October 13, 2022

Tony Doan
State Building Code Council Chair
1500 Jefferson Street SE
PO Box 21499
Olympia, WA 98504

SBCC Chair,

On behalf of the Washington Association of Building Officials (WABO), I am submitting a public comment relating to the approved as submitted proposal, log number 21-GP2-056, voluntary lateral force-resisting system alterations. WABO was the proponent of the original code proposal.

This public comment clarifies the applicability of the proposal and overall improves it, it does not change its original intent. It reflects comments heard from the ICC committee during the April 2022 Committee Action Hearings in Rochester NY and includes another IEBC proposal change (EB68) that will be incorporated in the 2024 IEBC.

The ICC Committee had feedback about the location of the proposed change as an exception, as well as the proposed change being too broad.

In response, we're making identical changes in sections 503.13 and 805.4. The text is being moved out of the exception into paragraph 2, section 2.1, and "where approved" is added to section 2.1. This gives a chance to the code official to review and determine if the proposed lateral design is reasonable. This public comment also adds sub-section 2.1.2 as a criterion for when this flexibility can be used. It clarifies that the purpose is to provide deformation compatibility with an existing structure that would likely not be allowed in today's codes due to its low ductility.

Thank you for the work the Building Code Council does and the opportunity to present our ideas for modifications.

Sincerely,

Nathalie Boeholt

Washington Association of Building Officials Technical Code Development Committee

State Building Code Council

Public Comment
International Existing Building Code

Amend sections to read as follows:

SECTION 503.13 Voluntary lateral force-resisting system alterations. Structural alterations that are intended exclusively to improve the lateral force-resisting system and are not required by other sections of this code shall not be required to meet the requirements of Section 1609 or 1613 of the International Building Code, provided that all of the following apply:

1. [no change]

2. New structural elements are detailed and connected to existing or new structural elements as required by the selected design criteria ~~International Building Code for new construction~~.

   2.1 Where approved, new lateral force-resisting systems are permitted to be of a type designated as "Ordinary" or "Intermediate" where ASCE 7 Table 12.2-1 states these types of systems are not permitted provided that both of the following apply:

   2.1.1 The selected design criteria is the International Building Code.

   2.1.2 The new "Ordinary" or "Intermediate" system provides deformation compatibility with the existing lateral force-resisting system.

   ~~Exception: New lateral force-resisting systems designed in accordance with the International Building Code are permitted to be of a type designated as "Ordinary" or "Intermediate" where ASCE 7 Table 12.2-1 states these types of systems are not permitted.~~

3. [no change]

4. [no change]

SECTION 805.4 Voluntary lateral force-resisting system alterations. Structural alterations that are intended exclusively to improve the lateral force-resisting system and are not required by other sections of this code shall not be required to meet the requirements of Section 1609 or 1613 of the International Building Code, provided that the following conditions are met:

1. [no change]

2. New structural elements are detailed and connected to existing or new structural elements as required by the selected design criteria ~~International Building Code for new construction~~.

2.1 Where approved, new lateral force-resisting systems are permitted to be of a type designated as "Ordinary" or "Intermediate" where ASCE 7 Table 12.2-1 states these types of systems are not permitted provided that both of the following apply:

2.1.1 The selected design criteria is the International Building Code.

2.1.2 The new "Ordinary" or "Intermediate" system provides deformation compatibility with the existing lateral force-resisting system.

~~Exception: New lateral force-resisting systems designed in accordance with the International Building Code are permitted to be of a type designated as "Ordinary" or "Intermediate" where ASCE 7 Table 12.2-1 states these types of systems are not permitted.~~

3. [no change]

4. [no change]