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:

AMENDMENT PROPOSAL

Please use a separate form for each proposal.

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

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**, 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:

R302.1, R302.1.1 (new) and R202

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

Proposal:
Revise as follows:

**R302.1 Exterior walls.** Construction, projections, openings and penetrations of exterior walls of dwellings, townhouses and accessory buildings shall comply with Table R302.1(1); or dwellings and townhouses equipped throughout with an automatic sprinkler system installed in accordance with Section P2904 shall comply with Table R302.1(2).

**Exceptions:**

1. Walls, projections, openings or penetrations in walls perpendicular to the line used to determine the fire separation distance.
2. Walls of individual dwelling units and their accessory structures located on the same lot.
3. Detached tool sheds and storage sheds, playhouses and similar structures exempted from permits are not required to provide wall protection based on the location on the lot. Projections beyond the exterior wall shall not extend over the lot line.
4. Detached garages accessory to a dwelling or townhouse located within 2 feet (610 mm) of a lot line are permitted to have roof eave projections not exceeding 4 inches (102 mm).
5. Foundation vents installed in compliance with this code are permitted.

Add new text as follows:

**R302.1.1 Townhouse imaginary lines.** For the purposes of determining fire separation distance and requirements of Section R302.1, townhouses shall have assumed imaginary lines established. Assumed imaginary lines shall begin at ends of the walls separating townhouses required by IRC R302.2 and shall extend to a lot line or to another imaginary line.

Revise as follows:

**[RB] FIRE SEPARATION DISTANCE.** The distance measured from the building face to one of the following:

1. To the closest interior lot line.
2. To the centerline of a street, an alley or public way.
3. To an imaginary line between two buildings or townhouses on the lot.

The distance shall be measured at a right angle from the face of the wall.

**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:**
This proposal adds a new Denver amendment to codify an interpretation that Denver has used for some time and to fix an inadvertent omission in the code as described below. This proposal is in line with Denver’s current policy “IRC R302.1 Exterior Wall Requirements for IRC Buildings”.

Prior to the 2015 IRC, Section R302.2 required each townhouse to be considered a separate building and be separated by fire-resistance-rated walls meeting requirements for exterior walls, with an exception to provide a fire-resistance-rated common wall. The 2015 IRC revised this section to only deal with common walls and a reference to exterior walls was removed. Since R302.1 only requires fire-resistance-rated exterior walls for dwellings and accessory buildings, all townhouse exterior wall requirements were technically removed from the code since a townhouse does not meet the definition of a dwelling. Prior to 2015 IRC, an imaginary line would be established between each townhouse since they were considered separate buildings and fire separation distance would be measured to the imaginary line, and it is believed that most jurisdictions still enforce this way (including Denver).

This proposal brings back the 2012 townhouse exterior wall requirements that are assumed to have been inadvertently removed from the code. It does this by adding townhouses to the scoping of R302.1 for exterior walls and by revising the definition of fire separation distance to include imaginary lines between townhouses (rather than calling townhouses separate buildings, which they are not). Section R302.1.1 is added to give requirements on how to establish imaginary lines. Townhouse exterior walls that are adjacent to lot lines would meet exterior wall requirements based on fire separation distance to the lot lines. Townhouse exterior walls that are adjacent to or near other townhouses would meet exterior wall requirements based on fire separation distance to the imaginary lines established. See Figures 1 and 2 below for application examples for this proposal. This proposal is necessary to fill the current hole in the code regarding exterior wall requirements for townhouses.
FIGURE 1 - IMAGINARY LINES BETWEEN TOWNHOUSES
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 impact on the cost of construction since this proposal is consistent with Denver’s current interpretation. Design cost may decrease due to increased clarity and less re-design. This proposal is in line with the intent of the IRC.

**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