
FIRE PREVENTION AND BUILDING SAFETY COMMISSION
Department of Homeland Security

Written Interpretation of the State Building Commissioner

Interpretation #: CEB-2022-46-2014 IBC-1027.5

Building or Fire Safety Law Interpreted

675 IAC 13-2.6 2014 Indiana Building Code Section 1027.5 Access to a public way. The *exit discharge* shall provide a direct and unobstructed access to a *public way*.

Exception: Where access to a *public way* cannot be provided, a safe dispersal area shall be provided where all of the following are met:

1. The area shall be of a size to accommodate at least 5 square feet (0.46 m²) for each person.
2. The area shall be located on the same lot at least 50 feet (15,240 mm) away from the building requiring egress.
3. The area shall be permanently maintained and identified as a safe dispersal area.
4. The area shall be provided with a safe and unobstructed path of travel from the building.

Issue

Does Section 1027.5 of the *2014 Indiana Building Code* (IBC) prohibit an exterior door from being considered part of a compliant means of egress¹ if its discharge does not provide a direct and unobstructed access to a public way?

Interpretation of the State Building Commissioner

No, Section 1027.5 of the *2014 IBC* does not prohibit an exterior door from being considered part of a compliant means of egress if its discharge does not provide a direct and unobstructed access to a public way, provided the exit discharge in question is designed and constructed in accordance with all the conditions named in the section's stated exception.

Rationale

Exit discharge is one of the three components of a means of egress system. In the order an evacuating occupant employs the system, those component parts are the exit access, the exit, and the exit discharge. One of the requirements for an exit discharge is direct and unobstructed access to a public way.

The presence of an exception in Section 1027.5 is evidence the authors of the code understood that there may be times when it is not possible for an exit discharge to provide evacuated occupants with a direct and unobstructed access to a public way, and that such a scenario should not automatically disqualify the exit discharge (and therefore the means of egress of which it is a part) from compliance.

To qualify for that exception, the code requires a safe dispersal area be provided for evacuated occupants, and it names four specific conditions that dispersal area must meet before the requirement for direct and unobstructed access to the public way can be waived. They are:

1. The dispersal area can be no smaller than 5 square feet per occupant;
2. The dispersal area must be on the same lot as the building being exited, and it may be located no closer than 50 feet from that building;
3. The dispersal area must be identified and permanently maintained as a safe dispersal area – it may be put to no other use such as parking, temporary structures, etc.; and
4. There must be a safe and unobstructed path of travel to the dispersal area from the building.

If all of these conditions are met, the exit discharge is not required to provide direct and unobstructed access to a public way, while still remaining a compliant component of a compliant means of egress. Failure to meet any of these conditions results in an exit discharge that is noncompliant, which in turn makes noncompliant the means of egress of which that exit discharge is a component part.

¹ The request, and therefore this interpretation, focus specifically on means of egress that are not considered accessible. Accessible means of egress are regulated elsewhere in the code.

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