
FIRE PREVENTION AND BUILDING SAFETY COMMISSION
Department of Homeland Security

Written Interpretation of the State Building Commissioner

Interpretation #: CEB-2019-31-2014 IBC-1021.2-Exc1

Building or Fire Safety Law Interpreted

[675 IAC 13-2.6](#) 2014 Indiana Building Code Section 1021.2, Exception 1

Issue

Whether a story can qualify for Exception 1 when access to the exterior is made on another, adjacent story.

Interpretation of the State Building Commissioner

To qualify for Exception 1 the story or spaces in question must exit directly outside, and do so at a level where exit discharge can take place, i.e., at or near grade and the public way. Having to leave story "A" in order to exit outside on story "B" eliminates story "A" from qualification for the exception.

Rationale

The question has arisen whether spaces on the second story of a given project qualify for the single-exit status granted by Exception 1 to Section 1021.2. That exception states that rooms, areas and spaces complying with Section 1015.1 with exits that discharge directly to the exterior at the level of exit discharge are permitted to have one exit. Our interpretation is derived from the wording of the exception and from the code's definition of the following terms: level of exit discharge, exit discharge, and exit.

- **Level of exit discharge** is defined as the story at the point at which an exit terminates and an exit discharge begins.
- **Exit discharge** is defined as that portion of a means of egress system between the termination of an exit and the public way.
- **Exit** is defined as that portion of a means of egress system between an exit access and the exit discharge or public way. Exit components include exterior exit doors at the level of exit discharge, interior exit stairways, interior exit ramps, exit passageways, exterior exit stairways and exterior exit ramps and horizontal exits. They do not include interior exit access stairways.

The first factor to consider is the wording of the exception, which requires an exit **that discharges directly to the exterior at the level of exit discharge**. That means two things: the story in question must have an exit that goes directly to the exterior, and once the occupant has traversed that exit, he or she must be at the level of exit discharge.

We then turn to the definitions. Level of exit discharge, by definition, falls between the exit termination and the public way – in other words, in order to be at the exit discharge, the occupant's next step must be to access the public way without having to further traverse any additional intervening exit components.¹

Logic also points us in this direction. In reading the definition of the level of exit discharge, we see it requires two features: an exit that terminates directly outside, and an exit discharge. It follows that a story that lacks an exit of any kind (by virtue of containing only interior exit access stairs, which are not exits) cannot be considered a level of exit discharge.

The code features several areas in which exclusions are granted from otherwise required safety measures (number of exits, travel distance, sprinklering, etc.), based on the simple provision of getting occupants out of the building and to the public way, via an immediately available exit that doesn't require further navigation of stairs, or even just interior exit access pathways. This is one of those exclusions. It is a basic example of code-sanctioned alternative life safety measures, and it relies for its effectiveness on simplicity and directness of access, and immediacy of effect. Occupants need to be able to leave the story (and in some cases the individual space) and find themselves immediately outside, with an unencumbered path to the public way. That is the reason for these provisions, and the only manner of application in which they have the desired effect. Having to leave the story in order to get to an exit would defeat the purpose of the exception.

¹ Code commentary supports the interpretation that level of exit discharge can occur approximately one-half story above or below grade plane. A full story of exterior stairs, however, is considered an exit, and exit discharge does

not occur until the stairs have been fully traversed and the exit terminated. It is only once the occupant has no more exit components to navigate, and he or she is ready to proceed to the next step in the means of egress system – the public way – that exit discharge has been achieved.

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