



Government of the District of Columbia
Department of Consumer and Regulatory Affairs

Interpretation of Regulations Document Configured Space

2018-003

References:

- Chapters 7, 8, 9 and 10 International Existing Building Code as amended by the DCMR 12.

There has been some debate about how to distinguish whether an alteration using the IEBC is Level 1, Level 2 or Level 3. The sticking point surrounds the definition of the term, *Work Area* in the IEBC which is unclearly defined as

That portion or portions of a building consisting of all reconfigured spaces as indicated on the construction documents. Work area excludes other portions of the building where incidental work entailed by the intended work must be performed and portions of the building where work not initially intended by the owner is specifically required by this code.

The term, *reconfigured* is not defined by the IEBC but generally means to be physically altered to accommodate a new use or purpose.

Chapter 10 sets out that a *Change in occupancy* (with no change in occupancy classification) shall not be made to any structure that will subject the structure to any special provisions of the International series of codes (I Codes). A *Change in occupancy* (with no change in occupancy classification) can be regarded as changing the nature of a room or space within a specified occupancy classification such as changing a bedroom into an art studio in a detached single dwelling. The building is still an R-3 but the use of one room has changed. This is not reconfigured space as the term in the definition of *Work Area* implies. This change in occupancy that cannot take place is referring to an increased level of code requirements, for instance, turning an art studio into a bedroom without the requisite egress window.

The IEBC seems to encourage the owner to comply with a code requirement by exempting this space from that defined as a *Work Area*. Using this logic, a work area does not include any room or space not physically altered by the actual work itself irrespective of any change of occupancy.


Lynn Underwood, MCP
Chief Building Official, DCRA

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