



Locking Devices on Egress Doors Serving Occupied Exterior Areas

Building Division Interpretations and Procedures

Index Number:	IBC-2017-002
Issue Date:	12/18/19
Code:	2015 International Building Code
Section:	1004.5.4, 1009.8.1, and 1010.1.9

Issue and Background

The use of exterior decks or roof areas where occupants must egress back through the building often results in a conflict between the need to ensure safe egress from the occupied exterior area, and the need to maintain security for the building.

The provisions addressing the design and function of the means of egress system are found in IBC Section 1001. The scoping section of Chapter 10 states: *Buildings or portions thereof shall be provided with a means of egress system as required by this chapter. A means of egress is defined as “A continuous and unobstructed path of vertical and horizontal egress travel from any occupied portion of a building or structure to a public way.” A means of egress consists of three separate and distinct parts: the exit access, the exit and the exit discharge.* As noted, the means of egress system must provide a continuous and unobstructed path of egress travel. A locked door that requires a code, key, or other special knowledge or effort to open is considered an egress pathway obstruction. The IBC is providing certainty that the means of egress system remains unobstructed at all times so occupants can safely and quickly exit the building, which also applies to occupied exterior areas where occupants must egress back through the building.

The following criteria for acceptance of egress doors with locking devices is established to preserve the level of safety intended by the International Building Code.

City of Bellevue Policy on Locked Egress Doors from Occupied Exterior Areas

Required egress doors serving occupied exterior areas, other than egress courts, where occupants must use one or more exits or exit access doors to egress through the building are permitted to be equipped with an approved locking device if installed and operated in accordance with all of the following:

1. The occupant load of the occupied exterior area shall not exceed 300 as determined by IBC Section 1004 or the building official. The maximum occupant load shall be posted when required by IBC Section 1004.3, and the sign shall be permanently affixed inside the building within 18" laterally of each required egress door and between 48" to 60" above the floor surface.
2. A live weatherproof telephone or equivalent two-way communication device installed in accordance with IBC Section 1009.8.1 and 1009.8.2 shall be located adjacent to one of the required egress doors on the exterior side, centered no more than 24" laterally from the edge of the door and between 34" to 48" above the walking surface.
3. The egress door locking device shall be readily distinguishable as locked and the device shall not be capable of locking or unlocking except by the use of a key.
4. A clear window or glazed door opening, not less than 5 square feet (0.46 m²) sq. ft. in area, shall be provided in the wall separating the inside of the building from the outdoor area to allow visual confirmation to determine if there are occupants using the outdoor area. The minimum net clear opening height dimension shall be 24 inches (610 mm). The minimum net clear opening width dimension shall be 20 inches (508 mm). The center of the glazed opening shall be located 48" to 60" above the finished floor level, and the nearest edge of the glazed opening shall be no more than 18" laterally from the adjacent edge of the egress door provided with locking hardware.
5. A readily visible durable sign shall be posted on the interior side on or adjacent to each locked required egress door serving the exterior area stating: THIS DOOR TO REMAIN UNLOCKED WHEN THE OUTDOOR AREA IS OCCUPIED. The letters on the sign shall be not less than 1" high on a contrasting background, and the sign shall be located 48" to 60" above the finished floor level, and the nearest edge of the sign shall be no more than 18" laterally from the adjacent edge of each egress door provided with locking hardware. This sign may also indicate the maximum occupant load as required by item 1 above.
6. The egress door and the locking device shall meet all other applicable provisions of the International Building Code where required, including, but not limited to:
 - Number of required exits
 - Egress door swing direction
 - Panic hardware
 - Accessibility
 - Exit signage
 - Egress and emergency illumination

7. The building official and fire marshal shall make the final determination of where this policy may be applied, and the use of any such locking device is revocable by the building official and fire marshal for due cause.

Exceptions

1. An occupied exterior area serving one single Group R, Division 1, 2, or 3 private residential unit, may have a locking device on the egress door without meeting items 1 through 5 above if the egress door meets all applicable provisions of the International Building Code or the International Residential Code.
2. An occupied exterior area of 250 square feet or less, accessed from a private office space, may have a locking device on the egress door without meeting items 1 through 5 above if the egress door meets all other applicable provisions of the International Building Code.

Notes

1. All references to the International Building Code shall mean as adopted and amended by the State of Washington and the City of Bellevue.

For questions concerning required permits, contact Development Services (425-452-4121) between 8 a.m. and 4 p.m., Monday through Friday (Wednesday, 10 to 4).

Signature Gregg Schrader
Gregg Schrader, PE, SE, Building Official

Date: 12/18/2019

Attachments

Supersedes: N/A