

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: RB72-09/10

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

RB72-09/10

R403.1.3

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 Submitted.

Commenter Reason: In seismic design categories D0, D1 and D2 the flexural demands placed upon footings of stud wall framed detached one- and two-family dwellings make the use of plain concrete footings devoid of any longitudinal reinforcing unacceptable. IRC Section R301.1 specifically states "This code shall result in a system that provides a complete load path that meets all requirements for the transfer of all loads from their point of origin through the load-resisting elements *to the foundation*." The foundation is an integral part of the seismic force-resisting load path and deserves to be constructed in a manner consistent with the seismic-resisting braced wall panels it is supporting. The current specific allowance for absence of any longitudinal reinforcing will also prevent any vertical reinforcing from being placed in the footing, since there is nothing to tie any vertical bar to; consequently the current provision is allowing totally unreinforced footings in dwellings up to three stories in height.

Since the mid-1990's wood light-frame prescriptive provisions for alternative wall bracing using tie-downs (as currently shown in IRC Figure R602.10.3.2) have required that the foundation at these alternative panels utilize one No. 4 bar top and bottom. Also, more recent IBC alternative wall bracing provisions utilizing a portal frame concept (Section 2308.9.3.2) that includes providing tie-downs similarly specifies footings with one No. 4 bar top and bottom. Unfortunately the equivalent portal frame provisions in IRC Section R602.10.3.4 do not address the footing's reinforcement. In addition, tie-downs are also specified in IRC Table R602.12(2) when stone or masonry veneer is installed, and in IRC Section R602.10.1.4.1 when brace wall panels are offset from the end of the wall line, yet neither of these IRC provisions mention minimum footing reinforcement. Further, IRC Section R301.1.1 explicitly allows use of AF&PA Wood Frame Construction Manual (WFCM) as a permitted alternative, but in that document all walls providing lateral resistance are required to use various types of tie-downs. Each time a tie-down is installed, the footing should be capable of resisting the flexural demands induced by that connection, yet the current Section R403.1.3 exception 1 ignores this need.

While we recognize there is a cost of installing this minimum reinforcing, we believe that most builders of dwellings in Seismic Design Categories D0, D1 and D2 are already providing this level of reinforcing, and that the cost of repairing cracks caused to interior and exterior finishes not to mention the foundation itself would far exceed the cost of minimal reinforcement of footings during the original construction.

With regard to any inconsistency of this proposal with the NEHRP Provisions, it must be noted that the applicable NEHRP provision (Sec. 9.4.2.2 Exception 1) has not been updated since its publication in 2004 (FEMA 450-1/2003) while during that period many of the IRC's provisions for the use of tie-downs at the ends of brace wall panels have been added to the code.
