



STATE OF WASHINGTON

STATE BUILDING CODE COUNCIL

Washington State Energy Code Development Standard Energy Code Proposal Form

Jan 2025

Log No. 24-GP1-242

Received 4/11/25

Code being amended: ☒ Commercial Provisions ☐ Residential Provisions

Code Section # _ C505.3 Change in occupancy

Brief Description: Exceptions to current requirement for full compliance with the code for change in occupancy for Group R dwelling units to allow for more practical conversions of existing buildings.

Proposed code change text:

C505.3 Change in occupancy. Spaces undergoing a change in occupancy alteration shall be brought up to full compliance with this code for all disciplines in the following cases:

1. Any space that is converted from a Group F, S or U occupancy to an occupancy other than Group F, S or U.
2. Any space that is converted to a Group R dwelling unit or portion thereof, from another use or occupancy.

Exceptions:

1. Spaces converted from Group R sleeping units.
2. Buildings or spaces **other than Group F, S, or U occupancies** that were permitted under the 2009 or later Washington State Energy Code are not required to be brought up to full compliance with this code and shall comply with requirements of the following sections: Sections C406, C408, C411, and C503.
3. Any Group R dwelling unit or portion thereof permitted prior to July 1, 2002, that is converted to a commercial use or occupancy.

Purpose of code change:

To meet an increasing need for cost-effective housing in the State of Washington, this proposal would help to lower barriers to converting existing spaces and buildings to Group R dwelling units by introducing exceptions for conversions of spaces that are Group R sleeping units or that were permitted under recent energy codes. Any associated alterations to existing building systems would still be required to meet the requirements of Section 503.

Reorganization of section and coordination with other code sections.

None.

Your amendment must meet one of the following criteria. Select at least one:



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- | | |
|--|---|
| <input type="checkbox"/> Addresses a critical life/safety need. | <input type="checkbox"/> Consistency with state or federal regulations. |
| <input type="checkbox"/> The amendment clarifies the intent or application of the code. | <input type="checkbox"/> Addresses a unique character of the state. |
| <input checked="" type="checkbox"/> Addresses a specific state policy or statute.
(Note that energy conservation is a state policy) | <input type="checkbox"/> Corrects errors and omissions. |

Check the building types that would be impacted by your code change:

- | | | |
|--|--|---|
| <input type="checkbox"/> Single family/duplex/townhome | <input checked="" type="checkbox"/> Multi-family 4 + stories | <input checked="" type="checkbox"/> Institutional |
| <input checked="" type="checkbox"/> Multi-family 1 – 3 stories | <input checked="" type="checkbox"/> Commercial / Retail | <input checked="" type="checkbox"/> Industrial |

Your name	Ben Omura	Email address	beno@deltaeconsulting.com
Your organization	Click here to enter text.	Phone number	206-690-2264
Other contact name Eric Vander Mey, ericv@deltaeconsulting.com			

Economic Impact Data Sheet

Is there an economic impact: ☒ Yes ☐ No

Briefly summarize your proposal's primary economic impacts and benefits to building owners, tenants, and businesses. If you answered "No" above, explain your reasoning.

This proposal would allow for more cost-effective Group R dwelling unit conversions in existing buildings/spaces. By lowering the conversion cost, the result would be to have more units of housing made available increasing supply and lowering cost to consumers.

Provide your best estimate of the **construction cost** (or cost savings) of your code change proposal? (See OFM Life Cycle Cost [Analysis tool](#) and [Instructions](#); use these [Inputs](#). **Webinars on the tool can be found [Here](#) and [Here](#)**)

\$6/square foot (For residential projects, also provide \$4,800/ dwelling unit)

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

Assuming a rough estimate of 10% of conversion costs for existing buildings to meet current energy code requirements, it is estimated that these proposed changes would reduce the energy code compliance cost by about 20%, or 2% of the overall conversion cost.

[The Rise and Fall of Office to Multifamily Conversions: A Real Estate Investigation | CBRE](#)

Assuming \$300/sf conversion cost for an average project/dwelling unit and an average dwelling units area of 800 square feet results in approximately \$240,000 conversion cost for a dwelling unit.

Provide your best estimate of the **annual energy savings** (or additional energy use) for your code change proposal?

[Click here to enter text.](#)KWH/ square foot (or) [Click here to enter text.](#)KBTU/ square foot

(For residential projects, also provide [Click here to enter text.](#)KWH/KBTU / dwelling unit)

Show calculations here, and list sources for energy savings estimates, or attach backup data pages

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

Clarifications should reduce enforcement time for conversions to Group R, however the result may increase the amount of reviews/inspections required due to increased volume of projects. It would be assumed that with additional permit/inspection fees additional resources could be allocated to address the need.

Small Business Impact. Describe economic impacts to small businesses:

None

Housing Affordability. Describe economic impacts on housing affordability:

Instructions: Send this form as an email attachment, along with any other documentation available, to: sbcc@des.wa.gov. For further information, call the State Building Code Council at 360-407-9255.

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

As indicated above the conversion cost for Group R dwelling units in existing buildings/spaces would be directly impacted by this proposal, decreasing conversion cost and increasing affordability/availability of housing.

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:

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