

STATE BUILDING CODE INTERPRETATION NO. I-20-12

October 4, 2012

The following is in response to your request for formal interpretation received on September 27, 2012 with regard to the intent of Section 903.2.7 of the 2003 International Building Code as referenced by the 2003 International Existing Building Code.

Scenario:

An existing building that contains three R-2 dwelling units, two business occupancies and one A-3 occupancy. The owner is going to change one of the spaces from business to another dwelling unit.

Question:

Would either the 2003 International Building Code or the 2003 International Existing Building Code require that the new dwelling unit or the entire building be provided with an automatic fire suppression system?

Answer:

The 2003 International Existing Building Code refers you to Chapter 9, of the 2003 International Building Code portion of the 2005 State Building Code, for the installation of an automatic fire suppression system. Section 903.2.7, of the 2003 International Building Code, requires in pertinent part that an automatic fire suppression system be installed throughout all existing buildings that have a Group R fire area newly introduced by a change of occupancy or by an addition.

Although it could be clearer, the intent of this change was not to penalize an owner when the building already contained a Group R fire area. The introduction of another dwelling unit does not significantly increase the life safety hazards already found in the building.

Since the building has an existing Group R fire area by virtue of the three existing dwelling units, adding a new dwelling unit in an existing space that is being utilized as a business would not require either the new dwelling unit or the building to be provided with an automatic fire suppression system since one has not newly introduced a new Group R fire area to the building.