



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.

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|-------------------------|--|---------|--------------|
| 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) | | |
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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: RB104-09/10

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

RB104-09/10

R602.7, R602.7.1 (new), Table R602.7.1 (new), Figures R602.7.1(1)-(2)(new)

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 Disapproval.

The Tri-Chapter recommends that this code proposal be denied until further structural analysis and evaluation can be performed. The lack of a solid header over wider window and door openings creates significant concerns over excessively "flexibility" around openings in exterior walls. This problem is much more significant when the exterior siding materials are rigid exterior building materials, such as exterior stucco plaster, where the recommended deflection criteria for stucco is limited to a maximum of $l/360$ (ASTM C926). For example, a single 2x12 header over a large window or door opening with up to an 8'-1" span would appear to fail to meet the deflection limitations for an exterior stucco wall when evaluating the potential bending in the header due to wind loading. As indicated, these "single headers" are only designed for vertical/gravity loading and are oriented in the "weak axis" for out-of-plane wind loading. Further, the allowance of a framing anchor attached to the full-height wall stud in lieu of the required jack stud results in additional problems of out-of-plane bending of the adjacent "single" king studs. For example, a single 2x4 king stud will fail to meet the maximum deflection criteria for out-of-plane bending when evaluating an 8'-0" opening and maximum wind speed and exposure as allowed in the IRC. The jack stud is no longer available to brace the king stud for out-of-plane wind forces. In addition to the out-of-plane bending problems identified above, the additional "flexibility and eccentricity" introduced by the use of "single headers" over wider window and door openings has not been evaluated. Even in minor earthquake and wind events, the additional flexibility around the wider window and door openings allowed in the proposed Table R602.7.1 are likely to result in more building damage due to excessive building movement.

We believe that whatever minimal energy savings is gained by the use of these single headers is more than offset by window failures and water intrusion issues that may result from excessive exterior wall deflection and building movement. We have seen examples of double pane window seals being broken, failure of window and door frames and seals, and water infiltration at door and window openings caused by excessive exterior wall deflection and building movement. The observed damages caused by excessive exterior wall deflection and building movement far exceeded the energy or materials savings that may otherwise result from this proposal.