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

2018 CODE DEVELOPMENT CYCLE

1) Name: David Renn, PE, SE  Date: 2/22/2019

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>
<th>Code Name</th>
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<th>Code Name</th>
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</thead>
<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 705.10

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

Proposal:
Delete without substitution

Section 705.10 Ducts and air transfer openings is amended by adding Exception 2 and renumbering the existing Exception such that it is Exception 1.

Exceptions:

2. The building is equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1.

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 is to delete a Denver amendment that is not necessary and is not related to any physical, environmental or customary characteristics that are specific to the City and County of Denver. The current amendment adds an exception for sprinklered buildings that is less restrictive than the IBC.

IBC 705.10 requires penetrations by air ducts and air transfer openings to have protected openings that comply with Section 717 (i.e. fire dampers) where an exterior wall is required to have protected openings. Per IBC Table 705.8, this typically only applies to nonsprinklered buildings with a fire separation distance of 3’ to less than 5’, since sprinklered buildings are not required to have protected openings except for Group H-1, H-2 and H-3 occupancies with a fire separation distance of 3’ to less than 5’ (i.e. footnote “i” to Table 705.8 makes the unprotected sprinkler category not applicable to these occupancies). Note that openings are not allowed with a fire separation distance less than 3’ and unprotected openings are allowed for nonsprinklered buildings with a fire separation distance of 5’ or more, meaning protected openings are not required with a fire separation distance of 5’ or more.

Based on the discussion above, Denver’s amendment that adds an exception for sprinklered buildings is not necessary for the vast majority of buildings since sprinklered buildings are typically not required to have protected openings. This exception could be used for Group H-1, H-2 and H-3 occupancies with a fire separation distance of 3’ to less than 5’, but this amendment less restrictive than the IBC and is not justified. For these reasons, this amendment should be removed.

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:
There is no impact due to the extremely rare cases where the current amendment could be used. This proposal removes a less-restrictive amendment resulting in the same requirements as 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

Departmental Impact:
There is no impact due to the extremely rare cases where the current amendment could be used.

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

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