



## California State Fire Marshal CODE INTERPRETATION

Date Issued	February 9, 2016	Interpretation	16-001
Topic	I-3 Occupancies General Questions		
Code Section(s)	2013 CBC Sections 408.1.2.2, 505, 508.2.4, 508.4, 1004, 1014.2, 1027.1		
Requested by	Nacht & Lewis Lorenzo Lopez, Vice President		
Date Received	August 26, 2015		

**Question 1:** Do all required exits from jail recreation yards need to exit directly to the exterior?

**Answer 1: No.** Exiting from recreation yards can be to the exterior, 2-hour exit enclosures (still part of exit), or horizontal exits.

**Question 2:** If one required exit is to the exterior, can one exit lead back into the building?

**Answer 2:** *See Answer 1.*

**Question 3:** Alternatively, can one of the exits discharge into an adjacent yard which has a separate exit to the exterior? (Separation distance requirements of the two different exits from yards would apply if they are the only exits provided for these yards)

**Answer 3: Yes.** In regards to egressing through adjacent yards, the intervening rooms and travel distance requirements apply.

**Question 4:** If recreation yards are covered, mostly enclosed, and sprinklered, are they considered exterior spaces which cannot exit into the building?

**Answer 4: No.** They are not exterior. The specific provisions for Jails located in CBC Chapter 12 are not adopted by the Office of the State Fire Marshal.

**Question 5:** In a detention housing tier, can one exit discharge through the adjacent tier as long as the primary exit is via a stair to the main level of the housing unit?

**Answer 5: No.** The tier concept was predicated on free egress off of the raised tier level.

## Code Interpretation 16-001 (Continued)

**Question 6:** In a detention environment, can one of the required exits travel through a single adjacent space before reaching a rated exit (exterior exit, rated corridor, rated stairwell).

**Answer 6: Yes.** All provisions of California Building Code Chapter 10 and Section 408 must be met.

**Question 7:** Is there any requirement that jail pods or inmate program rooms must exit into a rated corridor?

**Answer 7: Yes.**

**Question 8:** Can jail pods or program rooms exit into a non-rated circulation space with a custody station at the center; with the circulation space visible from a staff station; and providing a discernible path to an exit?

**Answer 8: No.** If the occupant load exceeds six persons.

**Question 9:** In a jail or prison housing unit, does the secure custody station require a 2-hour rated separation from the inmate areas it is designed to observe?

**Answer 9: No.** If secure custody station is located within the egress corridor, separation is required.

**Question 10:** In a jail or prison program room, do closets serving that room (which are under 100 sf in area) need to be separated by 1-hour construction from the program room?

**Answer 10: Yes.**

**Question 11:** Are tiers held to the same area requirements as mezzanines?

**Answer 11: No.** Tiers and mezzanines are different.

**Question 12:** Are they limited to 1/3 of the area of the space in which they are located?

**Answer 12: Yes.** The tier design concept is for the tier area to not exceed 1/3 of the floor area. This is to maintain a tenable space during a smoke or fire event and to allow for direct visual supervision of inmates by custody staff.

**Question 13:** In a jail project, where the size of rooms and spaces are dictated by 1231, must exiting loads be held to the requirements of Table 1004.1.2?

**Answer 13: Yes.** The specific provisions for Jails located in CBC Chapter 12 are not adopted by the Office of the State Fire Marshal and do not apply to exit design.