the two codes to allow townhouses to be constructed under the IRC as long as they also comply with Section 419 of the IBC.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction

Since it was already assumed that live/work could be constructed under the IRC, there is no cost difference.

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IBC: Table TABLE 508.4

Proposed Change as Submitted

Proponent: Ed Kulik, Chair, representing ICC Building Code Action Committee (bcac@iccsafe.org)

2018 International Building Code

Revise as follows

**TABLE 508.4
REQUIRED SEPARATION OF OCCUPANCIES (HOURS)^f**

OCCUPANCY	A, E		I-1 ^a , I-3, I-4		I-2		R ^a		F-2, S-2 ^b , U		B ^e , F-1, M, S-1		H-1		H-2		H-3, H-4		H-5	
	S	NS	S	NS	S	NS	S	NS	S	NS	S	NS	S	NS	S	NS	S	NS	S	NS
A, E	N	N	1	2	2	NP	1	2	N	1	1	2	NP	NP	3	4	2	3	2	NP
I-1 ^a , I-3, I-4	<u>1</u>	<u>2</u>	N	N	2	NP	1	NP	1	2	1	2	NP	NP	3	NP	2	NP	2	NP
I-2	<u>2</u>	<u>NP</u>	<u>2</u>	<u>NP</u>	N	N	2	NP	2	NP	2	NP	NP	NP	3	NP	2	NP	2	NP
R ^a	<u>1</u>	<u>2</u>	<u>N</u>	<u>N</u>	<u>2</u>	<u>NP</u>	N	N	1 ^c	2 ^c	1	2	NP	NP	3	NP	2	NP	2	NP
F-2, S-2 ^b , U	<u>N</u>	<u>1</u>	<u>1</u>	<u>2</u>	<u>N</u>	<u>N</u>	<u>1c</u>	<u>2c</u>	N	N	1	2	NP	NP	3	4	2	3	2	NP
B ^e , F-1, M, S-1	<u>1</u>	<u>2</u>	<u>1</u>	<u>2</u>	<u>2</u>	<u>NP</u>	<u>N</u>	<u>N</u>	<u>1</u>	<u>2</u>	N	N	NP	NP	2	3	1	2	1	NP
H-1	<u>NP</u>	<u>NP</u>	<u>NP</u>	<u>NP</u>	<u>NP</u>	<u>NP</u>	<u>NP</u>	<u>NP</u>	<u>NP</u>	<u>NP</u>	<u>NP</u>	<u>NP</u>	N	NP	NP	NP	NP	NP	NP	NP
H-2	<u>3</u>	<u>4</u>	<u>3</u>	<u>NP</u>	<u>3</u>	<u>NP</u>	<u>3</u>	<u>NP</u>	<u>3</u>	<u>4</u>	<u>2</u>	<u>3</u>	<u>NP</u>	<u>NP</u>	N	NP	1	NP	1	NP
H-3, H-4	<u>2</u>	<u>3</u>	<u>2</u>	<u>NP</u>	<u>2</u>	<u>NP</u>	<u>2</u>	<u>NP</u>	<u>2</u>	<u>3</u>	<u>1</u>	<u>2</u>	<u>NP</u>	<u>NP</u>	<u>1</u>	<u>NP</u>	1 ^d	NP	1	NP
H-5	<u>2</u>	<u>NP</u>	<u>2</u>	<u>NP</u>	<u>2</u>	<u>NP</u>	<u>2</u>	<u>NP</u>	<u>2</u>	<u>NP</u>	<u>1</u>	<u>NP</u>	<u>NP</u>	<u>NP</u>	<u>1</u>	<u>NP</u>	<u>1</u>	<u>NP</u>	N	NP

S = Buildings equipped throughout with an automatic sprinkler system installed in accordance with Section 903.3.1.1.

NS = Buildings not equipped throughout with an automatic sprinkler system installed in accordance with Section 903.3.1.1.

N = No separation requirement.

NP = Not Permitted.

- See Section 420.
- The required separation from areas used only for private or pleasure vehicles shall be reduced by 1 hour but not to less than 1 hour.
- See Section 406.3.2.
- Separation is not required between occupancies of the same classification.
- See Section 422.2 for ambulatory care facilities.
- Occupancy separations that serve to define fire area limits established in Chapter 9 for requiring fire protection systems shall also comply with Section 707.3.10 and Table 707.3.10 in accordance with Section 901.7.

Reason: Filling in the balance of Table 508.4 will avoid confusion and make the table more clear and functional.

Cost Impact: The code change proposal will not increase or decrease the cost of construction. This proposal is an editorial change and adds no new requirements to the code.

Public Hearing Results

Committee Action:
Disapproved

Committee Reason: Committee members spoke both in support and opposition to this proposal which intends to replicate the existing information in the upper right half of the table in the lower left half. However errors were found in the proposal which showed that further refinement was needed. (Vote: 14-0)

Assembly Action:
None
G88-18

Individual Consideration Agenda

Public Comment 1:

Proponent: Ed Kullik, representing ICC Building Code Action Committee (bcac@iccsafe.org) requests As Modified by This Public Comment.

Modify as follows:

2018 International Building Code

**TABLE 508.4
REQUIRED SEPARATION OF OCCUPANCIES (HOURS)^f**

OCCUPANCY	A, E		I-1 ^a , I-3, I-4		I-2		R ^a		F-2, S-2 ^b , U		B ^e , F-1, M, S-1		H-1		H-2		H-3, H-4		H-5	
	S	NS	S	NS	S	NS	S	NS	S	NS	S	NS	S	NS	S	NS	S	NS	S	NS
A, E	N	N	1	2	2	NP	1	2	N	1	1	2	NP	NP	3	4	2	3	2	NP
I-1 ^a , I-3, I-4	1	2	N	N	2	NP	1	NP	1	2	1	2	NP	NP	3	NP	2	NP	2	NP
I-2	2	NP	2	NP	N	N	2	NP	2	NP	2	NP	NP	NP	3	NP	2	NP	2	NP
R ^a	1	2	1	NP	2	NP	N	N	1 ^c	2 ^c	1	2	NP	NP	3	NP	2	NP	2	NP
F-2, S-2 ^b , U	N	1	1	2	2	NP	1 ^c	2 ^c	N	N	1	2	NP	NP	3	4	2	3	2	NP
B ^e , F-1, M, S-1	1	2	1	2	2	NP	1	2	1	2	N	N	NP	NP	2	3	1	2	1	NP
H-1	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP	N	NP	NP	NP	NP	NP	NP	NP
H-2	3	4	3	NP	3	NP	3	NP	3	4	2	3	NP	NP	N	NP	1	NP	1	NP
H-3, H-4	2	3	2	NP	2	NP	2	NP	2	3	1	2	NP	NP	1	NP	1 ^d	NP	1	NP
H-5	2	NP	2	NP	2	NP	2	NP	2	NP	1	NP	NP	NP	1	NP	1	NP	N	NP

S = Buildings equipped throughout with an automatic sprinkler system installed in accordance with Section 903.3.1.1.

NS = Buildings not equipped throughout with an automatic sprinkler system installed in accordance with Section 903.3.1.1.

N = No separation requirement.

NP = Not Permitted.

- a. See Section 420.
- b. The required separation from areas used only for private or pleasure vehicles shall be reduced by 1 hour but not to less than 1 hour.
- c. See Section 406.3.2.
- d. Separation is not required between occupancies of the same classification.
- e. See Section 422.2 for ambulatory care facilities.
- f. Occupancy separations that serve to define fire area limits established in Chapter 9 for requiring fire protection systems shall also comply with Section 707.3.10 and Table 707.3.10 in accordance with Section 901.7.

Commenter's Reason: Filling in the balance of Table 508.4 will avoid confusion and make the table more clear and functional. The public comment addresses the inconsistencies that were brought up during testimony.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction

This proposal is an editorial change and adds no new requirements to the code.