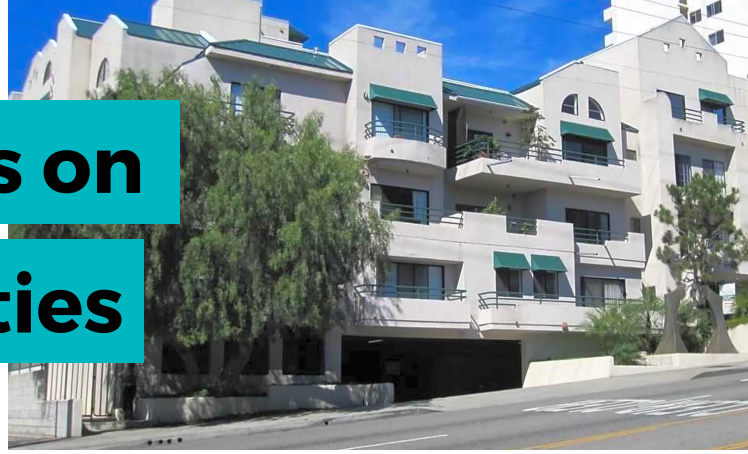


# Guidelines for ADUs on Multifamily Properties



Members of the Casita Coalition (agency staff, designers, contractors, nonprofits, and homeowners) frequently face questions about how the State ADU laws apply to the creation of ADUs within multifamily properties. These questions and answers may be very complex, due to the wide variety of multifamily properties throughout California. In these Guidelines, we have summarized commonly-asked questions and, with assistance from CA Housing & Community Development, have answered them to the best of our ability.

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**Appendix A:** Reduction in Housing Services Guidelines, Los Angeles Housing & Community Investment Department, Rent Adjustment Commission Regulations, Section 410, as amended 07-01-2019.

**Appendix B:** Sprinkler Requirements for Accessory Dwelling Units, Technical Bulletin, RESD-3-4, City of San Diego

# How to Use These Guidelines

Feel free to skip around these guidelines and appendices. We intend for each section to stand on its own. We have designed these Guidelines to provide helpful information to:

- Owners of multi-family properties interested in adding ADUs
- Builders of new multi-family properties trying to include ADUs
- Local Government Staff who want to better understand provisions in the State ADU laws for the creation of ADUs on multi-family property
- Local government staff who want to make it easier and faster for owners of multi-family properties to add ADUs.

For more information, please check out [Casita Coalition's Multifamily ADU Webinar](#)

## Key Definitions

Three definitions are critical to understanding these guidelines and the applicable state law. Frequently local governments use these terms differently than they are used in the State ADU law; in these guidelines, we use them consistent with the State ADU laws as interpreted by CA Housing & Community Development.

- **Multi-family Dwelling Structure:** a residential building that contains more than one dwelling unit, excluding an accessory dwelling unit. It may be a mixed-use building that also contains commercial and/or office space.
- **Non-livable space:** Areas of a multi-family dwelling structure that are outside the walls of an individual dwelling unit. Note that this definition is not the same as that for “non-habitable space.” which includes some rooms within the individual dwelling unit.
- **Statewide Exempt ADUs:** HCD has created this term to include all ADUs consistent with the requirements of CA Government Code 65852.2.e. Local governments may not apply development standards that might preclude the construction of one of these ADUs. ADUs that are not consistent with the requirements of CA Government Code 65852.2.e. are subject to other local standards. For example, a Statewide Exempt ADU would be a new detached ADU on multi-family property that is no more than 16 ft. tall and placed 4 ft. from the side and rear property lines; if that ADU was 18 feet tall, then it would no longer be considered “statewide exempt” and would be subject to the locally adopted ADU zoning requirements.

# Section I

## State law standards for ADUs on multi-family Properties

<b>Dev. Standards</b>	<b>Detached (New Construction)</b>	<b>Detached (Conversion of Accessory Structure)</b>	<b>Conversion of non-livable space within the building</b>	<b>Government Code Section</b>
<b>Eligible Parcels</b>	Zoned for Residential Use		Zoned for Residential Use	65852.2.e.1
<b>Types of ADUs</b>	Detached from multifamily building.	Conversion of an existing accessory structure. No JADUs.	Conversion of existing internal space. No JADUS.	65852.2.e.1.C and D; 65852.2.a.1.D
<b>Types of Space</b>	Newly constructed	Space within an existing accessory structure.	Space that is not within an individual dwelling unit.	65852.2.e.1.C and D; 65852.2.a.1.D
<b>Required Setbacks</b>	Maximum of 4 feet from side and rear property lines	None -- Accessory structure may be converted (or demolished and rebuilt) at its current location to similar dimensions	None -- Conversions of existing space within or attached to an existing multi-family structure	65852.2.e.1.D
<b>ADU Parking</b>	Follows same rules as all ADUs	Follows same rules as all ADUs	Follows same rules as all ADUs	65852.2.d
<b>Replacement Parking</b>	N/A	Not Required	N/A	65852.2.a.1.D.xi

See HCD's ADU Handbook, pg. 15-16, for more details.

# Section I - Cont.

## State law standards for ADUs on multi-family Properties

Dev. Standards	Detached (New Construction)	Detached (Conversion of Accessory Structure)	Conversion of non-livable space within the building	Code Section
<b>#s of Units</b>	At least 2 detached	At least 2 detached	No more than 25% of the number of units in the building	65852.2.e.1.D
<b>Maximum Size ("Statewide Exempt ADUs")</b>	1200 sq. ft., or as limited by local ordinance	1200 sq. ft., or as limited by local ordinance	1200 sq. ft., or as limited by local ordinance. No JADUs.	65852.2.e.1.C and D; 65852.2.a.1.D; 65852.2.c
<b>Maximum Size (Non-"Statewide Exempt ADUs")</b>	1200 sq. ft., or as limited by local ordinance	Limited to the size of the existing accessory structure	1200 sq. ft., or as limited by local ordinance	65852.2.e.1.C and D; 65852.2.a.1.D; 65852.2.c.1

# Section II

## Issues to Consider - Rules and Advice

### 1 What spaces in multi-family buildings may be converted to ADUs?

#### Non-Livable Space

The ADU law states that “multiple accessory dwelling units may be created “within the portion of existing multifamily dwelling structures that are not used as “livable spaces”. HCD considers “livable spaces” to be that area within an individual dwelling unit. Non-livable spaces would be areas outside a dwelling unit, including rooms for storage, boilers, passageways, attics, basements, or garages.

#### Amenities Used by Tenants

Some non-livable spaces are also amenities in the tenants’ eyes, which they believe they have a right to use. These amenities may be converted to ADUs if the tenants do not have a legal claim to use them. Often a lease defines what spaces a tenant has a right to use. However, other “implied use” measures may give the tenant the right to use it, even though the commitment was never put in writing. There may be an “implied” use of the open space, for example, confirmed verbally when they rented the apartment. Whether or not a tenant has a legal claim to use an amenity is beyond the authority of the State ADU laws, except where this right is in a written document.

#### *Advice - be thoughtful and careful!*

Contact local housing departments and rent control boards to learn what protections tenants have concerning the conversion of amenity spaces and the amount of compensation they may be entitled to. If a local agency has already created this structure for having this conversation, consider using this opportunity so tenants are not unnecessarily threatened.

#### Tenant compensation for loss of a space converted to an ADU

If the jurisdiction has Rent Control or some other similar authority, be sure to check their requirements for converting unused spaces. Depending on the nature of the “unused space” converted to an ADU, it is quite likely that the owner will be required to reduce the tenant’s rent. See Attachment A for an example of such requirements in LA.

### 1 What spaces in multi-family buildings may be converted to ADUs?

#### **Amenities previously required as a condition to construct the building:**

Some areas, such as parking spaces and open space, may have been required by a use permit or zoning standards as a prerequisite to constructing the building. Even though they were required for construction, if they qualify as spaces “that are not used as livable space” they may be converted to ADUs. Local governments may not require that the owner create these spaces elsewhere on the property. For example, the rule that local governments may not require “replacement parking” when a garage is converted into an ADU applies to multi-family properties just as it does to single-family properties.

Local governments shall, however, allow off-street parking elsewhere on the property, such as within required setback areas, and shall allow tandem parking. The local government may be excused from these requirements if they make specific findings that parking in setback areas or tandem parking is not feasible based upon specific site or regional topographical or fire and life safety conditions.

### 2 How to involve/work with local rent control agencies

- Determine if the ADU is converted from a portion (whether habitable or not) of the Pre 1978 structure and if the construction will interfere with a tenant’s right to occupy the premises.
- A Rent Stability Ordinance (RSO) may require a reduction in rent when a housing service or amenity provided at the inception of tenancy is removed.

#### **Contact local rent control board to determine:**

- Will the ADU be exempt from RSO?
- Will the conversion of existing space trigger a reduction in rent?

### 3 Any special rules for properties that are historic resources?

Federal law protecting historic resources applies to all ADUs, even if they qualify as “statewide exempt ADUs.” State and local rules, however, do not apply to “statewide exempt ADUs,” although many owners follow these rules voluntarily. For all other ADUs, the rules apply and must be objective standards.

#### State Rules

Government Code 65852.2.a.1.B.i applies to both single-family and multi-family properties. Local governments may apply “standards that prevent adverse impacts on any real property that is listed in the California Register of Historic Resources.” As required throughout this law, the standards must be ministerial, therefore “objective” standards, and not implemented through a discretionary permit. They must be ministerial permits.

State and Local standards are often subjective, but a local government may transform them into objective standards and apply them as part of the ministerial approval of the ADU. Some jurisdictions have created a voluntary review process, which owners often find helpful. Others, such as San Diego, have created a very short (7 - 10 days) review process by staff that they apply concurrently with the building permit review process.

If the ADU is a "statewide exempt ADU," the owner cannot be required to follow state or local rules for historic preservation for ADUs on multi-unit properties. Only federal rules apply to these ADUs.

#### Federal Rules

Federal laws apply to “statewide exempt ADU” (i.e., subdivision (e) ADUs) when the property is on the Federal Registry but not to those just on the California registry.)

***Advice - comply voluntarily when reasonable.***

### 4 Are fire sprinklers required when adding an ADU to a duplex because it becomes a 3-unit structure?

When an ADU is added to a duplex, its occupancy designation changes from R-3 (under the CA. Residential Code (CBC 903.2.7) to R-2 (under the CA Building Code). As R-3 occupancy, fire sprinklers are not required; as R-2 occupancy, fire sprinklers are required. However, the ADU law (Section 65852.2.e.3) states that “The installation of fire sprinklers shall not be required in an accessory dwelling unit if sprinklers are not required for the primary residence.” The local Building Official may choose to impose the Building Code and require fire sprinklers.

Building Officials have other options. They may accept alternative measures (such as fire alarms) or they may exempt the ADU from Fire Sprinklers under the CA Existing Building Code (CEBC). CEBC Section 506.1 allows a change of occupancy without imposing all the Building Code requirements **when the new use is less hazardous than the existing use**. In this case, the ADU will be less hazardous than the existing units because (1) it must comply with the current building code, which imposes significant “hardening” requirements on all new construction, and (2) it must be separated from the existing units by one-hour rated firewalls (See CBC 406.3.2). The City of San Diego uses this logic to conclude that ADUs created from existing space in a duplex are not required to be sprinkler protected if the existing units are not sprinkler protected (see Appendix B).





### **5** Phasing Construction of ADUs with new multi-family structures

In some cases, owners are building new multi-family structures with the intent of adding ADUs to the property as allowed under Subdivision (e). In most cases, local governments require them to phase the project - i.e. first build the multi-family building and, after it's finished, get new permits to create the ADUs.

Developers have asked if the State law requires local governments to process the new building and new ADU permits together, rather than phasing the permits.

Local governments may certainly allow this approach, rather than requiring the owner to phase development of the building, but State law does not require them to do so. The law in this case (65852.2.e.1.D) applies to "existing multi-family structures," not "existing and proposed" structures (as allowed for single-family dwellings).

So when does the "proposed" building become an "existing" building? HCD's interpretation is that the building is classified as "existing" when it is complete, which would be when the Certificate of Occupancy is issued.

HCD staff also point out that an owner may add an ADU to a multi-family property just as allowed for a single-family property. Government Code 65852.2 Subdivision (a) applies to both single-family and multi-family properties. One detached ADU could be permitted along with the proposed new multi-family building, as long as one proposed unit is labeled a primary dwelling unit.

### **6** For conversion ADUs, does the 25% apply to the entire parcel or to each building separately?

The 25% applies to each multi-family building separately, not to the total number of units on the parcel.

### **7** How do the rules differ when converting an Accessory Structure to an ADU on single family property vs. multi-family property?

The state law, subdivision (a) applies to both single family and multi-family properties. Thus, multi-family properties may convert an accessory structure (such as a detached garage) to an ADU, with all the same provisions given to conversions on single-family properties. Similarly, local governments may apply the same zoning standards to these ADUs as they may to ADUs on single-family parcels. See Government Code 65852.2.a.1.D.

State law does not include a height limit on the accessory structures to be converted. This applies to accessory structures on both single-family and multi-family parcels. Subdivision (e) protections apply to ADUS created by conversion of an accessory structure, whether on single-family or multifamily parcels.

### **8** Does a converted garage count toward the 2 freestanding ADUs or the 25% of units for conversion of space?

If the garage is detached, it counts toward the 2 detached ADUs allowed on multifamily parcels. If the garage is attached (i.e., within the multifamily building) then it counts toward the 25% of units created from unused space.

### **9** How many ADUS must a local government allow on a multi-family property?

Local jurisdictions must allow either 2 detached ADUs on the property with a multi-family dwelling structure OR conversion of unused space within a multifamily building into ADUs (up to 25% of the number of units in a building). The property owner may decide which category of ADUs to add to his/her property, in the numbers allowed by the State law. That is, the local jurisdiction may not adopt regulations that only allow detached ADUS, for example, or only allow one detached ADU and one conversion ADU. Some jurisdictions exceed the state law minimums and allow owners to build both 2 detached ADUs AND conversion ADUs up to 25% of the number of units in a building.

# Section III

## Suggestions for Local Governments

### **1. Allow multi-family owners to add up to 2 detached ADUs and also to convert non-livable spaces to ADUs.**

This will increase the number of dwelling units on properties that already have multiple units.

### **2. Increase the height limit for detached ADUs on multi-family properties from 16 feet to 20 ft., without losing their protections as a “statewide exempt ADU.”**

This provision can halve the size of footprint by allowing a 2 story ADU, thereby allowing more open space, and retaining the opportunity for 9-10 ft ceiling heights that offer better room volume in small units. Furthermore, this would allow ADUs to be built to allow parking under the unit and allow for the taller ceilings on the second floor. Thereby, owners could elect to provide parking opportunities for the tenants of the ADUs. Although ADUs are subject to height limits of 16 feet, local governments could use the underlying zoning development standards to allow cohesive design between existing and new structures.

### **3. Create a process to make it easier for landlords and tenants to reach agreement on spaces to be converted to ADUs and the compensation due to the tenant.**

The City of Los Angeles Rent Control Board has created a table listing the rent reduction due to tenants for each type of amenity that gets converted to an ADU. As a result, the process runs smoothly (see Appendix A).



## Additional Resources

**Appendix A:** Reduction in Housing Services Guidelines, Los Angeles Housing & Community Investment Department, Rent Adjustment Commission Regulations, Section 410, as amended 07-01-2019.

**Appendix B:** Sprinkler Requirements for Accessory Dwelling Units, Technical Bulletin, RESD-3-4, City of San Diego

### [Casita Coalition's Multi-Family ADU Webinar](#)

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*Reviewed by Greg Nickless, Housing and Community Development, for consistency with State ADU law, Govt. Code Section 65852.2.*



# REDUCTION IN HOUSING SERVICES

**Rent Adjustment Commission Regulations • Section 410.00 • Effective Date 11-17-1982  
•Amended 06-01-2006, 01-16-2013,06-20-2018, 07-01-2019**

**410.00 REDUCTION IN HOUSING SERVICES**

**410.01 AUTHORITY OF COMMISSION TO REGULATE**

**410.02** The Rent Adjustment Commission (the Commission) promulgates these regulations on reduction in housing services so that a corresponding reduction in rent can be determined to avoid an increase in rent in violation of the Rent Stabilization Ordinance (LAMC Sec. 151.02, Definition of Rent Increase).

**410.03** A tenant rents an apartment with the appurtenant housing services available at the time of renting the apartment. Landlords who reduce housing services without a corresponding reduction in rent effectuate an increase in rent. The purpose of these regulations is to guide the Los Angeles Housing + Community Investment Department in its evaluation of a corresponding reasonable reduction in rent.

**410.04** Housing services are services that are connected with the use or occupancy of a rental unit including, but not limited to, utilities (including light, heat, water and telephone), ordinary repairs or replacement, and maintenance including painting. The term also includes the provision of elevator service, laundry facilities and privileges, common recreational facilities, janitor service, resident manager, refuse removal, furnishings, food service, parking and any other benefits, privileges or facilities. (LAMC Sec. 151.02, Definition of Housing Services).

**411.00 SCOPE OF REGULATIONS**

**411.01** When a tenant makes a complaint that there has been a reduction in housing services in violation of housing codes related to habitability of a dwelling under California Health & Safety Code 17920.3 or 17920.10, the Los Angeles Housing + Community Investment Department will determine a corresponding reduction in rent under the Rent Escrow Account Program regulations (RAC Regulations 1200.00 et. Seq.

**411.02** When a tenant makes a complaint that there has been a reduction in housing services and those services do not correspond to the habitability of a dwelling under California Health & Safety Code 17920.3 or 17920.10, the Los Angeles Housing + Community Investment Department will determine a corresponding reduction in rent under regulations 413.00 et seq. and 414.00 et. seq. below.



**866-557-RENT [7368] HCIDLA.LACITY.ORG  
P.O. BOX 17280, LOS ANGELES, CA 90017-0280**

# REDUCTION IN HOUSING SERVICES

Rent Adjustment Commission Regulations • Section 410.00 • Effective Date 11-17-1982  
•Amended 06-01-2006, 01-16-2013,06-20-2018, 07-01-2019

- 411.03** A reduction of rent is applicable to all housing services, regardless of whether the housing service was created or established in violation of any provision of law.
- 411.04** The Commission promulgates the regulations for calculation of the corresponding reduction in rent in Section 413.00 to enable the Los Angeles Housing + Community Investment Department's Rent Investigations Unit to evaluate the evidence presented for determination of a reasonable corresponding reduction in rent for a reduction in housing services.
- 411.05** The Commission promulgates the Valuation Guidelines in Section 414.00 as guidelines only. They are not necessarily determinative of the value of Housing services in any particular case; rather the value of housing services provided in connection with a specific tenancy will be determined primarily upon the evidence presented to the Los Angeles Housing + Community Investment Department's Rent Investigations Unit, and only secondarily with references to these guidelines.
- 411.06** These regulations are not intended to provide any authority or support for the reduction, removal or taking away of housing services.
- 412.00** **REMEDIES FOR REDUCTION IN HOUSING SERVICES**
- 412.01** Where the reduction in services is a breach of the rental agreement, or of any obligations imposed by law on the landlord relating to habitability, the tenant is not prohibited from pursuing all remedies under applicable law.
- 412.02** Where there is a reduction in services without a corresponding decrease in rent, the tenant must file a complaint with the Los Angeles Housing and Community Investment Department and must provide written notice to the landlord of the loss of service. In addition, the tenant may pursue all other remedies under applicable law.
- 412.03** LAMC 151.11.A provides that a tenant may refuse to pay rent in excess of the maximum rent or maximum adjusted rent (LAMC Sec. 151.02 defines maximum rent and maximum adjusted rent). The fact that the tenant's rent is in excess of the maximum rent or maximum adjusted rent shall be a defense in any eviction or collection action. The Commission advises tenants who wish to pursue their legal remedies that the Ordinance contains provisions permitting both permanent and temporary rent increases (surcharges) that do not become part of the maximum rent or maximum adjusted rent. Tenants who wish to pursue their legal remedies in this regard are advised to seek advice from an attorney.



# REDUCTION IN HOUSING SERVICES

Rent Adjustment Commission Regulations • Section 410.00 • Effective Date 11-17-1982  
•Amended 06-01-2006, 01-16-2013,06-20-2018, 07-01-2019

## **413.00      CALCULATION OF CORRESPONDING REDUCTION OF RENT**

**413.01**      In evaluating the amount of rent reduction that may reasonably compensate the tenant for the loss of specific housing services, the Los Angeles Housing + Community Investment Department will consider the extent to which the reduction in housing services affects the tenants of a given rental unit, the rent paid by the tenant(s) for the unit, the relative significance of the reduced service in relation to the safety, health, convenience and comfort of the tenant(s), the prevailing market value of the housing service in question as a rental amenity, the extent to which the tenant(s) was led to rely upon the fact that the service would be provided and such other factors as are deemed to be relevant by the Los Angeles Housing + Community Investment Department.

**413.02**      When a tenant has suffered a reduction of services that are severable and specific to that tenant (i.e. loss of parking space, loss of storage, loss of cable), the corresponding reduction of rent may be calculated based on the reasonable replacement cost for that service to the tenant based upon the evidence submitted.

**413.03**      When a tenant has lost use and enjoyment of a portion of his or her specific unit, the corresponding reduction of rent may be calculated based on the percentage loss of square footage, where such methodology would be reasonable.

**413.04**      If a landlord restores the reduced housing service within reasonable time after notification by the tenant or the Los Angeles Housing + Community Investment Department, the Department may use this fact to decide against a corresponding reduction in rent.

**413.05**      If a housing service is temporarily interrupted as the necessary result of needed repairs, then the Los Angeles Housing + Community Investment Department may use this fact to decide against a corresponding reduction in rent when the landlord is not taking an unreasonable amount of time to restore the services.

## **414.00      TIME LIMITS**

**414.01**      The reduction of rent may not exceed 3 years retroactive from the date of filing a complaint with HCIDLA.

## **415.00      VALUATION GUIDELINES**

**415.01**      The valuation guidelines below are not necessarily determinative of the value of housing services reduced in any particular case. The value of those services will be determined primarily upon reasonable valuation evidence presented to the Los Angeles Housing + Community Investment Department in connection with a specific tenancy. The value of housing services below will only serve as guidelines in the Los Angeles Housing + Community Investment Department's determination of the reduction in rent for a specific tenancy where there is no evidence presented or where these values will assist the Los Angeles Housing + Community Investment Department's Rent Investigators in arriving at a reasonable valuation of the corresponding reduction in rent.



# REDUCTION IN HOUSING SERVICES

Rent Adjustment Commission Regulations • Section 410.00 • Effective Date 11-17-1982  
 •Amended 06-01-2006, 01-16-2013,06-20-2018, 07-01-2019

## 415.02 Suggested Valuation Guidelines Table (monthly values)

A/C	\$58-\$115
Clothes Dryer/Washer-coin	\$24
Clothes Dryer/Washer-unit	\$35-\$58
Door screens	\$12-\$24
Elevator service	\$58-\$115
Furnishings (for a furnished unit only)	\$231-\$577
Gardening/Landscape	\$12-\$24
Gates/Fences (security)	\$12-\$24
Kitchen facilities	\$231-\$462
Mailbox	\$24-\$35
Manager (on- site)	\$24-\$35
Parking	\$70-\$231

[In determining the corresponding reduction in rent, the Los Angeles Housing + Community Investment Department may consider the density of a particular neighborhood, the availability of local parking structures within walking distance of the tenant's dwelling, and the availability of street parking. Hollywood, Venice, West Los Angeles, Downtown Los Angeles, Korea town, Miracle Mile, Pico-Union, Fairfax- La Brea and the Beverly Center are examples of neighborhoods with very high cost of off-site rental parking and low availability of street parking].

Pool	\$21-\$78
Fitness Center	\$21-\$78
Recreational Facilities	\$12-\$24
Refrigerator	\$93-\$115
Stove	\$93-\$115
Storage	\$75-\$795
Sun shades (porch/balcony)	\$3-\$6
Yards, Patios, Balconies or Play Areas	\$12-\$139

## 415.03 The Suggested Valuation Guidelines Table in 415.02 was compiled based on data collected in September 2018 and updated in July 2019.

### THIS INFORMATION IS OFFERED FREE OF CHARGE TO THE GENERAL PUBLIC.

While this publication is designed to provide accurate and current information about the law, readers should consult an attorney or other expert for advice in particular cases, and should also read the relevant statutes and court decisions when relying on cited material. Laws and guidelines are frequently amended. The HCIDLA recommends that you verify information in the event that new changes are not yet reflected in this publication. The HCIDLA does not assume and hereby disclaims any liability to any party for any loss, damage, or disruption caused by errors or omissions, whether such errors or omissions result from negligence, accident, or any other cause.

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## Sprinkler Requirements for Accessory Dwelling Units

TECHNICAL BULLETIN  
**RESD-3-4**

City of San Diego  
Development Services Department

November 2020

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The purpose of this Technical Bulletin is to provide guidance in the requirements for sprinkler protection for accessory dwelling units when the primary residence is not sprinkler protected. For additional information regarding accessory dwelling units, see [Information Bulletin 400](#).

**I. GENERAL**

All new residential units require sprinkler protection per the 2019 California Building Standard Codes, however 2016 California Senate Bill 1069 exempts accessory dwelling units (ADUs) compliant with this Senate Bill from sprinkler protection when the primary dwelling unit is not sprinkler protected. Senate Bill 1069 does require the design to meet all health and safety requirements of the building standards.

**II. DETACHED ADUS**

Detached ADUs only require sprinkler protection when the primary dwelling unit is sprinkler protected. For duplexes and multiple dwelling unit (MDU) building sites adding an ADU, the primary dwelling unit is considered the entire duplex or the MDU building.

**III. ATTACHED ADUS**

Attached ADUs always require sprinkler protection when the primary dwelling unit is sprinkler protected.

The following attached ADU designs do not require sprinkler protection when the primary dwelling unit is not sprinkler protected:

- A. ADU attached to a single family home.
- B. ADU attached to a duplex (two-family dwelling) created by converting existing, permitted space. Although this project is a change of occupancy from a Group R-3 to a Group R-2, California Existing Building Code (CEBC), Section 506.1 allows for a change of occupancy without compliance with all of the requirements of the code for the new occupancy when the new use is less hazardous.
- C. ADU attached to an MDU created by converting the existing permitted space. As there is no change in occupancy and no increase in fire area, sprinklers are not required.

Documents referenced in this Technical Bulletin
<ul style="list-style-type: none"><li>• California Existing Building Code (<a href="#">CEBC</a>)</li><li>• California Fire Code (<a href="#">CFC</a>)</li><li>• <a href="#">Information Bulletin 400</a>, Accessory Dwelling Units and Junior Accessory Dwelling Units</li></ul>