

BBRS Official Interpretation No. 2014_05

Date: June 10, 2014

Subject: 8th Edition 780 CMR 34 Change of Occupancy - Seismic Requirements, Section 907.3.1.

Background/Discussion:

Chapter 34 of 780 CMR allows a building owner to choose one of three compliance methods: Prescriptive, Work Area, or Performance. If a *change of occupancy* is the basis of the permit application any of these methods may be chosen as the compliance path. Questions and various interpretations have arisen pertaining to the seismic requirements of the Work Area method found in Section 907.3.1¹ of the *International Existing Building Code* (IEBC). In particular, one interpretation is that if the occupancy change does not also involve a change of *occupancy category* (per Table 1604.5 of the *International Building Code*) then no seismic upgrade is required. This may be the case but not necessarily. Discussion of this topic with the BBRS Structural Advisory Committee and communication with David Bonowitz (Chair of the NCSEA EB subcommittee on structures for the IEBC) provided the basis for clarification of the requirements that follow.

QUESTION 1

If the Work Area compliance method is used for a building undergoing a change of occupancy then what seismic requirements have to be met?

ANSWER 1

Section 907.3.1 of the *International Existing Building Code 2009* must be evaluated if a change to a higher *occupancy category* occurs (see Table 1604.5 of the *International Building Code 2009*). However, nothing in the *change of occupancy* chapter (Chapter 9 of the *International Existing Building Code 2009*) relieves the structural requirements that may be triggered by chapters 4 to 12 (Work Area compliance method). For example if there is a change of occupancy and the work area exceeds 50% of the aggregate area of the building then the structural requirements of Chapter 8 (Alteration Level 3) must be evaluated and the more stringent requirement of Chapter 8 or 9 must be met.

1. MA amendment is copied below:

907.3.1 Replace first paragraph and Exception 1 as follows:

907.3.1 Compliance with the International Building Code level seismic forces. Where a building or portion thereof is subject to a *change of occupancy* that results in the building being assigned to a higher occupancy category based on 780 CMR Table 1604.5, the building shall comply with seismic forces as specified in Section 101.5.4.1 for the new occupancy category.

Exceptions:

1. Any occupancy being changed to Group A, E, I-1, R-1, R-2 or R-4 occupancies for buildings less than six stories in height and in Seismic Design Category A, B or C.