



Change of Use Analysis Evaluation

As required for uses increasing hazard classification

City of Franklin Inspection Services Department

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To all applicants changing the use of an existing space:

Certificates of Occupancy are required for all commercial businesses, uses, and structures. Approval involves verification that the proposal follows the zoning requirements and that new uses will not create a health or life-safety hazard in the building. This document describes analysis requirements for proposed uses that are different than those for which the structure was most recently legally occupied, before uses can be approved.

In most cases, the City of Franklin requires inspection prior to issuing an occupancy permit. Due to the complexity of the building code, historical code changes, and items which cannot be confirmed visually during inspections, it is necessary that additional code analysis is performed when a new use poses a higher hazard. Building codes in these situations may require significant alterations to be provided to the building.

An understanding of what may be required to ensure the code compliance of any building should be obtained as early on in any planning process as possible. A Change-of-Use Analysis may demonstrate that a structure is safe for a new use, or conclude that there are deficiencies which would require alteration before occupancy.

When a proposed use is a greater potential hazard based on Tables 1011.5, 1011.6, 1011.7 of the 2021 International Existing Building Code, a “Change-of-Use Analysis” is required during review of a Certificate of Occupancy application. Additional, if the proposed use includes a special occupancy or use per IEBC 1002.1, increased occupant load, or known fire hazards including combustible storage over 12 feet in height, high-hazard storage over 6 feet in height, a “Change-of-Use Analysis” evaluation shall be performed. The evaluation shall include architectural plans of the existing building which the proposed use will occupy along with separate plans for any proposed alterations to that space. The plan must indicate all occupancies unseparated from the proposed use and areas of the existing building outside of the area to be occupied that provide access to, and egress from, the subject space, or otherwise impact the building code limitations. The evaluation shall provide line-by-line verification of IEBC chapter 10 (as modified by SPS 366) in a format of your own choosing to confirm that the building meets all applicable building codes and identifies any and all existing code violations with a proposal to resolve them. Per state requirement SPS 361.31, a qualified design professional licensed in Wisconsin (Architect or Professional Engineer) shall be required to complete the analysis for any building over 50,000 cubic feet and is strongly recommended in all other cases. The conclusions reached by the design professional will then be reviewed by Inspection Services staff to validate that the proposed use will be code compliant.

If alterations are required, the alteration plans must demonstrate the altered structure will comply with relevant building codes in all regards that a “Change-of-Use Analysis” would show compliance.