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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ng below, I hereby grant and assign to City and County of Denver all rights in copyright I may have in any authorship contributions I make to City and County of Denver in connection with this proposal. I understand that I will have no rights in any City and County of Denver publications that use such contributions in the form submitted by me or another similar form and certify that such contributions are not protected by the copyright of any other person or entity.

Signature:

AMENDMENT PROPOSAL

Please use a separate form for each proposal.

1) Code(s) associated with this proposal. Please use acronym: DBC-IFC

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

<table>
<thead>
<tr>
<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>
</tr>
<tr>
<td>IBC</td>
<td>International Building Code</td>
</tr>
<tr>
<td>IEBC</td>
<td>International Existing Building Code</td>
</tr>
<tr>
<td>IECC</td>
<td>International Energy Conservation 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, STRIKETHROUGH 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:
DBC-IFC 909.10.6

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

Proposal:
909.10.6 System repairs and maintenance. All deficiencies noted in the annual report will be corrected within 30 days and, if required by the engineer, the smoke control system shall be re-tested. All smoke control systems will be maintained to perform its intended purpose under the code version with which it was built. As
stated in Section 107, correction and abatement of violations of this code shall be the responsibility of the owner. With approval of the Denver Building Department and the Denver Fire Department smoke control systems may be remodeled to comply with current code as long as the entire life safety systems (fire alarm, fire sprinkler, smoke control, egress, etc) are re-evaluated as an entire package.

**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:**
My understanding is that any smoke control system was designed as a component of the overall life safety plan for the building & that only bringing the smoke control system up to current standards may not fit with the rest of the original life safety plan.

**Note:** This section MUST include these items:
- **Purpose:** To assure life safety systems are being approached in a holistic fashion.
- **Reasons:** Many existing smoke control systems were designed based on the other facets of the life safety plan.
- **Substantiation:** One building I’m working on that had a SCS installed 35 years ago has more components (floor by floor sandwich affect) than a 5 story (non high-rise) would require. But since it is a historic building with smaller stairwells, this extra requirement was probably due to the restricted egress path.
- **Bibliography:** NA

**Referenced Standards:**

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

**Impact:**

**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