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**Sent:** Thursday, January 3, 2019 2:54 PM

**To:** Bumbalov, Stoyan@HCD <[Stoyan.Bumbalov@hcd.ca.gov](mailto:Stoyan.Bumbalov@hcd.ca.gov)>; Ali M. Fattah <[afattah@sandiego.gov](mailto:afattah@sandiego.gov)>

**Subject:** Re: 2019 California Existing Building Code (CEBC) - 15 Day Public comments Regarding Repairs

Hi Stoyan,

I would like to offer my support for HCD's proposed amendments to the repair provisions of the 2019 IEBC as modified in the recently posted 15-day public comment period package.

- The 2018 IEBC carries forth provisions for repairs to existing buildings sustaining less than substantial structural damage, as defined in the IEBC, in which damaged elements can be restored to their pre-damaged condition without triggering substantial evaluations and/or structural upgrades. This applies to residential and non-residential buildings as the IEBC does not differentiate between the two.
- Only those buildings evaluated to have sustained substantial structural damage or disproportionate earthquake damage (causing the building to become potentially substandard/unsafe) would be required to comply with the structural provisions of Section 405 of the IEBC. Even then, the required evaluation and/or retrofit would be for compliance with current load combinations with reduced seismic loads.
- Relocating the text for 'in-kind' replacement of existing and original material to Chapter 3, Provisions for All Compliance Methods is appropriate based on rationale for change provided by HCD. The relocated text still allows the use of like, 'in-kind' materials for repairs and alterations for all compliance methods.

I agree with HCD's position that Section 405 of the 2018 IEBC does not conflict with the HSC but rather expands on the provisions for repairs to existing buildings while still allowing replacement in kind for portions of existing buildings that sustain damage.

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