# AMENDMENT PROPOSAL

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

DBC-IBC 705.8.2

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

**Proposal:**

Delete without substitution

**Section 705.8.2 Projected openings is amended by replacing the Exception in its entirety:**

**Exception:**

Opening protective are not required where the building is equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1 or Section 903.3.1.2 and the exterior openings are protected by a water curtain using automatic sprinklers approved for that use.

**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:**

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**Acronym** | **Code Name** | **Acronym** | **Code Name**
---|---|---|---
DBC-xxx | Denver Building Code–xxx code base | IMC | International Mechanical Code
This proposal is to delete a Denver amendment that is not related to any physical, environmental or customary characteristics that are specific to the City and County of Denver. The current amendment revises the exception to IBC 705.8.2 to change the sprinkler requirements from NFPA 13 (Section 903.3.1.1) to NFPA 13 or NFPA 13R (Section 903.3.1.2) and, therefore, is less restrictive than the IBC.

Where opening protectives are required, the IBC exception allows sprinklered buildings with openings protected by water curtains to not have opening protectives that comply with Section 716. This exception is irrelevant for most occupancies since IBC Table 705.8.2 allows the same percentage of opening area for protected openings and unprotected openings in sprinklered buildings, so there is no benefit to adding the water curtains and they are not required. This exception is only relevant to Group H occupancies since footnote i to Table 705.8 makes the unprotected sprinklered category not applicable to H-1, H-2 and H-3 occupancies – water curtains could be used in lieu of opening protectives for this case.

Denver’s amendment to the exception to IBC 705.8.2 extends the water curtain substitution to buildings with NFPA 13R systems. With this revision, the exception is still irrelevant for occupancies that have an NFPA 13 system (except for H-1, H-2 and H-3) but is now relevant for occupancies that have a NFPA 13R system since the unprotected sprinklered category in Table 705.8 is only applicable to NFPA 13 systems. The IBC only includes water curtain options with NFPA 13 sprinkler systems and there is no justification for Denver to also allow water curtains with NFPA 13R systems, so 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:**

This proposal could result in a slight increase in the cost of construction resulting from smaller percentage of openings being allowed for 13R buildings – for example, an opening in a wall that was previously allowed with water curtains would be changed to a fire-resistance rated wall. 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:**

This proposal should reduce the cost of review since the water curtain opening protection would no longer be allowed, resulting in smaller deferred sprinkler submittals. The sprinkler review would also require less coordination with the original submittal since it would not be necessary to verify that required water curtain opening protection is carried through on deferred sprinkler submittals. Cost of inspection is also reduced due to the deletion of the water curtain protection.

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