STATE OF WASHINGTON

STATE BUILDING CODE COUNCIL

May 2018

Log No. _____

1. State Building Code to be Amended:

- ☐ International Building Code
- ☐ ICC ANSI A117.1 Accessibility Code
- ☒ International Existing Building Code
- ☐ International Residential Code
- ☐ International Fire Code
- ☐ Uniform Plumbing Code
- ☐ International Mechanical Code
- ☐ International Fuel Gas Code
- ☐ NFPA 54 National Fuel Gas Code
- ☐ NFPA 58 Liquefied Petroleum Gas Code
- ☐ Wildland Urban Interface Code

For the Washington State Energy Code, please see specialized energy code forms

Section(s): Section 502.1.1 and Section 1101.3
(e.g.: Section: R403.2)

Title: Risk Category Assignment
(e.g: Footings for wood foundations)

2. Proponent Name (Specific local government, organization or individual):
Proponent: Washington Association of Building Officials Technical Code Development Committee (Micah Chappell, chair; Jonathan Siu, technical consultant)

Title:

Date: September 10, 2024

3. Designated Contact Person:

Name: Julius Carreon PE SE
Title: Structural Engineer/ City of Bellevue
Address: 450 110th Ave NE, Bellevue, WA 98004

Office Phone: (425 452-4197)
Cell: ( )
E-Mail address: jcarreon@bellevuewa.gov

4. **Proposed Code Amendment**. Reproduce the section to be amended by underlining all added language, striking through all deleted language. Insert new sections in the appropriate place in the code in order to continue the established numbering system of the code. If more than one section is proposed for amendment or more than one page is needed for reproducing the affected section of the code, additional pages may be attached.

   Clearly state if the proposal modifies an existing amendment or if a new amendment is needed. If the proposal modifies an **existing amendment**, show the modifications to the existing amendment by underlining all added language and striking through all deleted language. If a new amendment is needed, show the modifications to the **model code** by underlining all added language and striking through all deleted language.

   Code(s) _IEBC_____ **Section(s)** __ **502.1.1 and 1101.3**_____

   Enforceable code language must be used.
   Amend section to read as follows:

ADDITIONS

502.1 General.

Additions to any building or structure shall comply with the requirements of the *International Building Code* for new construction. *Alterations* to the *existing building* or structure shall be made to ensure that the *existing building* or structure together with the *addition* are not less complying with the provisions of the *International Building Code* than the *existing building* or structure was prior to the *addition* except that the structural elements need to only comply with Sections 502.2 through 502.3. An *existing building* together with its *additions* shall comply with the height and area provisions of Chapter 5 of the International Building Code. Where a new occupiable roof is added to a building or structure, the occupiable roof shall comply with the provisions of the International Building Code.

Exception: In-filling of floor openings and nonoccupiable appendages such as elevator and exit stairway shafts shall be permitted beyond that permitted by the *International Building Code*.

502.1.1 Risk category assignment.

The risk category of the *addition* and *existing building* shall be classified in accordance with Section 1604.5 of the *International Building Code.* Where the addition is structurally independent of the *existing building* the classification for each portion shall be permitted to be determined independently in accordance with Section 1604.5.1. Where the addition is not structurally independent of the *existing building*, the *existing building* and its *addition* acting together as a single structure shall be assigned a risk category in accordance with Table 1604.5 of the *International Building Code.*

Where the *addition* results in a building being assigned to a higher *risk category* for the *existing building* compared with the *risk category* for the *existing building* before the *addition,* such a change shall comply with Section 506 of this code.

Exception:

1. Where the increase in building area or increase in occupant load due to the addition is less than 10 percent than building area or occupant load of the existing building before the addition, the original risk category classification of the existing building is permitted to remain unless required by Section 502.1.1.1. The cumulative effect of occupancy changes over time shall be considered.

502.1.1.1 Multiple Occupancies

Where the *addition* and the *existing building* have different occupancies, the *risk category* of each existing and added occupancy shall be determined in accordance with Section 1604.5.1 of the *International Building Code*. Where application of that section results in a higher *risk category* for the *existing building* compared with the *risk*

category for the *existing building* before the *addition*, such a change shall be considered a *change of occupancy* and shall comply with Section 506 of this code. Where application of that section results in a higher *risk category* for the *addition* compared with the *risk category* for the *addition* by itself, the *addition* and any systems in the *existing building* required to serve the *addition* shall comply with the requirements of the *International Building Code* for new construction for the higher *risk category*.

1101.1 Scope.

An *addition* to a building or structure shall comply with the International Codes as adopted for new construction without requiring the *existing building* or structure to comply with any requirements of those codes or of these provisions, except as required by this chapter. Where an *addition* impacts the *existing building* or structure, that portion shall comply with this code.

1101.3 Risk category assignment.

The *risk category* of the *addition* and *existing building* shall be classified in accordance with Section 1604.5 of the *International Building Code.* Where the addition is structurally independent of the *existing building* the classification for each portion shall be permitted to be determined independently in accordance with Section 1604.5.1 of the *International Building Code.* Where the addition is not structurally independent of the *existing building*, the *existing building* and its *addition* acting together as a single structure shall be assigned a risk category in accordance with Table 1604.5 of the *International Building Code.*

Where the *addition* results in a building being assigned to a higher *risk category* for the *existing building* compared with the *risk category* for the *existing building* before the *addition,* such a change shall comply with Chapter 10 of this code.

Exception: Where the increase in building area or increase in occupant load due to the addition is less than 10 percent than building area or occupant load of the existing building before the addition, the original risk category classification of the existing building is permitted to remain unless required by Section 1101.3.1. The cumulative effect of occupancy changes over time shall be considered.

1101.3.1 Multiple Occupancies

Where the *addition* and the *existing building* have different occupancies, the *risk category* of each existing and added occupancy shall be determined in accordance with Section 1604.5.1 of the *International Building Code*. Where application of that section results in a higher *risk category* for the *existing building* compared with the *risk category* for the *existing building* before the *addition*, such a change shall be considered a *change of occupancy* and shall comply with Chapter 10 of this code. Where application of that section results in a higher *risk category* for the *addition* compared with the *risk category* for the *addition* by itself, the *addition* and any systems in the *existing building* required to serve the *addition* shall comply with the requirements of the *International Building Code* for new construction for the higher *risk category*

5. **Briefly explain your proposed amendment, including the purpose, benefits and problems addressed.** Specifically note any impacts or benefits to business, and specify construction types, industries and services that would be affected. Finally, please note any potential impact on enforcement such as special reporting requirements or additional inspections required.

The proposed amendment to Sections 502.1.1 and 1101.3 of the International Existing Building Code (IEBC) aims to provide clear and specific guidelines for assigning risk categories to building additions and the existing structures they adjoin.

Historically, users of the International Existing Building Code (IEBC) referred to Section 1604.5 of the International Building Code (IBC) to determine the appropriate risk category, as there was no explicit provision within the IEBC itself. The 2024 edition of the IEBC now includes a provision for risk category assignment for additions. However, the amendments to Sections 502.1.1 and 1101.3 specifically address the assignment of risk categories in cases where the addition and the existing building have different uses (multiple occupancies). These amendments do not address scenarios where the addition and the existing building share similar occupancies. This omission may lead to confusion among users regarding the continued necessity of referring to IBC Section 1604.5 to determine the risk category in cases where the addition and the existing building have similar occupancies.

This proposal aims to resolve this potential misinterpretation by providing users with a reference to following specific IBC sections and moving the multiple occupancy provision in Sections 502.1.1 and 1101.3 into subsections, for consistency with the multiple occupancy provision in the IBC:

- The risk category of the addition and the existing building must be classified according to IBC Section 1604.5.
- If the addition is structurally independent, risk categories for each portion can be determined independently in accordance with IBC Section 1604.5.1
- If the addition is not structurally independent, the combined structure's risk category is determined using IBC Table 1604.5.

If the addition results in a higher risk category for the existing building, the change must comply with IEBC Section 506, Change of Occupancy provision for the prescriptive approach or IEBC Chapter 10 for work area method approach.

This proposal provides an exception that allows the original risk category to remain if the increase in building area or occupant load is less than 10%, unless otherwise required by multiple occupancy provisions (Section 1101.3.1). This proposed exception aims to be consistent with the lateral design exceptions offered for existing buildings in other sections of the IEBC, such as Exception 1 of Section 506.5.3, concerning seismic loads for buildings and structures undergoing a change of occupancy. This exception provides the necessary flexibility to existing buildings undergoing small additions.

6. Specify what criteria this proposal meets. You may select more than one.

- ☐ The amendment is needed to address a critical life/safety need.
- ☒ The amendment clarifies the intent or application of the code.
- ☐ The amendment is needed to address a specific state policy or statute.
- ☐ The amendment is needed for consistency with state or federal regulations.
- ☐ The amendment is needed to address a unique character of the state.
- ☐ The amendment corrects errors and omissions.

7. Is there an economic impact: ☐ Yes ☒ No

If no, state reason:

The code change proposal will not increase or decrease the cost of construction since this is intended to clarify the proper application of the code. In some cases, with small additions, construction costs may decrease because this proposal provides an exception for triggering a higher risk category if the proposed addition is less than 10% of the existing building.

If yes, provide economic impact, costs and benefits as noted below in items a – f.

a. ***Life Cycle Cost.*** Use the OFM Life Cycle Cost **Analysis tool** to estimate the life cycle cost of the proposal using one or more typical examples. Reference these **Instructions;** use these **Inputs.** Webinars on the tool can be found **Here** and **Here**). If the tool is used, submit a copy of the excel file with your proposal submission. If preferred, you may submit an alternate life cycle cost analysis.

b. ***Construction Cost.*** Provide your best estimate of the construction cost (or cost savings) of your code change proposal.

$Click here to enter text./square foot

(For residential projects, also provide $Click here to enter text./ dwelling unit)

Show calculations here, and list sources for costs/savings, or attach backup data pages

c. ***Code Enforcement.*** List any code enforcement time for additional plan review or inspections that your proposal will require, in hours per permit application:

d. ***Small Business Impact.*** Describe economic impacts to small businesses:

e. ***Housing Affordability.*** Describe economic impacts on housing affordability:

f. ***Other.*** Describe other qualitative cost and benefits to owners, to occupants, to the public, to the environment, and to other stakeholders that have not yet been discussed:

Please send your completed proposal to: sbcc@des.wa.gov

All questions must be answered to be considered complete. Incomplete proposals will not be accepted.