
FIRE PREVENTION AND BUILDING SAFETY COMMISSION
Department of Homeland Security

Written Interpretation of the State Building Commissioner

Interpretation #: CEB-2022-31-2014 IBC-1015.2.1-Exc 2

Building or Fire Safety Law Interpreted

675 IAC 13-2.6 2014 Indiana Building Code, Section 1015.2.1. Two Exits or Exit Access Doorways. Where two *exits* or *exit access doorways* are required from any portion of the *exit access*, the *exit* doors or *exit access doorways* shall be placed a distance apart equal to not less than one-half of the length of the maximum overall diagonal dimension of the building or area to be served measured in a straight line between *exit* doors or *exit access doorways*. Interlocking or *scissor stairs* shall be counted as one *exit stairway*.

Exceptions:

1. [Omitted for lack of relevance to the request.]
2. Where a building is equipped throughout with an *automatic sprinkler system* in accordance with Section 903.3.1.1 or 903.3.1.2, the separation distance of the exit doors or exit access doorways shall not be less than one-third of the length of the maximum overall diagonal dimension of the area served.

Issue

Whether Exception 2 to Section 1015.2.1 of the *2014 Indiana Building Code* (IBC) applies to an exterior court or yard of a fully sprinklered building.

Interpretation of the State Building Commissioner

Yes, Exception 2 to Section 1015.2.1 of the *2014 IBC* does apply to an exterior court or yard of a fully sprinklered building.

Rationale

Section 1004.5 of the *2014 IBC* requires courts or yards to meet all egress requirements of Chapter 10. This includes regulations on the minimum distance between two exits, as well as any exceptions allowed by the regulations.

This leads to the question of whether a space incapable of being sprinklered should qualify for an exception that is based on the presence of sprinklers. While it is true that the court or yard itself cannot be sprinklered practically, that is not sufficient argument to disallow the use of the exception. Sprinklers may not be present in the court or yard, but then neither is the primary hazard to typical building occupants. The fact that the space is not fully enclosed, but rather is open to the sky effectively prevents the use of sprinkler systems, but it also effectively eliminates the occupants' primary need for such systems.

Further, the occupants of a non-sprinklered court or yard still accrue life-safety benefit from the presence of sprinkler systems in the building which the court serves. The court occupants may not be in a sprinklered space themselves, but it would be incorrect to suggest they receive no life-safety benefit at all from the fact that the adjacent structure is fully sprinklered. The additional evacuation time provided occupants by sprinklers inside the building runs concurrently outside the building as well, and if the primary threat to the court occupants is damage or collapse of the structure adjacent to the court (or fire spreading from the structure to the court), it would be disingenuous to suggest that what helps the structure does not also help the court.

Posted: 11/02/2022 by Legislative Services Agency
An [html](#) version of this document.