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

**Written Interpretation of the State Building Commissioner**

**Interpretation #:** CEB-2019-07-2014 IBC-903.2.9

**Building or Fire Safety Law Interpreted**

**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 exist:

[Conditions 1-4 omitted for lack of relevance to the interpretation request]

5. A Group S-1 occupancy used for the storage of upholstered furniture or mattresses exceeds 2,500 square feet (232 m<sup>2</sup>).

**Issue**

Whether this requirement applies to S-1 retail self-storage facilities. The local authorities have instructed the designer that if their self-storage facility exceeds 2,500 square feet in size, it must be sprinklered under this rule.

**Interpretation of the State Building Commissioner**

This requirement does not apply to S-1 retail self-storage facilities unless their predominantly intended use is for the storage of upholstered furniture or mattresses.

**Rationale**

Condition #5 under IBC 903.2.9 was not intended to apply to typically-utilized S-1 retail self-storage facilities. The wording of the section makes it clear that sprinklers are required in S-1 facilities exceeding 2,500 square feet **when the use is for** the storage of upholstered furniture or mattresses. Self-storage units may contain such items, but that is typically not their primary intended use.

Research into the 2014 code adoption process indicates that the Fire Prevention and Building Safety Commission intended to draw a line between facilities in which the predominant use was the storage of such items, and those in which they may be stored incidentally. A similar provision appears under M occupancy rules, where the Commission chose to amend the language to make their intent more clear. While they did not amend the rule for S-1, research shows their intent is the same. The issue driving the lower sprinkler threshold is the increased fuel load represented by such items when they're stored in larger quantities. It was not their intent to require sprinklers in every retail self-storage facility exceeding 2,500 square feet, simply because a tenant may choose to store a mattress or recliner in their unit.

At times individual tenants might take extreme liberties with the manner in which they use their units, however the code cannot regulate all such facilities based on the assumption that each one will be so abused. Those instances must be addressed on a case-by-case basis by owner and tenant, and if necessary, the building/fire official.

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