

- Reason: Why is your proposal necessary?

2021 IRC Section R311.7, Exception 1 is proposed to be deleted since it is ambiguous as to when a stairway not in the public way but subject to the requirements of the IRC is or is not serving a building, porch or deck in an urban environment such as the City and County of Denver. It is important to note that in order to be subject to the requirements of the IRC a stairway must necessarily be associated with a building regulated by the IRC, including a detached one- or two- family dwelling, townhouses, or their accessory structures. In an urban environment such as Denver, stairways serve an important function in the way a user navigates changes in grade to and between buildings, regardless of whether the stairway is visually directly attached to the subject buildings and regardless of whether the stairway is a required stairway or a convenience stairway. Although it is not clear how a stairway associated with buildings regulated by the IRC can be seen as not “serving a building”, the recently added model code exception implies that there is a subset of these stairways in which it is not required to provide a safe or usable stairway. The recently added model code exception does not enumerate those conditions and leaves the code user to determine on a case-by-case basis and without clear guidance whether any individual stairway outside of a building regulated by the IRC is required to meet the minimum requirements of the building code.

2021 IRC Section R311.7, Exception 2 is proposed to be deleted since vertical egress from nonhabitable levels, including nonhabitable attics, is not required to be by a stairway. There is no apparent change in the factors contributing to the life-safety analysis between a stairway serving an attic and a stairway serving other nonhabitable portions of the building. The model code language already includes provisions for generally accepted and commonly understood alternative means of generally safely navigating a change in level without using a stairway.

2021 IRC Section R311.7, Exception 3 is proposed to be deleted since vertical egress from nonhabitable levels, including crawlspaces, is not required to be by a stairway. There is no apparent change in the factors contributing to the life-safety analysis between a stairway serving a crawlspace and a stairway serving other nonhabitable portions of the building. The model code language already includes provisions for generally accepted and commonly understood alternative means of generally safely navigating a change in level without using a stairway.

2021 IRC Section R311.7, Exception is proposed to be deleted since it is ambiguous as to when a ramp not in the public way but subject to the requirements of the IRC is or is not serving a building, porch or deck in an urban environment such as the City and County of Denver.

- Substantiation: Why is your proposal valid? (i.e. technical justification)

The stated intent of the stairway provisions in the IRC commentary to “*address a wide variety of issues that must be considered when designing a stairway that is both safe and usable*” does not differentiate between stairways serving a building and stairways that do not serve a building. The model code provisions for stairways clarify the generally accepted and commonly understood minimum requirements that allow a human user to navigate a stairway generally safely regardless of whether the stairway is directly attached to the subject buildings, is “serving a building, porch or deck”, or is serving an attic or crawlspace. Since there is no apparent change in the factors contributing to the life-safety analysis between a stairway meeting the model code exceptions and other stairways, and considering that a human user is required to navigate either condition, the ambiguous exceptions to the applicability of the minimum standards for stairways should be removed in an urban environment such as the City and County of Denver.

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.

Impact:

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

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|-----------------------|--|-----------------------------------|------------------------------------|
| Cost of construction: | <input checked="" type="checkbox"/> Increase | <input type="checkbox"/> Decrease | <input type="checkbox"/> No Impact |
| Cost of design: | <input checked="" type="checkbox"/> Increase | <input type="checkbox"/> Decrease | <input type="checkbox"/> No Impact |
| Restrictiveness: | <input checked="" type="checkbox"/> Increase | <input type="checkbox"/> Decrease | <input type="checkbox"/> No Impact |

Departmental Impact (City use only):

This amendment proposal decreases the cost of plans review.

This amendment decreases the cost of inspections.