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Sent: Thursday, January 3, 2019 12:06 PM

To: Bumbalov, Stoyan@HCD <Stoyan.Bumbalov@hcd.ca.gov>

Cc: Eugene Barbeau <eugene.barbeau@lacity.org>

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 includes provisions for repairs in kind that are based on a determination that substantial structural damage does not exist. Additionally, it appears that a new threshold for disproportionate earthquake damage has been added. Both of these provisions ultimately require an evaluation of the damaged building and the repairs or upgrades are not necessarily for full compliance like new buildings for example through reduced loads.

- The IEBC does not differentiate between residential and non-residential occupancies and as a consequence is clearer when applied to mixed occupancy buildings that include residential occupancies.
- Provisions of the H&S Section 17922 (f) can only be repealed through legislation and as a result they still apply, however it appears that the IEBC does not conflict with the H&S Code and includes more current and specific regulations.

It has always been the spirit of the State codes that non-compliant buildings be eventually brought up to compliance and thus deemed safe under the current State of the practice. The IEBC repair provisions are new to California and broaden provisions that allow "replacement in kind" for portions of buildings during repairs to damage to non-residential occupancies which is significant progress.

Community resilience is better served through regular upgrades to buildings and maintenance of the building stock. The IEBC provisions that have been fully vetted through an accredited national code development process and offer a balanced approach to achieving this goal. Additionally, FEMA reimbursement for code upgrades requires that mitigation measures be in place prior to the disaster and the IEBC provides such standards for repairs.

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