

April 22, 2022

## **Policy for Storm Shelters for Existing Schools Adding Modular Classroom Buildings**

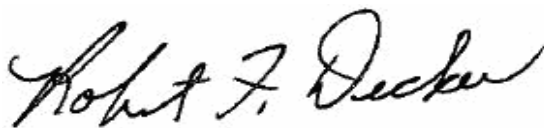
The 2021 Existing Building Code, section 303.2, requires that existing schools adding an addition with an occupant load of 50 or more provide a storm shelter meeting ICC 500. Most modular buildings (which are considered additions) brought onto the site will have an occupant load that exceeds 50, therefore technically requiring that a storm shelter be constructed. The safety of the children is of utmost importance. However, the requirement in the 2021 IEBC, Section 303.2.1 (exception #1) doesn't require a storm shelter to be built to house all of the occupants of the existing school but only those in the addition.

Memphis Shelby County Construction Enforcement's policy regarding this requirement will be as follows:

- Although modular buildings are considered additions and are usually onsite longer than six months, there is no substantial construction involved. Normally an addition is constructed from the ground up and can therefore be made to include a storm shelter complying with ICC 500.
- Municipal and other schools are on a tight budget already (hence the reason for modular buildings).
- Other jurisdictions have exempted modular buildings from this requirement considering them "temporary" in nature.
- The IEBC allows the storm shelter to limit the capacity to only the new addition.

For the reasons listed above, we will not require a storm shelter for additions to existing schools where the only addition(s) are modular buildings being brought onto the site. We will continue to require a compliant storm shelter for additions meeting the requirements of the 2021 IEBC, Section 303 when the addition is constructed from the ground up.

Although we will not require it, we will continue to encourage the construction of compliant storm shelters for existing schools for the sake of the children's safety.



Robert F. Decker, Building Official  
Office of Construction Code Enforcement