April 10, 2007

Florida Building Commission Department of Community Affairs Building Codes and Standards 2555 Shumark Oak Blvd. Tallahassee, Fl 32399-2100 FILING AND ACKNOWLEDGEMENT
FILED, on this date, with the decignated
Clerk, receipt of which is hereby

*cknowledged.

Paula P. Ford Commission Clerk

Det 28/07

Re: "Petition for Declaratory Standard before the Florida Building Commission"

Petitioner:

Jeffrey K. Hulsberg, P.E. Hulsberg Engineering, Inc. 11481 St. Augustine Rd., #202 Jacksonville, FL 32258

Reference: Construction of one single family home located in Clay County, Florida

Lot <u>23 Fairway Ridge</u>, a <u>3286 under roof</u> square foot single family home located approximately 900 feet from the shoreline of Doctor's Lake, an inland body of water measuring more than one mile across in the general vicinity of the subject property.

At Issue: Interpretation of FBC-R Section R031.2.1.4 No.4

Please clarify the intent of the Florida Building Code-Residential as it relates to the definition of, and the subsequent use of, Exposure Category "D" in the State of Florida. The language in the code is confusing as currently written and appears to contradict itself.

The subject lot is located in a 110 mph wind zone approximately 24 miles inland from the Coastal Construction Line and is approximately 900 feet from the shoreline of Doctor's Lake. The terrain immediately surrounding the lot, including the terrain between the lot and the shoreline of Doctor's Lake, consists of single family homes and wooded areas, and would be considered "B" type terrain under the current definition in the code.

Question 1: Is "D" a valid Exposure Category in Florida?

Section R301.2.1.4 No. 4 states "Exposure D. Flat, unobstructed areas exposed to wind flowing over open water (excluding shorelines in hurricane prone regions) for a distance of at least 1 mile (1.61 km). Shorelines in Exposure D include inland waterways, the Great Lakes and coastal areas of California, Oregon, Washington and Alaska." We are unclear as to the meaning of this language because it seems to exclude shorelines in hurricane prone regions. We can find no definition of shoreline in the code that limits this to ocean or gulf shorelines.

Question 2: If the answer to Question 1 is yes, is Exposure D only applicable to buildings directly exposed to wind coming over the water (i.e., only the first building traveling

inward from the shoreline)?

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Section R031.2.1.4 No. 4 states, "This exposure shall apply on to those buildings and other structures exposed to the wind coming from over the water." Does this mean a building shielded from the wind coming from over the water by other buildings or dense trees is not considered in Exposure "D"?

Question 3: If the answer to Question 2 is no, what is the transition zone length from Exposure D to the next applicable inland exposure category (Exposure B for the subject case)?

Section R301.2.1.4 No. 4 states, "Exposure D extends inland from the shoreline a distance of 1500 ft (457 m) or 10 times the height of the building or structure, whichever is greater." This greatly varies from the ASCE 7-02 language which states, "Exposure "D" shall extend inland from the shoreline for a distance of 660 ft. (200 m) or 10 times the height of the building, whichever is greater."

Respectfully submitted,

Jeffrey K. Hulsberg, P.E.

FL PE No. 33152

Hulsberg Engineering, Inc.



