

## STATE BUILDING CODE INTERPRETATION NO. I-4-06

March 7, 2006

The following is offered in response to your February 7, 2006 letter to me in which you seek a formal interpretation of the requirements of Sections 1006.2.1 and 1006.4 of the BOCA National Building Code/1996 portion of the 1999 State Building Code, in effect for building permits applied for from May 1, 1999 through December 30, 2005.

**Question 1:** “Can a means of egress from an auditorium pass through a vestibule, which serves as a light lock to that auditorium, before reaching a corridor and continuing on the path of exit access to a lobby and through a vestibule to the exterior?”

**Answer 1:** Yes, assuming exit access travel distance limitations and the requirements of Section 1006.2.1 of the referenced code are met. Section 1006.2.1 starts out by prohibiting egress from a room or space through adjoining areas, but then details a number of exceptions to the prohibition within the code text. In plain language, a means of egress is permitted to pass through an adjoining space if the following restrictions are met:

- The adjoining rooms or areas must be accessory to the primary area served, that is, the adjoining area must serve the primary area and be related to it
- The adjoining area cannot contain a high-hazard (Use Group H) occupancy
- The adjoining area must provide a discernable path of travel to an exit (but need not contain the exit itself)
- In a situation where there are two or more paths of exit access through adjoining spaces, only one path of exit access is permitted to pass through a kitchen, storeroom, restroom, closet or similar space
- Exit access shall not pass through a space subject to locking
- Means of egress from dwelling or sleeping units shall not pass through other dwelling or sleeping units or through toilet or bath rooms

**Question 2:** An auditorium in a fully sprinklered building requires three exit access doors based on occupant load. One exit access door (near the stage) is remote from the other two. The two exit access doors that are in close proximity to each other (at the rear of the auditorium) pass through a lobby which is protected as a corridor. Can these two exit access doors be considered separate means of egress if they pass through the same lobby but lead in different directions through and out of the lobby?

**Answer 2:** Yes. Section 1006.4 of the referenced code states, in part, that when more than one exit is required they shall provide direct access in separate directions from any point in the area served so as to minimize the possibility that multiple exits will be blocked by any one condition. Since remoteness in the scenario you describe is met by the door near the stage, you need only concern yourself with the path of travel taken when using the multiple doors at the rear of the auditorium. If there is an opportunity to travel in different directions to reach different exits after passing through the doors at the rear of the auditorium, you have satisfied the requirements of the code. Keep in mind that while the code requires travel in different directions, it does not require travel in opposite directions. So, for example, if the people using one door walk straight across the lobby to reach an exit and the people using the other door turn left or right to reach a different exit, the paths of exit travel are separate even though they traverse the same space. This is no different than entering a corridor through the multiple doors and having a choice of turning left or right to reach an exit.

**Note:** This interpretation is based solely on the requirements of the 1999 State Building Code. The requirements of the 1999 State Fire Safety Code also apply to this situation and it is possible that they differ from the information contained herein.