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Florida Department of Business and  
Professional Regulations  
Florida Building Commission  
1940 North Monroe Street  
Tallahassee, Florida 32399

In regards to: R703.6.4 Application & R703.6.5 Curing

**Members of the Commission:**

As Florida's Association representing the manufacturers of stucco, we are requesting the Commission exercise its authority to issue an Emergency Rule in order to avoid the misapplication of our products. Further, we are writing to endorse the current Requests for Declaratory Statements which have been filed on the matter. Those Codes which took effect on June 30, 2015 contain guidelines that may be interpreted to direct contractors to apply our Florida materials in a manner which will jeopardize stucco's effectiveness.

We applaud the leadership the Commission has displayed since the passage of HB849 in 2011 authorizing the adoption of the International Building Code with Florida exceptions as Florida's Building Code going forward. The Commission's members and staff have always been accessible and responsive in addressing our concerns on a host of issues and we are confident that that will again be the case.

As you are aware, the conflict in this instance was not a part of the prior version of the FBC. It originates at the International level and began adversely affecting Florida when the IBC language was engrossed in Florida's codes. Our industry is also working with the IBC to correct the conflict contained in their version.

Without question, it is recognized that the American Society for Testing and Materials is the benchmark for application of stucco. The FBC, having resulted from the IBC, refers to ASTM manuals as the guiding principle in which stucco will be applied.

Indeed, from the onset, it is denoted in the global reference to application:

R703.6 Exterior Plaster. Installation of these materials shall be in compliance with ASTM C 926 and ASTM C 1063 and the provisions of this code. (Emphasis added)

It would be best had IBC/FBC's stucco provisions were to end there, as we are confident in ASTM's principles of application. However the next section gives the contractor two methodologies in which to apply stucco. A base method, which conflicts with the prior ASTM requirement; and an exception to that method which again cites ASTM's standards -

R703.6.4 Application. Each coat shall be kept in a moist condition for at least 48 hours prior to application of the next coat. Exception: Applications installed in accordance with ASTM C 926. (Emphasis added)

The last section goes even further in creating confusion by requiring a method that does not comply with the ASTM standards which are required by the introductory provision (**R703.6 Exterior Plaster**) -

R703.6.5 Curing. The finish coat for two-coat cement plaster shall not be applied sooner than seven days after application of the first coat. For three-coat cement plaster, the second coat shall not be applied sooner than 48 hours after application of the first coat. The finish coat for three coat cement plaster shall not be applied sooner than seven days after application of the second coat. (Emphasis added)

The Lath & Bureau is contained within the FC&PA and its membership has expressed grave concern should this application principle be followed. The Bureau works diligently with contractors to teach and insure best practices are being followed. That difficult tasked is made even harder if the Code is both ambiguous in some instances (R703.6.4 Application) and deficient in others (R703.6.5 Curing).

As is the case with the Commission, our first and foremost concern is for the Florida residential and commercial property owner. Applied in the manner afforded in the ASTM, stucco is unmatched in its ability to provide exterior resiliency and sustainability to any structure. However, those attributes cannot be maximized if it is applied in the manners expressed in the IBC and FBC that stray from the ASTM standards.

Our stucco members include some of Florida's finest Corporate Partners including American Cement, Argos, Cemex, and Titan America. The economic downturn hit our industries and their employees hardest; in this delicate recovery we cannot afford to have a setback due to the incorrect application of a stellar Florida resource.

We are confident that the Commission will continue to do what is in the best interest of all Florida citizens by the issuance of an Emergency Rule and/or a Declaratory Statement which redacts those provisions which are contradictory to ATSM standards.

Thank you for your Leadership,



Cary O. Cohrs  
Chairman