Short-term Rental (STR), B&B or Resort Lodge Cottage Conversion Permit - Life Safety Survey Inspection

After receiving county planning approval, all dwellings used as short-term rentals (rented for 30 days or less), owner- or operator-occupied lodging houses (Bed & Breakfasts or B&Bs), or resort lodge cottages in unincorporated Larimer County must obtain a county building permit for conversion to the new use, pass a life safety survey inspection and receive a Certificate of Occupancy for the new use. With 10 or fewer occupants (five or fewer guestrooms), these uses can be reviewed under the International Residential Code. With 11 or more occupants, they are reviewed under the International Building Code as R (residential) occupancies. Large STRs require fire suppression sprinklers, accessibility and other features. STRs in buildings constructed under the 2021 building codes (whether built as STRs or later converted) of any size must install sprinklers. Local Fire Districts may have additional requirements.

STRs must pass inspection on all the following items. B&Bs and Resort Lodge Cottages must pass inspection on items #1 through 12 in the list below.

1. Address identification
2. No Unapproved/Unpermitted Uses/Work
3. Observable Structural Concerns
4. Emergency Escape and Rescue Openings for all bedrooms and sleeping areas
5. Window Wells for below-grade egress windows
6. Smoke Alarms
7. Carbon Monoxide Alarms
8. Fuel Gas Appliance Safety, including approved locations, dedicated spaces, required clearances, combustion air, approved venting systems, temperature/pressure relief valves, proper condensate disposal, rooms fire-blocked, no ventless fuel gas appliances
9. Home/Garage Fire Separation (Firewalls/Fire doors/Penetrations)
10. Handrails
11. Guardrails
12. Ground-Fault Circuit-Interrupter Protection
13. Environmental Air Duct Terminations (Bath/Laundry)
14. Cook Stove Anti-Tip Devices
15. Wildfire Hazard Defensible Space
16. No exterior solid-fuel appliances (fire pits, fireplaces, etc.)
17. Lighting at Exterior Stairs
18. Septic Systems Approved by Health Department
19. Stove-top fire-stop systems
20. Fire extinguishers
22. Signs posted at entrances/exits
23. Dark Sky-friendly downward facing, shielded exterior light fixtures
1. **Address identification - R332.2.1** Address numbers shall be plainly visible and legible from the Right-of-Way (ROW). If the house cannot be seen from the ROW, the address numbers must be displayed at the driveway turnoff. Address numbers shall contrast with their background and be a minimum of 4” high with a minimum stroke width of ½”.

2. **No Unapproved/ Unpermitted Uses/Work – R332.2.2, .3 and .4**

Property research done as part of the short-term rental application will determine if any work was done without a permit. If so, a separate as-built permit and inspection approvals must be obtained. The county inspector will use the floor plan approved as part of the building permit to verify all rooms are used for their identified purposes, including the designated bedrooms and/or sleeping areas. If unpermitted work is discovered during the Life-Safety Survey, additional permitting may be required.
3. **Observable Structural Concerns – R332.2.5** Structural concerns include hot tubs on decks not originally designed for the added weight of the hot tubs and additions not properly framed or supported. Visual indicators such as missing posts for point loads, inadequate deck connections or foundations shifting over time can also raise concerns. Work not permitted or changed use of rooms may also present a structural or life safety concern.

Unsafe deck beams, posts, footings, and rails.  
Unsafe connections to beam, ledger.

Missing point loads in the crawl space  
Stair-step cracking
4. Emergency Escape/Rescue Openings (EE&RO) in all sleeping rooms – R332.2.6 (R310)

R310.1.1 Emergency escape and rescue openings shall be openable from the inside without the use of a key, tool, or special knowledge such as sash removal or manipulation.

R310.2 All emergency escape and rescue openings shall have a minimum net clear width of 20", a minimum clear height of 24” AND minimum net clear opening of 5.7 sq. ft. (821 square inches). Using minimum width AND height will yield a window opening less than the minimum allowed. The clear width of casement windows is measured with the casement fully opened at 90° perpendicular to the wall.

R310.2.3 The windowsill shall be no higher than 44” above the finished floor.

NOTE: Existing emergency escape and rescue openings approved under older building codes (or prior to 1/1/72) do not need to be enlarged if they open at least 5.0 sq. ft and at least 22” in the least dimension.
5. Window Wells at below-grade emergency escape and rescue openings – R332.2.7

R310.2.4 The horizontal area of the window well shall be not less than 9 sq. ft. with a horizontal projection and width of not less than 36". Casement windows shall not encroach into the required window well dimensions. Attached ladders or stairs are required for wells over 44" tall. If any bars, grilles, covers, or screens are installed over the window well, they must be removable or releasable from the inside without the use of a key, tool or force greater than that required to open the window.
6. **Approved Smoke Alarms at all required locations – R332.2.8 (R314)**

**R314.1** Smoke alarms shall comply with NFPA 72 and be listed per UL 217. Combination smoke/CO alarms are permitted and must be listed per UL 217 and UL 2034. Installation manuals must be on site. Smoke alarms must be functional and interconnected.

**R314.3** Smoke alarms shall be installed in the following locations:
- In each sleeping room or space;
- Outside each separate sleeping area in the immediate vicinity of sleeping rooms;
- On each additional story, including basements and habitable attics.

Smoke alarms shall not be located within 3’ horizontally from a door or opening of a bathroom containing a bathtub or shower unless this would prevent placement of the required smoke alarm. They must be located at least 3’ from diffusers and vents.

**R314.3.1** Installations near permanently installed cooking appliances:
- Ionization smoke alarms shall not be installed within 20’ horizontally of such appliances.
- Ionization smoke alarms with an alarm-silencing switch shall not be installed within 10’ horizontally of such appliances.
- Photoelectric smoke alarms and smoke alarms listed and marked “helps reduce nuisance cooking alarms” shall not be installed within 6’ horizontally of such appliances.

**R314.6** Smoke alarms must be powered by the home electrical system with a battery backup.

**R314.7** When using smoke detectors as part of a fire alarm system, they must be listed per UL 268. Combination smoke/CO detectors must be listed per UL 268 and UL 2075.

NFPA 72 gives further guidance on the proper placement of smoke detectors, including:
- Smoke alarm rough-ins for flat ceilings must be at least 4” from adjoining walls.
- Smoke alarm rough-ins for peaked or sloped ceilings must be at least 4” vertically from the ceiling peak and within 36” horizontally of the ceiling peak.
- Smoke alarms shall not be located within three feet of the supply registers of a forced air furnace.
- In unfinished construction, alarms should be mounted on the bottom of the floor joists.
- Smoke alarms in a room with a ceiling sloped greater than one foot vertical in eight feet horizontal must be located on the high side of the ceiling.
Note: Measurements shown are to the closest edge of the detector.
7. Approved Carbon Monoxide Alarms at all required locations – R332.2.9 (R315)

**R315.1.1** Carbon monoxide (CO) alarms shall be listed per UL 2034. Combination carbon monoxide and smoke alarms shall be listed in accordance with UL 217 and UL 2034.

**R315.2.1** CO alarms shall be provided where:
The dwelling unit contains a fuel-gas or solid fuel appliance, and/or
The dwelling unit has an attached garage.

**R315.3** CO alarms shall be located *outside* of each separate sleeping area in the immediate vicinity of bedrooms and within 15’ of the door of each bedroom. Where a fuel-fired appliance is located in the bedroom or its attached bathroom, a CO alarm shall *also* be installed inside the bedroom.

**R315.5** Like smoke alarms, CO alarms must be interconnected so that activating one sets them all off. Physical interconnection is not required for listed, interconnected wireless alarms.

**R315.6** CO alarms must be powered by the home electrical system with a battery backup.

**R315.7** Carbon monoxide detection systems may be used instead of CO alarms. CO detection systems must comply with NFPA 720 and be listed in accordance with UL 2075. Combination CO/smoke detectors must be listed per UL 268 and UL 2075.

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**Symptoms of Carbon Monoxide Poisoning**

- Headaches
- Nausea
- Dizziness
- Breathlessness
- Collapse
- Loss of consciousness
Never place a Carbon Monoxide alarm in so called "dead space" - within 4" from the ceiling if mounted on the wall, and within 4" from the wall if mounted on the ceiling.
8. Fuel Gas Appliances – R332.2.10 (Chapter 24)

The manufacturer’s installation instructions must be available on site for review to verify the appliance has been installed in accordance with the manufacturer including but not limited to location, protection, clearances to combustibles, clearances for servicing, volume of combustion air available, venting, shutoff valves, and proper gas piping.

G2406.2 Prohibited Locations: Appliances shall not be located in sleeping rooms, bathrooms, toilet rooms, storage closets or in a space that opens only into such rooms or spaces, except where the installation complies with one of the following:

1. Direct-vent appliances installed in accordance with the conditions of the listing and the manufacturer’s instructions.
2. Vented room heaters, wall furnaces, vented decorative appliances, vented gas fireplaces, vented gas fireplace heaters and decorative appliances for installation in vented solid fuel-burning fireplaces installed in rooms that have a volume of at least 50 cubic feet per 1,000 Btu/h of the appliance input rating.
3. When installed in a room or space opening only into the bedroom or bathroom, the room must be used for no other purpose, is equipped with a solid, self-closing weather-stripped door, and all combustion air is taken directly from the outdoors.
4. A clothes dryer installed in a bedroom or bathroom with a permanent opening of at least 100 square inches communicating with a space outside of a bedroom, bathroom or closet.

Table G2427.10.5 Clearances from the vent or connector to combustibles shall be as listed by the manufacturer, generally 1” minimum for double-wall, 6” for a single-wall connector.

R602.8; R302.11 Fireblocking of openings and penetrations within the mechanical room or closet is required.
9. Home/Garage Separation (including attic access) - R332.2.11 (R302.6)

R302.5.1. Direct openings from a garage into a sleeping room are prohibited. Other openings between the utility and residential space must be equipped with either solid wood or solid or honeycomb-core steel doors not less than 1-3/8 inches thick, or minimum 20-minute rated, self-closing and self-latching fire doors.

R302.6 A garage/shop/barn that is attached to (or within 6’ of) the home shall be separated from the dwelling unit and its attic area by a minimum of 1/2-inch Type X (fire-resistant) gypsum board or equivalent, applied to the utility side of the common (or exterior) walls from the top of foundation to the underside of the roof deck, or run to the underside of the utility ceiling and then run horizontally to the outside walls.

Utility space beneath habitable rooms shall be separated from all habitable rooms above by not less than 5/8-inch Type X (fire-resistant) gypsum board or equivalent on the underside of the ceiling and any structural members. Bearing walls/structural elements supporting the floor above require minimum ½” gypsum.
Fire separations are critical to stopping potential fire spread, and will be inspected to verify compliance in duplexes, townhouses, garages, barns, and similar utility spaces.

Some penetrations will be easy to remediate.

Some separations require more extensive remediation. Fire-rated walls separating duplexes, townhouses, and utility from residential spaces must be continuous from top of foundation to underside of roof decking, from exterior wall to exterior wall, and all penetrations must be fire-protected. In this case, a contractor was hired to finish the drywall installation on the exposed side in the photo and install fire collars on both sides of the wall at the pipe penetrations.

10. Handrails R332.2.12 (R311.7.8)

- Continuous, grippable handrails (1 ¼ -2” diameter) shall be installed on at least one side of every stair run with four or more risers, with rail ends returned to the wall, floor, or a newel post.
- Handrail height shall be 34-38” above the sloped plane tangent to the tread nosings.
- Handrails may project up to 4 ½” into the required 36” stair width on either side and must leave at least 1 ½” clearance behind the rail.
11. Guardrails - R332.2.13 (R312)

R312.1 Guardrails (“guards”) shall be installed along open-sided walking surfaces, including stairs, ramps, and landings, that are more than 30" to the floor or grade below at any point within 36” horizontally from the edge of the open side.

R312.1.2 Required guards must be at least 36” in height above the walking surface or stair treads.

Exception: Guards used as handrails may be 34’’ to 38’’ above the plane tangent to the tread nosings.

R312.1.3 Guard openings between rails cannot allow passage of a 4” diameter sphere.

Exceptions:

1. The triangular opening between the riser/tread/rail cannot allow passage of a 6” diameter sphere.
2. Guard openings along the open side of stairs cannot allow passage of a 4 3/8” diameter sphere.

12. Ground-Fault Circuit-Interrupter (GFCI) Protection - R332.2.14 A GFCI monitors the amount of current flowing from hot to neutral and trips the circuit if there is any imbalance. If electricity flows from hot to ground through you, it could be fatal. The GFCI can sense the current flowing through you because not all of the current is flowing from hot to neutral as it expects -- some of it is flowing through you to ground. As soon as the GFCI senses that, it trips the circuit and cuts off the electricity.

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**GFCI Receptacle (Ground Fault Circuit Interrupter)**

GFCI receptacles are required when wiring:

- Garages
- Outdoors
- Kitchens
- Bathrooms
- Crawl Spaces
- Unfinished Basements

**CIRCUIT RESET:**
Press this button to return the outlet to normal functioning if it has been tripped or after a test.

**NEUTRAL Terminals:**
(Silver)

**HOT Terminals:**
(Brass)

**GROUNDING Terminal:**
(Green)

**CIRCUIT TEST:**
If power stops flowing when this button is pressed then the device is working properly.

**For Your Safety:**
GFCI receptacles protect you against electrical shock that can be caused by moisture, faulty electrical equipment and cords.
13. Environmental Air Duct Terminations – R332.2.15 (R303, Chapter 15)

Exhaust duct vents (clothes dryers, bath fans, etc.) are terminated on the outside of the building, located a minimum of 3’ from openings and not located over a public sidewalk. Dryer ducts shall be provided with a backdraft damper but no screens at the termination. Bath fan ducts need screens.

M1502 Clothes dryers shall be exhausted in accordance with the manufacturer’s installation instructions, independent of all other systems, with a maximum 35’ length (subtracting for fittings and change of direction) unless using an approved power ventilator.

Clothes dryer exhaust ducts must be 4” in diameter, a minimum of 28 gage rigid metal, with a smooth interior, joints running in the direction of air flow, sealed, with no fasteners protruding inside the duct. Flexible transition duct is allowed in the laundry room, before entering any walls, floors, or ceilings.

14. Cook Stove Anti-Tip Device – R332.2.16 An anti-tip device for the free-standing oven has been installed as per the manufacturer’s installation instructions.

Do you have a freestanding range?

Anti-tip brackets have been required since 1988; however they require special installation procedures which homeowners and/or non-certified installers may disregard.

Please, check all ranges to see that they can not tip over
Anti-tip kits are cheap and easy to install
15. Wildfire Hazard Defensible Space – R332.2.17 (R331)

Wildfire hazard defensible space shall be provided and maintained as required for new construction, following current Colorado State Forest Service guidelines. All ground cover and landscaping materials within 5’ of the STR should be noncombustible (no grass, bushes, etc.).

16. Exterior Solid Fuel-burning Appliances – R332.2.18

New solid-fuel fire pits, fireplaces, portable fireplaces, barbecues and other appliances are prohibited in Short-term rentals in the Wildfire Hazard Area due to our extreme fire danger. Existing solid-fuel appliances must be removed, locked, or altered so that short-term renters cannot use them. Gas fire-pits are allowed but must be permitted, inspected and approved, including the gas line, shutoff valve, metal or masonry fire ring, and clearance to the home and to combustibles (brush, grasses, trees, etc.)
17. Interior and exterior stairways – R332.2.19 should be provided with an artificial light source.
18. Septic Systems Approved by County Department of Health and Environment – R332.2.20

A septic system or OWTS (On-site Wastewater Treatment System) is a self-contained, underground wastewater treatment system, most often utilized in rural areas. State/county laws require a permit be issued by the county Health Department prior to constructing or making repairs to a septic system.

Septic system size for STRs is based on the number of bedrooms and sleeping areas. Increasing the number of occupants without addressing the septic system’s capacity may result in system failure.

For information on OWTS permits, guidelines and other resources, please go to https://www.larimer.org/contact-block/health/septic-systems/septic-systems-owts
19. **Stove-top fire-stop systems – R332.2.21**

An automatic fire-extinguishing system or alternative system approved by the Chief Building Official shall be installed above or adjacent to each stove, range, or cooktop, in accordance with the fire-extinguishing system manufacturer’s installation instructions.

Many manufacturers make these stand-alone systems, including “Stovetop,” “Range Queen” and others, with costs as low as $50 per unit. They will not cover an entire room or the entire home like a fire sprinkler will, but they can quickly put out a cooking appliance fire, which is one of the most common sources of home fires.

20. **Portable fire extinguishers – R332.2.22**

Unless the home has a fire sprinkler system installed, portable dry chemical-type fire extinguishers with a minimum rating of 2-A:10-B:C shall be mounted securely on a hanger or bracket intended for the extinguisher by the manufacturer, in a conspicuous location where they will have ready access and be immediately available for use in the following locations:

1. In each room with a cooking appliance, fireplace, heating appliance or water heater.
2. Inside and next to the door to a deck, porch, patio, or outdoor space with such appliances.
3. At least one on each story.

An operations manual shall be provided in a readily visible location such as on the kitchen counter or at the land-line phone. At a minimum, the manual shall contain the following items:
1) the address, GPS coordinates and phone number of the short-term rental;
2) exit mapping from each habitable room in the house;
3) a map of escape routes from the neighborhood to a public road;
4) contact information for and a copy of current registration with the Fire Department having jurisdiction, as well as contact information for Police/sheriff and ambulance service;
5) contact information for the owner or manager with a response time of 60 minutes or less;
6) the location of and instructions for emergency shutoff of water, gas and electrical systems;
7) information on the stove-top firestop and fire extinguishers;
8) information on Wildfire Hazard Area concerns;
9) the location of property lines and instructions to prevent trespass on neighboring properties;
10) instructions on safe interaction with wildlife, trash disposal and noise considerations.
22. Signs posted at entrances/exits – R332.24
A sign containing the information noted in Section R332.2.23 items 1 through 5 shall be posted at each entrance and exit of the home.

23. Dark Sky Exterior Lighting – R332.2.25
All exterior lighting fixtures shall direct light straight down from the fixture and be fully shielded so that no light is visible from the top or sides of the fixture.