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**STATE OF FLORIDA
BUILDING COMMISSION**

IN RE:

HFZ CAPITAL GROUP d/b/a THE
SHORE CLUB

CASE NO. **DS 2014-116**

**PETITION FOR DECLARATORY STATEMENT
BEFORE THE FLORIDA BUILDING COMMISSION**

HFZ Capital Group, d/b/a The Shore Club (the "Shore Club") files this petition for declaratory statement (the "Petition") regarding the applicability of a prior declaratory statement to a current and unrelated project whose material facts are consistent with the corresponding underlying material facts in the declaratory statement in question, and states as follows:

JURISDICTION

1. The Florida Building Commission (the "Commission") has jurisdiction to issue declaratory statements pursuant to section 120.565, Florida Statutes, relating to an agency's interpretation and enforcement of the specific provisions of the Florida

Building Code (FBC), which the agency is authorized to enforce. *See* § 553.775(3)(f), Fla. Stat.¹

The Petitioner

2. Petitioner's address is 600 Madison Avenue, 17th Floor, New York, New York 10022. Petitioner may be reached by telephone through undersigned counsel.

3. Petitioner is also the owner of property on the beach side of Collins Avenue in the City of Miami Beach in the Ocean Drive/Collins Avenue Historic District, located at or about 1901 Collins Avenue, Miami Beach, the location of the Shore Club resort.

4. Petitioner intends to make improvements to the existing buildings and facilities on the Shore Club site and add additional buildings and facilities (the Project"). Some aspects of the Project are located seaward of the Coastal Construction Control Line ("CCCL"). For those components of the Project that lie seaward of the CCCL and have a floor elevation above FEMA's base flood elevation but below the *One Hundred Year Storm Elevation* ("100-year Elevation") as defined in Section 3109.2 of the Florida Building Code- 2010 Building volume ("FBC 2010"), Petitioner wishes to utilize the Commission's holding in Declaratory Statement DCA07-DEC-179 (March 19, 2008)(the "Hollywood Dec Statement") in executing the Project.

¹ All references to Florida Statutes shall be to the 2014 edition unless otherwise indicated.

SUMMARY OF FACTS

4. In 2008, the City of Hollywood, Florida, petitioned for a declaratory statement which sought an interpretation of Section 3109 of the 2004 edition of the FBC (“FBC 2004”) as applied to certain development conditions occurring seaward of the CCCL. The Commission granted the Hollywood Dec Statement. The Hollywood Dec Statement provides answers to the same substantive issues that are now of concern to the Petitioner.

5. Because it is unclear to the Building Official if the prior declaratory statement (DCA07-DEC-179) is still valid under a now-later edition of the Florida Building Code than the building code edition it was issued under, and because the prior declaratory statement was issued to a location in Hollywood, Florida, as opposed to Miami Beach, the Building Official expressed concern as to the applicability of Hollywood Declaratory Statement to the Shore Club’s project so that even if he determined that the underlying material facts in the Hollywood Dec Statement that corresponded with the Shore Club’s project were substantially the same, he does not know whether he be would authorized (i.e., allowed) to apply the holding of the Hollywood Dec Statement to the Project.

COUNSEL FOR THE PETITIONER

7. Petitioner is represented by: Robert S. Fine, Esq., AIA. Florida Bar Number 0155586. Greenberg Traurig, P.A., 333 S.E. 2nd Avenue, Suite 4400, Miami,

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**THE STATUTES, RULE AND CODE PROVISIONS, AND THEIR
EFFECT ON PETITIONER**

8. Florida Building Code Provisions

a. The Florida Building Code

- i. FBC, 2010 Building volume (“FBC-Building”), Section 3109

9. Florida Statutes

- i. Section 553.775(2), Florida Statutes (2014)

- ii. Section 120.565, Florida Statutes

10. The Florida Administrative Code

- i. Chapter 28-105, Florida Administrative Code (“FAC”)

- ii. Rule 61G20-1.001, FAC (The Florida Building Code- see ¶ 8a
above)

11. The Effect of these Code Provisions on Petitioner

Petitioner is the owner and developer of an oceanfront resort property in south Miami Beach. Petitioner has proposed, and is in the process of attaining entitlements, for a project to update and upgrade the site and its existing buildings and facilities, as well as construct additional buildings and facilities in order to better serve its clientele, and elevate its place in the local resort hotel market. Some of the proposed

improvements occur on the site seaward of the CCCL. Some of these improvements are above FEMA's base flood elevation but below the 100-year Storm Elevation. The Commission addressed specifically this issue in the Hollywood Dec Statement, however, the Building Official is not comfortable applying that declaratory statement to the Project (because it was issued under an earlier code edition and for a project in a different jurisdiction) without the Commission confirming that it would not be inappropriate for him to do so.

NATURE OF DECLARATORY STATEMENT SOUGHT

11. The Shore Club seeks a declaratory statement answering the question: "is the Building Official of the City of Miami Beach authorized by the applicable statutes, rules and law, to utilize and apply the Hollywood Dec Statement to the Shore Club and its proposed development project if, in his (the Building Official's) opinion, the relevant, underlying, material facts of the Hollywood Dec Statement are consistent with the corresponding material facts of the Shore Club's proposed project and he otherwise feels the application would be appropriate?"

PETITIONERS' PROPOSED ANSWERS TO QUESTIONS POSED IN THE PETITION

12. Yes. Because Section 3109 of the FBC 2010, as relevant to the question posed, has not been substantively changed from Section 3109 of the FBC 2004, the Hollywood Dec Statement remains valid under the FBC2 2010. Section 553.775(2) of

the Florida Statutes provides: “[I]ocal enforcement agencies, local building officials, state agencies, and the commission shall interpret provisions of the Florida Building Code and the Florida Accessibility Code for Building Construction in a manner that is consistent with declaratory statements and interpretations entered by the commission.” Therefore, if the Building Official determines that the underlying material facts and conditions in the Hollywood Dec Statement are consistent with the corresponding facts and conditions in the Project, he may apply the holding of the Hollywood Dec Statement to the Project.

**ABBREVIATED MEMORANDUM IN SUPPORT OF
PETITIONER’S PROPOSED ANSWER TO THE QUESTION
PROPOSED IN THIS PETITION**

13. The Hollywood Dec Statement is based on the Commission’s interpretation of Section 3109 of FBC 2004. Substantively, Section 3109 of FBC 204 is identical to Section 3109 of FBC 2010, the building code that the Project will be subject to. See Redline comparison of Section 3109 of FBC 2004 and Section 3109 of FBC 2010, attached as Exhibit A. In courts of general jurisdiction, the doctrine requiring courts to generally follow the precedents of previous decisions is referred to as the doctrine of *stare decisis*. The doctrine of *stare decisis* as applied to administrative agencies under the executive branch of state government (referred to as administrative *stare decisis*) was addressed in *Gessler v. Dept. of Business and Professional Regulation*, 627 So. 2d 501 (Fla. 4th DCA 1993), *superseded by statute on other grounds, as stated in Caserta*

v. Department of Business and Professional Regulation, 686 So. 2d 651 (Fla. 5th DCA 1996), which concluded that:

[w]hile it is apparent that agencies, with their significant policy-making roles, may not be bound to follow prior decisions to the extent that the courts are bound by precedent, it is nevertheless apparent the legislature intends there be a principle of administrative *stare decisis* in Florida.

Id., 627 So. 2d at 504. Other courts have noted that *Gessler* applies “the fundamental principle that like cases should be treated alike.” See *Pagan v. Sarasota County Public Hospital*, 884 So. 2d 257, 266 (Fla. 2d DCA 2004) (Canady J., concurring). Other courts have concluded that an agency’s “unexplained, inconsistent policies are contrary to established administrative principles and sound public policy.” See *Brookwood-Walton County Convalescent Ctr. v. Agency for Health Care Admin.*, 845 So. 2d 223, 229 (Fla. 1st DCA 2003). Agencies, therefore, must attempt to be consistent when addressing similar sets of circumstances over time. If an agency changes its established policies, “it must either explain its reasons based upon expert testimony, documentary opinions, or other appropriate evidence.” See *Health Care and Retirement Corp. of America v. Dep’t of Health and Rehabilitative Servs.*, 559 So. 2d 665, 667-68 (Fla. 1st DCA 1990). Accordingly, since the Section 3109 of FBC 2010 has not changed in substance from Section 3109 FBC 2004, the holding in the Hollywood Declaratory Statement should remain intact and maintain its validity.

Florida (Building Code-authorizing) Statutes provide:

Local enforcement agencies, *local building officials*, state agencies, and the commission shall interpret provisions of the Florida Building Code and the Florida Accessibility Code for Building Construction *in a manner that is consistent with declaratory statements* and interpretations entered by the commission...

§ 553.775(2), Fla. Stat. (2014)(emphasis added). Section 120.565, Florida Statutes, provides that declaratory statements are fact-specific. Therefore, a building official applying a declaratory statement should ascertain the underlying material facts of a declaratory statement and assure him/herself that they are consistent with the corresponding material facts of a project that the declaratory statement is sought to be applied to. However, once the building official is comfortable that the corresponding material facts are consistent, Section 553.775(2) clearly authorizes, if not mandates, the building official to apply the declaratory statement to the condition where its application is sought.

In the particular case of this petition, it is significant to note that in the petition that led to the issuance of the Hollywood Dec Statement, the vast majority of the 12 projects cited in support of the declaratory statement were located in Miami Beach, at least two of which being located within 3 blocks of the Shore Club.

Conclusion

Based on the principle of administrative *stare decisis*, and the provisions of Section 553.775(2), Florida Statutes, the Commission should issue a declaratory statement holding that if the Building Official determines that the underlying material facts and conditions in the Declaratory Statement DCA07-DEC-179 are consistent with the corresponding material facts and conditions in the Shore Club's project, he may apply the holding of Declaratory Statement DCA07-DEC-179 to the Project.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing by

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This 4th day of September, 2014.

By: 
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EXHIBIT A

Chapter 31, Section 3109 - STRUCTURES SEAWARD OF A COASTAL CONSTRUCTION CONTROL LINE

SECTION 3109 STRUCTURES SEAWARD OF A COASTAL CONSTRUCTION CONTROL LINE

~~Chapter 31, Section 3109, (1)~~
3109.1 General.

Swimming pools shall comply with the requirements of this section and other applicable sections of this code.

~~Chapter 31, Section 3109, (1)(1)~~
3109.1.1 Scope.

The provisions of Section 3109 shall ensure that structures located seaward of the coastal construction control line are designed to resist the predicted forces associated with a 100-year storm event and shall apply to the following:

~~Chapter 31, Section 3109, (1)(1)(ab1)~~

1. All habitable structures which extend wholly or partially seaward of a coastal construction control line (CCCL) or 50-foot (15.3 m) setback line.

~~Chapter 31, Section 3109, (1)(1)(ac2)~~

2. Substantial improvement of or additions to existing habitable structures.

~~Chapter 31, Section 3109, (1)(1)(ad3)~~

3. Swimming pools that are located in close proximity to a habitable structure or armoring. An ~~environmeta~~environmental permit from the Florida Department of Environmental Protection, requiring special siting considerations to protect the beach-dune system, proposed or existing structures and public beach access, is required prior to the start of construction. The environmental permit may condition the nature, timing and sequence of construction of permitted activities to provide protection to nesting sea turtles and hatchlings and their habitat, including review, submittal and approval of lighting plans.

Exception: The standards for buildings seaward of a CCCL area do not apply to any modification, maintenance or repair ~~toof~~ any existing structure within the limits of the existing foundation which does not require, involve or include any additions to, or repair or modification of, the existing foundation of that structure.

~~Chapter 31, Section 3109, (1)(2)~~
3109.1.2 Certification.

As part of the permit process and upon placement of the lowest horizontal structural member, the applicant shall submit to the building official certification of the elevation of the lowest horizontal structural member of the lowest floor as built in relation to National Geodetic Vertical Datum (N.G.V.D.). Said certification shall be prepared by or under the direct supervision of a registered land surveyor or professional engineer or architect and certified by ~~the~~ same and be submitted prior to commencing any addition work. Any work undertaken prior to submission of the certification shall be at the applicant's risk. The building official shall review the submitted elevation data, and any deficiencies found shall be corrected by the permit holder immediately and prior to any further work being permitted to proceed.

~~Chapter 31, Section 3109, (2)~~
3109.2 ~~Definitions~~Definition.

The following word and term shall, for the purposes of this section and as used elsewhere in this code, have the meaning shown herein.

ARMORING. A manmade structure designed to either prevent erosion of the upland property or protect upland structures from the effects of coastal wave and current action. Armoring includes certain rigid coastal structures such as geotextile bags or tubes, seawalls, revetments, bulkheads, retaining wall or similar structures, but does not include jetties, groins or other construction whose purpose is to add sand to the beach and dune system, alter the natural coastal currents or stabilize the mouths of inlets.

BREAKAWAY WALL. A partition independent of supporting structural members that is intended to withstand design wind forces but to collapse from a water load less than that which would occur during a 100 year storm event without causing collapse, displacement or other structural damage to the elevated portion of the building or supporting foundation system.

COASTAL CONSTRUCTION CONTROL LINE. The line established by the State of Florida pursuant to Section 161.053, Florida Statutes, and recorded in the official records of the county which defines that portion of the beach-dune system subject to severe fluctuations based on a 100-year storm surge, storm waves or other predictable weather conditions.

DESIGN GRADE. The predicted eroded grade caused by the 100-year storm.

FIFTY-FOOT SETBACK LINE. A line of jurisdiction, established pursuant to the provisions of Section 161.052, Florida Statutes, in which construction is prohibited within 50 feet (15.24 m) of the line of mean high water at any riparian coastal location fronting the Gulf of Mexico or the Atlantic coast shoreline.

HABITABLE STRUCTURE. Structures designed primarily for human occupancy and are potential locations for shelter from storms. Typically included within this category are residences, hotels and restaurants.

LOWEST HORIZONTAL STRUCTURE MEMBER. Any shore-parallel structural member which supports floor, wall or column loads and transmits them to the pile foundation.

ONE-HUNDRED-YEAR STORM ELEVATION. The height of the breaking wave crest or wave approach as superimposed on the storm surge with dynamic wave set-up of a 100-year storm. This 100-year storm elevation is determined by the Florida Department of Environmental Protection based on studies published as part of the coastal construction control line establishment process and an analysis of topographic and other site specific data.

REBUILDING. See definition of "Substantial improvement."

SUBSTANTIAL IMPROVEMENT. See ~~definition in Section 161.54(12), Florida Statutes, 1612.~~

~~Chapter 31, Section 3109, (3)~~
3109.3 Elevation standards.

All habitable structures shall be elevated at or above an elevation which places the lowest horizontal structural member above the 100-year storm elevation as determined by the Florida Department of Environmental Protection in the report titled "One-Hundred-Year Storm Elevation Requirements for Habitable Structures Located Seaward of a Coastal Construction Control Line."

An applicant may request the Department of Environmental Protection to determine a site-specific 100-year storm elevation for the applicant's proposed habitable structure as part of the environmental permit application process. The elevation will be provided as part of the applicant's environmental permit and shall be subject to review under the provisions of Chapter 120, Florida Statutes.

Exceptions:

1. Additions, repairs or modifications to existing nonconforming habitable structures that do not advance the seaward limits of the existing habitable structure and do not constitute rebuilding of the existing structure.
2. Habitable structures located landward of existing armoring which is capable of protecting buildings from the effects of erosion from a 100-year storm surge. The applicant shall provide scientific and engineering evidence that the armoring has been designed, constructed and maintained to survive the effects of the design storm and provide protection to existing and proposed structures from the erosion associated with that event. Evidence shall include a report with data and supporting analysis, and shall be certified by a professional engineer registered in this state, that the armoring was designed and

constructed and is in adequate condition to meet the following criteria:

- a. The top must be at or above the still water level, including setup, for the design storm plus the breaking wave calculated at its highest achievable level based on the maximum eroded beach profile and highest surge level combination, and must be high enough to preclude runup overtopping.
 - b. The armoring must be stable under the design storm including maximum localized scour, with adequate penetration and toe protection to avoid settlement, toe failure, or loss of material from beneath or behind the armoring.
 - c. The armoring must have sufficient continuity or return walls to prevent flanking under the design storm from impacting the proposed construction.
 - d. The armoring must withstand the static and hydrodynamic forces of the design storm.
3. A higher elevation standard is required by either the National Flood Insurance Program (NFIP), as found on a community's Flood Insurance Rate Map (FIRM), or the local flood damage prevention ordinance. In such instances, the higher elevation standard shall apply.

~~Chapter 31, Section 3109, (4)~~
3109.4 Construction standards.

~~Chapter 31, Section 3109, (4) (1)~~
3109.4.1 Pile foundations.

All habitable structures shall be elevated on, and securely anchored to, an adequate pile foundation. Pile foundations for habitable structures shall be designed to withstand all reasonable anticipated erosion, scour and loads resulting from a 100-year storm including wind, wave, hydrostatic and hydrodynamic forces acting simultaneously with typical structural (live and dead) loads. All habitable structures should be anchored to their pile foundation in such a manner as to prevent flotation, collapse or lateral displacement. The elevation of the soil surface to be used in the calculation of pile reactions and bearing capacities for habitable structures shall

not be greater than that which would result from erosion caused by a 100-year storm event. Calculation of the design grade shall account for localized scour resulting from the presence of structural components. Design ratio or pile spacing to pile diameter should not be less than 8:1 for individual piles located above the design grade. Pile caps shall be set below the design grade unless designed to resist increased flood loads associated with setting the cap above the design grade, but at or below the natural grade. Pile penetration shall take into consideration the anticipated loss of soil above the design grade.

Exceptions:

1. Additions, repairs or modifications to existing nonconforming habitable structures that do not advance the seaward limits of the existing habitable structure and do not constitute rebuilding of the existing structure.

2. Habitable structures located landward of existing armoring which is capable of protecting buildings from the effects of erosion from a 100-year storm surge. The applicant shall provide scientific and engineering evidence that the armoring has been designed, constructed and maintained to survive the effects of the design storm and provide protection to existing and proposed structures from the erosion associated with that event. Evidence shall include a report with data and supporting analysis, and shall be certified by a professional engineer registered in this state, that the armoring was designed and constructed and is in adequate condition to meet the following criteria:

a. The top must be at or above the still water level, including setup, for the design storm plus the breaking wave calculated at its highest achievable level based on the maximum eroded beach profile and highest surge level combination, and must be high enough to preclude runoff overtopping.

b. The armoring must be stable under the design storm including maximum localized scour, with adequate penetration and toe protection to avoid settlement, toe failure or loss of material from beneath or behind the armoring.

c. The armoring must have sufficient continuity or return walls to prevent flanking under the design storm from impacting the proposed construction.

d. The armoring must withstand the static and hydrodynamic forces of the design storm.

~~Chapter 31, Section 3109, (4) (2)~~

3109.4.2 Walls below the 100-year storm elevation.

No substantial walls or partitions shall be constructed below the level of the first finished floor of habitable structures. All other walls shall be designed to break away.

Exceptions:

1. Stairways and stairwells;
2. Shear walls perpendicular to the shoreline;
3. Shear walls parallel to the shoreline, which are limited to a maximum of 20 percent of

the building length in the direction running parallel to the shore;

4. Shear walls parallel to the shoreline, which exceed 20 percent of the total building length (including any attached major structure) when they meet the following criteria:

a. A certification is provided by a Florida-registered professional engineer that certifies that the increased length of shear walls, over 20 percent, are located landward of the 100-year erosion limit;

b. A hydraulic analysis is provided and certified by a Florida-registered professional engineer that evaluates the potential impact of flow increase on the subject parcel and adjacent properties;

c. The hydraulic analysis demonstrates that although the overall shearwall coverage is more than 20 percent, the increased shearwall length will not result in substantial increase of flow velocities and drag forces on the structural components of the proposed structure and neighboring structures; and

d. The provisions under Section 3109.4.2 (Exception 4) do not include any low-rise building as defined in Section 1609.2.

5. Wind or sand screens constructed of fiber or wire mesh;

6. Light, open lattice partitions with individual, wooden lattice strips not greater than 3/4 inch (19 mm) thick and 3 inches (76 mm) wide;

7. Elevator shafts;

8. Small mechanical and electrical rooms; and

9. Break-away or frangible walls.

~~Chapter 31, Section 3109, (5)~~

3109.5 Flood loads during a 100-year storm.

~~Chapter 31, Section 3109, (5) (1)~~

3109.5.1 Load basis.

The structural design shall be based on the 100-year storm as determined by the Florida Department of Environmental Protection in studies published as part of the coastal construction control line establishment process. Breaking, broken and nonbreaking waves shall be considered as applicable. Design wave loading analysis shall consider vertical uplift pressures and all lateral pressures to include impact, as well as dynamic loading and the harmonic intensification resulting from repetitive waves.

~~Chapter 31, Section 3109, (5) (2)~~

3109.5.2 Hydrostatic load.

Habitable structures shall be designed in consideration of the hydrostatic loads which would be expected under the conditions of maximum inundation associated with a 100-year storm event. Calculations for hydrostatic loads shall consider the maximum water pressure resulting from a fully peaked, breaking wave superimposed on the design storm surge with dynamic wave setup.

Both free and confined hydrostatic loads shall be considered. Hydrostatic loads which are confined shall be determined using the maximum elevation to which the confined water would freely rise if unconfined. Vertical hydrostatic loads shall be considered as forces acting both vertically downward and upward on horizontal or inclined surfaces of major structures (e.g., floors, slabs, roofs, walls). Lateral hydrostatic loads shall be considered as forces acting horizontally above and below grade on vertical or inclined surfaces of major structures and coastal or shore protection structures. Hydrostatic loads on irregular or curving geometric surfaces may be determined in consideration of separate vertical and horizontal components acting simultaneously under the distribution of the hydrostatic pressures.

~~Chapter 31, Section 3109, (5) (3)~~
3109.5.3 Hydrodynamic loads.

Habitable structures shall be designed in consideration of the hydrodynamic loads which would be expected under the conditions of a 100-year storm event. Calculations for hydrodynamic loads shall consider the maximum water pressures resulting from the motion of the water mass associated with a 100-year storm event. Full-intensity loading shall be applied on all structural surfaces above the design grade which would affect the flow velocities.

~~Chapter 31, Section 3109, (6)~~
3109.6 Wind loads.

All habitable structures shall be designed in accordance with Chapter 16.

~~Chapter 31, Section 3109, (7)~~
3109.7 Swimming pools.

Swimming pools located in close proximity to an existing habitable structure or armoring shall be designed with an adequate pile foundation for the erosion and scour conditions of a 100-year storm event.

~~Chapter 31, Section 3109, (8)~~
3109.8 Storm debris.

All structures will be designed to minimize the potential for wind and water-borne debris during a storm.

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