



PLAN REVIEW COMMITTEE

SACRAMENTO VALLEY ASSOCIATION OF BUILDING OFFICIALS

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Committee Supported Responses Code Review Committee Question/Survey for December

Subject: Residential Attic Storage

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1a. Would your jurisdiction allow a pull-down ladder to be installed in residential occupancies for required attic access?

| | YES | | NO |
|--|-----|-----|-------|
| | 16 | 84% | 2 11% |

Given: A single family dwelling with an area noted on the plans as "future storage" in the attic. The area has a plywood floor and a clear height of 8'-0" but is otherwise unfinished.

1b. Would your jurisdiction allow a permanent stairway?

| | YES | | NO |
|--|-----|-----|-------|
| | 14 | 74% | 5 26% |

1c. Would your jurisdiction require a permanent stairway?

| | YES | | NO |
|--|-----|-----|--------|
| | 5 | 26% | 14 74% |

Comments by Spokespersons

- These are case by case decisions and not something our jurisdiction would establish as a policy.
 - Storage loads may apply to this area. The lateral analysis of the dwelling should factor in the potential storage live load at or above the upper plate line.
- 1a. We would allow it as long as it complies with required opening size.
- 1a. We do not allow stairways or pull down ladders to attic areas. We do not allow flooring in attics. We do not predict for what may happen in the future but deal with the actual present proposal. If flooring is to be installed in the attic area, then it must be classified as attic storage and then only a pull down ladder would be allowed.
- 1a. Where there is a required one-hour separation (1-hour assembly of the garage lid) the pull-down stairs shall be a listed full 1-hour rated assembly and it shall be installed to the manufactured listing and shall meet all specification upon final inspection.
- 1b. We would prohibit the permanent stairway --"Future storage" areas with 6'+ high ceilings and easy access often become non-permitted living areas.
- 1b. We would allow a permanent stairway but would require a "deed restriction" to be recorded. The deed restriction is a document prepared by the County that is signed and notarized by the County and the owner and recorded in the Recorder's office that restricts the use of the attic. The deed restriction would specify that there is no living, sleeping, cooking or eating allowed in the attic space.
- 1b. Should a permanent stairway be allowed, a notarized letter from the owner of the property shall be submitted with the Plan Check application process and it shall state the following, "If and when the attic storage space is used for any purpose other than storage, it shall be approved prior to the change in written form by the current Building Official. If the current owner and/or the future owner change the use of the said attic storage, all required fees shall be tripled at the current rate and all administrative cost shall be paid at the current rate by the current owner. This notarized

statement given to the Building Department shall be legally placed on the disclosure list when the property is sold, leased, or rented to the legal signer of the contract. No conditioned air supply, water supply, or sewer facilities shall be permitted to supply the attic storage area at any time". We have used this in Red Bluff on several occasions and it was approved by the "City Attorney".

1b,c. Further discussion with the applicant and the planning department would be necessary.

1c. Red Bluff has no requirement in place for support of the permanent stairway. This requirement, in my opinion, would encourage the change in use of the storage space without obtaining all of the proper permits.

Comments by Non-Jurisdictional Spokespersons

- The pull down ladder would not be allowed in a garage attic that communicates with the main house attic. It would need to be separated by 1-hour assembly.
- It would be allowed when there is required access to mechanical equipment only.
- The primary concern is that the ceiling structure (most likely trusses) is designed to carry additional loads (up and above the normal ceiling load). Also, the footings and lateral loads of the structure would have to be closely reviewed as the attic area could be construed to be a 'story' thus requiring an additional story to be considered in the structural design.

Code Review Committee Supported Responses

- 1a.** Yes, however, CBC Section 1505.1 requires that the opening be not less than 22" by 30". Most pull-down attic access ladders are made for a 22" wide rough opening and have a clear width of only about 17". The more common manufacturers of attic access ladders (Werner, Calvert and Rainbow) also make pull-down attic access ladders for rough openings widths of 25" and 30". The 25" will not typically comply, but the 30" should. If HVAC equipment is installed in the attic, access shall also comply with the CMC requirements.
- 1b.** Yes, regardless of the ceiling height or vertical clearance, complying stairs would be allowed.
- 1c.** Yes. Once the floor is significantly larger than what is needed to support and provide access to mechanical equipment and the vertical clearance is sufficient to deem the area "useable area" then it appears to be "floor area" as defined in CBC Section 207. Although the occupant load for a storage area is low, it does have an occupant load (based upon Table 10-A) and, therefore, is an "occupied space" required by Section 1001.1 (Scope) to have a means of egress. Section 1003.2.5 (Exit Continuity) requires that building elements along the means of egress comply with Chapter 10. Therefore, once we have an attic with a floor more extensive than a catwalk or required equipment access, we have an occupancy and complying means of egress is required.