



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).

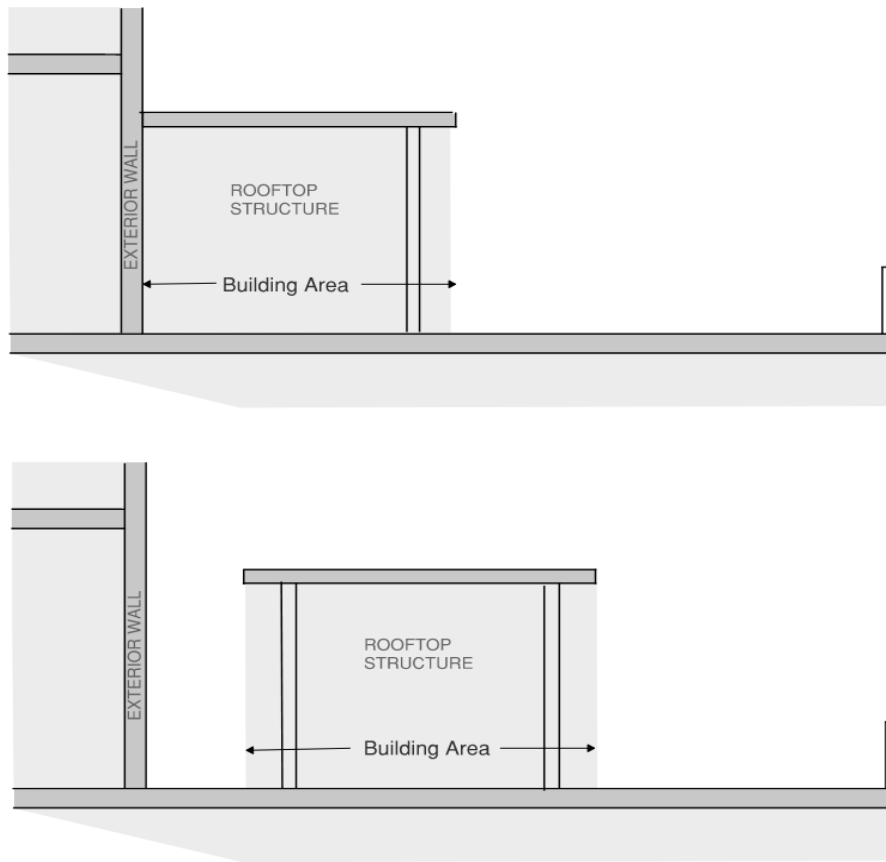


FIGURE 1 – Rooftop Structures (comply with SBC 601)



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) ¹
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.

¹ Distance may be reduced to 5' in an R-3 occupancy.

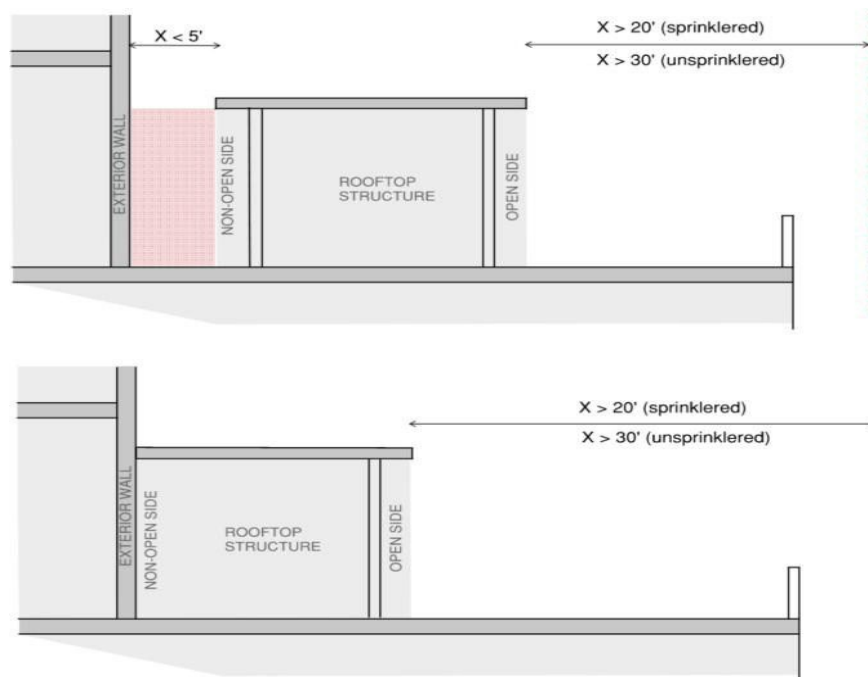


FIGURE 2 – Open Sides and Distance to Lot Line

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>