

www.iccsdchapter.org

10601-G Tierrasanta Blvd. Box #126
San Diego, CA 92124

FY 2018

BOARD OF DIRECTORS:

PRESIDENT

Aman Shah, P.E.
Coffman Engineers, Inc.

VICE PRESIDENT

Ali Fattah, P.E.
City of San Diego

SECRETARY

Jason Pasuit
Safebuilt/Esgil Corp.

TREASURER

Aaron Sturm
City of La Mesa

PAST PRESIDENT

Mehdi Shadyab, P.E.
City of San Diego

COMMITTEES:

Accessibility Chair

Mehdi Shadyab, P.E., CASp
City of San Diego, CA

CALGreen Chair

Scott Riffenburgh
Emerald Impact

CBC & CRC Code Chair

Ali Fattah
City of San Diego

Electrical Code Chair

Chad Gustine
Senior Electrical Inspector
City of San Diego, CA

Plumbing & Mech Code Chair

George Lockfort
Bureau Veritas

Education & Website Chair

Mehdi Shadyab, P.E.
City of San Diego, CA

International Code Council San Diego Area Chapter

Carlsbad, Chula Vista, Coronado, Del Mar, El Cajon, El Centro, Encinitas, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, San Diego City, San Diego County, San Marcos, Santee, Solana Beach, Vista

March 7, 2019

Stoyan Bumbalov
Department of Housing and Community Development
Division of Codes and Standards
2020 W. El Camino Avenue, Suite 250
Sacramento, CA 95833

Subject: SUPPORT FOR PROPOSED ADOPTION OF THE 2019 CALIFORNIA EXISTING BUILDING CODE BY THE DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT.

Dear Mr. Bumbalov:

I am writing to you on behalf of the San Diego Area Chapter of the International Code Council (ICC) representing the 20 jurisdictions in San Diego County to express our support for the proposed adoption of the 2018 International Existing Building Code (IEBC) with amendments as proposed by HCD. We also would like to reaffirm our support for HCD's decision to adopt the repair provisions in IEBC Chapter 4 without deletions.

Members from our area have participated directly with HCD through stakeholder meetings as well as through participation on the Code Advisory Committees of the California Building Standards Commission. We believe that the model codes should be adopted by the various State agencies with a minimum number of State amendments unless those necessary for compliance with Statutory or other requirements. Minimizing State amendments will improve consistency of application and uniformity of enforcement on a statewide basis.

We reviewed the comparative matrix (IEBC Vs H&SC) developed by HCD and concur with HCD's assessment that repair requirements in IEBC Section 405 do not conflict with H&S Code Section 17922. We also agree that the IEBC provides more enforceable thresholds than the broader determination that a damaged building is "substandard". Additionally, if Building Officials inspect damages to mixed occupancy buildings it would not be efficient or reasonable to have more detailed requirements for the non-residential portion.

The mission of the San Diego Area Chapter of ICC is to:

Promote uniformity and consistency in the application of the building codes; and, *Promote* public health and safety through education and training programs and active participation in the code development process; and, *Promote* public awareness of the important role that building department services play in contributing to the quality of life in the San Diego Region.

<http://www.iccsandiego.org>

Page 2
Mr. Stoyan Bumbalov
March 7, 2019

For example, if a live-work

dwelling unit sustains damage to the roof of the building, is the required scope of the repair determined based on IEBC Section 405 due to the commercial space on the ground floor? Or is the determination based on H&S Code Section 17922 due to the second-floor residential unit?

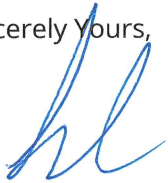
Stakeholders in opposition to HCD's proposed adoption package seem to disagree with the IEBC repair requirements and we believe that they should pursue changes through ICC and not the California Building Standards Commission. We agree with HCD's analysis of H&S Code Section 17922 and agree that the proposed IEBC adoption package satisfies H&S Code requirements that require adoption of the model code.

We would also like to express our support for HCD's proposed editorial change balloted through the 15-day public comment period commencing on February 20, 2019, where reference is made to Section 302.5 where text has been proposed to allow the retention of existing materials and methods of construction.

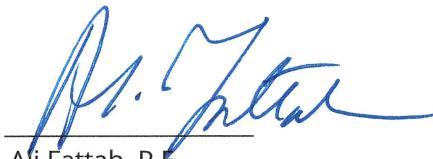
We welcome the opportunity to provide further explanation to our position should you find it necessary.

Please feel free to contact Ali Fattah at (619) 446-5406 should you have any questions, or should you find a need to discuss this matter further.

Sincerely Yours,



Aman Shah, P.E.
President
San Diego Area Chapter of ICC



Ali Fattah, P.E.
Vice President
San Diego Area Chapter of ICC