

- This amendment is less restrictive than the IBC for a fire safety provision (see discussion below), which is inconsistent with DBCA 104.9 that doesn't give the building official authority to grant modifications to the code where such modifications lessen any fire safety requirements.
- Wording in the amendment is inconsistent with the IBC section the exception is for, which creates interpretation issues (see discussion below).

The current amendment adds an exception that allows the fire-resistance rating of shaft enclosures for piping, ducts and vents to be reduced from 2 hours to 1 hour for buildings of five stories or less and of certain construction types. The IBC requires shafts to have a fire-resistance rating of 2-hours where connecting four stories or more, regardless of the use of the shaft and regardless of construction type. Shafts are intended to confine a fire to the floor of origin and prevent the fire from spreading to other levels through the shaft, so the use of the shaft (piping, ducts or vents in this case) is irrelevant - note that piping could include gas piping that could provide additional fuel to the fire and aid in the spread of fire. There is no justification for Denver's amendments to be less restrictive than the IBC and reduce the requirements of a fire safety provision.

The wording in this amendment is inconsistent with the wording in IBC 713.4, that this amendment is an exception to. IBC 713.4 bases shaft enclosure fire-resistance ratings on the number of stories connected by the shaft, including basements. The exception is instead based on "buildings of five stories or less", which is easily interpreted as a building with five stories above grade plane, resulting in shafts that connect more than five stories when basements are included. I don't believe the intent is to connect more than five stories, including basements, but could be interpreted to allow 7 stories to be connected if there are two basement levels.

For the reasons above, it is proposed that Denver's current amendment to IBC 713.4 be deleted.

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)

Cost of construction: Increase Decrease No Impact

Note: This proposal will increase cost of construction relative to the 2019 DBC but will have no impact on cost of construction relative to the 2021 IBC.

Cost of design: Increase Decrease No Impact

Restrictiveness: Increase Decrease No Impact

Note: This proposal will increase restrictiveness relative to the 2019 DBC but will have no impact on restrictiveness relative to the 2021 IBC.

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.