


BC BUILDING CODE INTERPRETATION COMMITTEE

A joint committee with members representing
AIBC, EGBC, BOABC

File No: 18-0075

INTERPRETATION

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Interpretation Date:	May 18, 2021
Building Code Edition:	BC Building Code 2018
Subject:	Egress from Occupied Roofs
Keywords:	Egress, Exit, Exterior Exit Passageway
Building Code Reference(s):	3.3.1.3, 3.4.2.5, 3.4.4.3
Question:	<p>On an open roof deck with exit doors to two separate exit stairs, can a delineated exit passageway be assumed on the roof from one exit to the other, to allow travel distance to be measured to that delineated exterior exit passageway?</p>
Interpretation:	<p>Yes (subject to concurrence with the AHJ)</p> <p>Sentence 3.3.1.3.(5) requires a means of egress at the roof level, designed in accordance with the requirements for exits in Section 3.4, for an occupancy at the roof. There are exceptions for Sentence (4) for a roof deck serving a single dwelling unit, and for Sentence (6) which requires two such means of egress, designed in accordance with the requirements for exits in Section 3.4, from a roof used or intended for an occupant load of more than 60 persons.</p> <p>Sentence 3.3.1.3.(7) further clarifies that the occupied roof area shall be used in place of the floor area in determining the egress requirement for Sentences (5) and (6). Note that this Sentence as published in the December 2019 BCBC revisions referenced Sentence (4) and (5), instead of (5) and (6). The BC Building and Safety Standards Branch will be publishing an errata to update these references, to Sentences (5) and (6).</p> <p>Locations of exits are regulated in Article 3.4.2.5, which specifies travel distances in a floor area, to an exit. "Floor area" is defined as the space between exterior walls and required firewalls (with additional exceptions that are not relevant to this question). An open roof does not have any floor area, but because Sentence 3.3.1.3.(7) requires the occupied roof area to</p> <p> Patrick Shek, P.Eng., CP, FEC, Committee Chair</p>
<p>The views expressed are the consensus of the joint committee with members representing AIBC, EGBC and BOABC, which form the BC Building Code Interpretation Committee. The Building and Safety Standards Branch, Province of BC and the City of Vancouver participate in the committee's proceedings with respect to interpretations of the BC Building Code. 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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be used in place of the floor area, the travel distance to an exit on a roof is limited to the same travel distance as in a floor area.

Article 3.4.2.5 allows different travel distances to an exit in sprinklered and unsprinklered floor areas. There are no references to the allowable travel distance on an open roof deck. An open deck could not be sprinklered because there is no ceiling, but unlike in an enclosed floor area, smoke or other products of combustion are unlikely to accumulate in high concentrations at a roof deck. Therefore, it would be reasonable to use the allowable exit travel distance in a sprinklered floor area, for an open roof deck.

The use of a delineated exit passageway between rooftop exits, with the travel distance measured to that delineated passageway, is an analogy to an exterior exit passageway as regulated in Article 3.4.4.3. of the Code. For exterior passageways complying with that Article, a fire separation is not required between the passageway and the adjacent floor area, and the exit travel distance can be measured to the passageway. It may be possible for a delineated rooftop passageway to meet the intent of the exterior passageway requirements, but the Code does not recognize the concept of a delineated passageway. Such an approach would require review with the authority having jurisdiction.

Some buildings may have large exterior podium areas, where exiting through the building is not necessary to reach a street, or where exits are remotely separated or in different structures adjoining the podium. Although the building code does not address such large roof decks, it may be possible to consider the podium as an exterior open space where travel distance is not regulated. Such an approach would require review with the authority having jurisdiction.



Patrick Shek, P.Eng., CP, FEC, Committee Chair

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