

CITY & COUNTY OF DENVER COMMUNITY PLANNING & DEVELOPMENT BUILDING PERMIT POLICY		
Subject: EGRESS DOORS – LOCKING AND SECURING		
Approved: Eric Browning, P.E., Building Official		Drafted by: Renn
Number: DCBC 1010	Effective Date: February 22, 2023	Page: 1 of 2

Reference: DCBC 1010

Key-operated locking devices that lock from the egress side are permitted in buildings in occupancy Group A having an occupant load of 300 or less, Groups B, F, M, and S, and in places of religious worship, in accordance with Denver Commercial Building Code (DCBC) Section 1010.2.4 Item 3. The following are clarifications of the locking configurations and devices that may be used under this code section:

- If a pair of doors is secured with a key-operated locking device that locks from the egress side, the locking arrangement must be such that one unlocking operation frees both doors.
- If the main exit is made up of multiple doors or multiple pairs of doors, none of these doors can be key-locked from the inside. The reason this is not acceptable is that inside locking of the main exit is allowed because there is assurance that the single door or the single pair of doors will in fact be unlocked when the facility is opened for business. This assurance is lost when there are multiple doors because only one door could be unlocked for the business to operate and the other exit doors – which might remain locked – would not be available for emergency exiting.
- For reasons stated above, key-operated locking devices from the egress (interior) side are not permitted in spaces served by main doors at multiple locations.
- Special doors, Revolving, Power-operated, and Horizontal sliding doors, shall not be fitted with a key-operated lock or latch that would prevent their operation.

The DCBC Section 1010.1 contains the provision that doors provided for egress purposes in numbers greater than required by this code, shall conform to the requirements of that section. This provision is interpreted and applied as follows:

An exterior door that is not a required exit but provides access to the outside for employees (deliveries, shipments, trash, etc.) will not be considered as a door "provided for egress purposes" and therefore will be allowed to be secured or locked in any manner desired by the business owner.

An exterior door that is not a required exit but is in an area normally occupied by the public must comply with all of the provisions for exit doors unless all the following conditions are met, in which case, locking is permitted.

- Door must be completely nontransparent and located in a nontransparent wall so that it does not visually suggest egress to the outside.
- Door must be equipped with a sign that reads "THIS DOOR IS NOT AN EXIT."
- All required exit doors must be equipped with code-complying exit signs.

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Existing Commercial Buildings

Existing buildings with exit door hardware that was installed prior to October 1990 and that complied with the archived Denver Building Code (Section 3303), prior to the incorporation of the Uniform Building Code, and with the joint City policy dated February 1983 will be allowed to remain in place unless otherwise addressed by the Denver Existing Building Code for change of occupancy or new door/hardware installations. This criterion was as follows:

1. Any exit door in an office, retail or industrial occupancy could be equipped with one sliding surface bolt mounted above the primary door latch but no more than 6" above the latch. Any door equipped with a sliding surface bolt was required to have a sign that read "THIS DOOR TO BE UNLOCKED DURING BUSINESS HOURS. IF THIS DOOR IS LOCKED DURING BUSINESS HOURS, NOTIFY THE FIRE DEPARTMENT."
2. If an existing exterior door only provides access to the outside for employees (deliveries, shipments, trash, etc.) and is not identified with exit signage, it may be secured or locked in any manner desired by the business owner. If such a door is identified with exit signage, the building owner may apply in writing to the Building Department to review the exiting requirements of the building. If it is determined that the door is not a required exit and the owner's application is approved by both the Building Department and the Fire Department, the exit signage shall be removed and the door may be secured or locked in any manner desired by the business owner.
3. A double-keyed lock was permitted on the main entrance door of any commercial occupancy. This was permitted on the theory that this main entrance door would always be unlocked during business hours.

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