Informal Interpretation Report
Number 7164

Date May 24, 2013

Edition 2010

Section 1016

Question:

Is it the intent of the FBC 2010 section 1016.2 Exterior egress balcony increase to permit the travel distance on an exterior egress balcony serving a two story E occupancy, protected with a fully automated sprinkler system to be increased beyond the limits of 200&#65533; indicated in Table 1016.1 to the closest riser of an open exterior exit stairway as defined by definition and allowed by FBC 2010 section 1016.1 Exception 2?

Answer

While Exceptions 1 and 2 do not seem to apply to this case, section 1016.1 states the maximum length of exit access travel is to, among other elements, an exterior exit stairway, not to the exit discharge. Travel distance is always measured to the entrance to an exit and that is what Section 1016.1 requires. Section 1016.1 contemplates the exterior stair as an exit, not an exit access.

While not enclosed, there are a number of other provisions of the code addressing exterior stairs as exits and egress balconies. There are requirements for fire rated separation from the interior of the building, including opening protection; the the protection of openings within 10 feet of the stair;for the percentage of openness on one side; and a requirement for the arrangement to be such as to restrict the accumulation of smoke.

In this case, The exit access travel distance of Table 1016.1 is 200 feet. However, Section 1016.2 specifically permits an increase of up to an additional 100 feet when using an egress balcony, provided the egress balcony is constructed in accordance with Section 1019. We are not provided with those details, but if the construction

complies with Section 1019, the distance to the exterior stair, not the exit discharge, is permitted to be 300 feet.

Commentary:

For additional clarity, here's a section of the FFPC that is a bit clearer on the subject matter. The second portion is commentary from the NFPA 101 Handbook.

7.6.3 Where any part of an exterior exit is within 10 ft(3050 mm) of horizontal distance of any unprotected building opening, as permitted by 7.2.2.6.3 for outside stairs, the travel distance to the exit shall include the length of travel to the finished ground level.
The intent of 7.6.3 is to clarify that, if the exterior stair is exposed to unprotected building openings within 10ft (3050 mm) horizontal distance, it is not considered an exit but is considered exit access; the travel distance,therefore, includes the measurement along the stair. The concept is illustrated in Exhibit 7.101. The openings in the wall that separates the rooms from the exit access balcony are not required to be fire rated in accordance with 7.5.3.3 (see the commentary that follows 7.5.3.3). Exterior Stair 1 is less than 10 ft (3050 mm) from the unprotected building openings (dimension d1). It cannot be considered an exit stair but, rather, an exit access stair in accordance with 7.6.3. The travel distance from point x must be measured to the bottom of the stair. Exterior Stair 2 is positioned 10 ft (3050 mm) from the unprotected building openings (dimension d2). It can be considered an exit in accordance with 7.6.3. The travel distance from point y needs to be measured only to the point on the stair landing that is 10 ft (3050 mm) from the unprotected exterior wall.

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