

Title 18 – Multi-Family Adaptive Re-Use & Middle Housing Appendix A

INDEX

Section 1 Introduction & Framework

- 1.0 Purpose and Intent
- 1.1 Definitions
- 1.2 Pathway for Single Stair
- 1.3 Pathway for Two Means of Egress
- 1.4 Exterior Fire Escape Provisions
- 1.5 Applicability and Baseline Eligibility
- 1.6 Building Scale Limits
- 1.7 Core Life-Safety Framework

Section 2 Unit & Building Compliance Structure

- 2.1 Unit-Based Compliance Structure for NEW CONSTRUCTION
- 2.2 Unit Distribution Requirements
- 2.3 Life-Safety Travel Distance Requirements

Section 3 Fire & Life-Safety Systems

- 3.1 Sprinkler Requirements & Fire Separations
- 3.2 Compartmentalization & Fire Separation
- 3.3 Ground-Floor Nonresidential Uses

Section 4 Compliance Pathways

- 4.1 Sprinkler Triggers by Pathway

Section 5 IBC Trigger Conditions

- 5.1 When Full International Building Code (IBC) Compliance Is Required

5.2 Height and Size Triggers

5.3 Travel Distance & Fire-Resistance Triggers

Section 6 - Maximum Residential Occupant Load

Section 7 Permit Review & Approval Process

Section 1 — Introduction & Framework:

1.0 Purpose and Intent

The purpose of these targeted amendments to Title 18 is to support context-sensitive residential mixed-use, multifamily new housing and adaptive reuse. These amendments establish clear alternative compliance pathways for these buildings while maintaining strong fire and life-safety protections. This appendix serves as the primary technical reference for determining project eligibility, compliance pathway, and required life-safety provisions.

Additionally, the alternative pathways allow small multifamily buildings utilizing a **single interior stair** configuration as well as **two means of egress** where the eligibility and building scale criteria established in this appendix are satisfied. [see Section 1.2 and Section 1.3]

1.1 Definitions

Adaptive Reuse

The conversion or rehabilitation of an existing building for a use other than its original intended purpose, or for continued residential use with modifications that improve functionality, safety, or code compliance. Adaptive reuse projects may include changes in occupancy classification, reconfiguration of interior spaces, or upgrades to building systems, while retaining the existing structure in whole or in substantial part.

Middle Housing

A range of residential building types that provide multiple dwelling units within a structure or site while maintaining a scale and form compatible with single-family neighborhoods. Middle housing includes, but is not limited to, duplexes, triplexes, fourplexes, residential condominiums, and small apartment buildings, typically characterized by smaller footprints, shared walls, and street-oriented entrances.

Residential Mixed-Use

The use or development, as applicable, of a site consisting of residential and nonresidential uses in which the residential uses are at least sixty-five percent of the total square footage of the development and meets the criteria found in El Paso City Code Section [20.10.363](#). The term includes the use or development of a condominium. A "condominium" means a single dwelling unit in a multi-unit dwelling or structure, which is separately owned and which may be combined with an undivided interest in the common areas and facilities of the property.

Multifamily

A building or part of a building containing three or more attached or detached dwelling units. The term includes the use or development of a condominium. A "condominium" means a single dwelling unit in a multi-unit dwelling or structure, which is separately owned and which may be combined with an undivided interest in the common areas and facilities of the property.

Group R-2 Occupancy

Section 310.3 of the International Building Code (IBC),

Residential Group R-2 occupancies containing *sleeping units* or more than two *dwelling units* where the occupants are primarily permanent in nature, including:

- Apartment houses
- Congregate living facilities (non-transient) with more than 16 occupants
 - Boarding houses (non-transient)
 - Convents
 - Dormitories
 - Fraternities and sororities
 - Monasteries
- Hotels (non-transient)
- Live/work units
- Motels (non-transient)
- Vacation timeshare properties

Group B Occupancy

Section 304.1 of the International Building Code (IBC)

Business Group B occupancy includes, among others, the use of a building or structure, or a portion thereof, for office, professional or service-type transactions, including storage of records and accounts. Business occupancies shall include, but not be limited to, the following:

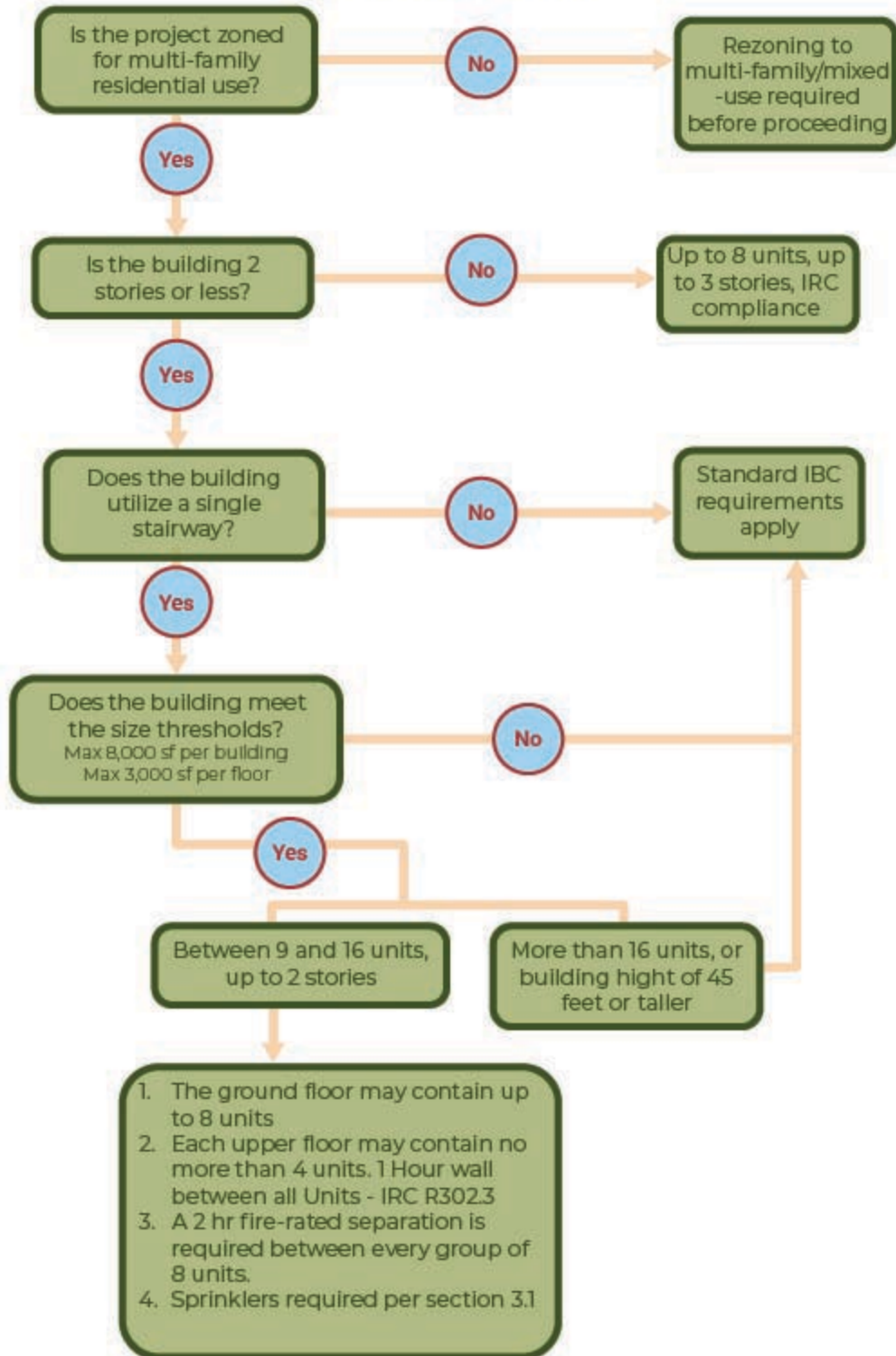
- Airport traffic control towers
- Ambulatory care facilities
- Animal hospitals, kennels and pounds
- Banks
- Barber and beauty shops
- Car wash
- Civic administration
- Clinic, outpatient
- Dry cleaning and laundries: pick-up and delivery stations and self-service
- Educational occupancies for students above the 12th grade including higher education laboratories
- Electronic data processing
- Food processing establishments and commercial kitchens not associated with restaurants, cafeterias and similar dining facilities not more than 2,500 square feet (232 m²) in area
- Laboratories: testing and research
- Motor vehicle showrooms
- Post offices
- Print shops
- Professional services (architects, attorneys, dentists, physicians, engineers, etc.)
- Radio and television stations
- Telephone exchanges
- Training and skill development not in a school or academic program (this shall include, but not be limited to, tutoring centers, martial arts studios, gymnastics and similar uses regardless of the ages served, and where not classified as a Group A occupancy)

1.2 Pathway for Single Stair

For Projects meeting the eligibility requirements of section 1.5, and building scale criteria of section 1.6, as well as sections 2 and 3.

Fig.1- New Construction

New Construction



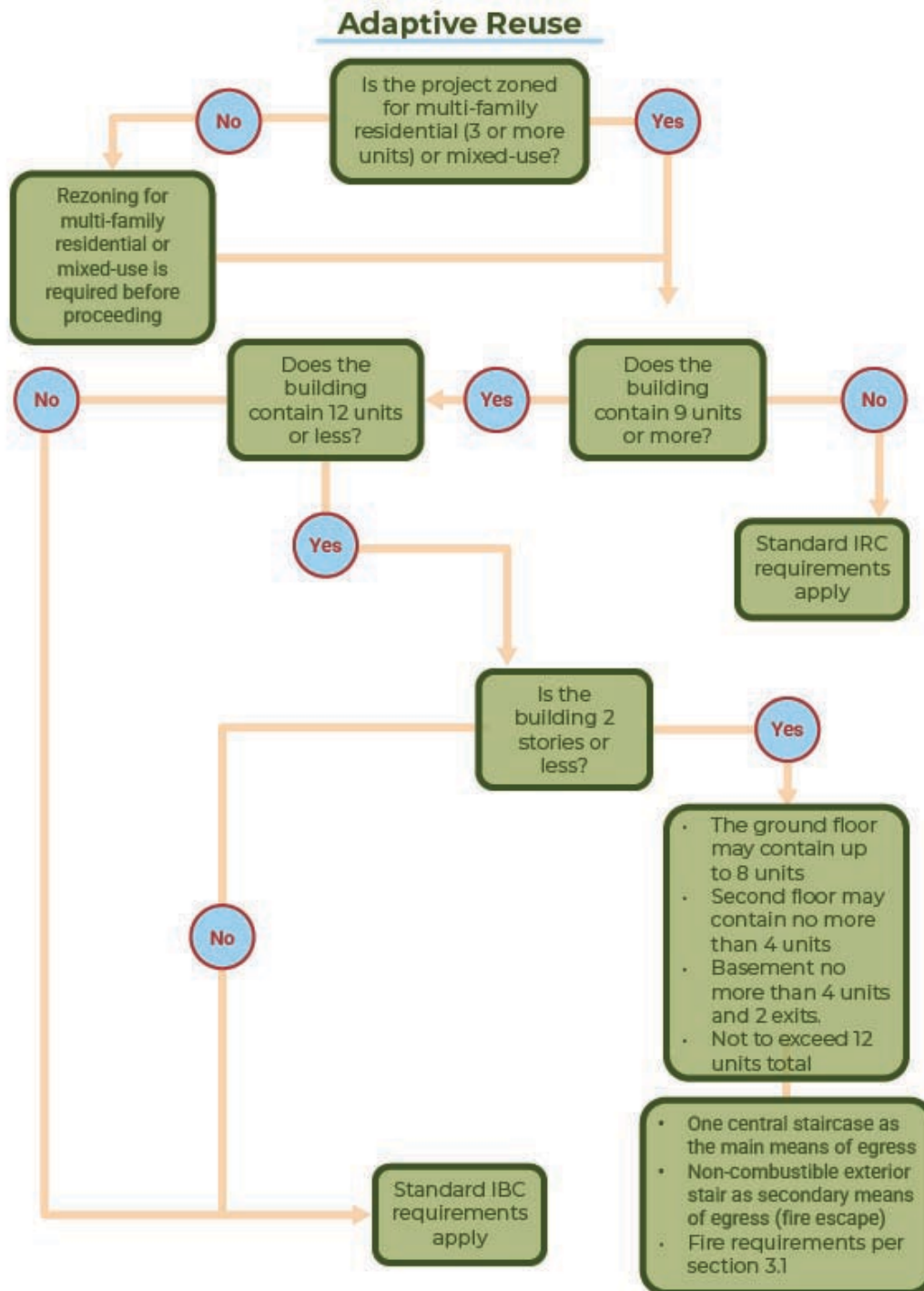


Fig. 1.2 – Adaptive Re-use

1.3 Pathway for Two Means of Egress

For Projects meeting the eligibility requirements of section 1.5, and building scale criteria of section 1.6, as well as the provisions of section 1.4, an alternative compliance path where the second means of egress is a Fire Escape, may be used.

1.4 Exterior Fire Escape Provisions

Fire escapes are intended to support **adaptive reuse feasibility** while maintaining life-safety performance. Where permitted, [see Section 1.3] the following shall apply:

- Fire escapes shall be constructed of non-combustible materials [see Fig. 6.0]
- Fire escapes may serve as a secondary means of egress only [see Fig. 6.0]
- A compliant interior exit stair shall still be required [see Fig. 6.0]
- Fire escapes shall not be used as the primary required exit stair [see Fig. 6.0]
- Fire escapes shall comply with applicable Fire Code
- Fire escape shall be accessible to all occupants of each floor through an unsecured common space OR from all individual units

The use of a non-combustible fire escape shall not reduce or replace required fire-resistance separations or sprinkler system requirements established under this appendix.

A non-combustible exterior fire escape may be permitted as secondary egress for adaptive reuse only:

- Ref. building scale limits established in Section 1.6
- Maximum unit thresholds established in Section 2.1
- Secondary egress only [see Fig. 6.0]
- Interior main egress compliant stair required [see Fig. 6.0]
- Fire Marshal approval required

1.5 Applicability and Baseline Eligibility

Projects may utilize the Title 18 alternative compliance pathways only if all baseline criteria are met:

Baseline Criteria

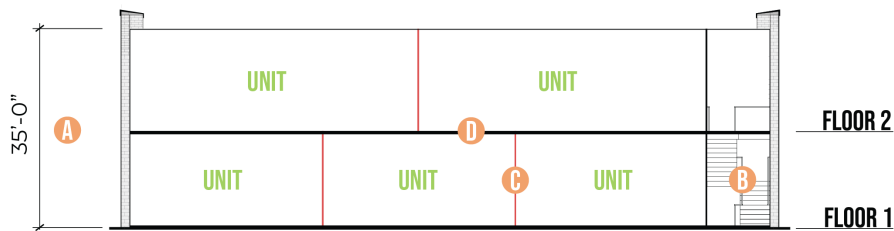
1. Property must be zoned to allow a multifamily (minimum three units) or mixed-use residential that complies with section 3.3;
2. Applies to new construction or adaptive reuse;
3. Must meet building scale limits in section 1.6 and unit count in section 2.1;
4. Projects not meeting criteria shall comply with applicable IRC or International Building Code (IBC) provisions.

1.6 Building Scale Limits

A compact footprint is required to limit travel distance for egress and as such, may not exceed any of the following criteria below.

For Single Stair pathway:

1. Maximum building height:
 - a. Up to 8 Units:
 - i. New construction & adaptive re-use: 3 stories, including basements, 35' Max.
 - b. Up to 12 units:
 - i. New construction: 2 stories, basements not permitted, 35' Max.
 - ii. Adaptive re-use/conversion: 2 stories including basements, 35' Max.
 - iii. Added fire protection referenced in section 3
 - c. Up to 16 units:
 - i. Adaptive re-use: 3 stories, basements included, 35' Max.
 - ii. Added fire protection referenced in section 3
2. Maximum building size: 8,000 SF total; or
3. Maximum floor plate: 3,000 SF per floor
4. Where basements are included, a second means of egress is required from the basement only.



BUILDING SCALE LIMITS	
Maximum Building Height	A
Single Egress / Fire Rated Stairwell	B
1 Hour Fire Partition Between All Units	C
2 Hour Fire Separation Floor Slab	D

Fig. 3.0 – Building Scale Limits- Up to 12 units, new construction

For two means of egress pathway

2. Maximum building height:
 - a. Up to 16 Units:
 - i. New construction: [El Paso Municipal Code 9.52.080.3](#)
 - ii. Adaptive re-use: 3 stories, basement allowed, 35' Max.
 - iii. Added fire protection referenced in section 3
3. Maximum building size: 8,000 SF total; or
4. Maximum floor plate: 3,000 SF per floor

The fire flow requirements in Appendix B of the IFC must be met based on the size and type of construction for the maximum building size. Fire hydrant location and distribution requirements in Appendix C of the IFC must be met for the maximum building size.

Buildings exceeding these limits are not eligible for the alternative pathway and must comply with International Building Code (IBC).

1.7 Core Life-Safety Framework

The alternative pathway is based on layered safety controls:

1. Height limit; [see Section 1.6]
2. Building size; [see Section 1.6]
3. Total units; [see Section 2.1, & Table 1.0]
4. Units per floor; [see Fig. 3]
5. Travel distances; and [see section 2.3, Table 4.0, Fig. 4.0-4.1]
6. Enhanced fire separation and compartmentalization [see section 3, Fig. 5.0]

Section 2 — Unit & Building Compliance Structure

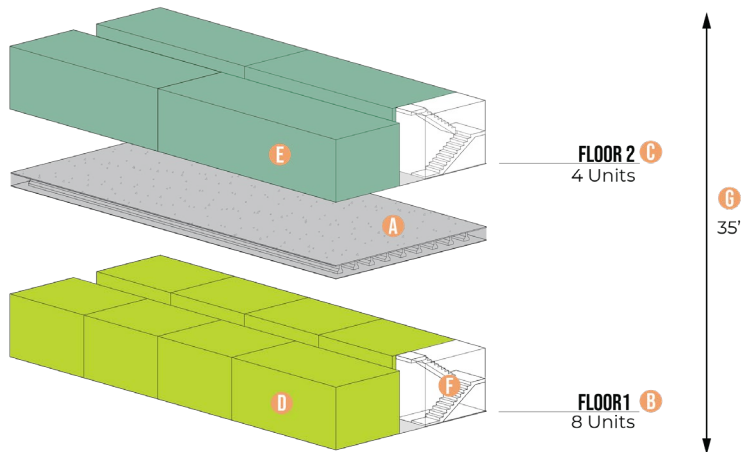
2.1 Unit-Based Compliance Structure for NEW CONSTRUCTION

The alternative pathways allow small multifamily buildings to follow various compliance paths, where the eligibility and building scale criteria established in this appendix are satisfied.

- Up to 8 dwelling units → IRC-based pathway
 - When more than 1 story, a 1 hour fire-rated stairway needs to be provided for egress and horizontal 1 hour fire separation between floors
- Up to 12 dwelling units → Enhanced single-stair pathway
- Up to 16 dwelling units → [El Paso Municipal Code 9.52.080.3](#)
- More than 17 dwelling units → IBC compliance required with full sprinkler requirements

Table 1.0 - Units allowed for each pathway.

Number of Dwelling Units	Allowed Pathway	Key Requirements
Up to 8 dwelling units	IRC-Based Pathway	Must meet IRC height, construction, and life-safety limits
9–12 dwelling units	Alternative compliance Pathway	Alternative enhanced life-safety provisions
Up to 16 dwelling units	Local code amendment compliance: El Paso Municipal Code 9.52.080.3	Two stairs as means of egress [see section 1.3], NO sprinklers required
17+ dwelling units	IBC Compliance Required	Full IBC compliance and NFPA sprinkler system required



DIMENSIONAL STANDARDS	
Max. Floor Size	3000 S.F.
Max Building Size	8000 S.F.
2 Hours Fire Separation Floor Slab	A
Max. Number of Stories	2 Floors
No more than 8 units on first floor	B
4 Units of all other floors	C
Efficiency Unit / 1 Hour Partition	D
One Bedroom Unit / 1 Hour Partition	E
Single Egress	F
Height Limit	G

Fig. 3.1-Dimensional Standards

2.2 Unit Distribution Requirements

A. Single Stair

For buildings containing between 9 and 12 dwelling units, fire-resistance-rated horizontal separations shall be provided between groups of eight units where required to maintain life-safety performance. [see Fig. 3.0 -3.1]

The units shall not exceed the following allowances: [see Fig. 3.0-3.1]

- 8 units on first floor
- 4 units on second floor;
- 4 units in basement, when applicable under adaptive re-use

B. Two Means of egress

As per (Ref. Acceptable means of egress section):

May not exceed provisions sec. 1.6 Building Scale, may include provisions in sec. 1.3, both applicable to [El Paso Municipal Code 9.52.080.3](#)

2.3 Life-Safety Travel Distance Requirements

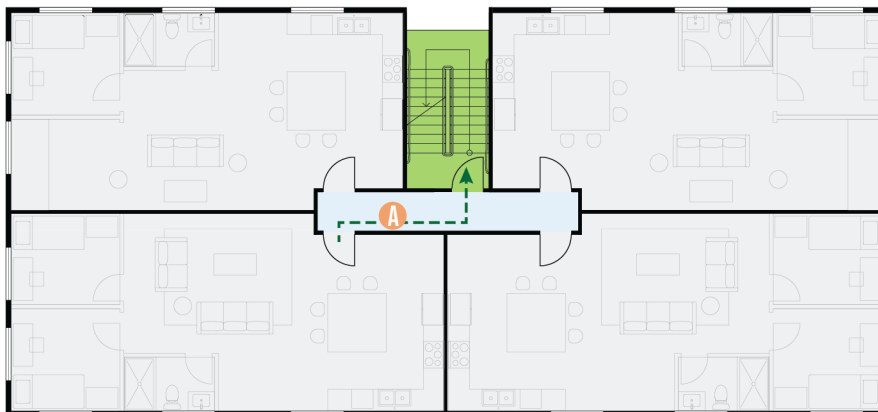
To ensure life safety, eligible projects may not exceed the following:

- Maximum distance from unit door to stair: 20 feet. [see Fig. 4.0]
- Maximum exit travel distance: [see table 4.0, Fig. 4.2, section 7]
 - Up to 8 units: 75'
 - 9-16 units: 125' (alternative path compliance)
 - More than 17 units: 150' (IBC compliance)

Additionally, eligible projects shall also provide the following layered protections [Fig. 3.0-3.1] fire-resistance separations;

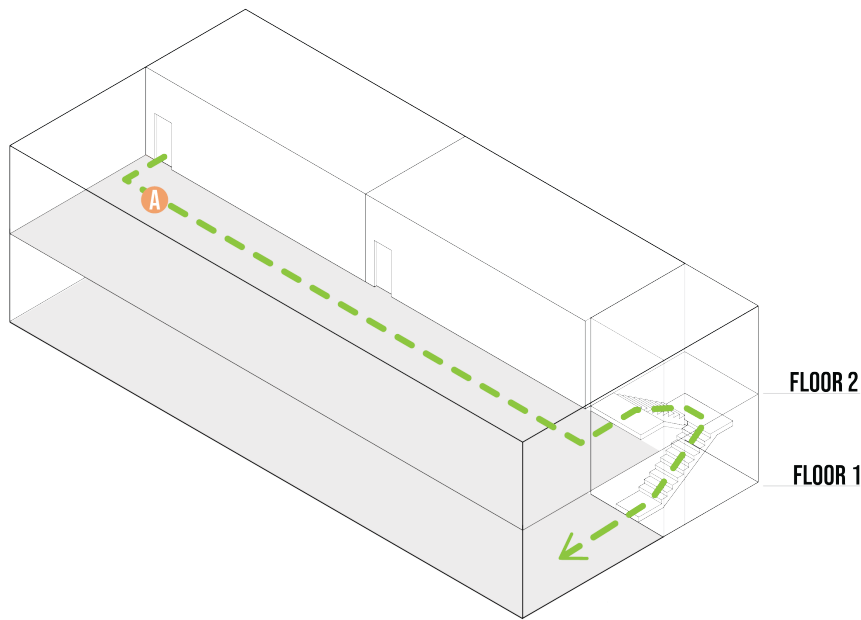
- compartmentalization;
- reduced occupant loads; and
- compact layouts.

Where travel distances exceed these limits, the project shall comply with International Building Code (IBC).



MAXIMUM TRAVEL DISTANCE	
20' to stair from unit door	A

Fig. 4.0 – Travel distance to single egress stair.



TRAVEL DISTANCE	
125' exit travel distance	A

Fig. 4.1- Exit Travel

Section 3 — Fire & Life-Safety Systems

3.1 Sprinkler Requirements & Fire Separations

Sprinkler requirements shall be determined based on the unit thresholds established in Section 2.1 (Unit-Based Compliance Structure) and the compliance pathways identified in Section 4.1 [see table 2.0]

- Up to 8 units: 1-hr fire partition between units required and a 2 hr. horizontal assembly between floors for more than 1 story; Single fire rated stair; Sprinklers Not Required .
- 9-12 Units: 1-hr fire partitions between units, and a 2 hr. horizontal assembly between floors for more than 1 story; single fire rated stair; required 13D sprinklers throughout.
- Up to 16 Units Adaptive Re-use: 1-hr fire partitions between units, and 1 hr. Horizontal assembly between floors for more than 1 story, secondary stair as means of egress; Sprinklers Not Required. When only single stair provided, 13D sprinklers required throughout. For new construction: [El Paso Municipal Code 9.52.080.3](#)
- 17 Units or more units: Full Compliance with the currently adopted IBC code.

See Table 2.0 - Compliance Summary Table for Sprinkler Requirements

Criteria	Up to 8 Units	Up to 12 Units New Construction	Up to 16 Units Adaptive Reuse	Up to 16 Units Adaptive Reuse (Sprinkler)
Maximum Height / Stories	3 stories (may include basement) 35 ft	2 stories (35 ft max, no base)	3 stories (may include basement) / 35 ft	3 stories (may include basement) / 35 ft
Means of Egress	1 stair	1 stair	1 stair + 1 fire escape	1 stair
Units per Floor	4 / floor	8 FF + 4	8 FF +4 + 4	8 FF +4 + 4
Fire Protection	FPU (1-hour)	FPU (1-hour) + 13D	FPU (1-hour)	FPU (1-hour) + 13D

3.2 Compartmentalization & Fire Separation

- Up to 2 groups of 8 units may be placed on one parcel, either as two separate buildings
- Or in one building where:
 - Every group of 8 units is separated by a 2-hr fire rated separation
 - Every group of 8 units has its own egress stair

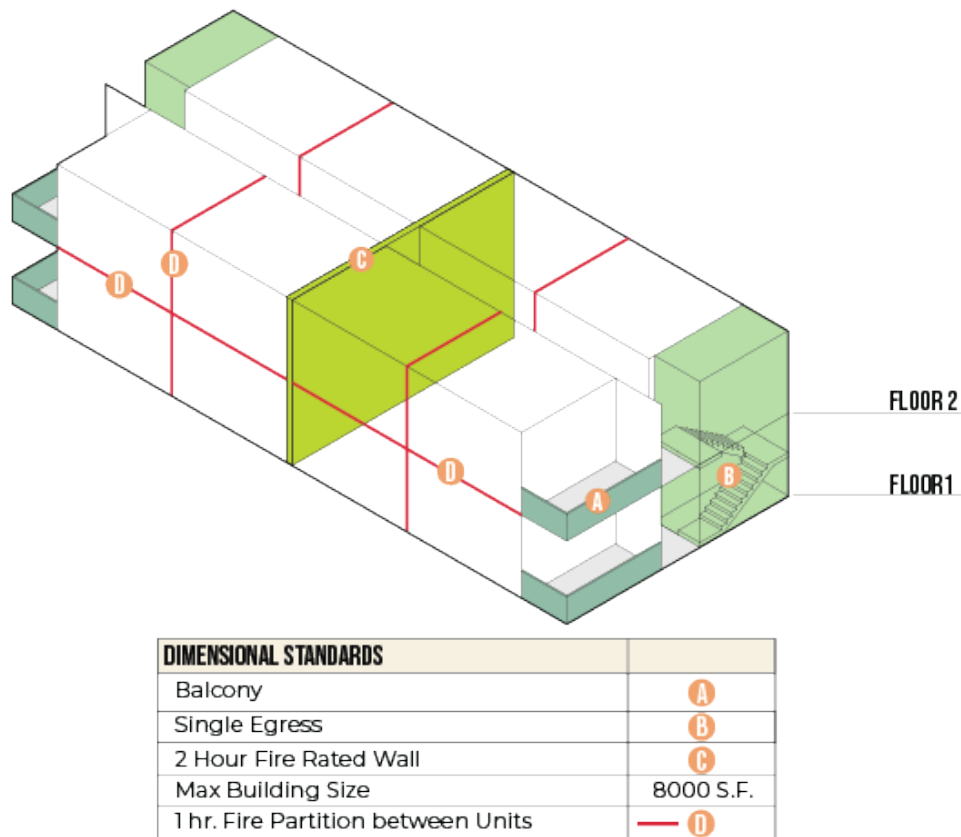


Fig. 5.0-Dimensional Standards- Fire separations & Compartmentalization with Fire rated stair



FORMS OF EGRESS ON MULTIFAMILY UNIT	
Central Staircase	A
Non-Combustible Stair / Fire Escape	B
Basements Require Second Means of Egress	C

Fig. 6.0- Adaptive re-use: Fire Escape & Single Stair Egress

3.3 Mixed Use Buildings - Ground-Floor Nonresidential Uses

Small-scale multifamily buildings subject to this amendment may incorporate limited nonresidential uses on the ground floor classified as Group B, provided the following standards are met:

- Nonresidential areas must be separated from adjacent residential dwelling units by fire-resistance-rated construction as required by the adopted International Building Code.
- The inclusion of a qualifying Group B use alone shall not trigger a sprinkler requirement, so long as the overall building remains eligible under the applicable compliance pathway identified in Section 4 (Path A or Path B).
- Where exit access components are shared between residential (Group R-2) and nonresidential (Group B) occupancies, the design shall conform to the most stringent applicable code provisions governing travel distance, protection, and means of egress.
- Floor assemblies supporting Group B areas shall be designed for commercial live loads. A minimum live load of 100 psf is required where occupant load exceeds 15 persons; otherwise, a minimum of 50 psf may be applied for smaller ground-floor Group B spaces.
- Individual Group B tenant spaces shall not exceed 35 percent of the total gross floor area of the building.

Section 4 — Alternative Compliance Pathways

Fig. 7- Compliance Pathway Decision Framework

Step 1 – Confirm baseline eligibility [see Section 1.5]

Step 2 – Verify building scale limits [see Section 1.6]

Step 3 – Determine unit threshold category [see Section 2.1] and Select compliance pathway:

- Path A → Up to 8 units under the IRC
- Path B → 9-12 units under the IRC
- Path C → Up to 16 units under Enhanced Compliance Path

Path A – Up to 8 units

Applies to both adaptive reuse of existing buildings AND new construction, where the project meets the eligibility criteria and unit thresholds established in Sections 1 and 2. for up to 8 units.

Path B – 9-12 units

Applies to both adaptive re-use and newly constructed multifamily or mixed-use buildings meeting the building scale limits and unit thresholds established in Sections 1 and 2.

Path C – Up to 16 units

Applies to both adaptive re-use for multifamily or mixed-use buildings meeting the building scale limits and unit thresholds established in Sections 1 and 2. For new construction: [El Paso Municipal Code 9.52.080.3](#)

Step 4 – Apply fire protection and sprinkler requirements [see Section 3.1 & Table 2.0 & 3.0].

Sprinkler system requirements shall be determined in accordance with Section 3.1, and section 4.1 Sprinkler Triggers by Pathway.

4.1 Sprinkler Triggers by Pathway

The table below summarizes typical sprinkler system determinations based on unit thresholds and project type. Final determination shall be made in accordance with Section 3.1.

Table 3.0 - Typical Sprinkler Requirements by Unit Count

Unit Count	Project Type	Typical Sprinkler System
≤8 units	New & adaptive re-use Residential – single stair	Not required
9-12 units	New construction Residential – single stair	NFPA 13D
≤16 units	Residential Adaptive Re-use – single stair + fire escape	Not required
≤16 units	New construction Residential – 2 stairs	Not required
≤16 units	Residential Adaptive re-use single stair	NFPA 13D
>16 units	Any project	Full compliance with adopted code

Section 5 — International Building Code (IBC) Trigger Conditions

5.1 When Full IBC Compliance Is Required: Unit Threshold Triggers

- More than 16 units

5.2 Height and Size Triggers

- See section 1.6 for building scale limits

- More than 35'-0" in Height

Buildings exceeding the size limits established in Section 1.6 shall comply with full International Building Code (IBC) requirements.

5.3 Travel Distance & Fire-Resistance Triggers

- Travel distance or fire-resistance requirements not met

Section 6 - Maximum Residential Occupant Load

In addition to occupant load requirements established by applicable building and fire codes, residential buildings shall comply with the following maximum occupancy standard:

- Occupancy shall not exceed **one (1) person per 200 square feet of net floor area**.

For purposes of this section, **net floor area** shall mean the floor area within the exterior walls of a building, excluding bathrooms, closets, hallways, mechanical rooms, stairways, and other non-occupiable spaces.

The allowable number of occupants shall be the **lesser of**:

1. The occupant load permitted by the adopted building and fire codes, or
2. The maximum occupancy calculated under this section.

Example:

An 8,000 square foot building (net floor area) shall be limited to a maximum of **forty (40) occupants**, unless a lower occupant load is required by code.

Section 7 — Permit Review & Approval Process

The proposed Title 18 amendments provide clear, predictable pathways for small-scale multifamily development and adaptive reuse. By controlling building size, unit distribution, and fire protection measures, the City can support additional housing options while maintaining strong life-safety standards

Applicants must document selected code path, unit counts, fire separations, travel distances, and sprinkler strategy.

Table 4.0 - Compliance Summary Table:

Units	Fire Separation	Egress	Sprinklers	Travel Distance	Max Stories	Notes
≤8	1-hr fire partitions between units and floors	1 stair	Not required	75 ft	2	Falls under IRC small multifamily
9-12	1-hr fire partitions between units and floors	1 stair	Req. 13D throughout	125 ft	2	Falls under IRC
Up to 16	1-hr fire partitions between units; vertical & horizontal fire separations between 8 units.	2 exits, but may include noncombustible external stair per sec. 1.3*	Not required	125 ft	3* 2**	* for adaptive reuse only; basements permitted ** New construction
		1 stair	Req. 13D throughout	125 ft	3*	* for adaptive reuse only; basements permitted
17+	IBC compliance		NFPA 13/full compliance with adopted code.	150 ft max to stair	> 2	Full IBC multifamily compliance

*In all cases going above 1 story, Stair needs to be 1hr rated. All basements require a second means of egress in all alternative compliance paths.