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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	Holly Harper
Organization/Entity/Agency or Affiliation	Los Angeles City Planning
Public Email Contact Information	holly.harper@lacity.org
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:

Building code requirements, in particular local ones, that make office-to-residential conversions economically infeasible.

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?

Office and apartment buildings are assigned the same risk category II in the CBC, yet some jurisdictions--including Los Angeles--have made the requirements for office-to-residential conversion more stringent, year by year.

Local building and safety departments could use strong guidance from State building officials, that could back them up in adding flexibility while not reducing safety for occupants. One idea floated by our local structural engineering and architectural professionals is to prioritize the most seismically-vulnerable construction types and/or building typologies for the most rigorous code provisions. Another might be to correct the most dangerous deficiencies first, such as in a partial conversion of lower floors.

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

Los Angeles has been a true pioneer in adaptive reuse, resulting in over 12K residential units added to downtown after the passage of our Downtown Adaptive Reuse Ordinance in 1999. A stock of early 20th century, mid-rise buildings that had sat largely empty above the ground floor was definitely instrumental in this early success.

As time moved forward and the most cost-effective potential conversion projects were realized, City of Los Angeles amendments were made to the CBC that treat residential occupancy as inherently more dangerous than offices. Alternative provisions for live/work units were established in the local code's Division 85, requiring structures to be retrofitted to achieve 75% seismic capacity but with some buildings--such as those with steel moment

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

To prioritize the most seismically-vulnerable construction types and/or building typologies for the most rigorous code provisions. Another might be to correct the most dangerous deficiencies first, such as in a partial conversion of lower floors.

Instead of a set of one-size-fits-all seismic retrofit requirements, develop a more subtle one based upon a given building's construction type, height, etc. To facilitate any phased adaptive reuse projects' compliance with seismic standards, it will be necessary to codify and clarify the triggers or thresholds for both seismic and nonstructural required upgrades.

Rationale for Proposal

The City's Division 85 allows live/work conversions to be retrofitted to achieve 75% seismic capacity but with some buildings--such as those with steel moment frame construction--even that standard might be inadequate to prevent collapse.

Unreinforced masonry, non-ductile concrete and wood frame with soft/weak/open wall buildings are already addressed through local ordinances, although progress in compliance has been slow; many potentially useful buildings may simply run out the clock and be

Economic Impact of Proposal

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

Will this proposal impact housing costs?

NO

If yes:

Describe the annual cost for each housing unit:

Will this proposal impact businesses and / or employees?

NO

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?

NO

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?

NO

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?

YES

If yes, please explain briefly.

It could affect it positively. The buildings to be converted aren't going anywhere.

Will this proposal have an impact on individuals?

NO

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.

Los Angeles is experiencing a record-high commercial vacancy rate, something like 27%. Buildings standing a third- to half-empty don't contribute to the vitality of their neighborhoods and the viability of many small businesses that depended upon their occupants to survive.

Difficult to quantify in dollars but adaptive reuse of these underutilized structures would be a net positive in adding much-needed housing and saving the embodied energy used in their construction. Without a major downturn in the commercial real estate market most such projects are economically infeasible (Los Angeles commissioned an economic feasibility study). If