CITY & COUNTY OF DENVER COMMUNITY PLANNING & DEVELOPMENT BUILDING PERMIT POLICY		
Subject:	**CODE TRANSITION RULES & APPLICATION EXPIRATION**	
Number: 25-DCBC 131.2	**Effective Date: December 1, 2025** Replaces policy dated: June 13, 2025	**Page: 1 of 3**

Reference: Denver Revised Municipal Code (DRMC) Section 10-16 (c)(2) and 2025 Denver Commercial Building Code Section 131.2

Scope: Clarifies the transition rules related to the continuation of projects designed under the 2019 or 2022 Denver Building Code; as well as construction documents application expiration for projects that are not approved (Building Log status other than 'Closed-Approved') and based on the 2019, 2022, or 2025 Denver Building Code (DBC).

Policy:

1) Transition Rules – DRMC Section 10-16

Any project can now submit construction drawings designed in compliance with the 2025 DBC. The following information is provided for the purpose of clarifying the transition rules for the continued use of the 2022 DBC for projects submitted after June 12, 2025, and on or before December 31, 2025. The transition rules are designed to promote the expeditious application and permitting of projects already in design while simultaneously recognizing that pivoting to a new code has cost and time implications that are relevant for development. The transition rules include specific deadlines that, if not met, necessitate the design of a project based on the 2025 DBC.

a) For projects designed based on the 2022 DBC, complete construction documents, as defined in DRMC 10-16 (c)(2), must be electronically submitted to the Community Planning and Development Department (CPD) by 11:59:59 PM on December 31, 2025. No extensions of time are allowed to submit the initial package of complete construction documents.

b) **All projects that submit complete construction documents for the first time after December 31, 2025, must be designed in accordance with the 2025 DBC.**

i) Clarifications to 1(b):

(1) Resubmittals or revisions to construction documents for projects designed based on the 2019 or 2022 DBC with a previously accepted Building Log "Application Intake" are not subject to the December 31, 2025 deadline.

(2) Deferred submittals and modified drawings for projects based on a previous code are not required to be designed based on the 2025 DBC if submitted after December 31, 2025.

(3) Type Approved project applications received after December 31, 2025, must be based on a Master design compliant with the 2025 DBC.

(4) Phased projects with multiple phases for one building may continue under the design code of the initial building phase. Utility and site work or excavation and shoring are not considered preceding phases for the purpose of this provision.

(5) Phased projects with multiple buildings may be initially submitted all at one time, on or before December 31, 2025, and compliant with the 2022 or 2025 DBC, and subject to the application expiration timeframes of the respective code.

(a) Phased projects with multiple buildings - where buildings are submitted separately - are subject to the December 31, 2025, deadline. Separate buildings submitted after December 31, 2025, even if part of the same project, must be designed based on the 2025 DBC.

c) In contrast to prior DBC transition rules language, there are no "Major Projects" with certain valuation or scope thresholds nor requests to be made for extensions beyond December 31, 2025. The ordinance language as adopted makes a clear delineation for initial complete construction documents received on or before December 31, 2025, and those received after, without exception.

d) For projects designed in accordance with the 2022 DBC and initially submitted on or before December 31, 2025, CPD staff will evaluate the completeness of submitted construction documents and accept or reject them in accordance with the provisions of ADMIN Section 133 of the 2022 DBC. If construction documents are found to be incomplete or rejected, and a subsequent submittal occurs after December 31, 2025, the project is required to comply with the 2025 DBC in its entirety.

2) Application Expiration – 2025 Denver Commercial Building Code Section 131.2

a) For projects designed based on either the 2019 or 2022 DBC, the Application Expiration criteria of the 2019 DBC Section 131.2 (pg. 53) or 2022 DBC Section 131.2 (pg. 53) apply, respectively.

b) For projects with construction documents designed based on the 2025 DBC, the Application Expiration criteria of the 2025 Denver Commercial Building Code Section 131.2 (pg. 35) apply:

> **Expiration of Application.** An application for permit shall expire if a building permit for construction has not been issued by the date 550 days (18 months) after the city council enactment of an edition of the International Building Code (IBC) later than 2024.
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> > *(For planning purposes, the adoption of an edition of the IBC later than 2024 is not anticipated until late 2027, resulting in potential application expiration dates for 2025 Denver Building Code applications in mid-2029, at the soonest.)*

No extensions of time need to be requested, nor will be granted. To initiate a new application after expiration, the applicant shall submit designs complying with the codes in effect at the time the new application is submitted.

Approvals:

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REVIEWED BY:
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