

Date: March 5, 2026

Subject: Preliminary Building Code Review – Existing 3-Story + Basement Commercial Structure located at 1321 West 2nd Ave, Spokane, WA.

Dear Mr. Dicker,

By request, I conducted a preliminary visual review on February 25, 2026, of an existing three-story commercial building with basement located at **1321 West 2nd Ave, Spokane, WA**. This review was limited in scope and was not a structural analysis or invasive investigation. The following observations are provided within the framework of the currently adopted building code.

1. Exterior Structural System

The exterior walls appear to be constructed of unreinforced masonry (URM). Based on visual observation, the exterior shell appears substantially complete and does not presently exhibit visible signs of major structural distress such as significant cracking, displacement, bowing, or ongoing deterioration.

Pursuant to the **2021 International Existing Building Code (IEBC)** §301.1 and §302.1, existing structures are permitted to remain provided they do not constitute an unsafe condition. At the time of observation, no exterior conditions were identified that would independently render the building unsafe under IEBC §303 or IBC §116 (Unsafe Structures).

That said, URM buildings are inherently brittle structural systems and are subject to evaluation under seismic provisions if substantial alteration, change of occupancy, or structural modification is proposed (IEBC Chapter 4, 5, or 6, as applicable to the selected compliance method).

2. Interior Conditions and Prior Unpermitted Work

The interior of the building presents several areas of concern:

1. It appears a previous tenant performed unpermitted interior demolition and alterations, including removal of wall assemblies consisting of lath, plaster, framing members, and associated electrical systems.
2. The extent of demolition suggests potential removal of partitions that may have been load-bearing or may have contributed to the building's lateral force-resisting system.

3. Despite removal of interior wall components, no visible floor sagging, excessive deflection, or apparent structural distortion was observed at the time of inspection.
4. Floor systems observed did not demonstrate noticeable deflection or distress; however, this observation is limited to visual conditions only.

Pursuant to IBC §105.1, a permit is required for structural alterations. Additionally, IEBC §304.1 requires that alterations comply with the applicable provisions for structural safety. Where structural elements have been removed or altered, verification by a Washington State licensed structural engineer may be required to confirm that gravity and lateral load paths remain intact and compliant with IBC Chapter 16.

3. Structural Integrity Considerations

While no visible sagging or immediate structural instability was observed, the absence of visible distress does not confirm structural adequacy. Removal of interior walls in older URM structures can affect diaphragm anchorage and lateral stability.

If rehabilitation is proposed, the following will likely be required:

- Structural evaluation report prepared by a licensed engineer (IEBC §301.1.1, §305, or §606 depending on work scope).
- Identification of existing gravity load paths and lateral load-resisting system.
- Seismic evaluation if alteration level or occupancy triggers IEBC Chapter 5, 6, or 7 requirements.
- Verification of diaphragm-to-wall anchorage (common URM deficiency).
- Electrical system evaluation for compliance with current code where modifications occurred (IBC §2701; NEC as adopted).

4. Rehabilitation Potential

Based on visual observations alone, it appears feasible that the building may be rehabilitated by preserving the exterior shell while undertaking substantial interior reconstruction.

The IEBC provides several compliance pathways (Prescriptive, Work Area, or Performance Method) that may allow adaptive reuse while maintaining the exterior structure, provided structural safety, egress, fire protection, and life safety provisions are met.

Final determination of rehabilitation feasibility will require:

- Formal permit application
- Detailed construction documents
- Structural analysis

- Code compliance review under the adopted 2021 IBC, IEBC, IFC, and related referenced standards

5. Conclusion

At the time of inspection:

- No exterior conditions were observed that would immediately classify the structure as unsafe.
- Interior demolition was evident and appears to have been conducted without permits.
- No visible structural sagging or distress was observed; however, engineering verification is required.
- Rehabilitation appears possible, subject to full code review and structural evaluation.

This correspondence is intended as a preliminary assessment only and does not constitute structural certification or approval of occupancy.

Please contact our office prior to initiating any rehabilitation work so that proper permitting and review procedures may be established.

Respectfully,



Dermott Murphy
Building Official
City of Spokane, WA
509-625-6142

