



The following text includes the Commercial Construction Consulting, Inc. proposed amendment to 780 CMR 3408 Requirements for Existing Buildings which is unique to Massachusetts. Proposed changes to 780 CMR 3408 are shown in ~~strikeout~~ (deleted text or numeric) or **red font** (for added text or numeric). Comments within code text are shown within parenthesis.

This text includes the original 7th Edition text with the errata of November 2008 incorporated and indicated as *bold underlined italic***.**

Supporting Statement for 3408.4.2

This change is intended to clarify minor rehabilitation and remodeling work as Level 1 work. Doing this would have the architect determine if the existing structural elements would be affected by the proposed work. The addition of a floor opening, such as a new elevator, escalator, or stair, has been reworded to read “when the new openings in any framed floor or roof area 5% or less of the area of the framed floor or roof.” This is compatible with the Level 2 requirement found in 3408.4.3 5. D. that discusses structural openings greater than 5% of the framed roof or floor.

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**780 CMR 3408.0 STRUCTURAL
REQUIREMENTS FOR EXISTING
BUILDINGS**

3408.4.2 Level 1 Work. (The language below currently defines Level 2 Work and we propose moving this language to be included in the definition of Level 1 Work)

Work involving any of the following.

1. Removal or repair of ceilings, partitions, or interior facing of exterior walls; new ceilings, partitions, or interior facing of exterior walls; reconstruction or repair of floors; new mechanical or electrical distribution systems within an area; or new elevators, escalators, or stairs within an area or serving an area, when the new openings in any framed floor or roof are 5% or less of the area of the framed floor or roof.

2. Work that is not specified for Levels 2, 3, 4, or 5.

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Supporting Statement for 3408.4.3

This sub-section of Section 3408 has created many problems within the construction and renovation industry. Currently, tenant spaces greater than 20,000 square feet or that are 50% of a pre-1975 building's area proposing any rehabilitation and remodeling work must be structurally evaluated. This includes even the most basic cosmetic renovation work and disregards the fact that no structural work is proposed. We opine that the current Massachusetts specific language poses an undue burden with little benefit to the public, and that is impractical to enforce and implement. Under the current provisions, it is difficult if not possible to implement potential required upgrades in fully occupied buildings without significant disruption of existing tenant spaces. This is already having a negative impact on renovation work

Removing the text will eliminate the need for unnecessary structural evaluations and upgrades to buildings that are undergoing non-structural renovations. Currently, the work described in this section **3408.4.3 1. and 2.** only involves change of use of a space and does not describe structural work whatsoever. Changes of use resulting in greater live loads are addressed in Section 3408.8.1.1; a change of use results in no other load changes in a building.

The changes within this section will not affect other portions of Chapter 3408.

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3408.4.3 Level 2 Work. ~~Work or change of use involving any of the following.~~

- ~~1. Change of use of an area which is more than 35% of the existing floor area of the building.~~
- ~~2. For Pre-1975 buildings, when rehabilitation or remodeling is accumulated over a floor area of 20,000 sf or 50% of the total floor area of the building, whichever is less, starting from July 1, 2008. The terms rehabilitation and remodeling for the purposes of this clause shall mean any of the following work: removal or repair of ceilings, partitions, or interior facing of exterior walls; new ceilings, partitions, or interior facing of exterior walls; reconstruction or repair of floors; new mechanical or electrical distribution systems within an area; or new elevators, escalators, or stairs within an area or serving an area.~~
- ~~3. 1. Increase in total framed floor and roof area due to structurally attached additions up to a lifetime limit of 10% of the total framed floor~~



and roof area of the building that existed on February 28, 1997, or on the date of the certificate of occupancy if the building was built thereafter.

4. 2. Increase in effective seismic weight, with or without structurally attached additions, up to a lifetime limit of 10% of the effective seismic weight of the building that existed on February 28, 1997, or on the date of the certificate of occupancy if the building was built thereafter.

5. 3. Structural work involving any of the following.

A. *More than 25% of the total existing framed floor and roof area or 20,000 sf of existing framed floor and roof area, whichever is less.*

Where the work involves existing beams or girders, the tributary Area of the beams and girders shall be included in the Count for framed floor and roof area.

B. More than 25% of the total area of shear walls above the foundation.

C. More than 25% of the total length of columns and diagonal braces.

D. Openings in any framed floor or roof that have an area more than 5% of the area of the framed floor or roof.

E. Changes to any structural wall that reduce its in-plane shear resistance by more than 15%.

F. Changes to any floor or roof diaphragm that reduce its in-plane shear resistance by more than 15%.

G. Removal or reconfiguration of lateral load resisting frames, or foundations supporting them.

6. 4. Exemption for Pile Foundations.

Structural repairs of pile foundations are exempt from Level 2 Work.

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