



## Assembling a Public Assembly

In recent months, I have gotten numerous calls from clients who have received Building Department or Fire Department violations regarding a place of assembly within their facility. In fact, I have received so many calls on this subject that I thought dedicating this month's newsletter to places of assembly might be helpful to our clients, colleagues and friends.

First let me clarify the difference between an assembly occupancy and a place of assembly. An assembly occupancy is a room or space where persons gather for religious, civic or social functions. If the number of persons in that room is 75 or more it must be classified as a place of assembly (in some jurisdictions, the number is 50).

The number of persons (or occupant load) in a place of assembly is derived by taking the square foot area of the space and dividing it by a tabular building code value (most often 12 net square foot per occupant). Therefore, a 2,000 square foot room area, divided by 12 net square foot per occupant would have 167 occupants. Since there are more than 75 persons by tabulation, this theoretical room must be classified as a place of assembly.

Even though on a daily basis there may be fewer than 167 persons in our theoretical room, the exit capacity must be sufficient to exit 167 persons and the 167 person occupant load must be listed on the building's Certificate of Occupancy. The capacity of exits is a function of how many doors there are, how wide they are and how far apart they are.

In places of assembly, due to higher concentrations of people, building codes require more exits and dictate they be readily accessible to even the most remote points in a room. Additional emergency and exit lighting is also required and there are very specific rules for the position of tables and chairs so that proper exit aisles are maintained.

Violations are most often written by the Building Department or Fire Department for failure to maintain a current public assembly permit, under the jurisdiction's Building Code. The core of this problem is administrative.

When the initial Certificate of Operation is first issued, it generally has a term of one year after which time, it must be renewed. The renewals are generated and mailed to a given facility by the Building Department based on an internally generated master list. In larger cities with a high volume of assembly filings each year, we have found it quite common that some initial public assembly filings never make it onto the Building Department's master lists. In these cases, renewal invoices for assembly permits do not get mailed out, the original certificates lapse, and ultimately results in the issuance of a violation.

Adding to the frustration is the tendency of files to "get lost" within large agencies so that applicants often cannot prove they have an approved assembly seating plans. This is most common where building ownership has changed. The only solution is to get ahead of the problem. Designate someone in your organization to verify that your public assembly location is on the assembly permits master list. Find out when to expect a renewal notice. If it does not arrive, check the master list again. You might also want to document your efforts by sending a certified letter to the manager at your local Building Department branch.

