

Code Amendment Proposal Form

For public amendments proposed to the 2021 editions of the International Codes



Instructions: Upload this form and all accompanying documentation. If you are submitting your proposal on a separate sheet, make sure it includes all information requested below.

All proposals must be received by **July 23, 2021**.

CONTACT INFORMATION

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Organization or Representing Self:

By signing below, I hereby grant and assign to City and County of Denver all rights in copyright I may have in any authorship contributions I make to City and County of Denver in connection with this proposal. I understand that I will have no rights in any City and County of Denver publications that use such contributions in the form submitted by me or another similar form and certify that such contributions are not protected by the copyright of any other person or entity.

Signature:

AMENDMENT PROPOSAL

Please use a separate form for each proposal.

1) Code(s) associated with this proposal. Please use acronym: IBC

If you submitted a separate coordination change to another code, please indicate which code: _____

<u>Acronym</u>	<u>Code Name</u>	<u>Acronym</u>	<u>Code Name</u>
DBC-AP	Denver Building Code—Administrative Provisions	IFC	International Fire Code
DBC-xxx	Denver Building Code—xxx (code) amendments (e.g., DBC-IBC, DBC-IEBC)	IFGC	International Fuel Gas Code
IBC	International Building Code	IRC	International Residential Code
IEBC	International Existing Building Code	IMC	International Mechanical Code
IECC	International Energy Conservation Code	IPC	International Plumbing Code
		DGC	Denver Green Code

2) Please check here if a separate graphic file is provided:

3) Use this template to submit your proposal or attach a separate file, but please include all items requested below in your proposal. The only formatting needed is **BOLDING**, ~~STRIKEOUT~~ AND UNDERLINING. Please do not provide additional formatting such as tabs, columns, etc., as this will be done by CPD.

Code Sections/Tables/Figures Proposed for Revision:

1007.1.1 Two exits or exit access doorways

Proposal:

Add new text as follows:

1007.1.1 Two exits or exit access doorways. Where two exits, exit access doorways, exit access stairways or ramps, or any combination thereof, are required from any portion of the exit access, they shall be placed a distance apart equal to not less than one-half of the length of the maximum overall diagonal dimension of the building or area to be served measured in a straight line between them. The required separation distance between distinct egress paths shall be maintained until an exit is reached. Interlocking or scissor stairways shall be counted as one exit stairway.

Exceptions:

1. Where interior exit stairways or ramps are interconnected by a 1-hour fire-resistance-rated corridor conforming to the requirements of Section 1020, the required exit separation shall be

measured along the shortest direct line of travel within the corridor.

2. Where a building is equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1 or 903.3.1.2, the separation distance shall be not less than one-third of the length of the maximum overall diagonal dimension of the area served.

3. Where exits from the story are separated a distance less than is required by 1007.1.1 for individual spaces on that story, the distance between egress paths along the path of travel from an exit access doorway to an exit may be reduced, but may not be less than the distance between exits from the story.

Supporting Information:

Purpose:

This amendment is necessary to clarify an interpretive and heavily debated section of code. New language will assist in providing consistency and clear expectations for both designers and reviewers.

Reason:

IBC 1006.2.1 establishes where two exits are required from any space. Space is not a defined term in the IBC. As such, it can be argued that as long as two exit access doorways from a given “space” are separated, nothing in the code requires this separation be maintained along the egress path to an exit. See condition in the attached graphic #1. This argument conflicts with past City and County of Denver interpretations. 2016 DBCA Section 1006.2.1.2 required two diverging exit access routes from the terminus of the common path of travel to an exit. The amendment was deleted in the 2019 DBCA, based on the interpretation that 1007.1.1 already prohibited egress path convergence.

Worth noting is that the intent of this amendment is **not** to address cumulative occupant loads, nor does it conflict with IBC 1006.2.1 exception 1. In fact, the commentary to 1006.2.1 states “it should be noted that where two doorways are required, the remoteness requirement of Section 1007.1 is applicable.” See examples in graphic #2.

Referenced Standards:

N/A

Impact:

Establishing consensus gives designers clear expectations at the beginning of the design process, avoiding delays and redesign at the permitting stage.

Note: Discuss the impact of this proposal in this section AND indicate the impact of this amendment proposal for each of the following:

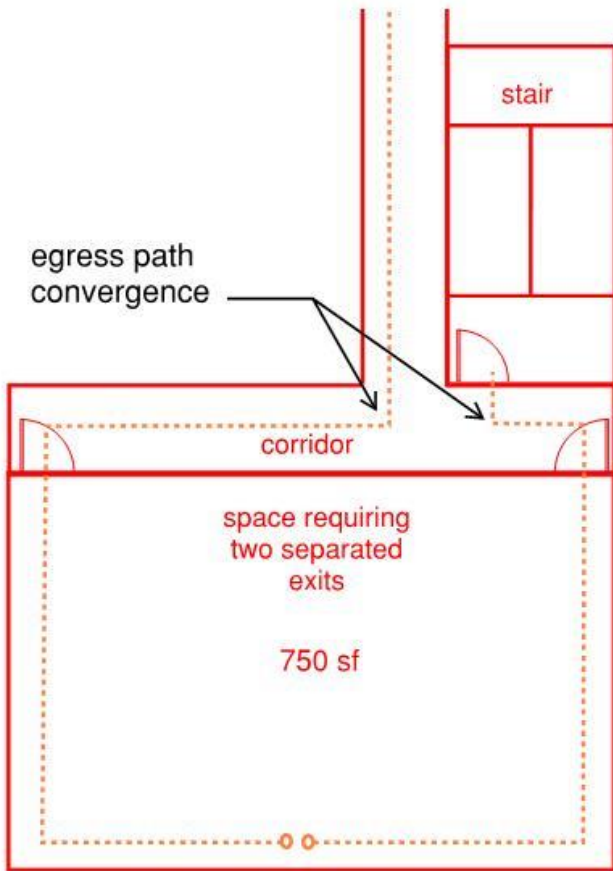
- The effect of the proposal on the cost of construction: Increase Reduce No Effect
- The effect of the proposal on the cost of design: Increase Reduce No Effect
- Is the proposal more or less restrictive than the I-codes: More Less Same

Departmental Impact: (To be filled out by CPD staff)

Establishing consensus on contested issues saves reviewers’ time.

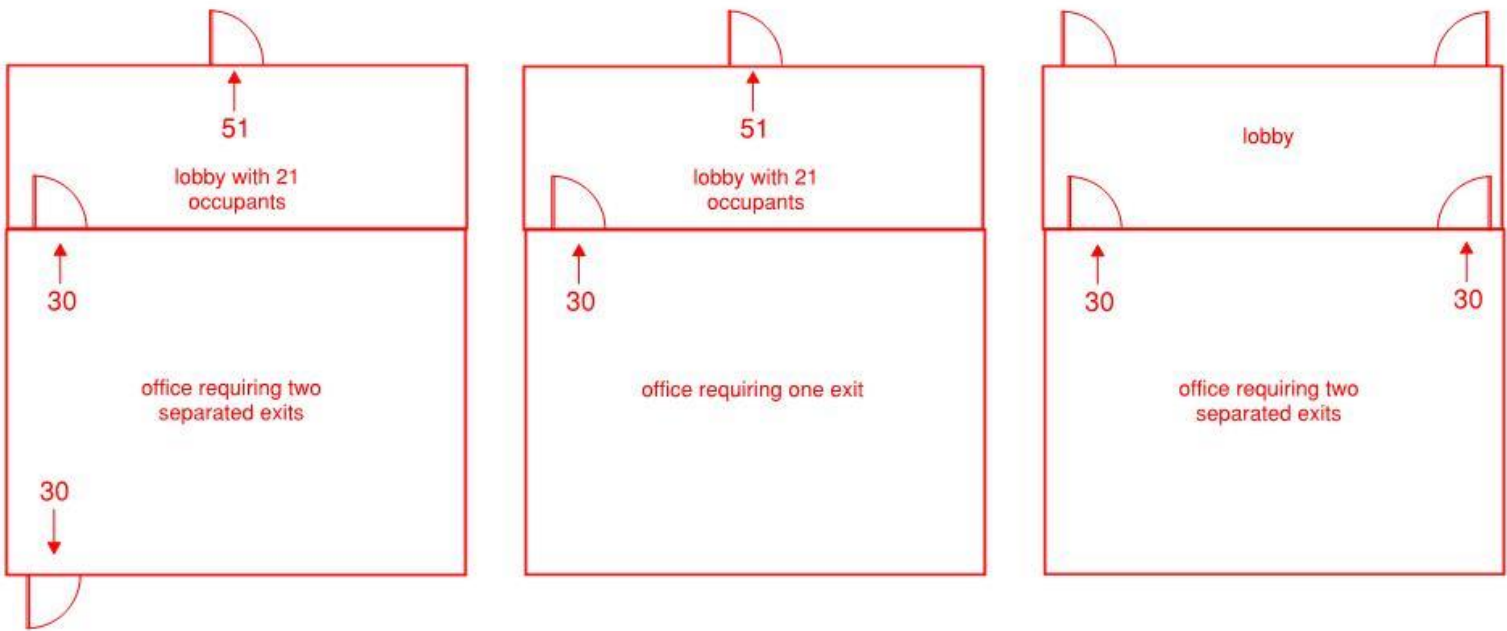
Note: CITY STAFF ONLY. Discuss the impact of this proposal in this section AND indicate the impact of this amendment proposal for each of the following:

- The effect of the proposal on the cost of review: Increase Reduce No Effect
- The effect of the proposal on the cost of enforcement/inspection: Increase Reduce No Effect



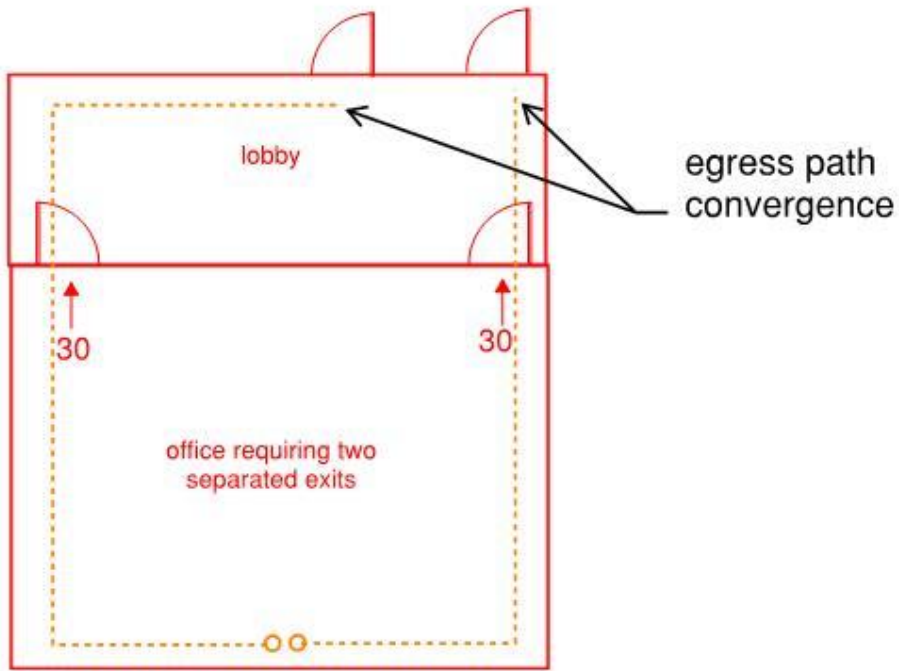
GRAPHIC 1

The intent of this amendment is to prohibit convergence of egress paths illustrated above



GRAPHIC 2a

All of the above configurations are compliant with both 1006.2.1 Exception 1 and this amendment. This proposal only requires exit separation be maintained where already required from a space needing two exits. This is consistent with the commentary language to 1006.2.1 Exception 1, which states: "It should be noted that where two doorways are required, the remoteness requirement of Section 1007.1 is applicable." The counter-argument would allow that on page 2.



GRAPHIC 2b

The above convergence of egress paths would be prohibited by this proposal