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To: CBSC@DGS
Subject: Public Comment for regarding the 2025 California Existing Building Code
Date: Wednesday, October 9, 2024 11:16:05 AM
Attachments: [Proposed revisions to 506.5.3.pdf](#)

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Dear CBSC,

We are submitting a public comment with consensus with the Existing Building Code Committee of the Structural Engineering Association of Southern California and in collaboration with the Los Angeles Tall Building Seismic Design Council.

Comment is regarding ITEM 5 in regards to adopting 2024 IEBC Chapter 5, specifically section 506.5.3.

Here is the proposed amendment to the IEBC.

506.5.3 Seismic loads (seismic force-resisting system).

Where a change of occupancy results in a building being assigned to a higher risk category, or where the change is from a Group S or U occupancy to an occupancy other than Group S or Group U, the building shall satisfy the requirements of Section 1613 of the California Building Code for the new risk category or [occupancy](#) using full seismic forces.

Exceptions:

1. Where the area of the new occupancy is less than 10 percent of the building area, ~~the occupancy is not changing from a Group S or Group U,~~ and the new occupancy is not assigned to Risk Category IV, compliance with this section is not required. The cumulative effect of occupancy changes over time shall be considered.
2. When a change of use results in a structure being reclassified from Risk Category I or II to Risk Category III and the structure is located where the seismic coefficient, SDS, is less than 0.33, compliance with the seismic requirements of CBC Section 1613 is not required.
3. Unreinforced masonry bearing wall buildings assigned to Risk Category III and to Seismic Design Category A or B shall be permitted to use Appendix Chapter A1 of this code.
4. Where the change is from a Group S or Group U occupancy and there is no change of risk category, use of reduced seismic forces shall be permitted.
5. [Compliance with this section is not required when all of the following are met:](#)
 - a. [Group S or Group U occupancy is an ancillary occupancy and not the primary occupancy of an existing mixed-occupancy building.](#)
 - b. [Group S or Group U occupancy is converted to the same occupancy as the existing building's primary occupancy.](#)
 - c. [There is no change in risk category of the building](#)

Suggestion and reasoning:

The current language in 2024 IEBC does not allow any portions of Group U or Group S occupancies to non-Group U or Group S occupancies without having the entire building satisfy the requirement of section 1613 of CBC. This creates a hardship when only a small portion, such as 10% of the building is covered, and it does not drastically change the characteristics of the entire building. For example, if a small office is created within an existing parking garage or portion of an attached garage is converted to an ADU. The change to the exception 1 will allow these small conversions.

New exception 5 is added to clarify that the requirements of section 506.5.3 do not apply if the existing Group U or Group S occupancies are accessory/ancillary occupancies that serve the main occupancy of the building, and they are converted to the same occupancies as the main occupancy of the building. For example, if portions of storage or parking space attached to a large apartment building is converted to ADU use. Having his exception/clarification will enable ADU conversions without unnecessary hardship and will be consistent with the intent of State's ADU bills.

See attached .pdf of the proposal.

Thank you for your consideration.

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