
FIRE PREVENTION AND BUILDING SAFETY COMMISSION
Department of Homeland Security**Written Interpretation of the State Building Commissioner****Interpretation #:** CEB-2023-16 [2014 IBC-1027.1-Exc.1]**Building or Fire Safety Law Interpreted**

675 IAC 13-2.6 2014 Indiana Building Code Section 1027.1 [EXIT DISCHARGE] General. Exits shall discharge directly to the exterior of the building. The *exit discharge* shall be at grade or shall provide direct access to grade. The *exit discharge* shall not reenter a building. The combined use of Exceptions 1 and 2 shall not exceed 50 percent of the number and capacity of the required exits.

Exceptions:

1. A maximum of 50 percent of the number and capacity of *interior exit stairways* and *ramps* is permitted to egress through areas on the *level of exit discharge* provided all of the following are met:
 - 1.1. Such enclosures egress to a free and unobstructed path of travel to an exterior *exit* door and such *exit* is readily visible and identifiable from the point of termination of the enclosure.
 - 1.2. The entire area of the *level of exit discharge* is separated from areas below by construction conforming to the *fire-resistance rating* for the enclosure.
 - 1.3 The egress path from the *interior exit stairway* and *ramp* on the *level of exit discharge* is protected throughout by an *approved automatic sprinkler system*. All portions of the *level of exit discharge* with access to the egress path shall either be protected throughout with an *automatic sprinkler system* installed in accordance with Section 903.3.1.1 or 903.3.1.2, or separated from the egress path in accordance with the requirements for the enclosure of *interior exit stairways* or *ramps*.

[Additional exceptions omitted for lack of relevance to the request.]

Issue

Whether Exception 1 of Section 1027.1 of the *2014 Indiana Building Code* may be utilized when a design that meets the conditions of the exception includes an exterior court immediately outside the exit.

Interpretation of the State Building Commissioner

Yes, Exception 1 of Section 1027.1 of the *2014 Indiana Building Code* may be utilized when a design that meets the conditions of the exception includes an exterior court immediately outside the exit. The presence of an exterior court has no bearing on this regulation.

Rationale

The design in this dispute includes an interior exit stair that discharges in or near a lobby space in the building interior, through which occupants must travel to reach the nearest exit. There is no evidence of a dispute over whether the specific characteristics of this design meet the conditions required for the application of Exception 1. In fact, statements provided with the request indicate that it is only the presence of the exterior court outside the exit that causes the local official to question the validity of the exception's use.

As such, the question to be answered is whether under the code, the presence of an exterior court immediately outside a building exit invalidates that exit's sanctioned use of Exception 1. To arrive at the answer, regulations governing exit discharge (Section 1027.1), egress courts (Section 1027.4) and access to the public way (Section 1027.5) must all be examined.

Section 1027.1 contains specific requirements for the proper manner of discharge from exits, one of which is that the exit must discharge directly to the building exterior. In providing Exception 1, the code grants exemption from that requirement for some interior exit stairs and ramps, saying that the interior exit stair or ramp may discharge its occupants within the building interior if the design meets the conditions stated in the exception. There is nothing in this section or its conditions that limits or modifies the applicability of the exception if an exterior court is located immediately outside the building exit.

Section 1027.4 grants that certain exterior courts are considered *egress courts* and are part of the exit discharge if they meet the conditions provided in the section. This is an important distinction – if an exterior court complies with the requirements of the section, it is not considered an object separate from the means of egress system that could potentially impede occupant access from the exit discharge to the public way, but it is rather an actual part of the exit discharge itself.

Section 1027.5 states that the exit discharge shall provide a direct and unobstructed access to a public way.

Taking Sections 1027.4 and 1027.5 in sum, two characteristics of these regulations become apparent: a compliant egress court is a portion of the egress system, and not an impediment to it; and perhaps more importantly, nowhere in these regulations is there a linkage between them and Section 1027.1 Exception 1 that would in any way affect that exception's applicability to a given design.

In summary, there is nothing in Section 1027.1 Exception 1 that limits or contradicts its applicability in the presence of an egress court, and there is nothing in the egress court section (1027.4) or the exit discharge section (1027.5) that says an egress court affects the application of 1027.1 Exception 1.

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