



# OKLAHOMA

## Uniform Building Code Commission Technical Code Review Committee

### Code Change Proposal Form

**NOTE:** This form and any attachments hereto are subject to the Oklahoma Open Records Act and may be disbursed, upon request, without further notice to the submitter.

**INSTRUCTIONS:**

1. Please type or print clearly.
2. Form must be signed. Any forms that are not signed or filled out completely, may not be considered.
3. Each requested change must be on a separate form.
4. If the space to show the proposed change or supporting information is not big enough to show the entire change, write the words "See Attached" in the space provided and submit the change on a separate page or document.

**Contact Information:**

Name Samuel Day

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**Financial Impacts:**

*Please provide the following information:*

Who will be impacted by this change, (i.e. contractors, business or homeowners, specific trades, etc.)?

Tenants and landlords will be impacted by this change as allowing more exterior exits stairs on small sites will increase life safety, lower costs, and improve sociability in small multifamily buildings.

What is the financial impact of this change?

Increase cost  Decrease costs  Keep Costs the Same

What is the expected amount of the increase or decrease? very little

If this change increases the cost of construction, will it exceed \$1,000,000 over the course of five years?

Yes  No

Explain the method used to determine the economic impact. Please provide the sources used to determine the impact, in the explanation.

**Code Change Information:**

Which code needs to be revised? International Building Code

Which part of the code needs to be revised?

Section 1027.5 Table \_\_\_\_\_ Figure \_\_\_\_\_ Page \_\_\_\_\_

**Proposed Change:**

Show the proposed new, revised, or deleted text in Legislative format. Line through text to be deleted and underline text to be added or revised.

1027.5 Location  
Exterior exit stairways and ramps shall have a minimum fire separation distance of 10 feet (3048 mm) measured at right angles from the exterior edge of the stairway or ramps, including landings, to:

1. Adjacent lot lines.
2. Other portions of the building.
3. Other buildings on the same lot unless the adjacent building exterior walls and openings are protected in accordance with Section 705 based on fire separation distance.

For the purposes of this section, other portions of the building shall be treated as separate buildings.

Exceptions:

1. Exterior exit stairways and ramps serving individual dwelling units of Group R-3 shall have a minimum fire separation distance of 5 feet (1525 mm).
2. Exterior exit stairways which extend no higher than 15 feet above the level of exit discharge may have a minimum fire separation distance of 2 feet.
3. Exterior exit stairs for buildings sprinkled according to 903.3.1.1 or 903.3.1.2 may have a minimum fire separation of 5 feet.

**Supporting Information:**

Please provide justification for the proposed change and clarify if it impacts life safety.

Exterior exit stairs offer both economic and social advantages in small multifamily buildings. They typically require lower upfront construction costs and reduced long-term maintenance compared to conditioned interior exit stairs. In addition, they can enhance sociability by creating more opportunities for incidental interaction among residents.

Despite these benefits, exterior exit stairs are often difficult to incorporate on small infill sites due to current setback requirements. These setbacks are intended to reduce the risk that a fire in an adjacent building could compromise egress. However, available fire data suggests that this risk is relatively limited. Exposure fires—those originating off-site—account for only about 1% of fire-related deaths in the United States. By contrast, the majority of fire fatalities result from smoke inhalation.

Exterior exit stairs, being open to the outdoors, effectively eliminate the risk of smoke accumulation that can occur in non-pressurized interior exit stairs. As a result, while exterior stairs may be more exposed to adjacent fires, they significantly reduce the primary cause of fire-related deaths. In this context, exterior exit stairs can offer a higher level of life safety than non-pressurized interior stairs, even when located at relatively small separation distances.

Signature: 05880dff-e4d6-4571-b14e-357fa877f66e Digitally signed by 05880dff-e4d6-4571-b14e-357fa877f66e Date: 2026.03.31 11:55:59 -05'00'

Date: \_\_\_\_\_

Send completed form to:  
Oklahoma Uniform Building Code Commission  
2401 N.W. 23 St, Ste 82, Oklahoma City, OK 73107  
Or email to: permitreporting@oubcc.ok.gov