

APPENDIX E – WILDFIRE RESILIENCY REQUIREMENTS

E.1 GENERAL

E.1.1 Purpose

The purpose of this Appendix E is to establish minimum regulations for the safeguarding of life and protection of property. These regulations are intended to mitigate the risk to life and structures from fire resulting from wildland fire exposure and fire exposure to adjacent structures and to inhibit structure fires from spreading to wildland fuels.

E.1.2 Applicability

The provisions of this Appendix E apply to all areas of unincorporated El Paso County that lie within the Wildland-Urban Interface but outside the boundaries of any Fire District.

E.1.3 Ground-truthing

A property owner may request a ground-truthing review of the fire intensity classification applied to their property as determined by reference to the maps produced by the Colorado Wildfire Resiliency Board.

E.1.3.1 Request for Review

A property owner requesting a ground-truthing review shall submit the following documentation, as required by the PCD Director:

- A written request justifying in detail the basis for a change in fire intensity application
- Technical documentation prepared by an approved qualified wildfire professional that describes and evaluates vegetative fuels on and within 300 feet of the property, topography, local weather patterns, and fire behavior modeling data.

E.1.3.2 PCD Director Determination

The PCD Director may assign a fire intensity classification other than that determined by the maps produced by the Colorado Wildfire Resiliency Board following review of the submitted materials and based upon the

criteria and characteristics set forth in Section 303.2 of the Colorado Wildfire Resiliency Code.

E.1.4 Scope

Compliance with this Appendix E is required for any construction, alteration, movement, repair, maintenance, or use of any building, structure, or premises that contain occupiable and/or habitable space, or for any change in use resulting in an occupiable and/or habitable space, unless excepted.

E.1.4.1 Existing Conditions

The legal occupancy or use of any property, building, structure, or condition existing on the date of adoption of this Appendix E may continue without change unless otherwise provided herein.

E.1.4.2 Additions or Alterations

If an addition or alteration increases the footprint of a building or structure existing as of the date of adoption of this Appendix E by 500 square feet or more, the addition or alteration, but not the existing building or structure, must comply with this Appendix E.

E.1.4.3 Exceptions

(A) Accessory Structures. The following accessory structures do not need to comply with this Appendix E:

- One-story, detached, accessory, nonhabitable structures such as tool and storage sheds, playhouses, and similar structures, if the floor area is 120 square feet or less and the structure is located 10 feet or more from the nearest habitable or occupiable structure.
- Accessory structures and buildings of an accessory character classified as Utility and Miscellaneous Group U (including Agricultural Structures), as defined in the Pikes Peak Regional Building Code, located more than 50 feet from a structure containing occupiable or habitable space.

(B) 35-Acre Parcels. Compliance with this Appendix E is not required for a parcel 35 acres or more in size that has only one residential structure and does not abut a residential or commercial area.

(C) Other Exceptions. The following activities do not require compliance with this Appendix E:

- Interior alterations of existing structures
- Alterations or repairs to the exterior of an existing structure, or an attachment to it, when less than 25 percent of the exterior is affected
- Painting, staining, and similar maintenance or restorative work
- Fences located more than 8 feet from a habitable structure

E.1.4.4 Maintenance

Property owners shall maintain buildings, structures, approved landscape materials and vegetation, defensible space and other requirements in compliance with this Appendix E on all parcels for which initial compliance is required.

E.1.5 Definitions

The following definitions apply only to those terms as used in this Appendix E and, in the event of a conflict, supersede definitions of the same terms found in Section 1.15 of this Code.

Agricultural Building – a structure designed and constructed to house farm implements, hay, grain, poultry, livestock, or other horticultural products. It may not be a place of human habitation or a place of employment where agricultural products are processed, treated, or packaged, nor may it be a place used by the public.

Approved – acceptable to the PCD Director.

Building – any structure intended for supporting or sheltering any occupancy.

Class A Tests – tests applicable to roof coverings that are expected to be effective against severe fire exposure, afford a high degree of protection to the roof deck, not slip from position, and not present a flying brand hazard.

Defensible Space – an area, either natural or man-made, where material capable of allowing a fire to spread unchecked has been treated, cleared, or

modified to slow the rate and intensity of an advancing wildfire and to create an area for fire suppression operations to occur.

Embellishments – elements incorporated into design and construction for ornamental or decorative purpose that are not integral to the structure or structural support.

Fire Intensity Classification – the level of fire intensity identified for areas where significant fuel hazards and associated dangerous fire behavior may exist, based upon vegetative fuels, topography, weather conditions, and flame length value. The Colorado Wildfire Resiliency Code Board has created three fire intensity classifications, low, moderate, and high, and has produced maps identifying the areas within the Wildland-Urban Interface to which the classifications apply.

Fire-Resistance-Rated Construction – the use of materials and systems in the design and construction of a building or structure to safeguard against the spread of fire within a building or structure and the spread of fire to or from buildings or structures to the Wildland-Urban interface area.

Fire-Retardant-Treated Wood – any wood product that, when impregnated with chemicals by a pressure process or other means during manufacture, shall have, when tested in accordance with ASTM E84 or UL 723, a listed flame spread index of 25 or less. The ASTM E84 or UL 723 test shall be continued for an additional 20-minute period and the flame front shall not progress more than 10.5 feet beyond the centerline of the burners at any time during the test.

Flame Spread Index – a comparative measure, expressed as a dimensionless number, derived from visual measurements of the spread of flame versus time for a material tested in accordance with ASTM E84.

Fuel Modification – a method of modifying fuel load by reducing the amount of nonfire-resistive vegetation or altering the type of vegetation to reduce the fuel load.

Habitable Space – a space in a building for living, sleeping, eating, or cooking.

Heavy Timber Construction – as described in Section 602.4 of the 2024 International Building Code.

Ignition-Resistant Material – building material that meets the requirements of Section E.2.1.3.

Ignition-Resistant Vegetation – plants that are less likely to readily ignite from a flame or other ignition source and produce fewer embers. While they can still be damaged by fire, their foliage and stems don't significantly contribute to the intensity of the fire. These plants are limited to those with an ignitability rating of 8 or higher identified in Fact Sheet 6.305 created by the Colorado State University Extension and Colorado State Forest Service.

Log Wall Construction – a type of construction in which exterior walls are constructed of solid wood members and where the smallest horizontal dimension of each solid wood member is not less than 6 inches. Log wall construction shall follow requirements of ICC 400.

Multilayered Glaze Panels – window or door assemblies that consist of two or more independently glazed panels installed parallel to each other, having a sealed air gap in between, within a frame designed to fill completely the window or door opening in which the assembly is intended to be installed.

Noncombustible – as applied to building construction material, a material that, in the form in which it is used, is one of the following:

- Material of which no part will ignite and burn when subjected to fire,
- Material conforming to ASTM E136, or
- Fire-rated gypsum board tested in accordance with ASTM C1396 with no less than a 1-hour fire-resistance rating with fire exposure from the outside only.

Occupiable Space – a room or enclosed space designed for human occupancy in which individuals congregate for amusement, education, or similar purposes or in which occupants are engaged at labor.

Roof Assembly – a system designed to provide weather protection and resistance to design loads. The system consists of a roof covering and roof deck or a single component serving as both. A roof assembly can include an underlayment, thermal barrier, ignition barrier, insulation, or a vapor retarder.

Roof Covering – the covering applied to the roof deck for weather resistance, fire classification, or appearance.

Roof Deck – the flat or sloped surface not including its supporting members or vertical supports.

Slope – the variation of terrain from the horizontal; the number of feet rise or fall per 100 feet measured horizontally, expressed as a percentage.

Structure – that which is built or constructed.

Structure Ignition Zone – the structure and the area around the structure (or home). The SIZ takes into account both the potential of the structure to ignite and the quality of defensible space surrounding it.

Tree Crown – the primary and secondary branches growing out from the main stem, together with twigs and foliage.

Wildland-Urban Interface – that geographical area where structures and other human development meet or intermingle with wildland or vegetative fuels, determined by reference to maps produced by the Colorado Wildfire Resiliency Code Board.

E.2 STRUCTURE HARDENING REQUIREMENTS

Exterior design and construction of new buildings and structures within the Wildland-Urban Interface areas of Colorado shall be constructed in accordance with this Section E.2, except as otherwise provided in this Appendix E.

Exception: Homes built to the HUD Manufactured Home Construction and Safety Standards are exempt from structure hardening requirements on their first installation.

E.2.1 Building Material

Building materials shall comply with any one of the requirements in Sections E.2.1.1 through E.2.1.3.

E.2.1.1 Noncombustible material

Noncombustible material shall comply with the definition of noncombustible materials found in Section E.1.4.

E.2.1.2 Fire-retardant-treated wood

Fire-retardant-treated wood shall be identified for exterior use and shall meet the requirements of Section 2303.2 of the 2024 International Building Code.

E.2.1.3 Ignition-resistant material

Ignition-resistant material shall be tested on the front and back faces in accordance with the extended ASTM E84 or UL 723 test for a total test period of 30 minutes, or with the ASTM E2768 test. The material shall bear identification showing the fire test results. Panel products shall be tested with a ripped or cut longitudinal gap of 1/8 inch. The material, when tested in accordance with the test procedures set forth in ASTM E84 or UL 723 for a test period of 30 minutes, or with ASTM E2768, shall comply with Sections E.2.1.3.(A) through E.2.1.3.(C). Material or products which melt, drip, or delaminate to the extent that the flame front is interrupted are not permitted.

Exception: Material composed of a combustible core and a noncombustible exterior covering made from either aluminum at a minimum 0.019-inch thickness or corrosion-resistant steel at a minimum 0.0149-inch thickness are not required to be tested with a ripped or cut longitudinal gap.

- (A) Flame spread. The material shall exhibit a flame spread index not exceeding 25.
- (B) Flame front. The material shall exhibit a flame front that does not progress more than 10 feet 6 inches beyond the centerline of the burner at any time during the test.
- (C) Weathering. Ignition-resistant material shall maintain its performance in accordance with this Section E.2.1.3 under conditions of use. The material shall meet the performance requirements for weathering (including exposure to temperature, moisture, and ultraviolet radiation) below, as applicable to the material and conditions of use.

- (1) Evaluation requirements for weathering. Fire-retardant-treated wood, wood-plastic composite materials, and plastic lumber materials shall be evaluated after weathering in accordance with Method A "Test Method for Accelerated Weathering of Fire-Retardant-Treated Wood for Fire Testing" in ASTM D2898.
- (2) Wood-Plastic composite materials. Wood-plastic composite materials shall also demonstrate acceptable fire performance after weathering by the following procedure: first, testing in accordance with ASTM E1354 at an incident heat flux of 50 kW/m² in the horizontal orientation, then, weathering in accordance with ASTM D7032, and then retesting in accordance with ASTM E1354 and exhibiting an increase of no more than 10 percent in peak rate of heat release when compared to the peak heat release rate of the nonweathered material.
- (3) Plastic lumber materials. Plastic lumber materials shall also demonstrate acceptable fire performance after weathering by the following procedure: first, testing in accordance with ASTM E1354 at an incident heat flux of 50 kW/m² in the horizontal orientation, then, weathering in accordance with ASTM D6662, and then retesting in accordance with ASTM E1354 and exhibiting an increase of no more than 10 percent in peak rate of heat release when compared to the peak heat release rate of the nonweathered material.

E.2.2. Class 1 Requirements

Buildings and structures constructed, modified, or relocated into or within areas having a low fire intensity classification shall comply with the Class 1 Requirements.

E.2.2.1 Roofing

- (A) Roofs shall have a roof covering or roof assembly classified as Class A when tested in accordance with ASTM E108 or UL 790.
 - (1) Flame and ember protection. For roof assemblies where the roof covering profile creates a space between the roof covering and roof deck, the space shall resist the entry of flames and embers by one or more of the following methods:

- Firestopping with noncombustible material of the space between the roof covering and the roof deck.
- Installation of one layer of cap sheet complying with ASTM D3909 over the combustible roof deck.
- Installation of a listed Class A classified roof assembly.

(2) Roof valley flashings. Valley flashings shall be not less than 0.019-inch (No. 26 galvanized sheet gage) of corrosion-resistant metal installed over a minimum 36-inch-wide underlayment consisting of one layer of cap sheet complying with ASTM D3909 running the full length of the valley.

(B) If a roof covering existing at the time of adoption of this Appendix E has 25 percent or more of its surface area replaced, or if work to reconstruct, alter, or repair the roof covering effectively replaces such material, the entire roof covering must be replaced with one that complies with this Section E.2.2.1.

E.2.2.2 Gutters and Downspouts

Gutters and downspouts shall be constructed of noncombustible material.

E.2.2.3 Ventilation Openings

Ventilation openings for enclosed attics, enclosed rafter spaces, and underfloor spaces shall be in accordance with the following, as applicable.

- (A) Performance requirements. Ventilation openings shall be fully covered with listed vents, tested in accordance with ASTM E2886, to demonstrate compliance with all the following:
- There shall be no flaming ignition of the cotton material during the Ember Intrusion Test.
 - There shall be no flaming ignition during the Integrity Test portion of the Flame Intrusion Test.
 - The maximum temperature of the unexposed side of the vent shall not exceed 662°F (350°C).

- (B) Prescriptive requirements. Ventilation openings shall be covered with noncombustible corrosion-resistant mesh with openings not to exceed 1/8-inch.

E.2.3 Class 2 Requirements

Buildings and structures constructed, modified, or relocated into or within areas having a moderate or high fire intensity classification shall comply with the Class 1 Requirements in Section E.2.2 and the Class 2 Requirements.

E.2.3.1 Protection of Eaves

Eaves and soffits shall be protected on the exposed underside by noncombustible material, ignition-resistant material, material approved for not less than 1-hour fire-resistance-rated construction, 5/8-inch Type X drywall, 2-inch nominal dimension lumber, 1-inch nominal fire-retardant-treated wood, or 3/4-inch nominal fire-retardant-treated plywood, all identified for exterior use and meeting the requirements of Section 2303.2 of the 2024 International Building Code. Fascias are required and shall be protected on the backside by noncombustible material, ignition-resistant materials, materials approved for not less than 1-hour fire-resistance-rated construction, 5/8-inch Type X drywall, or 2-inch nominal dimension lumber.

E.2.3.2 Exterior Walls

- (A) Exterior walls of buildings or structures shall be constructed with one of the following methods:
- Exterior wall assemblies with a minimum of 1-hour fire-resistance rating, rated for exposure on the exterior side,
 - Approved noncombustible material,
 - Heavy timber or log wall construction,
 - Noncombustible material complying with Section E.2.1.1 on the exterior side,
 - Fire-retardant-treated wood complying with Section E.2.1.2 on the exterior side, labeled for exterior use, and meeting the requirements of Section 2303.2 of the 2024 International Building Code, or
 - Ignition-resistant material complying with Section E.2.1.3 on the exterior side.

(B) Such material shall extend from the top of the foundation to the underside of the eave or the underside of the roof sheathing.

Exceptions:

- Exterior wall embellishments and architectural trim (exclusive of trim on exterior windows and doors), not to exceed 5 percent of the square footage of the exterior wall.
- Roof or wall top cornice projections and similar assemblies.
- Solid wood rafter tails and solid wood blocking installed between rafters having minimum dimension 2-inch nominal.

(C) Exterior Wall Coverings. Exterior wall coverings shall be limited to the following:

- Noncombustible material
- Fire-retardant-treated wood
- Ignition-resistant building material

Exception: Where one of the first two options listed in Section E.2.3.2 (A) is used, vinyl siding may be used as an exterior covering.

(D) Flashing. A minimum of 6 inches of metal flashing or noncombustible material applied vertically between the wall sheathing and the exterior cladding shall be installed at the ground, decking, and roof intersections. Combustible sheathing products exposed by the gap created at the base of the exterior walls, posts, or columns must be protected with noncombustible material or ignition-resistant material while still permitting drainage and moisture control from behind exterior cladding.

(E) If the exterior walls existing at the time of adoption of this Appendix E have 25 percent or more of their total surface area replaced, or if work to reconstruct, alter, or repair the exterior walls effectively replaces such material, the entire surface area of the exterior walls, including attachments, must be replaced with materials that comply with this Section E.2.3.2, and the Immediate Zone within 5 feet of the building or structure shall be made to comply with Section E.3.1.1.

E.2.3.3 Underfloor Enclosure

Buildings or structures shall have underfloor areas enclosed to the ground or comply with exterior walls in accordance with Section E.2.3.2.

E.2.3.4 Decking

Unenclosed decks shall have the deck walking surface constructed of one of the following:

- Approved noncombustible material
- Class A rated material, except that composite decking material with a minimum Class B rating shall be allowed
- Fire-retardant-treated wood identified for exterior use and meeting the requirements of Section 2303.2 of the 2024 International Building Code
- Ignition-resistant material

E.2.3.5 Appendages and Projections

Appendages and projections shall be constructed in accordance with Section E.2.3.2.

E.2.3.6 Exterior Glazing

Exterior windows, window walls and glazed doors, windows within exterior doors, and skylights shall be tempered glass, multilayered glazed panels, glass block, or have a fire protecting rating of not less than 20 minutes. This requirement does not apply to vehicle access doors.

E.2.3.7 Exterior Doors

Exterior doors, except vehicle access doors, shall be approved noncombustible construction, solid core wood not less than 1 ¾-inch thick, or have a fire protection rating of not less than 20 minutes.

E.2.3.8 Vehicle Access Door Perimeter Gap

Exterior vehicle access doors shall resist the intrusion of embers by preventing gaps between doors and door openings at the head, sill, and jamb of doors from exceeding 1/8 inch. Gaps between doors and door openings shall be controlled by one of the following methods:

- Weather-stripping products made of materials that (A) have been tested for tensile strength in accordance with ASTM D638 after exposure to ASTM G155 for a period of 2,000 hours, when the

maximum allowable difference in tensile strength values between exposed and non-exposed samples does not exceed 10 percent, and (B) exhibit a V-2 or better flammability rating when tested to UL 94 standards;

- Door overlaps onto jambs and headers; or
- Garage door jambs and headers covered with metal flashing.

E.2.3.9 Detached Accessory Structures

- (A) Detached accessory structures located less than 50 feet from a building containing habitable or occupiable space shall comply with Section E.2.3.2.
- (B) Underfloor areas. Where the detached accessory structure is located and constructed so that the structure or any portion thereof projects over a descending slope surface greater than 10 percent, the area below the structure shall have underfloor areas enclosed to within 6 inches of the ground with one of the following:
- exterior wall construction in accordance with Section E.2.3.2;
 - underfloor protection in accordance with Section E.2.3.3; or
 - 1/8-inch metal corrosion-resistant screen, plus an area within 5 feet of the detached accessory structure that meets the requirements of Section E.3.1.1.

Exception: The enclosure shall not be required where the underside of exposed floors and exposed structural columns, beams, and supporting walls are protected as required for exterior 1-hour fire-resistance-rated construction, heavy timber construction, noncombustible material on the exterior side, or fire-retardant-treated wood on the exterior side. The fire-retardant-treated wood shall be labeled for exterior use and meet the requirements of Section 2303.2 of the 2024 International Building Code.

E.3 SITE AND AREA REQUIREMENTS

E.3.1 Class 1 Requirements

Areas having a low fire intensity classification shall comply with the Class 1 Requirements.

E.3.1.1 Structure Ignition Zone 1 (0-5 feet): Immediate Zone

- (A) Materials. Use noncombustible, hard surface materials in this zone, such as rock, gravel, sand, concrete, bare earth, or stone/concrete pavers.
- (B) Plantings. Remove all plantings, including shrubs, slash, combustible mulch and other woody debris, with the exception of ignition-resistant vegetation.
- (C) Trees. There shall be no planting of new trees in the Immediate Zone.
 - (1) Mature trees of no less than a 10-inch diameter at 4.5 feet above ground level may be maintained.
 - (2) Tree crowns extending to within 10 feet of any structure shall be pruned to maintain a minimum clearance of 10 feet.
 - (3) Prune tree branches to a height of 6-10 feet from the ground or a third of the total height of the tree, whichever is less.

E.3.1.2 Site Signage

- (A) Marking of Roads. Approved signs or other approved notices shall be provided and maintained for access roads and driveways to identify such roads and prohibit the obstruction thereof.
- (B) Marking of Fire Protection Equipment. Fire protection equipment and fire hydrants shall be clearly identified in a manner approved to prevent obstruction.
- (C) Address Markers. Buildings shall have a permanently posted address, which shall be placed at each driveway entrance and be visible from both directions of travel along the road. In all cases, the address shall be posted at the beginning of construction and shall be maintained thereafter, and the address shall be visible and legible from the road on which the address is located in an approved manner.

E.3.1.3 Retaining Walls

Retaining walls shall be constructed with either noncombustible or ignition-resistant material when any of the following conditions exist:

- The retaining wall is within 8 feet of a structure regulated by this Appendix E or up to the property line when the property line is less than 8 feet away from the structure;
- The retaining wall is integral to the support of a structure regulated by this Appendix E; or
- The retaining wall is integral to the egress from a structure regulated by this Appendix E to a public way, easement, or private road.

E.3.1.4 Fencing

Fencing within 8 feet of a structure regulated by this Appendix E or up to the property line when the property line is less than 8 feet away from the structure shall be constructed with noncombustible or ignition-resistant material, except that vinyl fencing is allowed.

E.3.2 Class 2 Requirements

Areas having a moderate or high fire intensity classification shall comply with the Class 1 Requirements in Section E.3.1 and the Class 2 Requirements.

E.3.2.1 Structure Ignition Zone 2 (5-30 feet): Intermediate Zone

- (A) Dead Materials. Within the fuel modification area, hazardous dead plant material must be removed from live vegetation.
- (B) Fuels Accumulation. Avoid large accumulations of surface fuels, such as logs, branches, slash, and combustible mulch.
- (C) Trees.
 - (1) Tree crowns extending to within 10 feet of any structure shall be pruned to maintain a minimum clearance of 10 feet.
 - (2) Prune tree branches to a height of 6-10 feet from the ground or a third of the total height of the tree, whichever is less.
 - (3) Tree crowns shall be spaced to prevent structure ignition and promote fuel discontinuity to limit fire spread.
- (D) Shrubs. Shrub groups shall be spaced to prevent structure ignition. Shrubs shall be at least 10 feet away from the edge of tree branches.

E.3.2.2 Structure Ignition Zone 3 (30-100 feet): Expanded Zone

(A) Trees. Tree crowns shall be spaced at a minimum of 6-10 feet.

E.4 TECHNICAL ASSISTANCE

To determine compliance with this Appendix E, the PCD Director is authorized to require the owner or applicant to provide a technical opinion and report at their own expense.

E.4.1 Preparer Qualifications

The technical opinion and report shall be prepared by an approved qualified engineer, specialist, laboratory, or fire safety specialty organization. The PCD Director is authorized to require design submittals to be prepared by and bear the stamp of a registered design professional.

E.4.2 Content

The technical opinion and report shall analyze the properties of the design, operation, or use of the building or premises, the facilities and appurtenances situated thereon, and fuel management to identify and propose necessary recommendations.

E.4.3 Tests

Where there is insufficient evidence of compliance with this Appendix E, the PCD Director may require tests as evidence of compliance. Test methods shall be as specified in this Appendix E or by other recognized test standards. In the absence of recognized test standards, the PCD Director may approve the testing procedures. Tests shall be performed by an approved party.

E.5 ALTERNATIVE DESIGN, MATERIALS, AND METHODS

A design, material, or method other than those described in this Appendix E may be approved if it meets the requirements set forth in this Section E.5.

E.5.1 Approval Criteria

E.5.1.1 Compliance with Purpose

An alternative design, material, or method of construction shall comply with the purpose of this Appendix E.

E.5.1.2 Equivalency Criteria

An alternative design, material, or method of construction shall, for the purposes intended, be not less than the equivalent of that prescribed in this Appendix E with respect to all of the following as applicable:

- Quality
- Strength
- Effectiveness
- Durability
- Safety, other than fire safety
- Fire safety

E.5.2 Process

Requests to use an alternative, design, material, or method of construction must be submitted in writing and accompanied by a report that contains the following, as required by the PCD Director:

- Tests conducted to demonstrate equivalency of a scale sufficient to predict performance of the end use configuration, performed by an approved party
- Evaluations issued by an approved agency that contain the criteria used for the evaluation
- Reports other than evaluations described above that are prepared by an approved qualified engineer, specialist, laboratory, or fire safety specialty organization and that describe criteria, including but not limited to any referenced testing or analysis, used to determine compliance with Appendix E purpose and equivalency
- Designs designed by and bearing the stamp of a registered design professional
- Peer review reports prepared by an approved peer reviewer

E.6 MODIFICATIONS

Where there are practical difficulties involved in carrying out the provisions of this Appendix E, modifications may be granted in individual cases, provided the PCD Director finds all of the following:

- One or more special individual reasons make compliance with the strict letter of Appendix E impractical;
- The proposed modification is in conformance with the purpose of this Appendix E; and
- The proposed modification does not lessen health, life, and safety requirements.