Code Amendment Proposal Form

For public amendments proposed to the 2018 editions of the International Codes

Instructions: Upload this form and all accompanying documentation at www.denvergov.org/BuildingCode. If you are submitting your proposal on a separate sheet, make sure it includes all information requested below.

All proposals must be received by April 26, 2019.

CONTACT INFORMATION

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Organization: Self

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Signature: David P. Renn

AMENDMENT PROPOSAL

Please use a separate form for each proposal.

1) Code(s) associated with this proposal. Please use acronym: IBC

If you submitted a separate coordination change to another code, please indicate which code: 

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Code Name</th>
<th>Acronym</th>
<th>Code Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>DBC-xxxx</td>
<td>Denver Building Code–xxxx (code) amendments (e.g., DBC-IBC, DBC-IEBC)</td>
<td>IFGC</td>
<td>International Fuel Gas Code</td>
</tr>
<tr>
<td>IEBC</td>
<td>International Existing Building Code</td>
<td>IMC</td>
<td>International Mechanical Code</td>
</tr>
<tr>
<td>IECC</td>
<td>International Energy Conservation Code</td>
<td>IPC</td>
<td>International Plumbing Code</td>
</tr>
<tr>
<td></td>
<td></td>
<td>IBC</td>
<td>International Residential Code</td>
</tr>
</tbody>
</table>

2) Please check here if a separate graphic file is provided: ☐

Graphics may also be embedded within your proposal below.

3) Use this template to submit your proposal or attach a separate file, but please include all items requested below in your proposal. The only formatting needed is **BOLDING**, *STRIKEOUT* AND *UNDERLINING*. Please do not provide additional formatting such as tabs, columns, etc., as this will be done by CPD.

Code Sections/Tables/Figures Proposed for Revision:

IBC 707.5
Proposal:

Add new text for Exception 3 as follows:

**707.5 Continuity.** Fire barriers shall extend from the top of the foundation or floor/ceiling assembly below to the underside of the floor or roof sheathing, slab or deck above and shall be securely attached thereto. Such fire barriers shall be continuous through concealed space, such as the space above a suspended ceiling. Joints and voids at intersections shall comply with Sections 707.8 and 707.9

Exceptions:

1. Shaft enclosures shall be permitted to terminate at a top enclosure complying with Section 713.12.
2. Interior exit stairway and ramp enclosures required by Section 1023 and exit access stairway and ramp enclosures required by Section 1019 shall be permitted to terminate at the top enclosure complying with Section 713.12.
3. An exit passageway enclosure required by Section 1024.3 that does not extend to the underside of the floor or roof sheathing, slab or deck above shall be enclosed at the top with construction of the same fire-resistance rating as required for the exit passageway.

Note: Show the proposal using strikeout, underline format. At the start of each section, give one of the following instructions:
- Revise as follows:
- Add new text as follows:
- Delete and substitute as follows:
- Delete without substitution:

Supporting Information:

**Purpose and reasons:** The purpose of this proposal is to add an exception to fire barrier continuity that has already been approved to be included in the 2021 IBC through the ICC Group A code hearing process. This exception allows exit passageways to be enclosed at the top with a fire-resistance rated lid/ceiling instead of continuing the fire barriers to the sheathing, slab or deck above. This type of enclosure is commonly used in Denver and has been routinely approved under the modification provisions of DBCA 104.9 or the alternative method of construction provisions of DBCA 106.1. Since this has already been approved for the 2021 IBC, it is prudent to pull this forward into Denver’s amendments to the 2018 IBC rather than continue to treat this under the modification or alternative method provisions. This amendment would then be deleted when Denver adopts the 2021 IBC.

**Substantiation:** The content of this proposal has already been approved by ICC and its membership for inclusion in the 2021 IBC. The ICC proposal for this is FS27-18 which included the substantiation that follows. The committee vote on this proposal was 14-0 for “approved as submitted” and there were no public comments. Exception 2 currently allows interior exit stairway and ramp enclosures to terminate at a top enclosure meeting the requirements for a top enclosure of a shaft. This proposed change extends this same allowance to exit passageways. Since exit passageways and interior exit stairways and ramps are all exit components, the current allowance for a top enclosure should apply to all of these components. Since an exit passageway does not penetrate a floor as shaft does, this proposal includes this allowance as a new exception, rather than referring to top enclosure requirements for shafts.

The use of a fire-resistance rated top enclosure for an exit passageway is commonly used as a means to allow mechanical, electrical and plumbing work to route above an exit enclosure. This proposal would specifically allow what is currently allowed by many jurisdictions through the modifications or alternative methods provisions of Chapter 1.

**Bibliography:**
2018 Group A Proposed Changes to the I-Codes Columbus Committee Action Hearings (FS27-18) as published by the International Code Council

Note: This section MUST include these items:
- **Purpose:** 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. to reflect physical, environmental and customary characteristics that are specific to the City and County of Denver)
- **Reasons:** Clearly justify the change to 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 that clearly shows why the current code does not reflect physical, environmental and customary characteristics that are specific to the City and County of Denver and explains how such proposal will improve the code.
- **Substantiation:** 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:** Include a bibliography when substantiating material is associated with the amendment proposal. The proponent shall make the substantiating materials available for review.

**Referenced Standards:**

None.

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

**Impact:**

There is no change to construction or design cost since this new exception is not required to be used. If used, there is a cost trade-off between extending fire barriers to the sheathing, slab or deck and providing the top enclosure. Savings in mechanical, electrical and plumbing systems may also be realized by routing over an exit passageway instead of around an exit passageway. This proposal is less restrictive than the I-codes since this exception doesn’t exist in the I-codes, but this proposal arguably meets in the intent of the I-codes so “same” is indicated below.

Note: Discuss the impact of this proposal in this section AND indicate the impact of this amendment proposal for each of the following:
- The effect of the proposal on the cost of construction: ☐ Increase ☐ Reduce ☒ No Effect
- The effect of the proposal on the cost of design: ☐ Increase ☐ Reduce ☒ No Effect
- Is the proposal more or less restrictive than the I-codes: ☐ More ☐ Less ☒ Same

**Departmental Impact:** (To be filled out by CPD staff)

Note: CITY STAFF ONLY. Discuss the impact of this proposal in this section AND indicate the impact of this amendment proposal for each of the following:
- The effect of the proposal on the cost of review: ☐ Increase ☐ Reduce ☐ No Effect
- The effect of the proposal on the cost of enforcement/inspection: ☐ Increase ☐ Reduce ☐ No Effect