



California State Fire Marshal **CODE INTERPRETATION**

Date Issued	1-26-05	Interpretation #	04-031
Topic	Special Egress-vs-Electronically Locked Doors		
Code Section(s)	2001 California Building Code, Section 1003.3.1.10		
Requested by	Mark Obey Pyro-Com Systems, Inc. 15531 Container Lane Huntington Beach, CA 92649		

Section 1003.3.1.10 of the 2001 C.B.C. allows special egress control devices of the time delay type to be installed if they conform to the following requirements:

1. The device shall automatically de-activate upon the activation of either the sprinkler system or the smoke detection system.
2. The device shall automatically de-activate upon loss of power to the egress control device itself, the smoke detection system or the means of egress illumination system.
3. The device shall be capable of being de-activated by a signal from a switch located in an approved location.
4. An irreversible process that will de-activate the device shall be initiated whenever a manual force of not more than 15 pounds is applied for (2) seconds to the panic bar or other door latching hardware. The device shall deactivate within an approved time period of not more than 15 seconds. The delay established for each device shall not be field adjustable.
5. Actuation of the panic bar or other door latching hardware shall activate an audible signal at the door. And a sign shall be provided on the door displaying operating instructions.

I have 2 questions as to how this relates to a multi-story "B" occupancy office building in which the elevator lobby exit doors are being electronically locked via a card access system and the exit stairs are in the space outside of the elevator lobby:

1. Is the locking of the elevator lobby doors in this manner considered “special egress” therefore needing to meet the requirements above?

No. The locking of elevator lobby doors (enclosures) is prohibited pursuant to CBC 1004.2.3.3 exception #1.

*Please bear in mind that on a case-by-case basis, the local AHJ has the option of considering alternate methods of protection when it is deemed necessary.

2. What is the extent of the “smoke detection system” noted in item #1. (i.e. floor of alarm or entire building or based on exit path?) This is a question that I would like clarified regardless of the response to my first question above.

CBC Section 1003.3.1.10 (Special Egress Control Devices), states that the automatic smoke detection system shall be in accordance with the California Fire Code. Section 1006.2.14.1, of the California Fire Code clearly states, “In other than group I occupancies, in multi-story buildings the smoke detectors shall be installed throughout all occupied areas and mechanical/electrical spaces for the story where special egress-control devices are installed. Additional detectors are required in adjacent stories where the occupants of those stories utilize the same exit egress”. If the special egress control devices are utilized throughout the building, then the extent of the smoke detection system would need to cover the entire building.