



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: S83-09/10

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

S83-09/10

1602.1, 1608.3 (new), 1611.2

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

Commenter Reason:

The wording of the proposed new definition for “*Susceptible Bay*”, approved as part of the floor modification of item S83 contains very confusing wording that will certainly result in uneven or incorrect application and enforcement. This commenter considered submitting a public comment proposing alternative wording, however, it is impossible to know from the original submittal exactly what was intended, or how to fix it, therefore this public comment is recommending disapproval.

The structural implications (potential collapse) of water ponding on roof surfaces is a longstanding and very important safety issue that must have clear and unambiguous rules for both the design professional and the code enforcement community. The current code Section 1611.2 Ponding instability, achieves that goal because it is a clearly written and easily understood provision that applies to all roofs with a slope less than ¼ inch per foot. We are aware that the proposed new definition is derived from the final ballot draft of ASCE 7-10, but we do not agree that placing confusing language into the building code is an appropriate solution to achieving desired consistency of structural provisions, nor to achieve the important protection the code should provide from ponding induced roof collapses.

The difficulty with new definition is specifically located in its item 2), where it attempts to define portions of roofs that are not sloped less than ¼ inch per foot that must additionally comply with Section 8.4 of ASCE 7. The statement: “*A roof or portion thereof ...2) on which water is impounded upon it, in whole or in part, and the secondary drainage system is functional but the primary drainage system is blocked*” is very poorly worded and is simply unclear regarding the intended scope of application.

While it is reasonably clear that the definition intends to address a condition where water ponding occurs due to the blockage of one or more primary roof drains, the actual extent of what portions of the roof become a *susceptible bay* is anything but clear. As currently written, one could easily conclude that because when any primary drain is blocked water will pond up to the level of the secondary drain serving that portion of the roof, then each and every roof area where water cannot freely drain over an edge becomes a *susceptible bay*. If that was the intent, there certainly must be a better way to explain it. Additional enforcement and design application questions that will arise from the current definition include:

How deep must the water be to trigger this definition? Using the wording “*in whole or in part*” would imply any depth above zero. If that was intended, then even if a secondary drain is a scupper, or a roof edge, and is only 1 inch higher than the inlet of the primary drain, that roof area where the water ponds only one inch deep is still a *susceptible bay*.

Was there a minimum ponding depth threshold considered when drafting this change within the ASCE 7 committee? If there was, why is that depth not included in the definition? If no minimum depth was considered, what substantiation was provided to justify that any depth above zero when a primary drain is blocked creates the susceptible bay that requires additional design analysis?

While the final sentence of the definition appears to be clear, does a “*point of free drainage*” occur where the roof has a slightly raised edge at its perimeter, as is a common construction practice, or only when the flow of water is totally unimpeded on a slope of at least ¼ inch per foot to, and over, that edge?
