DENVER AMENDMENT PROPOSAL FORM
FOR PROPOSALS TO THE 2019 DENVER BUILDING CODE
AMENDMENTS AND THE 2021 INTERNATIONAL CODES

2021 CODE DEVELOPMENT CYCLE

1) Name: David Renn, PE, SE Date: 12/15/2021
   Email: david.renn@denvergov.org Representing (organization or self): Denver DS

2) One proposal per this document is to be provided with clear and concise information.
   Is a separate graphic file provided ( “X” to answer): ___ Yes or ___ No

3) Highlight the code and acronym that applies to the proposal

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Code Name</th>
<th>Acronym</th>
<th>Code Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>IBC</td>
<td>International Building Code</td>
<td>IRC</td>
<td>International Residential Code</td>
</tr>
<tr>
<td>IEBC</td>
<td>International Existing Building Code</td>
<td>IMC</td>
<td>International Mechanical Code</td>
</tr>
<tr>
<td>IFC</td>
<td>International Fire Code</td>
<td>DGC</td>
<td>Denver Green Code</td>
</tr>
</tbody>
</table>

AMENDMENT PROPOSAL

Please provide all the following items in your amendment proposal.

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

**Instructions:** If the proposal is for a new section, indicate (new), otherwise enter applicable code section.

**Proposal:**

**Instructions:** Show the proposal using *strikeout, underline* format.

Place an “X” next to the choice that best defines your proposal: _X Revision __ New Text __ Delete/Substitute __ Deletion

**1006.3 Egress from stories or occupied roofs.** The means of egress system serving any story or occupied roof shall be provided with the... All spaces located on a story or occupied roof shall have access to the required number of separate and distinct exits or access to exits based on the aggregate occupant load served in accordance with this section.

**Supporting Information (Required):**

All proposals must include a written explanation and justification as to how they address physical, environmental, and/or customary characteristics that are specific to the City and County of Denver. The following questions must be answered for a proposal to be considered.

- **Purpose:** What does your proposal achieve?
- **Reason:** Why is your proposal necessary?
- **Substantiation:** Why is your proposal valid? (i.e. technical justification)

The purpose of this proposal is to carry forward a 2024 code change that has already been approved through the ICC Group A hearings under proposal E17-21 with a 12-1 committee vote for “as submitted”, with no public comments. The issue addressed by this proposal comes up often in Denver where a story is required to have 3 exits based on occupant load, but each individual space on the floor only requires 2 exits for requirements for egress from spaces – in this case architects have tried to divide the story into two tenant spaces each with access to only 2 of the 3 required exits. This was never the intent of the code and this proposal fixes this. The reason statement from E17-21 follows to justify this change:
**Reason Statement:** As this section was revised over the past couple of cycles, the intent was lost. It has always been intended that occupants on a story or occupied roof have access to the minimum number of required exits. The existing language does not say that. It just says that you have to have the minimum number of exits. Therefore, you could have a story that has two exits and if it is split into separate spaces, the occupants may not have access to the minimum number of exits. An interior exit stairway may only be accessed from a single tenant space and you are not permitted to exit through an adjacent tenant to get to an exit. The drawing below shows what the current language permits. The story has two exits on each end of the building. However, if the story is split in two, the occupants from either side do not access to the other interior exit stairway. This proposal clarifies the intent of the code and requires access to the minimum number of exits from a story. Therefore, the layout below would not be permitted.

![Diagram](image)

**Bibliography and Access to Materials** (as needed when substantiating material is associated with the amendment proposal):

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**Other Regulations Proposed to be Affected**

*For proposals to delete content from the 2019 Denver Green Code in conjunction with adding it to other mandatory Denver codes and/or regulations, only.*

Please identify which other mandatory codes or regulations are suggested to be updated (if any) to accept relocated content.

**Referenced Standards:**

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

None.

**Impact:**

How will this proposal impact cost and restrictiveness of code? ("X" answer for each item below)

<table>
<thead>
<tr>
<th>Cost of construction:</th>
<th>Increase</th>
<th>Decrease</th>
<th>X No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cost of design:</td>
<td>Increase</td>
<td>Decrease</td>
<td>X No Impact</td>
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<tr>
<td>Restrictiveness:</td>
<td>Increase</td>
<td>Decrease</td>
<td>X No Impact</td>
</tr>
</tbody>
</table>

**Departmental Impact (City use only):**

This amendment proposal increases/decreases/is neutral to the cost of plans review.

This amendment increases/decreases/is neutral to the cost of inspections.