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LOCKS & LATCHES - COMMERCIAL

This is to provide guidance for the requirements of door operations, locks and latches in commercial units in compliance with the Building Code of New York State and the Fire Code of New York State.

Purpose

To provide guidance and some examples, not all-inclusive, of what is required and what cannot be utilized on egress doors in a commercial unit.

References

2025 Building Code of New York State; 2025 Fire Code of New York State

Definitions

Accessible. A site, building, facility or portion thereof that complies with Chapter 11.

Dwelling Unit. A single unit providing complete, independent living facilities for one or more persons, including permanent provisions for living, sleeping, eating, cooking and sanitation.

Fire Door. The door component of a *fire door assembly*.

FIRE DOOR ASSEMBLY. Any combination of a *fire door*, frame, hardware and other accessories that together provide a specific degree of fire protection to the opening.

Fire Exit Hardware. *Panic hardware* that is *listed* for use on *fire door assemblies*.

Means of Egress. A continuous and unobstructed path of vertical and horizontal egress travel from any occupied portion of a *building* or *structure* to a *public way*. A *means of egress* consists of three separate and distinct parts: the *exit access*, the *exit* and the *exit discharge*.

Panic Hardware. A door-latching assembly incorporating a device that releases the latch upon the application of a force in the direction of egress travel. See "*Fire exit hardware*."

Occupant Load. The number of persons for which the *means of egress* of a building or portion thereof is designed.

Sleeping Unit. A single unit that provides rooms or spaces for one or more persons, includes permanent provisions for sleeping and can include provisions for living, eating and either sanitation or kitchen facilities but not both. Such rooms and spaces that are also part of a dwelling unit are not sleeping units.

Code Sections

1010.1.9 Door operations. Except as specifically permitted by this section, egress doors shall be readily openable from the egress side without the use of a key or special knowledge or effort.

1010.1.9.1 Hardware. Door handles, pulls, latches, locks and other operating devices on doors required to be *accessible* by Chapter 11 shall not require tight grasping, tight pinching or twisting of the wrist to operate.

1010.1.9.2 Hardware height. Door handles, pulls, latches, locks and other operating devices shall be installed 34 inches (864 mm) minimum and 48 inches (1219 mm) maximum above the finished floor. Locks used only for security purposes and not used for normal operation are permitted at any height.

Exception: Access doors or gates in barrier walls and fences protecting pools, spas and hot tubs shall be permitted to have operable parts of the latch release on self-latching devices at 54 inches (1370 mm) maximum above the finished floor or ground, provided that the self-latching devices are not also self-locking devices operated by means of a key, electronic opener or integral combination lock.

1010.1.9.3 Monitored or recorded egress. Where electrical systems that monitor or record egress activity are incorporated, the locking system shall comply with Section 1010.1.9.7, 1010.1.9.8, 1010.1.9.9, 1010.1.9.10 or 1010.1.9.11 or shall be readily openable from the egress side without the use of a key or special knowledge or effort.

1010.1.9.4 Locks and latches. Locks and latches shall be permitted to prevent operation of doors where any of the following exist:

1. Places of detention or restraint.
2. 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*, the main door or doors are permitted to be equipped with key-operated locking devices from the egress side provided:
 - 2.1. The locking device is readily distinguishable as locked.
 - 2.2. A readily visible durable sign is posted on the egress side on or adjacent to the door stating: THIS DOOR TO REMAIN UNLOCKED WHEN THIS SPACE IS OCCUPIED. The sign shall be in letters 1 inch (25 mm) high on a contrasting background.
 - 2.3. The use of the key-operated locking device is revocable by the *building official* for due cause.
3. Where egress doors are used in pairs, *approved* automatic flush bolts shall be permitted to be used, provided that the door leaf having the automatic flush bolts does not have a doorknob or surface-mounted hardware.
4. Doors from individual *dwelling* or *sleeping units* of Group R occupancies having an *occupant load* of 10 or less are permitted to be equipped with a night latch, dead bolt or security chain, provided such devices are openable from the inside without the use of a key or tool.
5. *Fire doors* after the minimum elevated temperature has disabled the unlatching mechanism in accordance with *listed fire door* test procedures.
6. Doors serving roofs not intended to be occupied shall be permitted to be locked preventing entry to the building from the roof.

1010.1.9.5 Bolt locks. Manually operated flush bolts or surface bolts are not permitted.

Exceptions:

1. On doors not required for egress in individual *dwelling units* or *sleeping units*.
2. Where a pair of doors serves a storage or equipment room, manually operated edge- or surface-mounted bolts are permitted on the inactive leaf.
3. Where a pair of doors serves an *occupant load* of less than 50 persons in a Group B, F or S occupancy, manually operated edge- or surface-mounted bolts are permitted on the inactive leaf. The inactive leaf shall not contain doorknobs, panic bars or similar operating hardware.
4. Where a pair of doors serves a Group B, F or S occupancy, manually operated edge- or surface-mounted bolts are permitted on the inactive leaf provided that such inactive leaf is not needed to meet egress capacity requirements and the building is equipped throughout with an *automatic sprinkler system* in accordance with Section 903.3.1.1. The inactive leaf shall not contain doorknobs, panic bars or similar operating hardware.
5. Where a pair of doors serves patient care rooms in Group I-2 occupancies, self-latching edge- or surface-mounted bolts are permitted on the inactive leaf provided that the inactive leaf is not needed to meet egress capacity requirements and the inactive leaf shall not contain doorknobs, panic bars or similar operating hardware.

1010.1.9.6 Unlatching. The unlatching of any door or leaf shall not require more than one operation.

Exceptions:

1. Places of detention or restraint.
2. Where manually operated bolt locks are permitted by Section 1010.1.9.5.
3. Doors with automatic flush bolts as permitted by Section 1010.1.9.4, Item 3.
4. Doors from individual *dwelling units* and *sleeping units* of Group R occupancies as permitted by Section 1010.1.9.4, Item 4.

1010.1.10 Panic and fire exit hardware. Swinging doors serving a Group H occupancy and swinging doors serving rooms or spaces with an *occupant load* of 50 or more in a Group A or E occupancy shall not be provided with a latch or lock other than *panic hardware* or *fire exit hardware*.

Exceptions:

1. A main *exit* of a Group A occupancy shall be permitted to have locking devices in accordance with Section 1010.1.9.4, Item 2.

2. Doors provided with *panic hardware* or *fire exit hardware* and serving a Group A or E occupancy shall be permitted to be electrically locked in accordance with Section 1010.1.9.9 or 1010.1.9.10.

Electrical rooms with equipment rated 1,200 amperes or more and over 6 feet (1829 mm) wide, and that contain overcurrent devices, switching devices or control devices with exit or exit access doors, shall be equipped with *panic hardware* or *fire exit hardware*. The doors shall swing in the direction of egress travel.

1010.2 Door operations. Except as specifically permitted by this section, egress doors shall be readily openable from the egress side without the use of a key or special knowledge or effort.

1010.2.1 Unlatching. The unlatching of any door or leaf for egress shall require not more than one motion in a single linear or rotational direction to release all latching and all locking devices. Manual bolts are not permitted.

Exceptions:

1. Places of detention or restraint.
2. Doors with manual bolts, automatic flush bolts and constant latching bolts as permitted by Section 1010.2.4, Item 4.
3. Doors from individual dwelling units and sleeping units of Group R occupancies as permitted by Section 1010.2.4, Item 5.

1010.2.2 Hardware. Door handles, pulls, latches, locks and other operating devices of doors required to be accessible by Chapter 11 shall not require tight grasping, tight pinching or twisting of the wrist to operate.

1010.2.3 Hardware height. Door handles, pulls, latches, locks and other operating devices of doors shall be installed 34 inches (864 mm) minimum and 48 inches (1219 mm) maximum above the finished floor.

Exceptions:

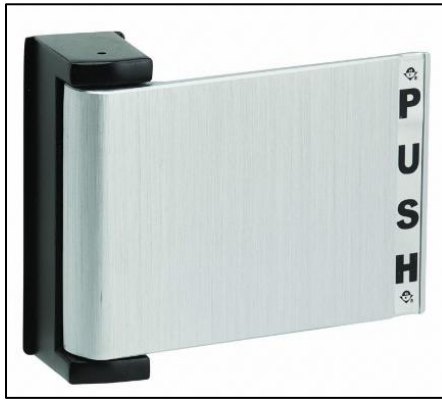
1. Locks used only for security purposes and not used for normal operation are permitted at any height.
2. The height of operating devices of locks and latches of doors and gates in barriers required to restrict access to a swimming pool, spa, or hot tub shall comply with Sections 3109.2.7 and 3109.2.8.

1010.2.4 Locks and latches. Locks and latches shall be permitted to prevent operation of doors where any of the following exist:

1. Places of detention or restraint.
2. In Group I-1, Condition 2 and Group I-2 occupancies where the clinical needs of persons receiving care require containment or where persons receiving care pose a security threat, provided that all clinical staff can readily unlock doors at all times, and all such locks are keyed to keys carried by all clinical staff at all times or all clinical staff have the codes or other means necessary to operate the locks at all times.
3. 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, the main door or doors are permitted to be equipped with key-operated locking devices from the egress side provided that:
 - 3.1. The doors are the main exterior doors to the building, or the doors are the main doors to the tenant space.
 - 3.2. The locking device is readily distinguishable as locked.
 - 3.3. A readily visible durable sign is posted on the egress side on or adjacent to the door stating: THIS DOOR TO REMAIN UNLOCKED WHEN THIS SPACE IS OCCUPIED. The sign shall be in letters 1 inch (25 mm) high on a contrasting background.
 - 3.4. The use of the key-operated locking device is revocable by the building official for due cause.
4. Manual bolts, automatic flush bolts and constant latching bolts on the inactive leaf of a pair of doors in accordance with Table 1010.2.4, provided that the inactive leaf does not have a doorknob, panic hardware, or similar operating hardware.
5. Single exit doors complying with Section 1006.2.1 or 1006.3.4 from individual dwelling or sleeping units of Group R occupancies and equipped with a night latch, dead bolt, manual bolt, or security chain that requires a second releasing motion, provided that such devices are openable from the inside without the use of a key or tool.
6. Fire doors after the minimum elevated temperature has disabled the unlatching mechanism in accordance with listed fire door test procedures.

7. Doors serving roofs not intended to be occupied shall be permitted to be locked preventing entry to the building from the roof.
8. Other than egress courts, where occupants must egress from an exterior space through the building for means of egress, exit access doors shall be permitted to be equipped with an approved locking device where installed and operated in accordance with all of the following:
 - 8.1. The maximum occupant load shall be posted where required by Section 1004.9. Such signage shall be permanently affixed inside the building and shall be posted in a conspicuous space near all the exit access doorways.
 - 8.2. A weatherproof telephone or two-way communication system installed in accordance with Sections 1009.8.1 and 1009.8.2 shall be located adjacent to not less than one required exit access door on the exterior side.
 - 8.3. The egress door locking device is readily distinguishable as locked and shall be a key-operated locking device.
 - 8.4. A clear window or glazed door opening, not less than 5 square feet (0.46 m²) in area, shall be provided at each exit access door to determine if there are occupants using the outdoor area.
 - 8.5. A readily visible, durable sign shall be posted on the interior side on or adjacent to each locked required exit access door serving the exterior area stating, "THIS DOOR TO REMAIN UNLOCKED WHEN THE OUTDOOR AREA IS OCCUPIED." The letters on the sign shall be not less than 1 inch (25.4 mm) high on a contrasting background.
 - 8.6. The occupant load of the occupied exterior area shall not exceed 300 occupants in accordance with Section 1004.
9. Locking devices are permitted on doors to balconies, decks or other exterior spaces serving individual dwelling or sleeping units.
10. Locking devices are permitted on doors to balconies, decks or other exterior spaces of 250 square feet (23.23 m²) or less serving a private office space.

Type of locks and latches allowed on the main entrance **this is not all inclusive*



Examples would not require door signage and would allow the door to be locked while the space is occupied



Examples would require door signage and would **NOT** allow the door to be locked while the space is occupied

Types of locks, latches, and bolts not allowed **this is not all inclusive*



Keyed cylinder or Thumb Turn not allowed on emergency exits (excluding the main door).

Main door shall meet the requirements of Section 1010.1.9.4.