



## Construction Code Interpretation 2021-SBC

### CCI 2021-SBC §601 Construction of Occupied Rooftop Structures

Release Date: 9/22/2025

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*The following interpretation is intended to provide guidance to staff for consistency of review and is subject to change without notice. Application of this interpretation to specific projects may vary.*

#### Code Issue:

How does SDCI enforce Table 601 as it relates to occupied rooftop structures?

#### Code Interpretation:

Occupied rooftop structures with a solidly constructed roof (less than 60% open at any time) create building area and are subject to the requirements of SBC Table 601. (See figure 1).

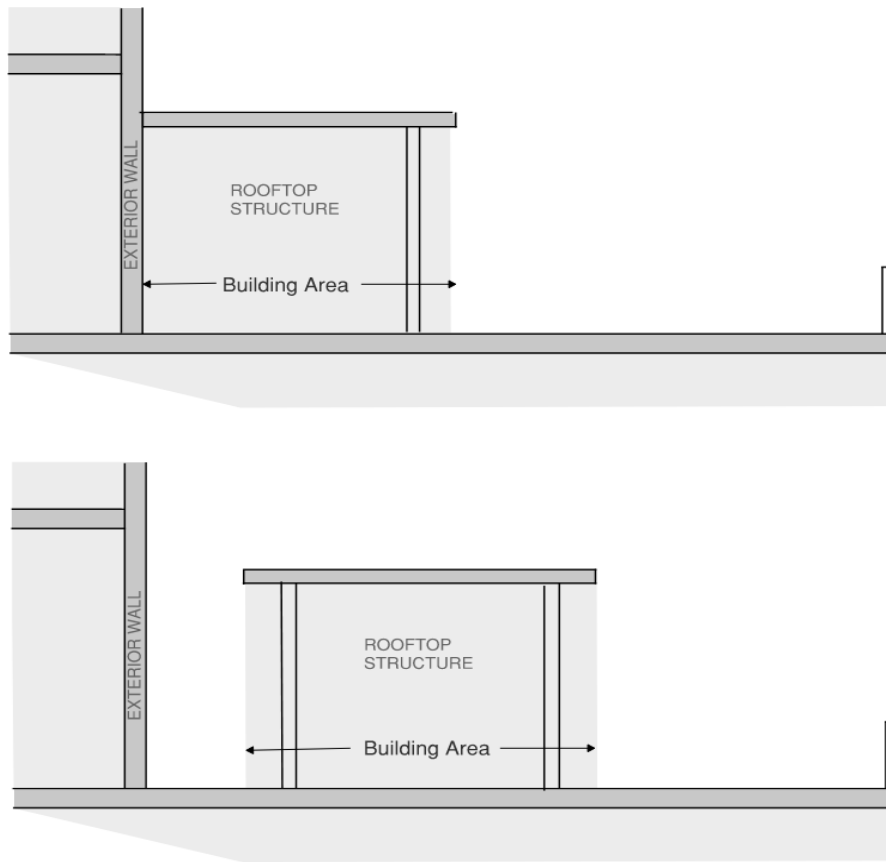


FIGURE 1 – Rooftop Structures (comply with SBC 601)



For projects meeting the criteria listed in options 1 or 2 below, SDCI will approve a Code Modification Request to waive some of the requirements in Table 601.

### **Option 1**

**Size of structure is less than 750 SF projected roof area and has less than 50 occupants.**

Where such structures satisfy all 4 conditions listed below, the required fire-resistance rating for building elements in Table 601 may be waived.

1. Building elements shall be constructed with non-combustible materials. Applied finishes must be Class A.
2. Structure sides shall be open to prevent the accumulation of smoke or toxic gas. At least 50% of the total area of the sides, measured from the horizontal projection of the roof above, must be open. (see figure 2)
  - Portions of the sides that are within 5' of other parts of the building do not qualify as open.
  - Portions of the sides enclosed by windows, screens or design elements and features covering > 50% of the area of the side do not qualify as open.
3. Distance from the roof edge of the structure to any interior lot line or to the opposite side of a public way shall be at least 20' in a sprinklered building and 30' in an unsprinklered building. (see figure 2) <sup>1</sup>
4. Structure cannot house any fuel-burning appliances or open flames.

### **Option 2**

**Size of structure is up to 1500 SF projected roof area and has no more than 100 occupants.**

Where such structures satisfy both conditions 1 through 4 listed above and condition 5 below, the required fire-resistance rating for primary structure may be reduced to 1-hour.

5. Building sprinkler and fire alarm systems shall be extended to the structure.

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<sup>1</sup> Distance may be reduced to 5' in an R-3 occupancy.

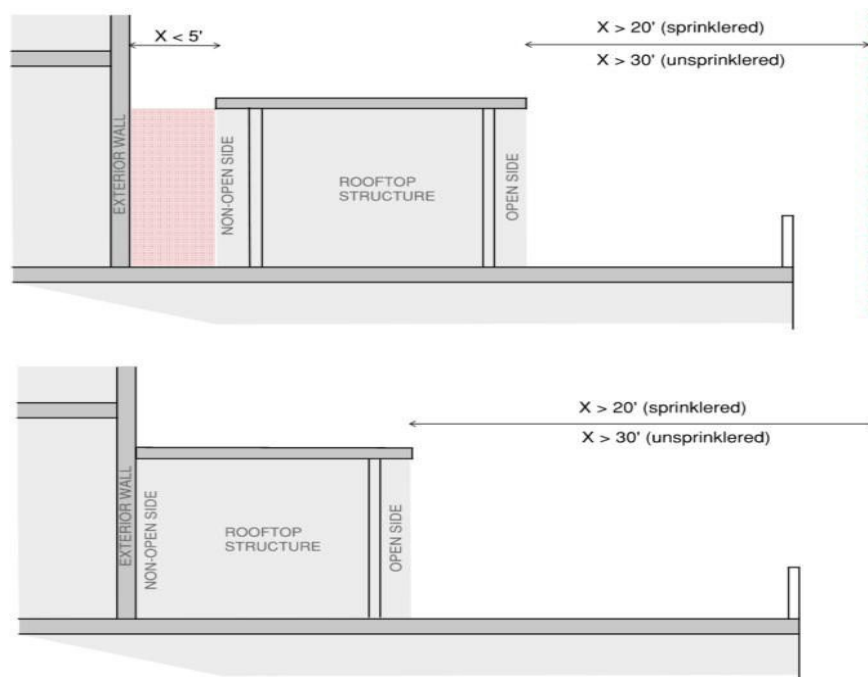


FIGURE 2 – Open Sides and Distance to Lot Line

Where an occupiable rooftop structure does not satisfy all of the conditions listed above, some flexibility may be granted on a case-by-case basis. Additional factors that may be considered to provide mitigation include:

- No required egress from other portions of the building travel under the structure
- Access route to a protected exit from the structure is open to sky
- Building sprinkler and fire alarm systems are extended to the structure, even if not required by the Seattle Fire Department.
- Structure covers less than 1/3 of the roof deck area.
- Users of the structure are familiar with the space. (not open to the general public)

For questions about whether this code solution applies to your project:

- If you have submitted a permit application, contact the Building Code plan reviewer assigned to your application
- If you have not submitted an application, send us a question through the SDCI website  
<http://www.seattle.gov/sdci/resources/send-us-a-question>.  
Visit the Applicant Services Center website for more information about hours and location  
<http://www.seattle.gov/sdci/about-us/who-we-are/applicant-services-center>