DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
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AB 529 ADAPTIVE REUSE WORKING GROUP
REQUEST FOR INFORMATION TEMPLATE GUIDELINE

The following guideline is intended to facilitate stakeholder feedback to HCD's Request for Information (RFI) on adaptive reuse. In order to ensure feedback can be organized and accurately reflected in HCD's findings, please fill out a separate form for each individual recommendation that you are proposing. Responses are due by *5:00 pm PST on December 5, 2024*.

Respondent Information

Providing the following personal information is voluntary and you may leave these sections blank if you would like to remain anonymous. While the name of an organization, entity, or agency may become part of the public record and be included with the published responses to this RFI, please note that the personal information (name, email contact information) of individuals (i.e., natural persons) will not be disclosed or published with the responses and will not become part of the public record, except as authorized or required by law. However, you have the option of consenting to HCD disclosing and/or publishing your name when posting your response/comment as indicated below. If you would like to be added to HCD's list of interested stakeholders who may be contacted as this development process pertaining to the identification of challenges and opportunities for adaptive reuse within the scope of AB 529 continues and progresses, please also indicate your preference in the section below.

Name	David Bonowitz
Organization/Entity/Agency or Affiliation	
Public Email Contact Information	
Add to Contact List	☒ Yes or ☐ No

☒ (OPTIONAL) I consent to HCD disclosing and/or publishing my name when posting my response/comment to this RFI.

Please provide Areas of Interest in Adaptive Reuse Report/Development Process:

Coordination with model, state, and local codes and standards -- including hazard mitigation plans and mitigation programs and regulations -- related to structural engineering and natural hazards mitigation, especially seismic assessment and retrofit.

Response

Assembly Bill 529 includes specific issue areas that the working group may consider. Which of these does this specific response fall into? Please select a response from the following Area of Interest:

- ☐ 1. Energy and Insulation Upgrades
- ☐ 2. Fire-rated Assemblies
- ☐ 3. Water and Sewer Piping
- ☐ 4. Energy infrastructure, including individual utility meter upgrades
- ☐ 5. Habitability
- ☒ 6. Any other local or state building requirement that may render the conversion or reuse of an existing building financially infeasible for residential uses

What are the opportunities that help support adaptive reuse related to the topic selected above?

General comment: Having read through the initial comments and HCD's responses in the May 8 Draft Report of Findings, I doubt that the process so far will result in anything helpful. Many of the comments seem unaware of the existing CEBC and related regulations, some of the HCD edits to the submitted responses seemed to miss their key points, and most of the HCD responses are vague, noncommittal, and in some cases wrongly dismissive. For example:
— Many comments (as edited by HCD) seem to wrongly assume that under current code, every AR project would need to satisfy the code for new construction, often with impacts on areas outside the converted spaces.
Comment continues below.

What are the challenges to adaptive reuse related to the topic selected above?

— Many comments (as edited) seem to not even realize that the CEBC exists. Those that acknowledge the CEBC seem unaware that the IEBC on which it is based offers multiple methods, including the Work Area method (toward which I believe the CEBC is moving).
— Many comments recognize that the CHBC as an alternative, but neither the comment nor the response seem to be aware of how obsolete the CHBC is, how large parts of it are inappropriate for permanent housing, and how other parts are already covered in the CEBC.
— Comments about expanded use of the CRC explicitly violate the (flawed) statutory definition of AR.
As such, the initial set of comments are not starting from a common baseline understanding.
Comment continues below with a suggestion for HCD.

Proposal

If you are proposing - specific amendments to the building standards, or other related health and safety standards, please fill out the boxes below.

Suggested Amendments or Description

This is not a specific code change proposal, but based on my notes above, I believe it would be very helpful for HCD to publish its own understanding of what the CURRENT California codes actually require and expect from an AR project. That would set a baseline for comments and proposals, and it would focus the effort on the right code — the CEBC. Since the AR definition is broad, this general code interpretation could be supplemented or illustrated by a few case study examples of expected AR types, perhaps including:
— Conversion of some/all (2 cases) of a 6-st (or 20-st?) office building to market housing.
— Conversion of a 1- or 2-story tilt-up, school, or other use to market housing.
— Conversion of a hotel or motel (already Group R) to market housing.
— A special case of one of the above, converting to assisted living or nursing home.
— A special case of one of the above, where the existing building is deemed historic.

Rationale for Proposal

Economic Impact of Proposal

Describe if and how this proposal will impact any of the following:

Will this proposal impact housing costs?

Click here to select a response

If yes:
Describe the annual cost for each housing unit:

Will this proposal impact businesses and / or employees?

Click here to select a response

If yes:

How many businesses would be impacted?

Describe the types of businesses impacted.

What would be the initial and annual ongoing costs to businesses impacted?

Would this proposal impact small businesses?

Click here to select a response

If yes:

How many small businesses would be impacted?

What would be the initial and annual ongoing costs to businesses?

Will this proposal have an impact on jobs or occupations?

Click here to select a response

If yes:

How many jobs will be created?

How many jobs will be eliminated?

Describe the types of jobs or occupations impacted.

Would this proposal affect the ability of California businesses to compete with other states?

Click here to select a response

If yes, please explain briefly.

Will this proposal have an impact on individuals?

Click here to select a response

If yes, please indicate initial and annual ongoing costs to individuals below.

Economic Benefit of Suggested Amendments

Describe the benefits of the suggested amendments to building standards, including but not limited to, the health and welfare of California residents and the environment, the total annual statewide benefit in dollars, and any expansion of businesses.