



CODE APPLICATION NOTICE

Health and Safety Code §129851

CAN: 2-903.2.21

SUBJECT

Automatic sprinkler system and fire protection at required exterior entrance covers

Effective: 10/16/2025



CODE SECTIONS

2022 California Building Code, Part 2
Chapter 2 DEFINITIONS

Chapter 9 FIRE PROTECTION AND LIFE SAFETY SYSTEMS
Section 903.2.21 Required exterior entrance covers

Chapter 11B ACCESSIBILITY TO PUBLIC BUILDINGS, PUBLIC ACCOMMODATIONS, COMMERCIAL BUILDINGS AND PUBLIC HOUSING

Section 11B-206.4.10 Medical care and long-term care facilities.
Section 11B-503 Passenger drop-off and loading locations.

Chapter 12 INTERIOR ENVIRONMENT
Section 1224.33.2.1 Exterior entrance.

Chapter 31 SPECIAL CONSTRUCTION
Section 3105 Awnings and canopies

Appendix – 2022 California Building Standards Code, Title 24, California Code of Regulations, code citation(s) related to this Code Application Notice (CAN).

Acronyms and Definitions assist the user in recognizing and identifying various acronyms and terms generally used in this CAN. Please refer to the “[Master Glossary of Acronyms and Definitions – Acronyms and Definitions Used in OSHPD Published Documents](https://hcai.ca.gov/document/master-glossary-of-acronyms-and-definitions/)” which is posted on the HCAI website at <https://hcai.ca.gov/document/master-glossary-of-acronyms-and-definitions/>. Other definitions may also be found in the [California Building Standards Code](#), Title 24, California Code of Regulations.

PURPOSE

Weather protection is required for at least one accessible entrance to a hospital and at the Emergency Department per the California Building Code Section 11B-206.4.10 or Section 1224.33.2.1 respectively. The purpose of this Code Application Notice (CAN) is to clarify when the weather protected cover requires fire rated construction or fire sprinklers based on the type of cover, construction type, use and location.

BACKGROUND

The requirements for canopies, porte-cocheres and roof overhangs that may be used for weather protection have been a source of confusion. A code amendment in the 2022 edition of the California Building Code was intended to clarify this issue but has added confusion and unnecessary requirements. At hospital or clinic entrances, they can be used to shelter patients entering or exiting their vehicles. At emergency entrances, vehicles such as ambulances may pull in or back under them and remain for an indefinite period. Another example is a covered walkway that provides weather protection to an entrance but does not attach to the hospital building. These different types of structures may vary in construction type, use and location which may require different fire protection features. Additionally, terms like roof overhang, canopy and porte-cochere may impact how they are constructed.

Section 903.2.21 *Required exterior entrance covers*, was added to the 2022 edition of the California Building Code and was intended to clarify this issue but has added confusion and an unnecessary requirement. This new section requires that an automatic sprinkler system be provided throughout the covered exterior entrances that are required by CBC Sections 11B-206.4.10 and 1224.33.2.1 regardless of the type of cover, construction type, use or location.

Section 11B-206.4.10 contains several requirements; the area of weather protection shall include the passenger drop-off and loading zones and the accessible route from the passenger loading zone to the accessible entrance. This can be accomplished using different types of structures, construction types, and may not necessarily be attached to the building. By stating in Section 903.2.21 that an automatic sprinkler system shall be provided throughout covered exterior entrances conflicts with other provisions of the code that may not require automatic sprinklers at these types of structures.

It is commonly accepted that if a vehicle can drive under a cover, it would be required to have fire rated construction (depending on construction type) and fire sprinklers. What has been unclear is where the line of delineation is when a canopy may extend beyond the perimeter of the access aisle and over the vehicle pull-up space and not require fire rated construction or fire sprinklers. This CAN will define the limits to the coverage of the vehicle loading zone to determine when fire rated construction or fire sprinklers will be required.

INTERPRETATION

Section 903.2.21 applies to porte-cocheres, canopies, or roof overhangs where vehicles are intended to drive or stop under. These structures are not considered separate occupancies but are extensions of the main building, with the same construction type, fire protection requirements, and fire sprinkler requirements, unless other exceptions or conditions apply.

Section 11B-206.4.10 addresses “canopy or roof overhang” but does not mention a porte-cochere providing the same weather protection. It is acceptable to use a porte-cochere to comply with 11B-206.4.10. See Figure 1.

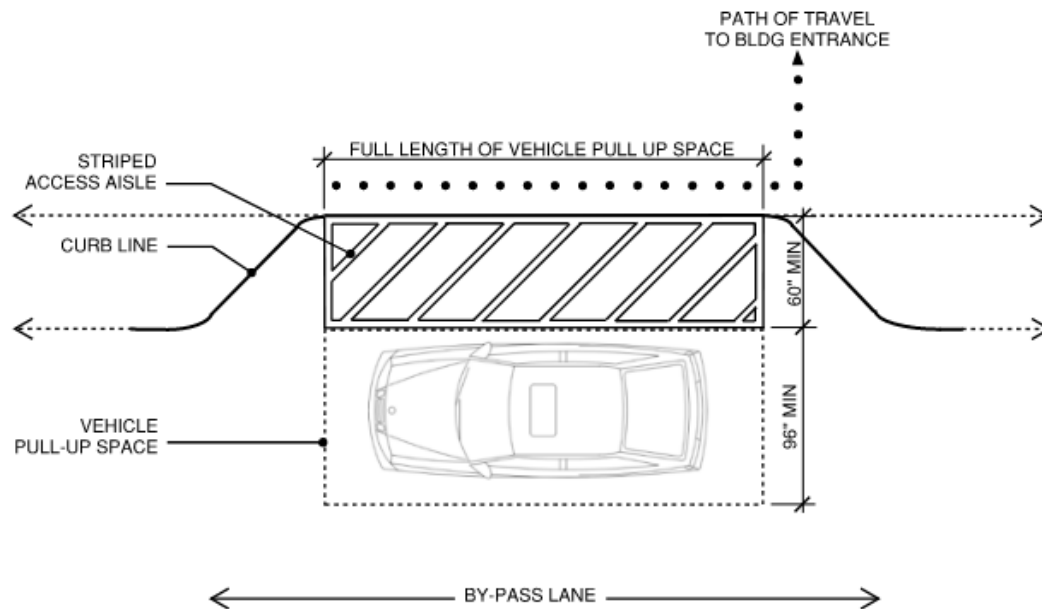
Section 11B-206.4.10 points to Section 11B-209.3 which in turn refers to Section 11B-503 for the passenger drop-off and loading zone requirements. Section 11B-503 states, the passenger drop-off and loading zones shall provide at minimum a 96-inch wide, by 20-foot-long vehicular pull-up space that does not overlap the vehicular way. It also requires a clearly marked 60-inch access aisle. The

passenger drop-off and loading zones are not intended for parking. The vehicle pull-up space does not need to be covered. See Figures 2.

If a canopy is a separate structure and does not fully cover vehicles when dropping off or picking up passengers, then it does not require fire rated construction or fire sprinklers (depending on construction type) and shall comply with CBC Section 3105. See Figure 3. If a canopy extends more than 4 feet into the vehicle pull-up space, as measured from the outside edge of the access aisle, then it may need to be fire rated construction or fire sprinklers.



Figure 1. Example of Porte-Cochere with required sprinklers.



NOTE: DETECTABLE WARNING
MATS NOT SHOWN FOR CLARITY.

Figure 2. Passenger drop-off and loading zone.



Figure 3. Example of canopy, passenger drop-off and loading zone, no sprinklers required.

<u>Original signed</u>	<u>10/16/2025</u>
Chris Tokas, Deputy Director	Date

APPENDIX

2022 California Building Standards Code, Title 24, California Code of Regulations

2022 California Building Code, Part 2
Chapter 2 DEFINITIONS

CANOPY means a permanent structure or architectural projection of rigid construction over which a covering is attached that provides weather protection, identity or decoration. A canopy is permitted to be structurally independent or supported by attachment to a building on one or more sides.

ENTRANCE. [HCD 1, HCD 2, HCD-1/AC and DSA-AC] Any access point to a building or portion of a building or facility used for the purpose of entering. An entrance includes the approach walk, the vertical access leading to the entrance platform, the entrance platform itself, vestibule if provided, the entry door or gate, and the hardware of the entry door or gate.

For the purposes of this CAN, **Porte-Cochere** is defined as follows:

PORTE-COCHERE (per Webster's Third New International Dictionary) **1:** a passageway through a building or screen wall designed to let vehicles pass from the street to an interior courtyard

2: a roofed structure extending from the entrance of a building over an adjacent driveway and sheltering those getting in or out of vehicles

Chapter 9 FIRE PROTECTION AND LIFE SAFETY SYSTEMS
Section 903.2.21

903.2.21 Required exterior entrance covers. An automatic sprinkler system shall be provided throughout covered exterior entrances required by California Building Code Section 11B-206.4.10 or Section 1224.33.2.1.

Chapter 11B ACCESSIBILITY TO PUBLIC BUILDINGS, PUBLIC ACCOMODATIONS,
COMMERCIAL BUILDINGS AND PUBLIC HOUSING

11B-206.4.10 Medical care and long-term care facilities. Weather protection by a canopy or roof overhang shall be provided at a minimum of one accessible entrance to licensed medical care and licensed long-term care facilities where the period of stay may exceed twenty-four hours. The area of weather protection shall include the passenger drop-off and loading zone complying with Section 11B-209.3 and the accessible route from the passenger loading zone to the accessible entrance it serves.

11B-503 Passenger drop-off and loading zones

...

11B-503.3 Access aisle. Passenger drop-off and loading zones shall provide access aisles complying with Section 11B-503 adjacent and parallel to the vehicle pull-up space. Access aisles shall adjoin an accessible route and shall not overlap the vehicular way.

Chapter 12 INTERIOR ENVIRONMENT

1224.33.2.1 Exterior entrance. A well-marked, illuminated and covered entrance, at grade level. The emergency vehicle entry cover shall provide shelter for both the patient and the emergency medical crew during transfer from an emergency vehicle into the building. This exterior entrance shall not be

substituted for the required accessible entrance to the hospital, protected from the weather by canopy or roof overhang assigned for passengers loading zone. Ambulance entrances shall provide a minimum of 6 feet (183 mm) in clear width to accommodate bariatric stretchers, mobile patient lift devices and accompanying attendants. Reception shall be located to permit staff observation and control of access to treatment area, pedestrian and ambulance entrances and public waiting area.

SECTION 3105 AWNINGS AND CANOPIES

3105.1 General. Awnings and canopies shall comply with the requirements of Sections 3105.2 and 3105.3 and other applicable sections of this code.

3105.2 Design and construction. Awnings and canopies shall be designed and constructed to withstand wind or other lateral loads and live loads as required by Chapter 16 with due allowance for shape, open construction and similar features that relieve the pressures or loads. Structural members shall be protected to prevent deterioration. Awnings shall have frames of noncombustible material, fire-retardant treated wood, heavy timber complying with Section 2304.11, or 1-hour construction with combustible or noncombustible covers and shall be either fixed, retractable, folding or collapsible.

3105.3 Awnings and canopy materials. Awnings and canopies shall be provided with an approved covering that complies with one of the following:

1. The fire propagation performance criteria of Test Method 1 or Test Method 2, as appropriate, of NFPA 701.
2. Has a flame spread index not greater than 25 when tested in accordance with ASTM E84 or UL 723.
3. Meets all of the following criteria when tested in accordance with NFPA 286:
 - 3.1. During the 40 kW exposure, flames shall not spread to the ceiling.
 - 3.2. Flashover, as defined in NFPA 286, shall not occur.
 - 3.3. The flame shall not spread to the outer extremity of the sample on any wall or ceiling.
 - 3.4. The peak heat release rate throughout the test shall not exceed 800 kW.

All fabrics and all interior decorative fabrics or materials shall be flame resistant in accordance with the provisions set forth in CCR, Title 19, Division 1, Chapter 8. Tops and sidewalls shall be made either from fabric that has been flame resistant treated with an approved exterior chemical process by an approved application concern, or from inherently flame-resistant fabric approved and listed by the State Fire Marshal (see CCR, Title 19, Division 1, Chapter 8).

Exception: The fire propagation performance and flame spread index requirements shall not apply to awnings installed on detached one- and two-family dwellings.