



CITY OF COVINGTON
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CHANGE OF OCCUPANCY

The purpose of International Existing Building Code (IEBC) chapter 10 is to provide regulations for the circumstances when an existing building is subject to a change in occupancy or a change in occupancy classification. A change of occupancy is not to be confused with a change of occupancy classification. The International Building Code (IBC) defines different occupancy classifications in Chapter 3, and special occupancy requirements in Chapter 4. Within specific occupancy classifications there can be many different types of actual activities that can take place. For instance, a Group A-3 occupancy classification deals with a wide variation of different types of activities, including bowling alleys and courtrooms, indoor tennis courts and dance halls. When a facility changes use from, for example, a bowling alley to a dance hall, the occupancy classification remains A-3, but the different uses could lead to drastically different code requirements. Therefore, the IEBC deals with the special circumstances that are associated with a change in the use of a building within the same occupancy classification as well as a change of occupancy classification.

A change of occupancy classification or change of occupancy of any building requires the approval of the Building Official according to section 1001.2, International Existing Building Code 2015 Edition. In order to secure that approval, several areas of the building may need structural changes, additional fire protection, or zoning code upgrades as required by the code for the proposed occupancy. This occurs most frequently when a residence is converted to a commercial use or any other commercial use is converted to a different occupancy or the character of an existing occupancy needs to be changed by a new tenant. Subject to the approval of the building official, the use or occupancy of existing buildings shall be permitted to be changed and the building is allowed to be occupied for purposes in other groups without conforming to all the requirements of this code for those groups, provided the new or proposed use is less hazardous, based on life and fire risk, than the existing use.

A BUSINESS LICENSE CANNOT BE APPROVED UNTIL THIS PROCESS IS COMPLETED.

PROCEDURES FOR CHANGE OF OCCUPANCY

Proponent Responsibilities:

1. The proponent must secure the services of a person or firm familiar with the current edition of IEBC, IBC, IMC, UPC, IFC, (including pertinent State amendments), and the International Energy Conservation Code, Ventilation Codes and City of Covington municipal code to inspect the building and prepare plans showing compliance with current code requirements for the proposed use. In buildings that are over 4000 square feet in area the plans are required to be drawn by a Washington State Licensed Architect.
2. The proponent will apply for a change of occupancy or change of occupancy classification permit for the proposed change of occupancy. If no construction is required for the conversion only plans demonstrating compliance are required. If construction is required to convert the building for the proposed change of occupancy a complete set of construction drawings are required as well as plans demonstrating compliance with all current codes for the proposed use in the unmodified areas of the building.

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City Process:

1. A permit application for a change of occupancy will be routed to all City departments normally involved in processing permit applications. The change of occupancy must be compatible with land use requirements of the zone in which it is located and must comply with all building code requirements. The City will review the request and issue a determination based on information provided.

2. Appropriate permits will be issued for improvements required by the change of occupancy. When all work conducted under such permits has been inspected and approved, the Building Official will issue a new Certificate of Occupancy for the new use.

Additional Information:

Buildings undergoing a change of occupancy frequently require upgrades in the following areas:

- Barrier Free Access
- Minimum Plumbing Facilities
- Exit Facilities (life safety)
- Fire Resistive Elements (fire safety)
- Minimum Required Ventilation
- Parking Requirements
- Landscaping Requirements
- Signage Regulation

Barrier Free Access: Changes that allow access to the new use by those in wheel chairs or otherwise physically challenged is required under state and federal law. Upgrades could include ramps, wider doors, restroom upgrades, parking areas, signage.

Minimum Plumbing Facilities: The minimum number of plumbing facilities is determined based on the occupant load of the occupancy. Additional restroom facilities must meet the requirements for new construction.

Fire Resistive Elements: Depending on the location of the building on the site, exterior walls and opening in exterior walls may require fire protection that was not previously required. In addition, a fire suppression system (sprinklers) may be required or modified to fit the proposed use.

Exit Facilities: The exiting system may require upgrading to meet life safety requirements; submitted plans should clearly detail the location, construction, size and character of all portions of the means of egress system. The structural loading requirements for exit facilities is 100 pounds per square foot for nonresidential occupancies and 40 pounds per square foot for residential occupancies. The floor will likely need to be structurally upgraded when converting from a dwelling to a non residential occupancy.

Parking Requirements: The zoning code contains specific requirements for the amount and location of parking required for each land use zone. Paving of parking areas or adding additional parking may be required.

Landscaping Requirements: Required landscaping must be installed to meet the criteria established by the zoning code.

Signage Regulation: Review of all signage is required. Proposed signs should be submitted by separate permit to the Development Services Division of Community Development.

Each proposed change of occupancy is unique. The information that is provided in this handout is not exhaustive. A pre-application meeting should be scheduled with appropriate staff if a change of occupancy is desired.