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**CODE APPLICATION NOTICE (CAN)**  
H&S Code §129851

**SUBJECT**

Construction Separation of Emergency Vehicle  
and Passenger Drop-Off and Loading Zones

Formerly CAN 2-1109B.2

**CAN: 2-508**

**Effective: 09/03/2020**



**CODE SECTIONS**

Sections 508.2, 508.3, 508.4 and 706.1  
2019 California Building Code (CBC)

**California Building Code**

**508.2 Accessory occupancies.** Accessory occupancies are those occupancies that are ancillary to the main occupancy of the building or portion thereof.

...

**508.3 Nonseparated occupancies.** Buildings or portions of buildings that comply with the provisions of this section shall be considered as nonseparated occupancies.

...

**508.4 Separated occupancies.** Buildings or portions of buildings that comply with the provisions of this section shall be considered as separated occupancies.

...

**706. Fire Walls**

**706.1 General.** Fire walls shall be constructed in accordance with Sections 706.2 through 706.11. The extent and location of such fire walls shall provide a complete separation. Where a fire wall separates occupancies that are required to be separated by a fire barrier wall, the most restrictive requirements of each separation shall apply.

...

**Webster's Third New International Dictionary of the English Language,  
Unabridged**

**DEFINITION**

**PORTE-COCHERE** a roofed structure extending from the entrance of a building over an adjacent driveway and sheltering those getting in or out of vehicles.

## **PURPOSE**

The purpose of this Code Application Notice is to identify the occupancy classification for weather protected ambulance and passenger drop-off and loading zones, also known as “porte-cocheres”, as required by CBC Sections 11B-206.4.10 and 1224.33.2.1, that are located immediately adjacent to health facilities.

## **BACKGROUND**

The occupancy requirements for a covered passenger drop-off (porte-cochere) are not clearly defined in the California Building Code. OSHPD classifies these areas as “Open Parking Garages” since this is the occupancy that the use most nearly resembles.

## **INTERPRETATION**

There are four different approaches for classifying covered passenger drop-off and loading zones (porte-cocheres):

- 1) An accessory use in accordance with CBC Section 508.2
- 2) A nonseparated use in accordance with CBC Section 508.3
- 3) A separated occupancy group in accordance with CBC Section 508.4
- 4) A separate building in accordance with CBC Section 706.1

The most significant concerns related to each of these approaches are identified below.

1) A porte-cochere may be considered an accessory occupancy and individually classified in accordance with the CBC Section 302.1. To be considered an accessory occupancy, a porte-cochere must be considered ancillary to the main occupancy and the aggregate area of all accessory occupancies shall not exceed 10% of the floor area of the story in which they are located. Where a porte-cochere provides a covered accessible entrance or a covered emergency vehicle entry required by the California Building Code, the porte-cochere is considered as ancillary to the main occupancy. In addition, to be considered an accessory occupancy, calculations shall be provided demonstrating that the aggregate floor area of all unseparated accessory occupancies in the same story do not exceed 10% of the floor area of the story.

As an accessory occupancy, a porte-cochere most nearly resembles a low-hazard storage occupancy such as an open parking garage or Group S-2 occupancy. CBC Section 508.2.4, Exception 3 permits no separation between a Group S-2 occupancy accessory to a Group I-2 or I-2.1 occupancy.

CBC Section 406.5.11 prohibits the parking of buses, trucks and similar vehicles in an open parking garage.

The building automatic sprinkler system must provide protection for the porte-cochere. NFPA 13-2016, Section 8.15.7.2 is not applicable to accessory occupancy areas as they are considered to be a part of the building.

A porte-cochere that is considered as an accessory occupancy shall be the same type of building construction as the primary occupancy.

2) Where a porte-cochere is adjacent to an occupancy other than a Group H-2, H-3, H-4, H-5, I-2, I-2.1 and L, it is permitted to construct the porte-cochere as a nonseparated Group S-2 occupancy in accordance with CBC Section 508.3.

The building automatic sprinkler system must provide protection for the porte-cochere. NFPA 13-2016, Section 8.15.7.2 is not applicable to nonseparated occupancy areas as they are considered to be a part of the building.

A porte-cochere that is considered as a nonseparated occupancy shall be the same type of building construction as the primary occupancy.

3) The porte-cochere is permitted to be constructed as a separated Group S-2 occupancy in accordance with CBC Section 508.4. CBC Section 508.4.4, Table 508.4 requires a 2-hour fire barrier separation between I and S-2 occupancies. However, footnote "b" of Table 508.4 states, "*Areas used for private or pleasure vehicles shall be allowed to reduce the separation by 1 hour.*" For the purpose of this reduction, private or pleasure vehicles shall be restricted to passenger vehicles and shall not include delivery trucks/vans, ambulances or other commercial vehicles. In accordance with NFPA 13-2016, Section 8.15.7.2 states that sprinklers are permitted to be omitted where the porte-cochere is of noncombustible or limited combustibile construction. Parking areas and loading/unloading areas for vans or ambulances shall be classified as an S-2 occupancy and separated from the adjacent use in accordance with CBC Section 508.4.4. The reduction allowed in footnote "b" of Table 508.4 would not be applicable. These areas must be protected by the building sprinkler system in accordance with NFPA 13-2016, Section 8.15.7.1.

Some combustibile materials are permitted in Type I and Type II construction in accordance with CBC Section 603.1. However, when a porte-cochere is constructed as a required means of egress from a Group I-2 occupancy, light-transmitting plastics in wall and roof panels are prohibited in accordance with CBC Sections 2607.1, 2609.1 and 1004.4.

A porte-cochere that is considered as a separated occupancy shall be the same type of building construction as the primary occupancy.

Regardless, if the ambulance or passenger drop-off and loading zone also serves as part of the means of egress from the Group I-2 occupancy, in accordance with CBC Section 1004.4, the porte-cochere must be protected by automatic fire sprinklers. In addition, in accordance with CBC Section 1028.3, to

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minimize the accumulation of smoke and toxic gases, the porte-cochere shall be sufficiently open to the exterior.

4) The porte-cochere may be constructed as a separate building. In such case, a fire wall located between the primary building and the porte-cochere constructed in accordance with CBC Section 706.1 and CBC Table 706.4 is required.

A porte-cochere erected as a separate building is permitted to be constructed of Type I, Type II or Type IV construction in accordance with CBC Section 406.5.1. In accordance with CBC Sections 2607.1 and 2609.1, light-transmitting plastics in wall and roof panels is permitted.

Automatic fire sprinkler protection is not required for a porte-cochere constructed as a separate building that complies with the open parking garage requirements for openings in accordance with CBC 406.5.2 and in accordance with CBC 406.5.11, does not accommodate for the parking of buses, trucks and similar vehicles.

In accordance with CBC 1028.1, exits from the primary building are not permitted to discharge into a porte-cochere constructed as a separate building.

The CBC does not require fire sprinkler protection of open parking garages. When fire sprinkler protection is provided, weather protected ambulance and passenger drop-off and loading zones accommodating parking and unloading areas for vans and ambulances shall be permitted.

If a vehicle can park under or drive through the roof overhang area (porte-cochere), it is not considered a “canopy” as defined in CBC Section 202 and therefore, CBC Section 3105 “Awnings and Canopies” does not apply.

Original signed	9/03/2020
<hr/> Paul Coleman	Date