



Interpretation of Regulations Document

2018-005

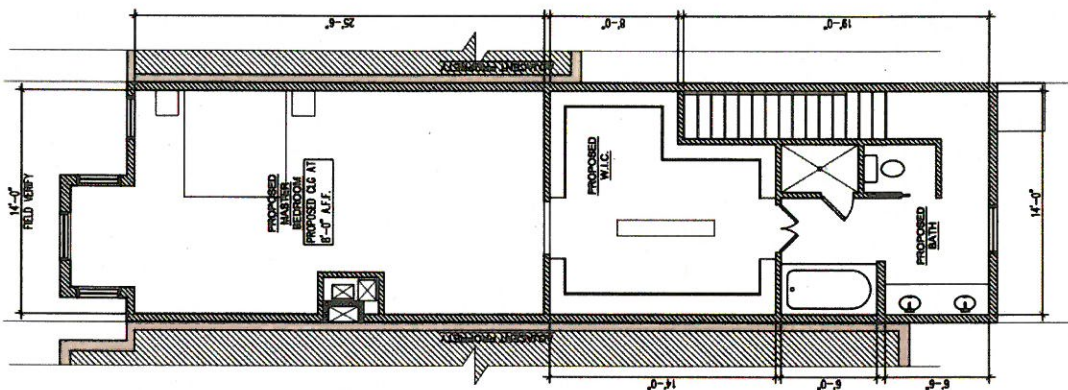
Means of Egress Through Ensuite Bathrooms

References:

Sections R310, R311 International Residential Code and Section 503 of the International Property Maintenance Code; both as amended by DCMR 12 & the ICC code commentaries for each code.

The question is regarding whether or not the means of egress from one bedroom in a single family home may traverse through a walk-in closet or a toilet room or bathroom as depicted in the drawing:

Section R311 of the IRC establishes no limitation for the path of a means of egress in a single family home. So, although peculiar in nature, certain conditions may dictate the need for this arrangement of bathroom, closet and sleeping room.



For example, if the rooms were reversed and the bedroom was closer to the stairway, the sleeping room would have questionable access to an egress window. Section 503 of the International Property Maintenance Code seems to establish a limitation preventing the arrangement. The section states in part, *“Toilet Rooms and bathrooms shall provide privacy and shall not constitute the only passageway to a hall or other space, or to the exterior. A door or interior locking device shall be provided for all common or shared bathrooms and toilet rooms in a multiple dwelling”*

This specific provision was written mainly for existing buildings where an owner reconfigured the use of a building to facilitate an extra sleeping room, usually for rental purposes. The lockable provision is specifically intended for shared bathrooms such as a dormitory or boarding houses. This provision is intended to prevent a situation where a tenant is inconvenienced or where the means of egress could be jeopardized by locked doors on the bathroom or unanticipated wet floors and obstructions. However this section primarily points at rooms or spaces in residence that serves as a multiple dwelling such as a boarding house; an ensuite bathroom changes this dynamic. The case presented appears to be a proposed story addition to a single family dwelling, so this provision of the IPMC does not apply for a single family dwelling. The proposed layout does not represent a code violation of either code. However, there should be a stipulation that the door in the direction of egress travel (bathroom) not be lockable type.

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