STATE BUILDING CODE INTERPRETATION NO. I-1-06

January 10, 2006

The following is offered in response to your letter to me dated January 4, 2006 in which you seek a formal interpretation of the provisions of Section 419.1.1 of the 2003 International Building Code portion of the 2005 State Building Code.

Question: The lowest story of an Educational Occupancy is three feet or less above adjoining grade. Would a classroom on this story be considered to be located on the level of exit discharge?

Answer: Yes. The code defines level of exit discharge as the horizontal plane located at the point at which an exit terminates and exit discharge begins. Exit elements can include exterior exit stairs and ramps. Section 1023.1 of the referenced code requires that the exit discharge be at grade or provide direct access to grade. Inclusion of the phrase "provide direct access to grade" allows for a scenario where the exit door from the story opens onto an exterior ramp or stair that provides direct access to grade, such as a stair or ramp that is less than a full story from the story being designated as the level of exit discharge. One could not, for instance, designate the second story of a building as a level of exit discharge simply because a door from the second story led to an exterior stair a full flight above the grade below. The intent of the code is that the story designated as the level of exit discharge be the story that is closest to finished exterior grade, keeping in mind that a sloping site might result in a building with more than one level of exit discharge.