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 _X__ 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 _X_ New Text _X_ Delete/Substitute _X_ Deletion

**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 FS21-21 with a 13-0 committee vote for “as modified”, with no public comments. This is needed to clarify language in the code that has been challenged by architects on some projects in Denver. Following is the reason statement from FS21-21 justifying this change:

4/14/21
**Reason Statement:** Footnote "g" allows an open parking structure to have unlimited openings where the fire separation distance is 10 feet or greater, but "open parking structure" is not defined and is up for interpretation - this proposal clarifies exactly what requirements must be met to allow unlimited openings. It is believed the intent is that this footnote is for open parking garages that comply with the special requirements in Chapter 4 for open parking garages. To clarify intent, this proposal revises "open parking structure" to defined term "open parking garage" and requires compliance with section 406.5 to use this footnote.

It should be noted that it is necessary to require compliance with 406.5 in addition to using the defined term since the defined term doesn't include all of the requirements in 406.5. For example, 406.5.1 requires Type I, II or V construction, but this isn't mentioned in the definition.

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

None.

**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><em>X</em> No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cost of design:</td>
<td>___ Increase</td>
<td>___ Decrease</td>
<td><em>X</em> No Impact</td>
</tr>
<tr>
<td>Restrictiveness:</td>
<td>___ Increase</td>
<td>___ Decrease</td>
<td><em>X</em> 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.

4/14/21