

## STATE BUILDING CODE INTERPRETATION NO. 11-Sept01

**CODE:** 2009 IBC/IFC  
2009 IEBC

**SECTION:** IBC Sections 903.2.8, 3401.3, 3408.1, 3412.2.2; IFC Sections 102.3, 903.2.8  
IEBC Section 912

**QUESTION:** The owner of an existing mixed use, three level building is proposing to change a portion of the lower level from a Group B occupancy to an A-2 occupancy that will provide live music, food and drink, including alcohol. The existing building includes a Group R-1 occupancy as the top level, and Group B occupancies on the mid and lower levels. Each level is approximately 6,000 square feet. Is the building required to be sprinkled throughout?

**ANSWER:** The answer to this question is based on what codes are being used by the designer/owner.

If the International Building Code is cited as the governing document, Section 3412.2.2 would require the building to be sprinkled throughout if the portion of the building undergoing the occupancy change was not separated per Table 508.4. If the portion of the building had adequate separation, only that portion being changed would need to be sprinkled.

If the International Existing Building Code is cited as the governing document, Section 912.1 and Section 912.2.2 would require the building to be sprinkled throughout if the portion of the building undergoing the occupancy change was not separated with fire barriers. If the portion of the building had adequate separation, only that portion being changed would need to be.

In the IEBC, Section 912.1.1.1 discusses non-separated requirements. If the change of occupancy is only part of the building and not separated by fire barriers, then all of Chapter 8 applies to the entire building. Section 912.1.1.2 states that if there is separation with fire barriers, only the separated portion is required to comply with Chapter 8. Sections 912.2.1 and 912.2.2.2 discuss the fire protection required. Both of those paragraphs refer to "...shall be provided throughout the area where the change of occupancy occurs." The issue is what does "area" mean in those sections. To be consistent, the area is defined as the separated area of the new occupancy.

**SUPERSEDES:** None

**REQUESTED BY:** City of Leavenworth