



California State Fire Marshal **CODE INTERPRETATION**

Date Issued	March 24, 2016	Interpretation	16-002
Topic	Delayed Egress in R-3.1 Occupancies		
Code Section(s)	2013 CBC §1008.1.9.7 and CRC R313		
Requested by	CAL FIRE - Office of the State Fire Marshal Ernie Paez, Division Chief		
Date Received	January 20, 2016		

Questions:

Does the code allow for the use of a NFPA 13D fire sprinkler system to meet the requirements for delayed egress locks in a R-3.1 (Residential Care Facility) occupancy with six or less people?

No. The California Residential Code (CRC) Section R325.6.9 and California Building Code (CBC) Section 425.8.10 requires delayed egress locks to be in compliance with CBC Section 1008.1.9.7 (there is a printing error in the CRC that incorrectly references CBC Section 1008.1.8.6). CBC Section 1008.1.9.7 requires buildings with delayed egress locks to be equipped throughout with an automatic sprinkler system in accordance with Section CBC 903.3.1.1, a fire alarm system with complete smoke detection, and nine other items. CBC Section 903.3.1.1 requires an NFPA 13 sprinkler system, not a 903.3.1.2 which is an NFPA 13D system. Therefore, delayed egress locks with a NFPA 13D sprinkler system would not be code compliant.