

---

**FIRE PREVENTION AND BUILDING SAFETY COMMISSION**  
**Department of Homeland Security**

**Written Interpretation of the State Building Commissioner**

**Interpretation #:** CEB-2022-40-2014 IBC-310.1

**Building or Fire Safety Law Interpreted**

[675 IAC 13-2.6](#) **2014 Indiana Building Code Section 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.

**Issue**

Whether the staff sleeping quarters of an ambulance response company are considered an R Occupancy Group under Section 310.1 of the *2014 Indiana Building Code* (IBC).

**Interpretation of the State Building Commissioner**

Yes, the staff sleeping quarters of an ambulance response company are considered an R Occupancy Group under Section 310.1 of the *2014 IBC*.

**Rationale**

Section 302.1 of the *2014 IBC* states that "where a structure is proposed for a purpose that is not specifically provided for in this code, such structure shall be classified in the group that the [proposed] occupancy most nearly resembles, *according to the fire safety and relative hazard involved*" (emphasis added).

Ambulance response companies are not named specifically in Chapter 3 of the *2014 IBC*, so we must follow the instructions contained in Section 302.1, above, and classify them as the occupancy group whose use the ambulance response company most nearly resembles. Its general office and dispatch areas most nearly resemble B occupancies, but sleeping quarters are specifically named in Section 310.1 as a qualifying characteristic of an R occupancy group.

The interested person in this case maintains, however, that an ambulance response facility most nearly resembles a fire station. Despite the explicit "sleeping purposes" language of 310.1, the *2014 IBC* amends the model code to place fire stations in the B occupancy group even though most, if not all, such facilities include sleeping quarters for firefighters. Because the two facilities share common characteristics of staffing by emergency responders, and the inclusion of onsite sleeping quarters, the interested person suggests the entire ambulance facility should be considered the same B occupancy group as a fire station.

To fully consider that argument we must examine the model code's intent in Chapter 3, the intent of the Indiana Fire Prevention and Building Safety Commission in modifying that chapter, and, as quoted above from Section 302.1, *the fire safety and relative hazard* represented by the proposed use.

The intent of the model code is illustrated in the ICC's *2012 International Building Code Commentary* publication. This is important because even though ICC commentary is not enforceable as building law, it demonstrates that its authors understood the multiple functions found in fire stations, and expected them to be classified as mixed-use facilities accordingly. The relevant portion of the commentary is found in Section 304.1 Business Group B, and is shown here:

*Fire stations will be a mix of offices, parking and maintenance facilities for the fire engines and living spaces for the fire fighters. Often a meeting room that is open to the public is also included. This type of facility is a mix of Group A, B, R and S occupancies.*

The Commission amended Chapter 3 by naming fire stations specifically as single-use B occupancies, arguing that to follow the ICC's model of mixed-use fire stations would present a financial hardship for small, rural fire companies whose construction budgets may be too small to include the necessary occupancy separations and sprinkler systems. To bolster that argument, it was noted that the hazard represented by a fire would be limited in these instances, since the building's own occupants are trained firefighters, and they have all the necessary specialized firefighting equipment immediately onsite. Further, it is worth noting that since most fire stations are free-standing structures, there are rarely any other contiguous facilities that are subject to the hazard.

This last question of potential hazard to both the facility in question and to its neighbors is an important

consideration because of the final phrase in Section 302.1. That phrase tells us that in addition to the similarity of function and activities in the proposed space, the choice of occupancy group must also take into account the "fire safety and relative hazard" involved in the proposed use. The occupants of an ambulance response company are not likely to be as prepared to deal with fire as firefighters, in training or equipment, and as a result the lack of the otherwise required sprinkler systems or separation assemblies is a greater hazard here than it is in fire stations. And if the ambulance response company facilities happen to be part of a larger structure that also contains other unseparated tenants, that hazard extends to those spaces as well.

In conclusion, it would be an error to believe the considerations that led the Commission to classify fire stations as Occupancy Group B extend to other occupied structures that do not share *all* the qualifying characteristics of a fire station that help mitigate the hazard of a fire in the facility. In the case of an ambulance response company, the shared characteristics of emergency response staff and sleeping quarters on premises are not enough to warrant a single B occupancy designation.

*Posted: 12/21/2022 by Legislative Services Agency*

An [html](#) version of this document.