October 5, 2018

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

Re: ASCE7-2016 (ADM 94)

Dear Chairman Carlson:

The Single-ply Roofing Industry (SPRI) has been a long supporter of ASCE7 and of its adoption into the both model codes as well as state codes, including Florida. It is a valuable and much needed component of good and safe building design. However, in the 2016 edition, there were significant changes made to the wind load requirements, which will significantly reduce the number of single-ply roofing assemblies that can be used, particularly in the state of Florida. A reduction in allowed assemblies has the very real potential to dramatically increase the cost of construction.

For this reason, the decision to adopt the 2016 edition of ASCE7 via ADM94 is of no small consequence and should not be made without careful evaluation of the cost impacts to making such a change.

Has the Florida Building Commission considered the fiscal impacts related to the 2016 edition of ASCE-7 and what that will mean for Florida? Has the Florida Building Commission determined to what extent the impact of it will have on local government relative to enforcement, the impact to property and building owners, as well as to industry, relative to the cost of compliance?

This is a decision that does not need to be made at this point in the process. There is ample time for the Commission to evaluate the potentially significant cost impacts of this change and then make its decision in the next phase of the process, when all the information is available.

Respectfully submitted,

Mike Ennis

Technical Director, SPRI

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