



**Florida Roofing & Sheet Metal Contractors Association, Inc.**

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ROOFING FLORIDA MAGAZINE  
FRSA SERVICES CORP

*October 5, 2018*

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

Re: FBC adoption of ASCE 7-16 Referenced Standard (ADM94-16)

Dear Chair Carlson:

On behalf of the Florida Roofing and Sheet Metal Contractors Association (FRSA), we respectfully request that the Florida Building Commission (FBC):

- Remove ASCE 7-16 from the consent calendar in favor of fiscal analysis followed by discussion
- Prepare a statement of estimated regulatory costs specifically for ASCE 7-16
- If the fiscal impact outweighs benefits, if any, decline to adopt ASCE 7-16 at this time and keep sufficient and well-performing ASCE 7-10 in place

In support of this request, FRSA submits these comments for your review and consideration.

FRSA is the professional association for roofing contractors in Florida, it has been in existence for over 95 years, and its purpose is to foster and encourage a high standard of business ethics among members and inform the public of the importance of doing business with competent, ethical and licensed companies.

The procedure used to adopt the International Building Code's (IBC) referenced standards had ASCE 7-16 lumped together with 897 other referenced standard changes. We are aware that incorporating the IBC changes into the Florida Building Code (FBC) is new and quite complicated, but a standard of this significance clearly deserves separate debate and consideration prior to deciding on whether it should or should not be adopted as a part of the Florida Building Code.

The fiscal impact created by the adoption of ASCE 7-16 has not been provided to either the International Code Council (ICC) or the FBC. FRSA knows that the fiscal impact will be significant. In the absence of documentation provided, FRSA believes it is the obligation of the FBC to take steps to determine specifically the expected fiscal impact of adopting ASCE 7-16. It is clear that fiscal impact is an important part of the Florida Building Code. FS 553.73 (9)(c) states:

The commission may not approve any proposed amendment that does not accurately and completely address all requirements for amendment which are set forth in this section. The commission shall require all proposed amendments and information submitted with proposed amendments to be reviewed by commission staff prior to consideration by any technical advisory committee. These reviews shall be for sufficiency only and are not intended to be qualitative in nature. Staff members shall reject any proposed amendment that fails to include a fiscal impact statement. Proposed amendments rejected by members of the staff may not be considered by the commission or any technical advisory committee.

For the commission to adopt a standard of this magnitude with clear and substantial cost implications without a fiscal impact analysis is contrary to the clear and stated requirements in law.

In support of our position, below are listed some (not all) of the questions and considerations that demand fiscal analysis before ASCE 7-16 can be adopted as part of the FBC:

1. It is known that the increased pressure coefficients of ASCE 7-16 have a disproportional effect on Florida. This standard was heavily debated and was passed by a narrow majority by the International Code Council (ICC). It faced strong opposition from jurisdictions throughout the country even though none of these areas will be impacted by the wind loading components of the standard to the degree that Florida will. This issue requires detailed exploration and one or more determinations on how, if adopted, this will increase the cost of construction in Florida.
2. FRSA is concerned that the existing roofing technologies may not be able to meet the increased pressures required by ASCE 7-16. Many roof covering components have maximized their ability to resist the current wind loading standards. Many system application methods may have to be abandoned due to their inability to meet these increased pressures. Mechanically attached roof systems in particular will struggle with the higher resistance requirements. This will lead to more direct to deck applications which create problems during reroofs. Some jurisdictions are requiring a mechanically attached base sheet when an existing direct to deck application is encountered. Others will not allow direct to deck applications. Depending on the jurisdiction and the interpretation finding an alternative that meets all of the requirements will prove difficult.

3. Florida's roofing industry like many other construction disciplines is experiencing severe workforce shortages. Also like many other construction disciplines, much of Florida's required roofing skills are learned by experience in the field (this is in addition to classroom training that is a foundation but not the only knowledge that is needed). As described by engineers and others, ASCE 7-16 is exceptionally complex and implementation calls for more than a minor amount of training and added experience for construction contractors, construction workers and, importantly building code administrators and inspectors. The added cost (and possibly feasibility) for this needs to be ascertained before outright adoption of ASCE 7-16.

ASCE 7-10 has proven to be very effective and meaningfully compliant with Florida's strengthening and mitigation needs. A recent report titled "Rating the States" published by the Insurance Institute for Business & Home Safety (IBHS) states that Florida has the highest score of 18 states included in the report. Florida's score is also higher in 2018 than in 2015. Numerous other reports have touted how well buildings built in compliance with our current Florida Building Code – which includes ASCE 7-10 – performed. From our research and review as well as our observations the ICC hearings on this subject, we are very concerned that the only reason for adopting ASCE 7-16 is change for the sake of change with not only no real benefit, but some measurable, tangible and very real detriment in both construction standards and fiscal impact. Florida does not need to take any steps back, and we respectfully ask the Florida Building Commission to study this carefully and fully before the adoption of ASCE 7-16.

We appreciate your consideration. Please feel free to contact me with any questions or if you would like any additional information.

Sincerely,

*Michael J. Silvers*

FRSA Director of Technical Services

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