



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
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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: S166-09/10

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

S166-09/10

1908.1.8

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

1908.1.8 (c) Plain concrete footings supporting walls are permitted, provided the footings have at least two continuous longitudinal reinforcing bars. Bars shall not be smaller than No. 4 and shall have a total area of not less than 0.002 times the gross cross-sectional area of the footing. For footings that exceed 8 inches (203 mm) in thickness, a minimum of one bar shall be provided at the top and bottom of the footing. Continuity of reinforcement shall be provided at corners and intersections.

Exceptions:

1. In Seismic Design Categories A, B and C, detached one- and two-family dwellings three stories or less in height ~~and constructed with stud-bearing walls, are permitted to have plain concrete footings without longitudinal reinforcement supporting walls are permitted.~~

All remaining exceptions are unchanged.

Commenter Reason: In seismic design categories D, E and F, 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. The footing 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 walls or shear 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 (currently in IBC Section 2308.9.3.1) for alternative wall bracing using tie-downs have required that the foundation at these alternative panels utilize one No. 4 bar top and bottom. Also, more recent alternative wall bracing provisions (Section 2308.9.3.2) that use tie-downs similarly specify footings with one No. 4 bar top and bottom. In addition, since the 2003 IBC, provisions for tie-downs at braced walls of buildings having stone or masonry veneer have been specified (Sections 2308.11.2 and 2308.12.2), but without any mention of minimum foundation reinforcing. Each time a tie-down is installed, the footing should be capable of resisting the flexural demands induced by that connection, yet the current 1918.1(c) exception 1 ignores this need.

There are additional reasons that this provision should be revised. The 2006 IBC reduced the number of stories permitted when using conventional construction provisions to two stories in Seismic Design Category C (Section 2308.11.1) and to one story in Seismic Design Categories D and E (Section 2308.12.1), while section 1908.1.8 continues to allow plain concrete footings for stud bearing wall of one- and two-family dwellings up to three stories in height. This implies that plain concrete footings are permitted even in engineered one- and two-family dwelling construction. The IBC also explicitly deems the use of AF&PA Wood frame Construction Manual (WFCM) as permitted to substitute for the traditional 2308 bracing provisions, but in that document all walls providing lateral resistance are required to use various types of tie-downs.

To address the concern of the ICC Structural Committee in Baltimore regarding the original proposal's application of the exception 2 to U occupancies, that change has been removed in this amended public comment proposal. 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 conventional construction limits on number of permitted story levels and the use of tie-downs have progressed in the IBC since that time, as noted above.

While we recognize there is a cost of installing this minimum reinforcing, we believe that most builders of dwellings in Seismic Design Categories D through F 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.
