


# BC BUILDING CODE INTERPRETATION COMMITTEE

A joint committee with members representing  
**AIBC, APEGBC, BOABC, POABC**

**File No: 12-0064**

**INTERPRETATION**

**Page 1 of 2**

Interpretation Date:	September 16, 2015
Building Code Edition:	BC Building Code 2012 (after December 19, 2014)
Subject:	Fire protection of exits (exit exposure protection) for houses with Secondary suites
Keywords:	unprotected openings, fire protection of exits, exit exposure protection, houses, secondary suites
Building Code Reference(s):	9.9.4.1.(1), 9.9.4.4.(1), 9.9.4.6.(1), 9.10.13.5, 9.10.13.7, 9.37.2.8.(1)
<b>Question:</b>	<p>A single family dwelling has a "basement" secondary suite. The single exterior exit door of the secondary suite opens to an exterior travel path 900mm long and then travels outside up 3 steps to level ground. Above this exterior means of egress are windows of the main suite within the exposing limits described by Sentences 9.9.4.4.(1) and 9.37.2.8.(1).</p> <ol style="list-style-type: none"><li>1. Are the 3 steps considered an unenclosed exit stair contemplated by Sentences 9.9.4.1.(1) and 9.37.2.8.(1)?</li><li>2. Would the exposing windows of the main suite above require fire protection (exit exposure protection)?</li><li>3. Is Division B Appendix A commentary A-9.37.2.8. giving the Authority having Jurisdiction the ability to override the Building Code?</li></ol>
<b>Interpretation:</b>	<ol style="list-style-type: none"><li>1. No.</li></ol> <p>Sentence 9.37.2.8.(1) is the applicable reference for houses containing a secondary suite, not Sentence 9.9.4.1.(1).</p> <p>A set of 3 exterior steps (3 risers) or less, serving a single dwelling unit does not require handrails and would not be considered a flight of stairs. Similarly 3 steps would not be considered unenclosed stairs as contemplated by Sentence 9.37.2.8.(1).</p> <p> R. J. Light, Committee Chair</p>
<p>The views expressed are the consensus of the joint committee with members representing AIBC, APEGBC, BOABC, and POABC, which form the BC Building Code Interpretation Committee. The purpose of the committee is to encourage uniform province wide interpretation of the BC Building Code. These views should not be considered as the official interpretation of legislated requirements based on the BC Building Code, as final responsibility for an interpretation rests with the local <i>Authority Having Jurisdiction</i>. The views of the joint committee should not be construed as legal advice.</p>	
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Page 2 of 2

2. Some judgement is required to the specific condition under review. The explanatory commentary in Division B Appendix A A-9.37.2.8 indicates:

**“Openings near Unenclosed Exit Stairs and Ramps**

Unprotected door or window openings in other fire compartments adjacent to exit stairs and ramps should be protected from the other suite to provide safe passage to a safe area. Normally such protection as required by Part 9 would extend both vertically and horizontally beyond the adjacent openings. This is considered excessive due to required fire safety measures and the relatively short travel distances in this type of building. The application of current Part 9 requirements would in many cases require the protection of all openings in entire faces of dwelling units, which could be very restrictive. Authorities should exercise judgment with regard to deciding which openings are close enough to the exit facility to pose a problem during the early stages of a fire and require appropriate opening protection. Those openings that directly pass the means of egress are required to be protected.”

In this particular case, if the exterior means of egress for the secondary suite does not involve stairs and ramps, the windows of the main suite above the secondary suite are not considered an exposing condition under Sentence 9.37.2.8.(1).

Sentences 9.9.4.1.(1), 9.9.4.4.(1), and 9.9.4.6.(1), are applied for multiple suites under Part 9 and would be considered excessive protection.

Further considerations that could be used in the assessment include whether the building is sprinklered or not, whether combustible or noncombustible construction and / or cladding are used, travel distances within the suites, detection and alarm systems provided, etc.

3. No.

Discussion and exercise of judgement is needed by both the design proponent and the Authority having Jurisdiction to arrive at an appropriate protection regime.  
See discussion under previous question 2.

  
R. J. Light, Committee Chair

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