



ICC CODES - PUBLIC COMMENT FORM

FOR PUBLIC COMMENTS ON THE "2009/2010 REPORT OF THE PUBLIC HEARINGS"

- IBC - International Building Code (E, FS, G, S)
- IEBC-International Existing Building Code (EB)
- IFC-International Fire Code (F)
- IFGC - International Fuel Gas Code (FG)
- IMC - International Mechanical Code (M)
- IPC - International Plumbing Code (P)
- IRC - International Residential Code-Building (RB)
- IRC-International Residential Code-Plumbing/Mechanical (RP, RM)
- IWUIC- International Wildland-Urban Interface Code (IWUIC)

CLOSING DATE: All Comments Must Be Received by February 8, 2010. The 2009/2010 Final Action Hearings for the codes listed above, will be held May 14-23, 2010 in Dallas, TX.

1) Please type or print clearly: Public comments will be returned if they contain unreadable information.

Name:	Homer Maiel, PE, CBO			Date:	2/3/2010
Jurisdiction/Company:	City of San Jose				
Submitted on Behalf of:	ICC Tri-Chapter (Peninsula, East Bay, Monterey Bay Chapters)				
Address:	200 E. Santa Clara Street, Second Floor				
City:	San Jose	State:	CA	Zip +4:	95113-1905
Phone:	(408) 535-7765	Ext:	n/a	Fax:	408-292-6246
e-mail:	homer.maiel@sanjoseca.gov				

2) Copyright Release: In accordance with Council Policy #28 Code Development, all Code Change Proposals, Floor Modifications and Public Comments are required to include a copyright release. A copy of the copyright release form is included at the end of this form. Please follow the directions on the form. This form as well as an alternative release form can also be downloaded from the ICC website at www.iccsafe.org. If you have previously executed the copyright release, please check the box below:

2009/2010 Cycle copyright release on file

3) Code Change Proposal Number:

Indicate the Code Change Proposal Number that is being addressed by this Public Comment: E107-09/10

4) Public Comment: The Final Action requested on this Code Change Proposal is: (Check Box)

Approved as Submitted (AS):
 Approved as Modified by this Public Comment (AMPC):
 Approved as Modified by the Code Committee as Published in the ROH (AM):
 Approved as Modified by Assembly Floor Action as Published in the ROH (AMF):
 Disapproved (D):

Attached Proposed Modifications and/or Reason Statements:

See Attached Individual Consideration Form

PLEASE USE SEPARATE FORM FOR EACH PUBLIC COMMENT
 SUBMITTAL AS A DOCUMENT ATTACHED TO AN EMAIL IS PREFERRED
 SEE BACK OF FORM FOR DIRECTIONS ON WHERE TO SEND PUBLIC COMMENTS

INDIVIDUAL CONSIDERATION FORM

E107-09/10

1015.2.1 (IFC[B] 1015.2.1)

Individual Consideration Agenda

This item is on the agenda for individual consideration because a public comment was submitted.

Public Comment:

Homer Maiel, PE, CBO, City of San Jose, representing ICC Tri-Chapter (Peninsula, East Bay, Monterey Chapters), requests Approved as Modified.

Modify the proposal as follows

1015.2.1 (IFC [B] 1015.2.1) Two exits or exit access doorways. Where two exits or exit access doorways are required from any portion of the exit access, the exit doors or exit access doorways shall be placed a distance apart equal to not less than one-half of the length of the maximum overall diagonal dimension of the building or area to be served measured in a straight line between exit doors or exit access doorways. Interlocking or scissor stairs shall be counted as one exit stairway.

Exceptions: of

1. Where exit enclosures are provided as a portion the required exit and are interconnected by a 1-hour fire-resistance-rated corridor conforming to the requirements of Section 1018, the required exit separation shall be measured along the shortest direct line of travel within the corridor. ~~The exit or exit access doorway to such enclosures shall not be less than 25 feet (7.62m), measured in a straight line, from the exit or exit access doorway of another exit enclosure.~~ The exit enclosures interconnected by a 1-hour fire-resistance-rated corridor must also be separated by a distance of not less than 30 feet, or not less than one-fourth of the length of the maximum overall diagonal dimension of the building or area served. This distance shall be measured in a straight line between the nearest points of the exit enclosure.

2. Where a building is equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1 or 903.3.1.2, the separation distance of the exit doors or exit access doorways shall not be less than one-third of the length of the maximum overall diagonal dimension of the area served.

Commenter Reason:

The original proposal adding a sentence to Exception 1 is modified in this public comment to delete the original proposed wording and substitute wording identical to that used in 2009 IBC Section 403.5.1, Remoteness of exit stairway enclosures. This substituted wording addresses the comments received from the ICC Egress Committee by using currently established exit enclosure separation distance criteria from Section 403.5.1, and by removing the term "exit access doorway". The fact that very small footprint buildings normally only need one exit per Table 1021.2, and that this provision only applies once two exits are required, should mitigate the concern raised about the separation being too restrictive when applied to very small footprint buildings.

The 2009 IBC's inclusion of a straight line separation requirement between exit enclosures applicable to High Rise Buildings (having an occupied floor located more than 75 feet above the lowest level of fire department vehicle access) is equally applicable in buildings of fewer stories, because of the code's underlying premise for having a minimum separation of exits is that all occupants should be reasonably assured to have the use of at least one of the two required exits.
