AMENDMENT PROPOSAL

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

**Code Sections/Tables/Figures Proposed for Revision:**

DBC-IBC 718.6

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

**Proposal:**

Delete without substitution

**SECTION 718**

**CONCEALED SPACES**

Section 718.6 Occupancy Groups R and I in cold-formed metal-framed buildings is added as follows:

> **718.6 Occupancy Groups R and I in cold-formed metal-framed buildings:** Draftstopping shall be provided in floor/ceiling and attic spaces of metal-framed buildings or portions thereof containing occupancy Group R-1, Group R-2 with three or more dwelling units, Group R-3 with two or more dwelling units and all Group R-4 and Group I. Draftstopping shall be located in accordance with Section 718.6.1 through 718.6.4.

**Exception:**

Draftstopping is not required in buildings equipped throughout with an automatic sprinkler system in accordance with IFCA Section 903.3.1.1 provided automatic sprinklers are installed in the concealed floor/ceiling and attic spaces.

> **718.6.1 Draftstopping at dwelling unit and sleeping unit separations.** Draftstopping shall be located above and in line with the dwelling unit and sleeping unit separations so that the area between draftstops does not exceed 5,000 square feet and the greatest horizontal dimension does not exceed 80 feet.

**718.6.2 Draftstopping at corridors.** Draftstopping shall be located above and in line with the corridor walls.

**Exception:**
Where corridor walls provide a sleeping unit or dwelling unit separation, draftstopping shall only be required above one of the corridor walls.

718.6.3 Draftstopping in attics. Draftstopping shall be installed to subdivide attic spaces and concealed roof spaces in the locations above and in line with walls identified in Sections 718.6.1 and 718.6.2.

718.6.4 Draftstopping materials. Draftstopping materials shall be not less than ½ inch (12.7 mm) gypsum board, cement fiberboard or other approved (rigid) non-combustible materials adequately supported. The integrity of draftstopping shall be maintained.

**Note:** Show the proposal using **strike**, **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 is to delete Denver’s amendment that adds IBC 718.6 since this amendment is not related to any physical, environmental or customary characteristics that are specific to the City and County of Denver. It is believed that requirements added with this amendment are unnecessary from a fire safety standpoint and this amendment focuses on a single type of framing, while not addressing other types of framing with the same condition, as discussed below.

The current amendment adds Section 718.6 that requires draftstopping in floor/ceiling and attic spaces of cold-formed metal-framed buildings. IBC general section 718.1 includes charging language for 718 that requires draftstopping to be installed in **combustible concealed locations** and references specific code sections. This amendment adds a new section for draftstopping in select **non-combustible concealed locations** and this section is not referenced in the general section of 718, so it is unclear how one would even get to this section. The IBC commentary for 718.1 states “The key words in this section are “combustible concealed spaces”. This section does not apply to non-combustible construction.” The draftstopping provisions in the code are specifically for combustible concealed locations to control fire spread within such locations. For non-combustible concealed spaces, control of fire spread is accomplished through IBC 718.5 that prohibits combustible materials in concealed spaces with some exceptions – this limits the amount of combustible material that would contribute to the spread of fire. Based on this, there is no justification to extend draftstopping provisions to combustible concealed spaces.

The current amendment is limited to concealed spaces in cold-formed metal-framed buildings which would typically have cold-formed metal trusses within the floor/ceiling and attic spaces. It is unclear why this amendment is narrowly focused on this type of framing when a similar concealed space would occur for other systems. For example, if structural steel open-web joists were used instead of cold-formed steel trusses, there would be a very similar concealed space but this would be deemed acceptable without draftstopping since the amendment is only for cold-formed metal framing. There appears to be no justification to focus on this one type of framing.

For the reasons above, it is proposed that Denver’s current amendment that adds 718.6 be deleted.

**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.

**Referenced Standards:**

None.

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

**Impact:**
This proposal will decrease the cost of construction relative to Denver’s 2016 IBC amendments to the 2015 IBC but would have no effect relative to the 2018 IBC. This proposal should reduce the cost of design since draftstopping design and detailing doesn’t have to be addressed. This proposal deletes a more-restrictive amendment to bring Denver in line with the IBC.

**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

**Departmental Impact:**
This proposal should reduce the cost of review and inspections since review and inspection of draftstopping would not be required.

**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