

CITY & COUNTY OF DENVER COMMUNITY PLANNING & DEVELOPMENT BUILDING PERMIT POLICY		
Subject: OCCUPANCY CLASSIFICATION FOR MARIJUANA USES		
Approved: Scott V. Prisco, AIA, Building Official		Drafted by: Browning
Number: IBC Section 302.1	Effective Date: August 8, 2016 Revised: August 22, 2020	Page: 1 of 1

Reference: IBC Section 302, 303, 304, 306, 307, 309, 311, 312

Scope: IBC Section 302.1 states that when a structure is proposed for a purpose that is not specifically provided for in the International Building Code, such structure shall be classified in the group that the occupancy most nearly resembles, according to the fire safety and relative hazard involved.

The provisions of this policy outline the occupancy classification for commercial marijuana uses (such as grow facilities, infused product manufacturers, stores, centers, and testing facilities) that engage in the growing, manufacturing and selling of marijuana, be that for medical or recreational purposes.

Marijuana facilities must comply with all Denver Building and Fire Code requirements, including hazardous occupancy classification requirements when hazardous material use or storage exceeds Maximum Allowable Quantities (MAQ) regarding marijuana operations; any other Denver Fire Department requirements; Environmental Health, SUDP/Wastewater, and any Zoning code requirements.

1. Marijuana Stores and Centers

All marijuana stores and centers that will be engaged in marijuana sales, medical or recreational, will be defined as a Group M occupancy in accordance with the IBC for any facility that requires the issuance of a certificate of occupancy to be issued as part of the permitting and inspection process. Occupant load, means of egress, plumbing fixtures, and other code compliance elements shall be designed and built based on Occupancy Group M.

2. Marijuana Grow Facilities

Facilities or portions thereof engaged in the growing of marijuana shall be classified as an F-1 occupancy, which includes facilities that are typically referred to as a “greenhouse”. (See IBCA 306.2)

3. Marijuana Manufacturing Facilities

Facilities or portions thereof engaged in the manufacturing of marijuana products including, but not limited to, edibles, extraction of marijuana oil, and lotions shall be classified as an F-1 occupancy.

4. Marijuana Testing Facilities

Facilities or portions thereof engaged in the testing and laboratory research related to marijuana shall be classified as a B occupancy.

5. Marijuana Storage Facilities

Facilities or portions thereof engaged in the storage of raw materials, processed, partially processed, or finished products and materials shall be classified as a S-1 occupancy

6. Multiple Occupancies

A medical or recreational marijuana store or center, grow, manufacturing, testing, or storage facility may be classified as having multiple occupancies. For example, if the facility was selling various products, , processing materials, and storing finished products then a multiple-occupancy classification of M/F-1/S-1 may be appropriate. This determination will be made by the Architect of record and confirmed by the Architectural/Structural plans review engineer during plan review.