INTERPRETIVE MEMORANDUM

DATE: August 7, 1997

TO: Office of State Fire Marshal Inspection Sections
State Fire Marshal Certified Fire Prevention Bureaus

FROM: Pat Slaughter, Administrative Director, Inspections and Licensing

SUBJECT: DETENTION, AISLE SPACING BETWEEN BUNKS

Research of all applicable codes was recently done in order to clarify the currently enforced requirement for 28" aisle spacing between bunk in Detention facilities. In all of the codes (1967-1994), the sections that apply to Detention state that the requirements for means of egress shall comply with Chapter 5, unless modified by the occupancy chapter. The results of this research is as follows:

1. The codes from 1967 through 1976 specified a minimum width of any exit access to be *not less than 28"* (Chapter 5).

2. The codes from 1981 through 1991 increased this dimension to a minimum of *36"*, however allowed a dimension of *28" in Existing buildings*.

3. Beginning with the application of the 1981 Code through 1994, the occupancy chapters were modified to require a minimum of *4 ft. width New, and 3 ft. width Existing for "aisles, corridors, and ramps required for egress"* (see 14-2.3.2).

4. The 1994 code, while requiring a minimum width of *36"* in all occupancies (Chapter 5), diverged from previous codes by allowing an exception for exit access formed by “furniture and movable partitions, serving not more than six people...” The 1994 code with exceptions is as follows:

   5-3.4.1 The minimum width of any means of egress shall be as specified for a given egress component by Chapter 5 or for individual occupancies by Chapters 8 through 29, but in no case shall such width be less than 36 in.

   *Exception No 1: The minimum width of exit access formed by furniture and movable partitions, serving not more than six people, and less than 50 ft. In length, shall be not less than 18 in. at and below 38 in. height or 28 in. above 38 in. height, provided the minimum 36 in. for new and 28 in. for existing can be provided without moving permanent walls.*

   *Exception No. 2: Doors as provided for in 5-2.1.3*

   *Exception No. 3: In existing buildings, the minimum width shall be not less than 28 in.*

   *Exception No. 4: Aisles and aisle accessways in assembly occupancies as provided in Chapters 8 and 9.*

It should be noted that the modification made in 1994 is the first time that furniture and movable partitions has been addressed, and in this regard is of importance to the issue of aisle spacing between bunk in a detention occupancy. Though this modification would seem to allow a spacing of 18" with single bunk, and 28" for double bunk, the occupancy chapter itself has been modified (since 1981) to require a 4 ft. width for aisles, corridors, and ramps. In the specific case of aisle spacing between bunk in detention occupancies, however, it is the determination of this office that *28" spacing between bunk shall remain as the required minimum.*

All other areas in the means of egress shall comply with the requirements of the occupancy chapter and/or Chapter 5.

Authorized by: State Fire Marshal