

Build something great™



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October 4, 2018

TO: E. J. Carlson, Chair
Florida Building Commission
P.O. Box 511232
Punta Gorda FL 33951

BY ELECTRONIC MAIL
jcarlson-soforth@comcast.net

FR: Wade Shepherd, Boral Roofing

RE: Adoption of ASCE 7-16 and its impact to the Tile Roofing Industry

Boral Roofing is one of the world's leading manufacturers for concrete, clay and metal roofing products. In Florida we are one of the predominant concrete roof tile manufacturers with production facilities in Lake Wales, Okeechobee and Pompano Beach. Boral Roofing provides roof tile, underlayments and other accessory roofing products to the roofing industry throughout Florida.

As members of the TRI, we support the position and questions raised by the tile industry and others recommending delay of action and implementation of ASCE-7-16. The negative impact of the proposed change has been highlighted by our industry and others. As Boral, would add these additional concerns.

- 1) Has the commission considered the impact of specifying a new code that conflicts with formal testing and research of affected products?

Boral Roofing, as a global company has performed extensive wind uplift testing in both our UK partner's wind tunnels and in our national research labs. Our formal product approvals and industry-based data are the result of our collaborative efforts. We have not seen the field evidence or formal research on our products to demonstrate the need for such drastic increases. Further, we have participated in additional validations from other research facilities here in Florida that reviewed and replicated our previous testing.

- 2) Educational Impact - Has the Commission identified the challenges, confusion and significant time and monetary resources to help educate the entire building community?

As an industry and Boral, we work closely with the TRI, our builders and our extensive contractor network to help educate and develop best practices and sustainable solutions for improved performance in all areas. Our contractor network has raised serious concerns for the implementation of the proposed changes in a time where we lack workers to fill the jobs needed today. We are concerned that small businesses will be hurt by the lack of resources to properly train and struggle to comply with the new, more complicated codes.





- 3) Corner Zone Implications - Has the commission determined the cost implications for addressing only corner zones on steep slope applications that have seen over a 200% increase in pressure?

Some new zones in ASCE 7-16, particularly the corners, have drastically increased uplift pressures that will prevent a single, economical attachment solution for the entire roof, which is common practice in installations today. To meet the higher wind loads, there are three options:

- a. Multiple fastening methods on one roof – increases risk of mistakes by the designer or installer and would be more difficult to train
- b. One fastening method for the entire roof that is most conservative and more expensive and a significant overall cost increase to the installation and inspection.
- c. Alternative roof cladding materials that meet the higher wind loads at higher cost (i.e. standing seam metal), reducing the options available to customers for products that have demonstrated performance. The builder markets are very price sensitive and market shifts will have adverse impacts on the Florida markets.

- 4) Has the commission considered the cost impacts from accessory and related materials?

As Boral, we offer components and accessories into the market that are packaged with our tile products. The new codes will require delays and inventory issues as the building officials perform review and renewed product approvals to comply with the new standards. Each manufacturer of a component will need to provide Boral the required engineering, testing and research data before we can revise our product approvals for inclusion. This will have an adverse effect in the market for Boral and other companies that provide more than one component.

In summary, Boral joins with the TRI and other trade and construction associations urging the commission to delay implementation of the ASCE-7-16 at this time. We further ask that FBC staff be allowed to perform due diligence, cost analysis and work with those affected in Florida to develop a more efficient and cost-effective alternative for the FBC to consider.

Sincerely,

A handwritten signature in cursive script that reads "Wade Shepherd".

Wade Shepherd
Sr. Manager, Roof System Components and Technical Services
Boral Roofing, USA

cc: FBC Commissioners
Tom Campbell, Executive Director, Florida Building Commission
Mo Madani, Florida Building Commission