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

**Written Interpretation of the State Building Commissioner**

**Interpretation #:** CEB-2021-20-2014 IBC-905.3.1

**Building or Fire Safety Law Interpreted**

**675 IAC 13-2.6 Indiana Building Code, 2014 Edition, Section 905.3.1 Height.** Class III standpipe systems shall be installed throughout buildings where the floor level of the highest *story* is located more than 30 feet (9144 mm) above the lowest level of fire department vehicle access, or where the floor level of the lowest *story* is located more than 30 feet (9144 mm) below the highest level of fire department vehicle access.

**Exceptions:** *[Omitted for lack of relevance to request.]*

**Issue**

Whether the 30-foot vertical distance specified for the highest story in the *2014 Indiana Building Code* (IBC) Section 905.3.1 is measured from the elevation of the lowest surface on which the fire department vehicle stands, or at the lowest floor elevation at which fire department personnel can enter the structure.

**Interpretation of the State Building Commissioner**

The 30-foot vertical distance specified for the highest story in the 2014 IBC Section 905.3.1 is measured from the elevation of the lowest surface on which the fire department vehicle stands, and not from the lowest level at which fire department personnel can enter the structure.

**Rationale**

The purpose of the section is to require structures, through their design and equipping, to accommodate the practical limits of equipment found on fire-fighting response vehicles. It does so by placing limits on the allowable vertical distance from the vehicle to the uppermost and lowermost floor elevations of structures not equipped with standpipes.

The text of the section makes it clear that the fire department vehicle is at the center of the requirement by using the phrase "level of fire department **vehicle access**" (emphasis added). This is confirmed in the International Code Council's published commentary on the section, and again when we solicited and received a written opinion on the question from the ICC.

Since it is the vehicle's equipment limits that are being addressed by the requirement, it is logical that the basis or starting point of measurement is, as the section states, the level of fire department vehicle access. In other words, the measurement, whether up or down, is taken from the elevation of the surface on which the vehicle stands when it is deployed to the site and staged for a fire operation. The section does not address in any way individual department personnel, or the level or elevation at which those personnel gain access to the building.

To ensure the worst-case scenario is always considered, the requirement is written such that for above-grade stories, the *highest* floor level can be no more than thirty feet above the *lowest* fire department vehicle access, and for below grade stories, the *lowest* floor level can be no more than thirty feet below the *highest* fire department vehicle access. Exceeding either of those limits requires the installation of standpipes.

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