DENVER AMENDMENT PROPOSAL FORM
FOR CPD INTERNAL PROPOSALS TO THE 2016 DENVER BUILDING CODE AMENDMENTS AND THE 2018 INTERNATIONAL CODES

2018 CODE DEVELOPMENT CYCLE

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2) Proposals should be drafted in Word with the only formatting that is needed being BOLDING, STRIKEOUT AND UNDERLINING. Please do not provide additional formatting such as tabs, columns, etc.

Please use a separate form for each proposal submitted.

Is separate graphic file provided? ☐ Yes ☒ No

<table>
<thead>
<tr>
<th>Acronym</th>
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<tbody>
<tr>
<td>DBC-xxx</td>
<td>Denver Building Code–xxx code base</td>
<td>IMC</td>
<td>International Mechanical Code</td>
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AMENDMENT PROPOSAL

Please provide all of the following items in your amendment proposal.

**Code Sections/Tables/Figures Proposed for Revision:**
DBC-IBC 3007.6
DBC-IBC 3007.6.2
DBC-IBC 3007.6.3
DBC-IBC 3007.6.4

**Note:** If the proposal is for a new section, indicate (new).

**Proposal:**

**Revise as follows**

[F] Section 3007.6 Fire service access elevator lobby is amended to add one three sentences at the end of the paragraph and adding Exceptions 2 and 3 as follows:

Fire service access elevator lobby shall have direct access to the building floor plate without passing through an interior exit stairway or ramp, any intervening rooms, or exit enclosures. In residential high rise buildings where fire service elevator lobbies are required and where the corridors are considered areas of rescue assistance, construction of a separate fire service elevator lobby with the required two-way area of rescue assistance communication system in the fire service lobby is permitted. Area of the fire service elevator lobby shall be increased to accommodate the required wheelchair spaces.

[F] Section 3007.6.2 Lobby enclosure is replaced in its entirety with the following:

3007.6.2 Lobby enclosure. The fire service access elevator lobby shall be enclosed with a smoke barrier having a fire-resistance rating of not less than 1 hour, except that lobby doorways shall comply with Section 3007.6.3. Fire service access elevator lobby shall not be used for storage any other purpose.

**Exceptions:**
1. Enclosed fire service access elevator lobbies are not required at the levels of exit discharge.
2. Enclosed fire service access elevator lobbies are not required in open parking garages.
3. Enclosed fire service access elevator lobbies in enclosed parking garages are permitted to be enclosed with smoke partitions, except that lobby doorways shall comply with Section 3007.6.3.

[F] Section 3007.6.3 Lobby doorways is amended by adding an exception as follows:

Exception: ¾-hour fire door assemblies are not required in enclosed parking garages. Such doors shall comply with Section 710.5.2.

[F] Section 3007.6.4 Lobby size is amended by adding the following at the end of the paragraph:

An area of refuge area of rescue assistance lobby is permitted to be combined with the fire service access elevator lobby provided the area of refuge area of rescue assistance lobby shall be increased to accommodate the required wheelchair spaces.

Note: Show the proposal using strikeout, underline format. At the beginning of each section, one of the following instruction lines are also needed:

•Revise as follows
•Add new text as follows
•Delete and substitute as follows
•Delete without substitution

Supporting Information:

This proposal revises and clarifies several existing amendments as outlined below. These amendments are needed to provide requirements that are specific to Denver’s firefighting operations in relation to fire service access elevator (FSAE) lobbies. The reduction in requirements for lobbies at garages is consistent with several Administrative Modification requests that have been approved in the past. Note that this proposal is consistent with a proposal to revise DBC-IBC 403.5.7 for accessible means of egress in high rise buildings – this proposal deletes the term “area of rescue assistance” and replaces with the defined term “area of refuge”.

3007.6 is revised to require FSAE lobbies to have direct access to the building floor plate without passing through interior exit stairways or ramps, as was previously in this amendment, but deletes the requirement for direct access without passing through intervening rooms. The intervening rooms requirement is vague in that it doesn’t state how much of the floor must be accessed without passing through an intervening room and, in most cases, it is impossible to provide access to the entire floor plate without going through intervening rooms. 3007.6 is revised to require FSAE lobbies to have direct access to the building floor plate without passing through interior exit stairways or ramps, as was previously in this amendment, but deletes the requirement for direct access without passing through intervening rooms. The intervening rooms requirement is vague in that it doesn’t state how much of the floor must be accessed without passing through an intervening room and, in most cases, it is impossible to provide access to the entire floor plate without going through intervening rooms. 3007.6 is revised to delete requirements for residential high-rise buildings that use corridors as an area of rescue assistance. The proposed revisions to DBC-IBC 403.5.7 are such that these requirements are no longer needed.

3007.6 is revised to delete Exception 2 that allows FSAE lobbies to not be provided at open parking garages. This exception is moved to 3007.6.2 which is specifically for lobby enclosures and is a better location for this. Also, the reference to non-fire-resistance rated area of rescue assistance lobbies serving garage levels is deleted since there are no requirements elsewhere in the code for this.

3007.6 is revised to delete Exception 3 that allows FSAE lobbies to not have a fire-resistance rating at enclosed parking garages. This exception is moved to 3007.6.2 which is specifically for lobby enclosures and is a better location for this. To clarify this requirement, the new exception simply permits these enclosures to be smoke partitions instead of smoke barriers (smoke partitions are not required to have a fire-resistance rating). Also, the reference to non-fire-resistance rated area of rescue assistance lobbies serving garage levels is deleted since there are no requirements elsewhere in the code for this. The sentence that allows exit access through these lobbies is also deleted since this is already allowed by IBC 3007.6.3007.6.2 is revised as noted above and to revise the requirement that FSAE lobbies not be used for any other purpose to a requirement that FSAE lobbies not be used for storage. Since FSAE lobbies can be used for egress (per IBC 3007.6) and can be used as an area of refuge (per DBC-IBC 3007.6.4), the current amendment is incorrect. The Fire Department concern is that these lobbies not be used for storage and the amendment is revised to prohibit this use.

3007.6.3 is amended to add requirements for FSAE lobby enclosure doors in enclosed parking garages. Since Denver allows fire partitions, as noted above, the ¾-hour fire door assemblies are not needed and reference is instead made to Section 710.5.2 which gives requirements for doors in smoke partitions.

3007.6.4 is revised to change “area of rescue assistance lobby” to defined term “area of refuge”. This change is consistent with the proposed changes to DBC-IBC 403.5.7 that will make a similar change. Note that “Area of rescue assistance lobby” is not used elsewhere in the code and is not defined.
Note: The following items are required to be included:

**Purpose:** The proponent shall clearly state the purpose of the proposed amendment to physical, environmental and customary characteristics that are specific to the City and County of Denver (e.g., clarify the Code; revise outdated material; substitute new or revised material for physical, environmental and customary characteristics; add new requirements to the Code; delete current requirements, etc.)

**Reasons:** The proponent shall justify changing the current Code provisions, stating why the proposal is necessary to reflect physical, environmental and customary characteristics that are specific to the City and County of Denver. Proposals that add or delete requirements shall be supported by a logical explanation which clearly shows why the current does not reflect physical, environmental and customary characteristics that are specific to the City and County of Denver and explains how such proposals will improve the Code.

**Substantiation:** The proponent shall substantiate the proposed amendment based on technical information and substantiation. Substantiation provided which is reviewed and determined as not germane to the technical issues addressed in the proposed amendment shall be identified as such.

**Bibliography** (as needed): The proponent shall submit a bibliography when substantiating material is associated with the amendment proposal. The proponent shall make the substantiating materials available for review.

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**Referenced Standards:**

None.

List any new referenced standards that are proposed to be referenced in the code.

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**Impact:**

This proposal clarifies current amendments and should have no cost impact relative to the current Denver Building Code. The elevator lobby provisions for garages are less-restrictive than the I-Codes.

**Note:** The proponent shall discuss the impact of the proposed amendment and indicate one of the following for each point below regarding the amendment proposal:

- The effect of the amendment proposal on the cost of construction;  
  - Increase  
  - Reduce  
  - No Effect

- The effect of the amendment proposal on the cost of design;  
  - Increase  
  - Reduce  
  - No Effect

- Is the amendment proposal more- or less-restrictive than the I-Codes;  
  - More  
  - Less  
  - Same

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**Departmental Impact:**

This proposal clarifies current amendments and should have no impact on review or enforcement.

**Note:** The proponent shall discuss the impact of the proposed amendment and indicate one of the following for each point below regarding the amendment proposal:

- The effect of the amendment proposal on the cost of review;  
  - Increase  
  - Reduce  
  - No Effect

- The effect of the amendment proposal on the cost of enforcement/inspection;  
  - Increase  
  - Reduce  
  - No Effect