

Brad,

The code defines a mezzanine as **MEZZANINE**. An intermediate level or levels between the floor and ceiling of any *story* and in accordance with Section 505.

Crucially, NCBC Section 505.2 stipulates that a mezzanine, when in compliance with the section, "shall be considered a portion of the story below" and "shall not contribute to either the building area or number of stories"

The area limitation is governed by Section 505.2.1

505.2 Mezzanines. A *mezzanine* or *mezzanines* in compliance with Section 505.2 shall be considered a portion of the *story* below. Such *mezzanines* shall not contribute to either the *building area* or number of *stories* as regulated by Section 503.1.

The area of the *mezzanine* shall be included in determining the *fire area*. The clear height above and below the *mezzanine* floor construction shall be not less than 7 feet (2134 mm).

regarding to openness and enclosure requirements: NCBC Section 505.2.3 generally mandates that a mezzanine be "open and unobstructed to the room in which such mezzanine is located" However, the inquiry notes the intent to enclose the area, which is addressed by Exception#1 to this section:

1. *Mezzanines* or portions thereof are not required to be open to the room in which the *mezzanines* are located, provided that the *occupant load* of the aggregate area of the enclosed space is not greater than 10.

based on given occupant load is 6 (area sq. ft. / 300 sq. ft. per occupant = 6 occupants). the calculated occupant load (6) is less than the threshold of 10, the enclosure of the mezzanine is permitted under this exception.

With regards to the sprinkler question. Short answer is yes, it is exempted.

Details of interpretation as follows: The key lies in the distinction between a "floor" and a "story." As established in Section 505.2 a compliant mezzanine is considered a portion of the story below and does not constitute a separate story. If the main floor of the multipurpose room is the level of exit discharge, then the mezzanine, by definition, is located within that level of exit discharge.

The enclosure of the mezzanine, while permitted by Section 505.2.3 Exception 1, does not alter its fundamental classification as a mezzanine under Section 505.2. Therefore, a mezzanine that complies with all provisions of Section 505 is not considered a "floor other than a level of exit discharge" for the purpose of triggering the sprinkler requirement in Section 903.2.1.3(3).

It is also noted that the area of the mezzanine must be included in determining the fire area. The sprinkler requirement would still be triggered if the total fire area exceeds 12,000 square feet or if the total occupant load exceeds 300.

Conclusion

The proposed design for the elevated storage area is an appropriate code path for avoiding the automatic sprinkler requirement under NCBC Section 903.2.1.3(3), provided the following conditions are met:

- 1.The elevated area fully complies with the definition and limitations of a mezzanine under NCBC Section 505, including the area limitation of one-third of the room below.
- 2.The enclosure is permitted under Section 505.2.3, Exception 1, based on an occupant load of 10 or less.
- 3.The main floor of the Group A-3 occupancy is the level of exit discharge for the building.
- 4.The total fire area (including the mezzanine) does not exceed 12,000 square feet, and the total occupant load does not exceed 300, to avoid triggering sub-items (1) and (2) of Section 903.2.1.3.

The fundamental principle is that a compliant mezzanine is considered part of the story below. If that story is the level of exit discharge, the mezzanine is not considered to be on a "floor other than a level of exit discharge."

I hope this information is helpful to you, please let me know if you have further questions.
Kind regards.

Hany Senada, P.E.
Chief Building Code Consultant



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From: Yip, Pak <pak.yip@ncdoi.gov>

Sent: Tuesday, January 20, 2026 2:31 PM

To: Brad Sutton <bsutton@harnett.org>

Cc: Senada, Hany A <hany.senada@ncdoi.gov>

Subject: FW: [External] group A-3 Mezzanine or second story?

Brad,

Thank you for your inquiry regarding the mezzanine. Since your question pertains to the NC Building Code, I am forwarding it to Hany Senada, our Chief Building Code Consultant, for further review and action.

Should you have any additional questions or require further assistance, please feel free to contact me.

Best regards,

Pak Keung Yip, P.E.
Chief Code Consultant



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From: Brad Sutton <bsutton@harnett.org>
Sent: Tuesday, January 20, 2026 2:25 PM
To: Yip, Pak <pak.yip@ncdoi.gov>
Subject: [External] group A-3 Mezzanine or second story?

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Pak,

I have a question about mezzanines. I have a group A-3 multipurpose building at a church. They show the rooms (kitchen and bathrooms) adjacent to this multipurpose room framed with a floor/ceiling assembly above. Their plan is to use this area above for unconditioned storage only. It will be accessed by a stairway and has 10 feet or more of headroom. A portion of this area will also be used for HVAC equipment.

The proposed storage area is less than 1/3 of the total floor space of the multipurpose building, so it would meet the definition of a mezzanine (505.2.1) .

Mezzanines under 505.2.3 are required to be open to the floor below. However, exception 1 allows a mezzanine to be enclosed provided the occupant load is less than 10. Calculating their storage area occupant load at 300 sq ft/occ nets it at 6 people.

Since the mezzanine, by definition, is not considered a story, would this be an appropriate code path with this area enclosed, still allowing a sprinkler exemption? 903.2.1.3 (3) requires sprinklers in group A-3 where “ ***The fire area is located on a floor other than a level of exit discharge serving such occupancies***”

Thanks again, in advance, for all the support you folks provide to us!

Brad Sutton

Chief Code Official

Harnett County Inspections