

AGENDA

STATE BUILDING CODE TECHNICAL REVIEW BOARD

Friday, April 17, 2026 - 10:00am

Virginia Housing Center
4224 Cox Road Glen Allen, Virginia 23260

- I. Roll Call **(TAB 1)**
- II. Approval of February 19, 2026 Minutes **(TAB 2)**
- III. Public Comment
- IV. Interpretation Request No. 01-26 **(TAB 3)**

In Re: Phil Winslow (City of Norfolk)

2021 VCC 313.2.6 Group R-2, R-3, or R-5.

Question 1: How many custodial care recipients are allowed to reside in a single family detached dwelling Use Group R5 non-sprinklered, where all care recipients are capable of self-preservation and responding to an emergency situation, with 24 hour live-in supervision/care provider regulated by the Virginia Department of Behavioral Health or Social Services?

- V. Interpretation Request No. 02-26 **(TAB 4)**

In Re: Corian Carney (York County)

2021 VEBC 601.2.1 Level 1.

Question 1: Is removal without replacement of moisture or rodent damaged insulation considered an alteration in accordance with VEBC 601.2.1?

Question 2: Would permanent air sealing of required crawlspace venting be considered an alteration in accordance with VEBC 601.2.1?

- VI. Interpretation Request No. 03-26 **(TAB 5)**

In Re: Corian Carney (York County)

2021 VECC 601.2.2 Level 2.

Question 1: Would new installation of a vapor barrier in an underfloor space be considered an alteration in accordance with VEBC 601.2.2?

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Question 2: Would new installation of dehumidification equipment in an underfloor space be considered an alteration in accordance with VEBC 601.2.2?

VII. Interpretation Request No. 04-26 **(TAB 6)**

In Re: Corian Carney (York County)

2021 VCC 108.1 When applications are required.

Question 1: Would replacement or removal of floor or ceiling insulation require application for permit in accordance with VCC 108.1?

Question 2: Would alterations to existing underfloor spaces such as sealing of vents and application of vapor retardant materials require application for permit in accordance with VCC 108.1?

VIII. Interpretation Request No. 05-26 **(TAB 7)**

In Re: Corian Carney (York County)

2021 VEBC 501.1 Scope.

Question 1: Is replacement of moisture or rodent damaged insulation considered a repair in accordance with VEBC 501.1?

Question 2: Would removal without replacement of moisture or rodent damaged insulation be considered abatement of wear due to normal service conditions in accordance with VEBC 501.1 and therefore be exempt from Chapter 5 requirements?

IX. Eric Mays Draft Interpretation and Letter to BHCD for Review Board Review and Consideration **(TAB 8)**

X. Secretary's Report

- a. May 15, 2026 meeting update
- b. Legal updates from Board Counsel

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STATE BUILDING CODE TECHNICAL REVIEW BOARD

James R. Dawson, Chair
(Virginia Fire Chiefs Association)

W. Shaun Pharr, Esq., Vice-Chair
(The Apartment and Office Building Association of Metropolitan Washington)

Vince Butler
(Virginia Home Builders Association)

J. Daniel Crigler
(Virginia Association of Plumbing-Heating-Cooling Contractors and the Virginia Chapters of the Air Conditioning Contractors of America)

Alan D. Givens
(Virginia Association of Plumbing-Heating-Cooling Contractors and the Virginia Chapters of the Air Conditioning Contractors of America)

Christina Jackson
(Commonwealth at large)

Joseph A. Kessler, III
(Associated General Contractors)

R. Jonah Margarella, AIA, NCARB, LEED AP
(American Institute of Architects Virginia)

Eric Mays
(Virginia Building and Code Officials Association)

Joanne D. Monday
(Virginia Building Owners and Managers Association)

James S. Moss
(Virginia Building and Code Officials Association)

Elizabeth C. White
(Commonwealth at large)

Aaron Zdinak, PE
(Virginia Society of Professional Engineers)

Vacant
(Electrical Contractor)

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1 STATE BUILDING CODE TECHNICAL REVIEW BOARD
2 MEETING MINUTES
3 February 19, 2026

4
5 Microsoft Teams meeting

6 Join: <https://teams.microsoft.com/meet/26532944387127?p=zhhUXhquoz55yGahc5>

7 Meeting ID: 265 329 443 871 27

8 Passcode: Fu7a27do
9

Members Present

Mr. James R. Dawson, Chairman
Mr. Daniel Crigler
Ms. Christina Jackson
Mr. Joseph Kessler
Mr. R. Jonah Margarella
Mr. Eric Mays, PE
Ms. Joanne Monday
Mr. James S. Moss
Mr. W. Shaun Pharr, Esq., Vice-Chairman
Mr. Aaron Zdinak, PE

Members Absent

Mr. Vince Butler
Mr. Alan D. Givens
Ms. Elizabeth White

10
11 Call to Order

The meeting of the State Building Code Technical Review Board (“Review Board”) was called to order at approximately 10:00 a.m. by Chair Dawson.

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13
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15 Roll Call

The roll was called by Mr. Luter and a quorum was present. Mr. Justin I. Bell, legal counsel for the Review Board from the Attorney General’s Office, was also present.

16
17
18
19 New Business

Reconsideration for Fairfax County: Appeal No. 23-03:

20
21 A petition for reconsideration for Appeal No. 23-03 was presented in
22 the Review Board members’ agenda package.

23
24 After discussion, Ms. Monday moved that the Review Board lacked
25 jurisdiction to hear the motion because the petition was untimely filed
26 pursuant to §2.2-4023.1(A), which required the party file the petition
27 with the agency not later than 15 days after service of the final decision.

28
29 The following persons were present and allowed to speak to the
30 petition:

31 Lewis Washington, Property Owner
32 Jay Riat, Fairfax County Building Official
33 Patrick Foltz, Assistant County Attorney for Fairfax County
34

35 The motion was seconded by Ms. Jackson and passed unanimously.

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36
37 Reconsideration Order Fairfax County: Appeal No. 23-03:
38
39 After review and consideration of the reconsideration order presented
40 virtually to the Review Board members, Ms. Jackson moved to approve
41 the reconsideration order as presented. The motion was seconded by
42 Ms. Monday and passed unanimously.
43
44 Approval of Minutes The draft minutes of the January 16, 2026 meeting in the Review Board
45 members’ agenda package were considered. Ms. Monday moved to
46 approve the minutes with the following edit:
47
48 Add a (.) after 202 and capitalize *The* on page 39 line 148.
49
50 The motion was seconded by Mr. Moss and passed with Messrs.
51 Kessler and Pharr abstaining.
52
53 Final Order Choice Housing Management (Eric DeSoto): Appeal No. 25-10:
54
55 After review and consideration of the final order presented in the
56 Review Board members’ agenda package, Ms. Jackson moved to
57 approve the final order as presented. The motion was seconded by Ms.
58 Monday and passed with Messrs. Kessler and Pharr abstaining.
59
60 Poole, Brooke, and Plumlee (Dieffenbach): Appeal No. 25-11:
61
62 After review and consideration of the final order presented in the
63 Review Board members’ agenda package, Ms. Monday moved to
64 approve the final order as presented. The motion was seconded by Ms.
65 Jackson and passed with Messrs. Kessler and Pharr abstaining.
66
67 The State of Culpeper LLC (James A. Wells): Appeal No. 25-14:
68
69 After review and consideration of the final order presented in the
70 Review Board members’ agenda package, Ms. Jackson moved to
71 approve the final order as presented. The motion was seconded by Ms.
72 Monday and passed with Messrs. Kessler, Pharr, and Zdinak
73 abstaining.
74
75 Public Comment Chair Dawson opened the meeting for public comment. Mr. Luter
76 advised that no one had signed up to speak. With no one coming
77 forward, Chair Dawson closed the public comment period.
78
79 Secretary’s Report Mr. Luter informed the Review Board that he and Mr. Moss attended
80 Mr. Hutchins funeral service in Galax Virginia on February 7, 2026.
81

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82 Mr. Luter informed the Review Board of the current caseload and that
83 there would be no meeting on March 20, 2026. Mr. Luter further
84 informed the Review Board that the next scheduled meeting was April
85 17, 2026.

86
87 Mr. Bell provided legal updates to the Review Board members.

88
89 Adjournment There being no further business, the meeting was adjourned by proper
90 motion at approximately 11:00 a.m.

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94 Approved: April 17, 2026

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97 _____
98 Chair, State Building Code Technical Review Board

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100
101 _____
102 Secretary, State Building Code Technical Review Board

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REQUEST FOR INTERPRETATION

TO: OFFICE OF THE STATE BUILDING CODE TECHNICAL REVIEW BOARD
VIRGINIA DEPT. OF HOUSING AND COMMUNITY DEVELOPMENT
Main Street Centre
600 E. Main Street, Suite 300
Richmond, Virginia 23219-1321
Tel: (804) 371-7150 Fax: (804) 371-7092
Email: sbco@dhcd.virginia.gov



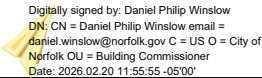
From: Daniel Philip Winslow

Phone Number : 757-403-6923

Email Address: daniel.winslow@norfolk.gov

Applicable Code: VCC 2021'

Code Section(s): 310, 313, 903	Revised Code Sections detailed 3-6-26 Phil Winslow 310.6.1, 313.1, 313.2.6, 903.3.1.3 Mainly 313.2.6 with the other code sections as related and/or in support of the main question shown at the bottom of this page, please.
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Submitted by (signature): Daniel Philip Winslow  Date: 2/20/26

QUESTION(S):

How many custodial care recipients are allowed to reside in a Single Family Detached Dwelling Use Group R5 non-sprinklered, where all of the care recipients are capable of self preservation and responding to an emergency situation, with 24 hour live-in supervision/care provider, regulated by the Virginia Dept. of Behavioural Health or Social Services?

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SECTION 310 RESIDENTIAL GROUP R

310.1 Residential Group R.

Residential Group R includes, among others, the use of a building or structure, or a portion thereof, for sleeping purposes when not classified as an Institutional Group I or when not regulated by the *International Residential Code*. Group R occupancies not constructed in accordance with the *International Residential Code* as permitted by Sections 310.4.1 and 310.4.2 shall comply with Section 420.

310.2 Residential Group R-1.

Residential occupancies containing sleeping units or more than two dwelling units, and:

1. The occupants are primarily transient, and
2. There are more than 10 occupants.

310.3 Residential Group R-2.

Residential occupancies containing sleeping units or more than two dwelling units where the occupants are not primarily transient.

310.4 Residential Group R-3.

Residential occupancies containing no more than two dwelling units and where the occupancy is not classified as Group R-1, R-2, R-4, R-5, or I, and:

1. The occupants are not primarily transient, or
2. There are no more than 10 transient occupants per dwelling unit.

310.4.1 Radon-resistant construction.

Group R-3 buildings and structures shall be subject to the radon-resistant construction requirements in Appendix F of the *International Residential Code* (IRC) in localities enforcing such requirements pursuant to Section R331 of the IRC.

310.4.2 Lodging houses.

Owner-occupied or proprietoroccupied lodging houses and other transient boarding facilities not more than three stories above grade plane in height, with five or fewer guest rooms and 10 or fewer total occupants shall be permitted to be classified as either Group R-3 or R-5, provided that smoke alarms are installed in compliance with Section 907.2.11.2 for Group R-3 or Section R314 of the IRC for Group R-5.

310.5 Residential Group R-4.

Residential occupancies with more than five but not more than 16 persons, excluding staff, who reside on a 24-hour basis in a supervised environment and receive *custodial care*. Buildings of Group R-4, other than assisted living facilities licensed by the Virginia Department of Social Services, shall be classified as the occupancy condition indicated in Section 310.5. Assisted living facilities licensed by the Virginia Department of Social Services shall be classified as one of the occupancy conditions indicated in Section 310.5.1 or 310.5.2.

310.5.1 Condition 1.

This occupancy condition shall include buildings in which all persons receiving *custodial care* who, without any assistance, are capable of responding to an emergency situation to complete *building* evacuation or, in which not more than five of the residents may require physical assistance from staff to respond to an emergency situation when all residents who may require the physical assistance from staff reside on a level of exit discharge and the path of egress to the exit does not include steps.

310.5.2 Condition 2.

This occupancy condition shall include buildings in which there are any persons receiving *custodial care* who require limited verbal or physical assistance while responding to an emergency situation to complete building evacuation.

310.5.3 Radon-resistant construction.

Group R-4 buildings and structures shall be subject to the radon-resistant construction requirements in Appendix AF of the *Virginia Residential Code* (VRC) in localities enforcing such requirements pursuant to Section R331 of the VRC.

310.6 Residential Group R-5.

Residential Group R-5 occupancies shall include residential occupancies within the scope of Section 310.6.1 and *manufactured homes* in accordance with the Virginia Manufactured Home Safety Regulations (13VAC5-91).

310.6.1 Virginia Residential Code.

The provisions of the IRC for detached one-family and two-family dwellings and townhouses as amended by *Virginia Construction Code (VCC) Section 310.8*, also referred to as the *Virginia Residential Code (VRC)* printed by the ICC, shall apply to *construction*, rehabilitation, and demolition of the types of buildings and structures listed in this subsection, and the *equipment* therein, provided the *building* or structure is not more than three stories above grade plane in height with a separate means of egress:

1. Detached single-family and two-family dwellings.
2. Townhouses.
3. Care facilities for five or fewer people.
4. Owner-occupied or proprietor-occupied lodging houses with no more than five guest rooms and 10 or fewer total occupants.
5. Accessory structures of Group R-5 occupancies.
6. Other occupancies specifically permitted in this code to be classified as Group R-5.

All references to the IRC in the *International Building Code (IBC)* shall be considered to be references to this section.

310.6.1.1 Additional requirements.

Methods of construction, materials, systems, *equipment* or components for Group R-5 structures not addressed by prescriptive or performance provisions of the VRC shall comply with applicable VCC requirements.

310.7 Radon-resistant construction in Groups R-3 and R-4 structures.

Groups R-3 and R-4 structures shall be subject to the radon-resistant *construction* requirements in Appendix F of the IRC in localities enforcing such requirements pursuant to [Section R331](#) of the IRC.

310.8 Amendments to the IRC.

The following changes shall be made to the IRC for its use as part of this code:

(DHCD Note: The changes to the IRC are available in the *Virginia Residential Code* published by the ICC, or the pamphlet form of the VCC published by the DHCD. They are not included in the printing of the VCC.)

SECTION 313 STATE REGULATED CARE FACILITIES (SRCF)

313.1 General.

Notwithstanding any other requirements of this code, this section applies to the use and occupancy classification of state regulated care facilities addressed in this section.

313.2 Assisted living facilities.

Assisted living facilities licensed by the Virginia Department of Social Services shall be classified as one of the occupancies specified in [Sections 313.2.1](#) through [313.2.6](#).

313.2.1 Group I-1 Condition 1.

Facilities with more than 16 persons receiving care, in which all persons receiving care, without any assistance, are capable of responding to an emergency situation to complete *building* evacuation, shall be classified as Group I-1 Condition 1. Not more than five of the persons may require physical assistance from staff to respond to an emergency, provided all persons requiring assistance reside on a level of exit discharge and the path of egress to the exit does not include steps.

313.2.2 Group I-1 Condition 2.

Facilities with more than 16 persons receiving care, in which there are persons who require assistance by not more than one staff member while responding to an emergency situation to complete *building* evacuation, shall be classified as Group I-1 Condition 2. Not more than five of the persons may require physical assistance from more than one staff member to respond to an emergency situation.

313.2.3 Group I-2 Condition 1.

Facilities with more than five persons receiving care who require assistance by more than one staff member when responding to an emergency situation to complete *building* evacuation, shall be classified as Group I-2 Condition 1.

313.2.4 Group R-4 Condition 1.

Facilities with nine to 16 persons receiving care, where all persons receiving care, without any assistance, are capable of responding to an emergency situation to complete *building* evacuation shall be classified as R-4 Condition 1. Not more than five of the persons may require physical assistance from staff to respond to an emergency, provided all persons requiring assistance reside on a level of exit discharge and the path of egress to the exit does not include steps.

313.2.5 Group R-4 Condition 2.

Buildings with nine to 16 persons receiving care, who may require assistance by not more than one staff member when responding to an emergency situation to complete *building* evacuation, shall be classified as Group R-4 Condition 2. Not more than five of the persons may require physical assistance from staff to respond to an emergency situation.

313.2.6 Group R-2, R-3, or R-5.

Facilities with no more than eight persons receiving care, with one or more resident counselors, and all persons are capable of responding to an emergency situation without physical assistance from staff, may be classified as Group R-2, R-3, or R-5. Up to five of the persons may require physical assistance from staff to respond to an emergency situation when in compliance with the following:

1. All residents that require physical assistance from staff reside on a level of exit discharge and the path of egress to the exit does not include steps.
2. The *building* is protected by an automatic sprinkler system installed in accordance with [Section 903.3](#) of this code or [Section P2904](#) of the IRC.

313.3 Family day homes.

Family day homes registered or licensed by the Virginia Department of Education shall be classified as Group R-2, R-3, or R-5.

313.4 Group homes.

Group Homes licensed by the Virginia Department of Behavioral Health and Developmental Services shall be classified as one of the occupancies specified in [Sections 313.4.1](#) through [313.4.3](#).

313.4.1 Groups R-2, R-3, R-4 Condition 1 or 2, or R-5.

Facilities with no more than eight persons receiving care, with one or more resident counselors, shall be classified as Group R-2, R-3, R-4 (Condition 1 or 2), or R-5. Not more than five of the persons may require physical assistance from staff to respond to an emergency situation.

313.4.2 Group R-4 Condition 1.

Facilities with eight to 16 persons receiving care, where all persons, without any assistance, are capable of responding to an emergency situation to complete *building* evacuation shall be classified as Group R-4 Condition 1. Not more than five of the persons may require physical assistance from staff to respond to an emergency, provided all persons requiring assistance reside on a level of exit discharge and the path of egress to the exit does not include steps.

313.4.3 Group R-4 Condition 2.

Facilities with eight to 16 persons receiving care or facilities with more than five persons requiring physical assistance from staff to respond to an emergency situation shall be classified as Group R-4 Condition 2.

313.5 Hospice facilities.

Hospice facilities licensed by the Virginia Department of Health shall be classified as one of the occupancies specified in [Sections 313.5.1](#) through [313.5.3](#).

313.5.1 Group I-2.

Facilities with 16 or more persons receiving care shall be classified as Group I-2.

313.5.2 Group R-4 Condition 1.

Facilities with less than 16 persons receiving care shall be classified as Group R-4 Condition 1.

313.5.3 Group R-5.

Facilities with five or fewer persons receiving care are permitted to be classified as Group R-5.

**SECTION 903
AUTOMATIC SPRINKLER SYSTEMS****[F] 903.1 General.**

Automatic sprinkler systems shall comply with this section.

[F] 903.1.1 Alternative protection.

Alternative *automatic fire-extinguishing systems* complying with [Section 904](#) shall be permitted instead of automatic sprinkler system protection where recognized by the applicable standard and *approved* by the fire code official.

[F] 903.2 Where required.

Approved *automatic sprinkler systems* in new buildings and structures shall be provided in the locations described in [Sections 903.2.1](#) through [903.2.12](#).

Exception: Spaces or areas in telecommunications buildings used exclusively for telecommunications equipment, associated electrical power distribution equipment, batteries and standby engines, provided that those spaces or areas are equipped throughout with an *automatic smoke detection system* in accordance with [Section 907.2](#) and are separated from the remainder of the building by not less than 1-hour *fire barriers* constructed in accordance with [Section 707](#) or not less than 2-hour *horizontal assemblies* constructed in accordance with [Section 711](#), or both.

[F] 903.2.1 Group A.

An *automatic sprinkler system* shall be provided throughout buildings and portions thereof used as Group A occupancies as provided in this section.

[F] 903.2.1.1 Group A-1.

An *automatic sprinkler system* shall be provided throughout stories containing Group A-1 occupancies and throughout all stories from the Group A-1 occupancy to and including the *levels of exit discharge* serving that occupancy where one of the following conditions exists:

1. The *fire area* exceeds 12,000 square feet (1115 m²).
2. The *fire area* has an *occupant load* of 300 or more.
3. The *fire area* is located on a floor other than a *level of exit discharge* serving such occupancies.
4. The *fire area* contains a multitheater complex.

[F] 903.2.1.2 Group A-2.

An *automatic sprinkler system* shall be provided throughout stories containing Group A-2 occupancies and throughout all stories from the Group A-2 occupancy to and including the *levels of exit discharge* serving that occupancy where one of the following conditions exists:

1. The *fire area* exceeds 5,000 square feet (464 m²).
2. The *fire area* has an *occupant load* of 100 or more *innight clubs* or 300 or more in other Group A-2 occupancies.
3. The *fire area* is located on a floor other than a *level of exit discharge* serving such occupancies.

[F] 903.2.1.3 Group A-3.

An *automatic sprinkler system* shall be provided throughout stories containing Group A-3 occupancies and throughout all stories from the Group A-3 occupancy to and including the *levels of exit discharge* serving that occupancy where one of the following conditions exists:

1. The *fire area* exceeds 12,000 square feet (1115 m²).
2. In Group A-3 occupancies other than places of religious worship, the *fire area* has an *occupant load* of 300 or more.
3. The *fire area* is located on a floor other than a *level of exit discharge* serving such occupancies.

[F] 903.2.1.4 Group A-4.

An *automatic sprinkler system* shall be provided throughout stories containing Group A-4 occupancies and throughout all stories from the Group A-4 occupancy to and including the *levels of exit discharge* serving that occupancy where one of the following conditions exists:

1. The *fire area* exceeds 12,000 square feet (1115 m²).
2. The *fire area* has an *occupant load* of 300 or more.
3. The *fire area* is located on a floor other than a *level of exit discharge* serving such occupancies.

[F] 903.2.1.5 Group A-5.

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An *automatic sprinkler system* shall be provided for all enclosed Group A-5 accessory use areas in excess of 1,000 square feet (93 m²).

[F] 903.2.1.5.1 Spaces under grandstands or bleachers.

Enclosed spaces under *grandstands* or *bleachers* shall be equipped with an *automatic sprinkler system* in accordance with [Section 903.3.1.1](#) where either of the following exist:

1. The enclosed area is 1,000 square feet (93 m²) or less and is not constructed in accordance with [Section 1030.1.1.1](#).
2. The enclosed area exceeds 1,000 square feet (93 m²).

[F] 903.2.1.6 Assembly occupancies on roofs.

Where an occupied roof has an assembly occupancy with an *occupant load* exceeding 100 for Group A-2 and 300 for other Group A occupancies, all floors between the occupied roof and the *level of exit discharge* shall be equipped with an *automatic sprinkler system* in accordance with [Section 903.3.1.1](#) or [903.3.1.2](#).

Exception: *Open parking garages* of Type I or Type II construction.

903.2.1.7 Multiple fire areas.

An *automatic sprinkler system* shall be provided where multiple *fire areas* of Group A-1, A-2, A-3 or A-4 occupancies share *exit* or *exit access* components and the combined *occupant load* of these *fire areas* is 300 or more.

[F] 903.2.2 Ambulatory care facilities.

An *automatic sprinkler system* shall be installed throughout the entire floor containing an *ambulatory care facility* where either of the following conditions exist at any time:

1. Four or more care recipients are *incapable of self-preservation*.
2. One or more care recipients that are *incapable of self-preservation* are located at other than the *level of exit discharge* serving such a facility.

In buildings where ambulatory care is provided on levels other than the *level of exit discharge*, an *automatic sprinkler system* shall be installed throughout the entire floor as well as all floors below where such care is provided, and all floors between the level of ambulatory care and the nearest *level of exit discharge*, the *level of exit discharge*, and all floors below the level of *exit discharge*.

Exception: Floors classified as an *open parking garage* are not required to be sprinklered.

[F] 903.2.3 Group E.

An *automatic sprinkler system* shall be provided for Group E occupancies as follows:

1. Throughout all Group E *fire areas* greater than 20,000 square feet (1858 m²) in area.
2. The Group E *fire area* is located on a floor other than a *level of exit discharge* serving such occupancies.

Exception: In buildings where every classroom has not fewer than one exterior *exit* door at ground level, an *automatic sprinkler system* is not required in any area below the lowest *level of exit discharge* serving that area..

[F] 903.2.4 Group F-1.

An *automatic sprinkler system* shall be provided throughout all buildings containing a Group F-1 occupancy where one of the following conditions exists:

1. A Group F-1 *fire area* exceeds 12,000 square feet (1115 m²).
2. A Group F-1 *fire area* is located more than three stories above *grade plane*.
3. The combined area of all Group F-1 *fire areas* on all floors, including any *mezzanines*, exceeds 24,000 square feet (2230 m²).

[F] 903.2.4.1 Woodworking operations.

An *automatic sprinkler system* shall be provided throughout all Group F-1 occupancy *fire areas* that contain woodworking operations in excess of 2,500 square feet (232 m²) in area that generate finely divided combustible waste or use finely divided combustible materials.

[F] 903.2.4.2 Group F-1 distilled spirits.

An *automatic sprinkler system* shall be provided throughout a Group F-1 *fire area* used for the manufacture of distilled spirits.

[F] 903.2.4.3 Group F-1 upholstered furniture or mattresses.

An *automatic sprinkler system* shall be provided throughout a Group F-1 *fire area* that exceeds 2,500 square feet (232 m²) used for the manufacture of upholstered furniture or mattresses.

[F] 903.2.5 Group H.

Automatic sprinkler systems shall be provided in high-hazard occupancies as required in Sections 903.2.5.1 through 903.2.5.3.

[F] 903.2.5.1 General.

An automatic sprinkler system shall be installed in Group H occupancies.

[F] 903.2.5.2 Group H-5 occupancies.

An automatic sprinkler system shall be installed throughout buildings containing Group H-5 occupancies. The design of the sprinkler system shall be not less than that required by this code for the occupancy hazard classifications in accordance with Table 903.2.5.2.

Where the design area of the sprinkler system consists of a corridor protected by one row of sprinklers, the maximum number of sprinklers required to be calculated is 13.

**[F] TABLE 903.2.5.2
GROUP H-5 SPRINKLER DESIGN CRITERIA**

LOCATION	OCCUPANCY HAZARD CLASSIFICATION
Fabrication areas	Ordinary Hazard Group 2
Service corridors	Ordinary Hazard Group 2
Storage rooms without dispensing	Ordinary Hazard Group 2
Storage rooms with dispensing	Extra Hazard Group 2
Corridors	Ordinary Hazard Group 2

[F] 903.2.5.3 Pyroxylin plastics.

An automatic sprinkler system shall be provided in buildings, or portions thereof, where cellulose nitrate film or pyroxylin plastics are manufactured, stored or handled in quantities exceeding 100 pounds (45 kg).

[F] 903.2.6 Group I.

An automatic sprinkler system shall be provided throughout buildings with a Group I fire area.

Exceptions:

1. An automatic sprinkler system installed in accordance with Section 903.3.1.2 shall be permitted in Group I-1, Condition 1 facilities.
2. An automatic sprinkler system is not required where Group I-4 day care facilities are at the level of exit discharge and where every room where care is provided has not fewer than one exterior exit door.
3. In buildings where Group I-4 day care is provided on levels other than the level of exit discharge, an automatic sprinkler system in accordance with Section 903.3.1.1 shall be installed on the entire floor where care is provided, all floors between the level of care and the level of exit discharge, and all floors below the level of exit discharge other than areas classified as an open parking garage.
4. An automatic sprinkler system shall not be required for open-sided or chainlink-sided buildings and overhangs over exercise yards 200 square feet (18.58 m²) or less in Group I-3 facilities, provided such buildings and overhangs are of noncombustible construction.

[F] 903.2.7 Group M.

An automatic sprinkler system shall be provided throughout buildings containing a Group M occupancy where one of the following conditions exists:

1. A Group M fire area exceeds 12,000 square feet (1115 m²).
2. A Group M fire area is located more than three stories above grade plane.
3. The combined area of all Group M fire areas on all floors, including any mezzanines, exceeds 24,000 square feet (2230 m²).

[F] 903.2.7.1 High-piled storage.

An automatic sprinkler system shall be provided in accordance with the International Fire Code in all buildings of Group M where storage of merchandise is in high-piled or rack storage arrays.

[F] 903.2.7.2 Group M upholstered furniture or mattresses.

(Section deleted.)

903.2.8 Group R.

An automatic sprinkler system installed in accordance with Section 903.3 shall be provided throughout all buildings with a Group R fire area, except for Group R-2 occupancies listed in the exceptions to this section when the necessary water pressure or volume, or both, for the system is not available:

Exceptions:

1. Group R-2 occupancies that do not exceed two stories, including basements that are not considered as a story above grade, and with a maximum of 16 dwelling units per fire area. Each dwelling unit shall have at least one door opening to an exterior exit access that leads directly to the exits required to serve that dwelling unit.
2. Group R-2 occupancies where all dwelling units are not more than two stories above the lowest level of exit discharge and not more than one story below the highest level of exit discharge of exits serving the dwelling unit and a 2-hour fire barrier is provided between each pair of dwelling units. Each bedroom of a dormitory or boarding house shall be considered a dwelling unit under this exception.

[F] 903.2.8.1 Group R-3.

An *automatic sprinkler system* installed in accordance with [Section 903.3.1.3](#) shall be permitted in Group R-3 occupancies.

[F] 903.2.8.2 Group R-4, Condition 1.

An *automatic sprinkler system* installed in accordance with [Section 903.3.1.3](#) shall be permitted in Group R-4, Condition 1 occupancies.

[F] 903.2.8.3 Group R-4, Condition 2.

An *automatic sprinkler system* installed in accordance with [Section 903.3.1.2](#) shall be permitted in Group R-4, Condition 2 occupancies.

[F] 903.2.8.4 Care facilities.

An *automatic sprinkler system* installed in accordance with [Section 903.3.1.3](#) shall be permitted in care facilities with five or fewer individuals in a single-family dwelling.

[F] 903.2.9 Group S-1.

An *automatic sprinkler system* shall be provided throughout all buildings containing a Group S-1 occupancy where one of the following conditions exists:

1. A Group S-1 *fire area* exceeds 12,000 square feet (1115 m²).
2. A Group S-1 *fire area* is located more than three stories above *grade plane*.
3. The combined area of all Group S-1 *fire areas* on all floors, including any *mezzanines*, exceeds 24,000 square feet (2230 m²).
4. A Group S-1 *fire area* used for the storage of commercial motor vehicles where the *fire area* exceeds 5,000 square feet (464 m²).

[F] 903.2.9.1 Repair garages.

An *automatic sprinkler system* shall be provided throughout all buildings used as *repair garages* in accordance with [Section 406](#), as shown:

1. Buildings having two or more *stories above grade plane*, including basements, with a *fire area* containing a *repair garage* exceeding 10,000 square feet (929 m²).
2. Buildings not more than one *story above grade plane*, with a *fire area* containing a *repair garage* exceeding 12,000 square feet (1115 m²).
3. Buildings with *repair garages* servicing vehicles parked in basements.
4. A Group S-1 *fire area* used for the repair of commercial motor vehicles where the *fire area* exceeds 5,000 square feet (464 m²).

[F] 903.2.9.2 Bulk storage of tires.

Buildings and structures where the area for the storage of tires exceeds 20,000 cubic feet (566 m³) shall be equipped throughout with an *automatic sprinkler system* in accordance with [Section 903.3.1.1](#).

[F] 903.2.9.3 Group S-1 Distilled spirits or wine.

An *automatic sprinkler system* shall be provided throughout a Group S-1 *fire area* used for the bulk storage of distilled spirits or wine.

[F] 903.2.9.4 Group S-1 upholstered furniture and mattresses.

An *automatic sprinkler system* shall be provided throughout a Group S-1 *fire area* where the area used for the storage of upholstered furniture or mattresses exceeds 2,500 square feet (232 m²).

Exception: Self-service storage facilities not greater than one story above grade plane where all storage spaces can be accessed directly from the exterior.

[F] 903.2.10 Group S-2 parking garages.

An *automatic sprinkler system* shall be provided throughout buildings classified as parking garages where [any](#) of the following conditions exists:

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1. Where the fire area of the enclosed parking garage in accordance with Section 406.6 exceeds 12,000 square feet (1115 m²).

2. Where the enclosed parking garage in accordance with Section 406.6 is located beneath other groups.

Exception: Enclosed parking garages located beneath Group R-3 occupancies.

3. Where the fire area of the open parking garage in accordance with Section 406.5 exceeds 48,000 square feet (4460 m²).

[F] 903.2.10.1 Commercial parking garages.

An *automatic sprinkler system* shall be provided throughout buildings used for storage of commercial motor vehicles where the *fire area* exceeds 5,000 square feet (464 m²).

[F] 903.2.10.2 Mechanical-access enclosed parking garages.

An *approved automatic sprinkler system* shall be provided throughout buildings used for the storage of motor vehicles in a *mechanical-access enclosed parking garage*. The portion of the building that contains the *mechanical-access enclosed parking garage* shall be protected with a specially engineered *automatic sprinkler system*.

[F] 903.2.11 Specific building areas and hazards.

In all occupancies other than Group U, an *automatic sprinkler system* shall be installed for building design or hazards in the locations set forth in Sections 903.2.11.1 through 903.2.11.6.

[F] 903.2.11.1 Stories without openings.

An *automatic sprinkler system* shall be installed throughout all stories, including basements, of all buildings where the floor area exceeds 1,500 square feet (139.4 m²) and where the *story* does not comply with the following criteria for *exterior wall* openings:

1. Openings below grade that lead directly to ground level by an exterior *stairway* complying with Section 1011 or an outside *ramp* complying with Section 1012. Openings shall be located in each 50 linear feet (15 240 mm), or fraction thereof, of *exterior wall* in the *story* on not fewer than one side. The required openings shall be distributed such that the lineal distance between adjacent openings does not exceed 50 feet (15 240 mm).
2. Openings entirely above the adjoining ground level totaling not less than 20 square feet (1.86 m²) in each 50 linear feet (15 240 mm), or fraction thereof, of *exterior wall* in the *story* on not fewer than one side. The required openings shall be distributed such that the lineal distance between adjacent openings does not exceed 50 feet (15 240 mm). The height of the bottom of the clear opening shall not exceed 44 inches (1118 mm) measured from the floor.

[F] 903.2.11.1.1 Opening dimensions and access.

Openings shall have a minimum dimension of not less than 30 inches (762 mm). Access to such openings shall be provided for the fire department from the exterior and shall not be obstructed in a manner such that fire fighting or rescue cannot be accomplished from the exterior.

[F] 903.2.11.1.2 Openings on one side only.

Where openings in a *story* are provided on only one side and the opposite wall of such *story* is more than 75 feet (22 860 mm) from such openings, the *story* shall be equipped throughout with an *approved automatic sprinkler system*, or openings shall be provided on not fewer than two sides of the *story*.

[F] 903.2.11.1.3 Basements.

Where any portion of a *basement* is located more than 75 feet (22 860 mm) from openings required by Section 903.2.11.1, or where walls, partitions or other obstructions are installed that restrict the application of water from hose streams, the *basement* shall be equipped throughout with an *approved automatic sprinkler system*.

[F] 903.2.11.2 Rubbish and linen chutes.

An *automatic sprinkler system* shall be installed at the top of rubbish and linen chutes and in their terminal rooms. Chutes shall have additional sprinkler heads installed at alternate floors and at the lowest intake. Where a rubbish chute extends through a building more than one floor below the lowest intake, the extension shall have sprinklers installed that are recessed from the drop area of the chute and protected from freezing in accordance with Section 903.3.1.1. Such sprinklers shall be installed at alternate floors, beginning with the second level below the last intake and ending with the floor above the discharge. Access to sprinklers in chutes shall be provided for servicing.

[F] 903.2.11.3 Buildings 55 feet or more in height.

An *automatic sprinkler system* shall be installed throughout buildings that have one or more stories with an *occupant load* of 30 or more located 55 feet (16 764 mm) or more above the lowest level of fire department vehicle access, measured to the finished floor.

Exception: Occupancies in Group F-2.

[F] 903.2.11.4 Ducts conveying hazardous exhausts.

Where required by the *International Mechanical Code*, automatic sprinklers shall be provided in ducts conveying hazardous exhaust or flammable or combustible materials.

Exception: Ducts where the largest cross-sectional diameter of the duct is less than 10 inches (254 mm).

[F] 903.2.11.5 Commercial cooking operations.

An *automatic sprinkler system* shall be installed in commercial kitchen exhaust hood and duct systems where an *automatic sprinkler system* is used to comply with [Section 904](#).

[F] 903.2.11.6 Other required fire protection systems.

In addition to the requirements of [Section 903.2](#), the provisions indicated in [Table 903.2.11.6](#) require the installation of a [fire protection](#) system for certain buildings and areas.

**[F] TABLE 903.2.11.6
ADDITIONAL REQUIRED PROTECTION SYSTEMS**

SECTION	SUBJECT
402.5, 402.6.2	Covered and open mall buildings
403.3	High-rise buildings
404.3	Atriums
405.3	Underground structures
407.7	Group I-2
410.6	Stages
411.3	Special amusement buildings
412.2.4	Airport traffic control towers
412.3.6, 412.3.6.1, 412.5.6	Aircraft hangars
415.11.11	Group H-5 HPM exhaust ducts
416.5	Flammable finishes
417.4	Drying rooms
424.3	Play structures
428	Buildings containing <i>laboratory suites</i>
507	Unlimited area buildings
508.5.7	Live/work units
509.4	Incidental uses
1030.6.2.3	Smoke-protected assembly seating
IFC	Sprinkler system requirements as set forth in Section 903.2.11.6 of the <i>International Fire Code</i>

[[F] 903.2.12 During construction.

Automatic sprinkler systems required during construction, alteration and demolition operations shall be provided in accordance with [Chapter 33](#) of the *International Fire Code*.

[F] 903.3 Installation requirements.

Automatic sprinkler systems shall be designed and installed in accordance with [Sections 903.3.1](#) through [903.3.8](#).

[F] 903.3.1 Standards.

Sprinkler systems shall be designed and installed in accordance with [Section 903.3.1.1](#) unless otherwise permitted by [Sections 903.3.1.2](#) and [903.3.1.3](#) and other chapters of this code, as applicable.

[F] 903.3.1.1 NFPA 13 sprinkler systems.

Where the provisions of this code require that a building or portion thereof be equipped throughout with an *automatic sprinkler system* in accordance with this section, sprinklers shall be installed throughout in accordance with [NFPA 13](#) except as provided in [Sections 903.3.1.1.1](#) and [903.3.1.1.2](#).

[F] 903.3.1.1.1 Exempt locations.

Automatic sprinklers shall not be required in the following rooms or areas where such rooms or areas are protected with an *approved* automatic fire detection system in accordance with [Section 907.2](#) that will respond to visible or invisible particles of combustion. Sprinklers shall not be omitted from a room merely because it is damp, of fire-resistance-rated construction or contains electrical equipment.

1. A room where the application of water, or flame and water, constitutes a serious life or fire hazard.
2. A room or space where sprinklers are considered undesirable because of the nature of the contents, where

approved by the fire code official.

3. Generator and transformer rooms separated from the remainder of the building by walls and floor/ceiling or roof/ceiling assemblies having a *fire-resistance rating* of not less than 2 hours.
4. Rooms or areas that are of noncombustible construction with wholly noncombustible contents.
5. Fire service access elevator machine rooms and machinery spaces.
6. Machine rooms, machinery spaces, control rooms and control spaces associated with occupant evacuation elevators designed in accordance with [Section 3008](#).

[F] 903.3.1.1.2 Bathrooms.

In Group R occupancies sprinklers shall not be required in bathrooms that do not exceed 55 square feet (5 m²) in area and are located within individual *dwelling units* or *sleeping units*, provided that walls and ceilings, including the walls and ceilings behind a shower enclosure or tub, are of noncombustible or limited-combustible materials with a 15-minute thermal barrier rating.

[F] 903.3.1.2 NFPA 13R sprinkler systems.

Automatic sprinkler systems in Group R occupancies shall be permitted to be installed throughout in accordance with [NFPA 13R](#) where the Group R occupancy meets all of the following conditions:

1. Four stories or fewer above *grade plane*.
2. The floor level of the highest story is 30 feet (9144 mm) or less above the lowest level of fire department vehicle access.
3. The floor level of the lowest story is 30 feet (9144 mm) or less below the lowest level of fire department vehicle access.

The number of stories of Group R occupancies constructed in accordance with [Sections 510.2](#) and [510.4](#) shall be measured from [grade plane](#).

[F] 903.3.1.2.1 Balconies and decks.

Sprinkler protection shall be provided for exterior balconies, decks and ground floor patios of *dwelling units* and *sleeping units* where either of the following conditions exists:

1. The building is of Type V construction, provided that there is a roof or deck above.
2. Exterior balconies, decks and ground floor patios of dwelling units and sleeping units are constructed in accordance with [Section 705.2.3.1](#), Exception 3.

Sidewall sprinklers that are used to protect such areas shall be permitted to be located such that their deflectors are within 1 inch (25 mm) to 6 inches (152 mm) below the structural members and a maximum distance of 14 inches (356 mm) below the deck of the exterior balconies and decks that are constructed of open wood joist construction.

[F] 903.3.1.2.2 Corridors and balconies in the means of egress.

Sprinkler protection shall be provided in *corridors* and for balconies in the *means of egress* where any of the following conditions apply:

1. Corridors with combustibile floor or walls.
2. Corridors with an interior change of direction exceeding 45 degrees (0.79 rad).
3. Corridors that are less than 50 percent open to the outside atmosphere at the ends.
4. Open-ended corridors and associated exterior stairways and ramps as specified in [Section 1027.6](#), Exception 3.
5. Egress balconies not complying with [Sections 1021.2](#) and [1021.3](#).

[F] 903.3.1.2.3 Attics.

Attic protection shall be provided as follows:

1. *Attics* that are used or intended for living purposes or storage shall be protected by an *automatic sprinkler system*.
2. Where fuel-fired equipment is installed in an unsprinklered *attic*, not fewer than one quick-response intermediate temperature sprinkler shall be installed above the equipment.
3. Where located in a building of Type III, Type IV or Type V construction designed in accordance with [Section 510.2](#) or [510.4](#), attics not required by Item 1 to have sprinklers shall comply with one of the following if the roof assembly is located more than 55 feet (16 764 mm) above the lowest level of fire department vehicle access [needed to meet the provisions in Section 503](#).
 - 3.1. Provide *automatic sprinkler system* protection.
 - 3.2. Construct the *attic* using noncombustible materials.
 - 3.3. Construct the *attic* using *fire-retardant-treated wood* complying with [Section 2303.2](#).
 - 3.4. Fill the *attic* with noncombustible insulation.

The height of the roof assembly shall be determined by measuring the distance from the lowest required fire vehicle access road surface adjacent to the building to the eave of the highest pitched roof, the intersection of the highest roof to the exterior wall, or the top of the highest parapet, whichever yields the greatest distance. For the purpose of this measurement, required fire vehicle access roads shall include only those roads that are necessary for compliance with [Section 503](#) of the *International Fire Code*:

4. Group R-4, Condition 2 occupancy *attics* not required by Item 1 to have sprinklers shall comply with one of the following:
 - 4.1. Provide *automatic sprinkler system* protection.
 - 4.2. Provide a heat detection system throughout the *attic* that is arranged to activate the building fire alarm system.
 - 4.3. Construct the *attic* using noncombustible materials.
 - 4.4. Construct the *attic* using *fire-retardant-treated wood* complying with [Section 2303.2](#).
 - 4.5. Fill the *attic* with noncombustible insulation.
5. Sprinkler protection shall be provided for *attics in buildings* of Type III, IV or V construction in Group R-2 occupancies that are designed or developed and marketed to senior citizens 55 years of age or older and in Group I-1 occupancies in accordance with [Section 7.2 of NFPA 13R](#).

[F] 903.3.1.3 NFPA 13D sprinkler systems.

Automatic sprinkler systems installed in one- and two-family *dwelling*s; Group R-3; Group R-4, Condition 1; and *townhouses* shall be permitted to be installed throughout in accordance with [NFPA 13D](#).

[F] 903.3.2 Quick-response and residential sprinklers.

Where *automatic sprinkler systems* are required by this code, quick-response or residential automatic sprinklers shall be installed in all of the following areas in accordance with [Section 903.3.1](#) and their listings:

1. Throughout all spaces within a *smoke compartment* containing care recipient *sleeping units* in Group I-2 in accordance with this code.
2. Throughout all spaces within a *smoke compartment* containing gas fireplace appliances and decorative gas appliances in Group I-2.
3. Throughout all spaces within a *smoke compartment* containing treatment rooms in *ambulatory care facilities*.
4. *Dwelling units* and *sleeping units* in Group I-1 and R occupancies.
5. Light-hazard occupancies as defined in [NFPA 13](#).

[F] 903.3.3 Obstructed locations.

Automatic sprinklers shall be installed with regard to obstructions that will delay activation or obstruct the water distribution pattern and shall be in accordance with the applicable *automatic sprinkler system* standard that is being used. Automatic sprinklers shall be installed in or under covered kiosks, displays, booths, concession stands, or equipment that exceeds 4 feet (1219 mm) in width. Not less than a 3-foot (914 mm) clearance shall be maintained between automatic sprinklers and the top of piles of *combustible fibers*.

Exception: Kitchen equipment under exhaust hoods protected with a fire-extinguishing system in accordance with [Section 904](#).

[F] 903.3.4 Actuation.

Automatic sprinkler systems shall be automatically actuated unless specifically provided for in this code.

[F] 903.3.5 Water supplies.

Water supplies for *automatic sprinkler systems* shall comply with this section and the standards referenced in [Section 903.3.1](#). The potable water supply shall be protected against backflow in accordance with the requirements of this section and the *International Plumbing Code*. For connections to public waterworks systems, the water supply test used for design of fire protection systems shall be adjusted to account for seasonal and daily pressure fluctuations based on information from the water supply authority and as approved by the fire code official.

[F] 903.3.5.1 Domestic services.

Where the domestic service provides the water supply for the *automatic sprinkler system*, the supply shall be in accordance with this section.

903.3.5.1.1 Limited area sprinkler systems.

Limited area sprinkler systems serving fewer than 20 sprinklers on any single connection are permitted to be connected to the domestic service where a wet automatic standpipe is not available. Limited area sprinkler systems connected to domestic water supplies shall comply with each of the following requirements:

1. Valves shall not be installed between the domestic water riser control valve and the sprinklers.

Exception: An approved indicating control valve supervised in the open position in accordance with [Section 903.4](#).

2. The domestic service shall be capable of supplying the simultaneous domestic demand and the sprinkler demand required to be hydraulically calculated by [NFPA 13](#), [NFPA 13R](#), or [NFPA 13D](#).

903.3.5.1.2 Residential combination services.

A single combination water supply shall be allowed provided that the domestic demand is added to the sprinkler demand as required by [NFPA 13R](#).

[F] 903.3.6 Hose threads.

Fire hose threads and fittings used in connection with *automatic sprinkler systems* shall be as prescribed by the fire code official.

[F] 903.3.7 Fire department connections.

Fire department connections for *automatic sprinkler systems* shall be installed in accordance with [Section 912](#).

[F] 903.3.8 Limited area sprinkler systems.

(Section deleted.)

903.3.8.1 Number of sprinklers.

(Section deleted.)

903.3.8.2 Occupancy hazard classification.

(Section deleted.)

903.3.8.3 Piping arrangement.

(Section deleted.)

903.3.8.4 Supervision.

(Section deleted.)

903.3.8.5 Calculations.

(Section deleted.)

[F] 903.4 Sprinkler system supervision and alarms.

Valves controlling the water supply for *automatic sprinkler systems*, pumps, tanks, water levels and temperatures, critical air pressures and waterflow switches on all sprinkler systems shall be electrically supervised by a *listed* fire alarm control unit.

Exceptions:

1. *Automatic sprinkler systems* protecting one- and two-family *dwelling*s.
2. Limited area sprinkler systems in accordance with [Section 903.3.8](#).
3. *Automatic sprinkler systems* installed in accordance with [NFPA 13R](#) where a common supply main is used to supply both domestic water and the *automatic sprinkler system*, and a separate shutoff valve for the *automatic sprinkler system* is not provided.
4. Jockey pump control valves that are sealed or locked in the open position.
5. Control valves to commercial kitchen hoods, paint spray booths or dip tanks that are sealed or locked in the open position.
6. Valves controlling the fuel supply to fire pump engines that are sealed or locked in the open position.
7. Trim valves to pressure switches in dry, preaction and deluge sprinkler systems that are sealed or locked in the open position.
8. [Underground key or hub gate valves in roadway boxes](#).

[F] 903.4.1 Monitoring.

Alarm, supervisory and trouble signals shall be distinctly different and shall be automatically transmitted to an *approved* supervising station or, where *approved* by the fire code official, shall sound an audible signal at a *constantly attended location*.

Exception: Backflow prevention device test valves located in limited area sprinkler system supply piping shall be locked in the open position. In occupancies required to be equipped with a fire alarm system, the backflow preventer valves shall be electrically supervised by a tamper switch installed in accordance with [NFPA 72](#) and separately annunciated.

903.4.2 Alarms.

Approved audible devices shall be connected to every automatic sprinkler system. Such sprinkler water-flow alarm devices shall be activated by water flow equivalent to the flow of a single sprinkler of the smallest orifice size installed in the system. Alarm devices shall be provided on the exterior of the building in an approved location. Where a fire alarm system is installed, actuation of the automatic sprinkler system shall actuate the *building* fire alarm system. Group R-2

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occupancies that contain 16 or more dwelling units or sleeping units, any dwelling unit or sleeping unit two or more stories above the lowest level of exit discharge, or any dwelling unit or sleeping unit more than one story below the highest level of exit discharge of exits serving the dwelling unit or sleeping unit shall provide a manual fire alarm box at an approved location to activate the suppression system alarm.

[F] 903.4.3 Floor control valves.

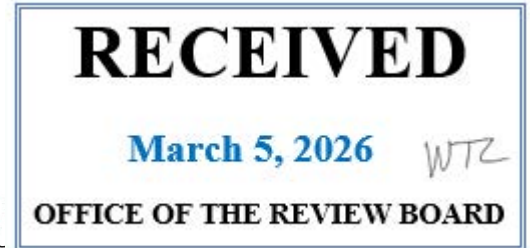
Approved supervised indicating control valves shall be provided at the point of connection to the riser on each floor in high-rise buildings.

[F] 903.5 Testing and maintenance.

Automatic sprinkler systems shall be tested and maintained in accordance with the *International Fire Code*.

REQUEST FOR INTERPRETATION

TO: OFFICE OF THE STATE BUILDING CODE TECHNICAL REVIEW BOARD
VIRGINIA DEPT. OF HOUSING AND COMMUNITY DEVELOPMENT
Main Street Centre
600 E. Main Street, Suite 300
Richmond, Virginia 23219-1321
Tel: (804) 371-7150 Fax: (804) 371-7092
Email: sbco@dhed.virginia.gov




From: Corian R. Carney, CBO - York County Building Official

Phone Number : 757-890-3571

Email Address: corian.carney@yorkcounty.gov

Applicable Code: Virginia Existing Building Code

Code Section(s): 601.2.1

Submitted by (signature):  Date: 3/4/26

QUESTION(S):

1. Is removal without replacement of moisture- or rodent-damaged insulation considered an alteration in accordance with VEBC 601.2.1?
2. Would the permanent air-sealing of required crawlspace venting be considered an alteration in accordance with VEBC 601.2.1?

(Page left blank intentionally)

601.2 Levels of alterations.

Alterations to any *building* or *structure* shall be classified as the following:

601.2.1 Level 1.

Level 1 alterations include the removal and replacement or the covering of existing materials, elements, equipment, or fixtures using new materials, elements, equipment, or fixtures that serve the same purpose, or the removal without replacement of materials, elements, equipment, or fixtures. Level 1 alterations shall comply with the applicable provisions of [Section 602](#).

601.2.2 Level 2.

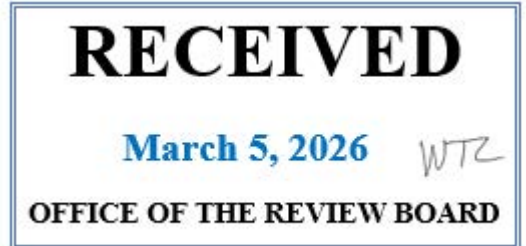
Level 2 alterations shall comply with the applicable provisions of [Sections 602](#) and [603](#) and shall include the following:

1. The addition or elimination of any door or window.
2. The addition or elimination of any wall, floor, or ceiling assembly.
3. The reconfiguration or extension of any system.
4. The installation of any additional equipment, materials, elements, or fixtures.

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From: Corian R. Carney, CBO - York County Building Official

Phone Number : 757-890-3571

Email Address: corian.carney@yorkcounty.gov

Applicable Code: Virginia Existing Building Code

Code Section(s): 601.2.2

Submitted by (signature):  Date: 3/4/26

QUESTION(S):

1. Would the new installation of a vapor barrier in an underfloor space be considered an alteration in accordance with VEBC 601.2.2?
2. Would the new installation of dehumidification equipment in an underfloor space be considered an alteration in accordance with VEBC 601.2.2?

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601.2 Levels of alterations.

Alterations to any *building* or *structure* shall be classified as the following:

601.2.1 Level 1.

Level 1 alterations include the removal and replacement or the covering of existing materials, elements, equipment, or fixtures using new materials, elements, equipment, or fixtures that serve the same purpose, or the removal without replacement of materials, elements, equipment, or fixtures. Level 1 alterations shall comply with the applicable provisions of [Section 602](#).

601.2.2 Level 2.

Level 2 alterations shall comply with the applicable provisions of [Sections 602](#) and [603](#) and shall include the following:

1. The addition or elimination of any door or window.
2. The addition or elimination of any wall, floor, or ceiling assembly.
3. The reconfiguration or extension of any system.
4. The installation of any additional equipment, materials, elements, or fixtures.

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From: Corian R. Carney, CBO - York County Building Official

Phone Number : 757-890-3571

Email Address: corian.carney@yorkcounty.gov

Applicable Code: Virginia Construction Code

Code Section(s): 108.1

Submitted by (signature):  Date: 3/4/24

QUESTION(S):

1. Would replacement or removal of floor, wall or ceiling insulation require application for permit in accordance with VCC 108.1?
2. Would alterations to existing underfloor spaces such as sealing of vents and application of vapor retardant materials require application for permit in accordance with VCC 108.1?

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108.1 When applications are required.

Application for a permit shall be made to the building official and a permit shall be obtained prior to the commencement of any of the following activities, except that applications for emergency *construction*, alterations or *equipment* replacement shall be submitted by the end of the first *working day* that follows the day such work commences. In addition, the building official may authorize work to commence pending the receipt of an application or the issuance of a permit.

1. *Construction* or demolition of a *building or structure*. Installations or alterations involving (i) the removal or addition of any *wall*, partition or portion thereof, (ii) any structural component, (iii) the repair or replacement of any required component of a fire or smoke rated assembly, (iv) the alteration of any required means of egress system, including the addition or removal of *emergency supplemental hardware*, (v) water supply and distribution system, sanitary drainage system or vent system, (vi) electric wiring, (vii) fire protection system, mechanical systems, or fuel supply systems, or (viii) any *equipment* regulated by the USBC.
2. For *change of occupancy*, application for a permit shall be made when a new certificate of occupancy is required by the VEBC.
3. Movement of a lot line that increases the hazard to or decreases the level of safety of an *existing building or structure* in comparison to the *building code* under which such *building or structure* was constructed.
4. Removal or disturbing of any asbestos containing materials during the *construction* or demolition of a *building or structure*, including additions.

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REQUEST FOR INTERPRETATION

TO: OFFICE OF THE STATE BUILDING CODE TECHNICAL REVIEW BOARD
VIRGINIA DEPT. OF HOUSING AND COMMUNITY DEVELOPMENT
Main Street Centre
600 E. Main Street, Suite 300
Richmond, Virginia 23219-1321
Tel: (804) 371-7150 Fax: (804) 371-7092
Email: sbco@dhcd.virginia.gov



From: Corian R. Carney, CBO - York County Building Official

Phone Number : 757-890-3571

Email Address: corian.carney@yorkcounty.gov

Applicable Code: Virginia Existing Building Code

Code Section(s): 501.1

Submitted by (signature):  Date: 3/4/26

QUESTION(S):

1. Is replacement of moisture- or rodent-damaged insulation considered a repair in accordance with VEBC 501.1?
2. Would removal without replacement of moisture- or rodent-damaged insulation be considered 'abatement of wear due to normal service conditions' in accordance with VEBC 501.1 and therefore be exempt from Chapter 5 requirements?

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CHAPTER 5 REPAIRS

SECTION 501 GENERAL

501.1 Scope.

Repairs, including the patching, restoration or replacement of damaged materials, elements, equipment or fixtures shall comply with the requirements of this chapter. Repairs to *historic buildings* need only comply with [Chapter 9](#). Portions of the existing *building* or *structure* not being repaired shall not be required to comply with the requirements of this code applicable to newly constructed *buildings* or *structures*. Work on nondamaged components that is necessary for the required repair of damaged components shall be considered part of the repair and shall not be subject to the provisions of [Chapter 6](#). Routine maintenance required by [Section 302](#), ordinary repairs exempt from permit in accordance with [Section 108.2](#) of the *Virginia Construction Code (VCC)*, and abatement of wear due to normal service conditions shall not be subject to the requirements for repairs in this section.

501.2 Conformance.

The work shall not make the *building* less conforming than it was before the repair was undertaken. Repairs shall be done in a manner that maintains the following:

1. Level of fire protection that is existing.
2. Level of protection that is existing for the means of egress.
3. Level of accessibility that is existing.

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VIRGINIA STATE BUILDING CODE TECHNICAL REVIEW BOARD

I N T E R P R E T A T I O N

Interpretation Number: XX/2026

Code: 2021 Virginia Construction Code

Section No: Section 202 Definitions

Section 202 Definitions

FARM BUILDING OR STRUCTURE. A *building* or structure not used for residential purposes, located on property where farming operations take place, and used primarily for any of the following uses or combination thereof:

1. Storage, handling, production, display, sampling or sale of agricultural, horticultural, floricultural or silvicultural products produced in the farm.
2. Sheltering, raising, handling, processing or sale of agricultural animals or agricultural animal products.
3. Business or office uses relating to the farm operations.
4. Use of farm machinery or *equipment* or maintenance or storage of vehicles, machinery or *equipment* on the farm.
5. Storage or use of supplies and materials used on the farm.
6. Implementation of best management practices associated with farm operations.

QUESTION: Does a building or structure located on property where farming operations take place and used for "agritourism activity", as referenced in § 36-99 B of the Code of Virginia and defined in § 3.2-6400 of the Code of Virginia, meet the definition of farm building or structure in the USBC?

ANSWER: Yes, although the Virginia Construction Code does not explicitly list agritourism activity within the Farm Building or Structure definition, the Code of Virginia §36-99 has incorporated agritourism activity as defined in § 3.2-6400.

Code of Virginia 36-99. Provisions of Code; modifications

"B. In formulating the Code provisions, the Board shall have due regard for generally accepted standards as recommended by nationally recognized organizations, including, but not limited to, the standards of the International Code Council and the National Fire

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Protection Association. Notwithstanding the provisions of this section, farm buildings and structures shall be exempt from the provisions of the Building Code, except for a building or a portion of a building located on a farm that is operated as a restaurant as defined in § 35.1-1 and licensed as such by the Board of Health pursuant to Chapter 2 (§ 35.1-11 et seq.) of Title 35.1. However, farm buildings and structures lying within a flood plain or in a mudslide-prone area shall be subject to floodproofing regulations or mudslide regulations, as applicable. However, any farm building or structure (i) where the public is invited to enter for an agritourism activity, as that term is defined in § 3.2-6400, for recreational, entertainment, or educational purposes and (ii) that is used for display, sampling, or sale of agricultural, horticultural, floricultural, or silvicultural products produced on the farm or the sale of agricultural-related or silvicultural-related items incidental to the agricultural operation shall have:..."

This Official Interpretation was issued by the State Building Code Technical Review Board at its meeting of [DATE].

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Abigail Spanberger
Governor

Carrie Cheney
Secretary of
Commerce and Trade

COMMONWEALTH of VIRGINIA

Tamarah Holmes, PhD
Director

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

STATE BUILDING CODE TECHNICAL REVIEW BOARD

[DATE]

Mr. Louie Berbert, Chair
Board of Housing and Community Development
600 East Main Street, Suite 300
Richmond, VA 23219

RE: Virginia Uniform Statewide Building Code – Farm Building Exemption

Dear Mr. Berbert,

The State Building Code Technical Review Board (SBCTRB) has heard multiple appeals over the years regarding farm buildings and structures. The primary driver of the appeals has been the ambiguity in the application of the Virginia Uniform Statewide Building Code (VUSBC) and the Code of Virginia.

The addition of *agritourism activity* to the Code of Virginia § 36-99. *Provisions of Code; modifications* without corresponding changes to the VUSBC has increased the ambiguity. As a result, Building Officials are applying the VUSBC as written, while the SBCTRB has the latitude to fully consider the Code of Virginia. For additional information, please refer to SBCTRB Interpretation Number 3/2024, Interpretation **X/2026**, and Appeal 25-11 *Poole, Brooke, and Plumlee (Dieffenbach)* (attached).

The STRB recommends that the Board of Housing and Community Development consider amending the VUSBC as soon as practicable to support Virginia’s vision of a consistent and uniform application of the VUSBC. The SBCTRB has drafted proposed changes to the VUSBC for your consideration and deliberation (attached).

Sincerely,

James R. Dawson, Chair
State Building Code Technical Review Board

Attachments

Interpretation Number: 3/2024

Interpretation Number: **X/2026**

Appeal 25-11 *Poole, Brooke, and Plumlee (Dieffenbach)*

Proposed VUSBC Code Change – Farm Buildings and Structures



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**Virginia Uniform Statewide Building Code – Farm Building Exemption
Recommended Code Changes**

VUSBC, Section 202 Definitions, amend the following:

FARM BUILDING OR STRUCTURE. A *building* or structure not used for residential purposes, located on property where farming operations take place, and used primarily for any of the following uses or combination thereof:

1. Storage, handling, production, display, sampling or sale of agricultural, horticultural, floricultural or silvicultural products produced in the farm.
2. Sheltering, raising, handling, processing or sale of agricultural animals or agricultural animal products.
3. Business or office uses relating to the farm operations.
4. Use of farm machinery or *equipment* or maintenance or storage of vehicles, machinery or *equipment* on the farm.
5. Storage or use of supplies and materials used on the farm.
6. Implementation of best management practices associated with farm operations.
7. Agritourism Activity as defined in § 3.2-6400 of the Code of Virginia.



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