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 FILING AND ACKNOWLEDGEMENT
 FILED, on this date, with the designated
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February 2, 2009

Petition for Declaratory Statement before the Florida Building Commission

By: Florida Roofing, Sheet Metal & Air Conditioning Contractors Association, Inc.

Issue: The Florida Roofing, Sheet Metal and Air Conditioning Contractors Association, Inc. (FRSA) is requesting clarification on behalf of State Pride Roofing Inc. of West Palm Beach regarding code requirements of roof to wall connections as listed in the 2007 FBC Existing Volume. State Pride Roofing is in the process of estimating a future project that is located within the wind borne debris region of the state. The project involves a single family dwelling and has an insured value of over \$300,000.00 and needs roof to wall improvements as per FBC, Existing Volume, Section 611.8 and need to determine if the home needs the roof to wall improvements. The home has both gable and hip roof areas. The cost to perform all necessary roof to wall connection improvements will exceed 15% of the re-roof cost.

611.8 When a roof covering on an existing site-built-single-family residential structure is removed and replaced on a building that is located in the wind-borne debris region as defined in the Florida Building Code, Building and that has an insured value of \$300,000 or more or, if the building is uninsured or for which documentation of insured value is not presented, has a just valuation for the structure for purposes of ad valorem taxation of \$300,000 or more:

- (a) Roof to wall connections shall be improved as required by Section 611.8.1
- (b) Mandated retrofits of the roof-to-wall connection shall not be required beyond a 15 percent increase in the cost of re-roofing.

Exception: Single family residential structures permitted subject to the Florida Building Code are not required to comply with this section.

611.8.1 Roof-to-wall connections for site-built single family residential structures. Where required by Section 611.8, the intersection of roof framing with the wall below shall provide sufficient resistance to meet the uplift loads specified in Table 611.8.1 either because of existing conditions or through retrofit measures. As an alternative to an engineered design, the prescriptive retrofit solutions provided in Sections 611.8.1.1 through 611.8.1.76 shall be accepted as meeting the mandated roof-to-wall retrofit requirements.

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Exceptions:

1. Where it can be demonstrated (by code adoption date documentation and permit issuance date) that roof-to-wall connections and/or roof-to-foundation continuous load path requirements were required at the time of original construction.
2. Roof-to-wall connections shall not be required unless evaluation and installation of connections at gable ends or all corners can be completed for 15% of the cost of roof replacement.

611.8.1.7 Priorities for mandated roof-to-wall retrofit expenditures. Priority shall be given to connecting the exterior corners of roofs to walls where the spans of the roofing members are greatest. For houses with both hip and gable roof ends, the priority shall be to retrofit the gable end roof-to-wall connections unless the width of the hip end is more than 1.5 times greater than the width of the gable end.

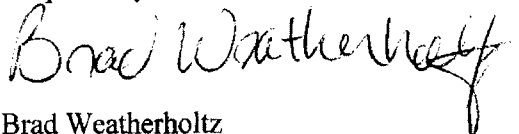
Question 1: Does a home requiring roof to wall improvements as per 611.8, with both gable and hip configurations, and a confirmed cost to improve both gable ends and hip corners that would exceed 15% of the re-roof cost be required to improve only the portion that would apply as per 611.8.1.7?

Question 2: If the answer to question 1 is yes, then it would seem that 611.8.1.7 enforces partial improvements (up to 15% of the cost of the re-roof) in lieu of all improvements that was previously listed in 611.8 (C) that was stricken at the time of the glitch review and approve process and is not consistent with the approved language submitted by the wind mitigation workgroup. **Question:** Does section 611.8.1, exception 2. supersede section 611.8 (b) and void 611.8.1.7 when a home has both gable ends and hip corners that require improvements?

~~(c) Where complete retrofits of all the roof to wall connections as prescribed in Section 611.8.1 would exceed 15 percent of the cost of the re-roofing project, the priorities outlined in Section 611.8.1.7 shall be used to limit the scope of work to the 15 percent limit.~~

Question 3: If the answer to Question 2. is no. On a home that has both gable and hips, and as per section 611.8.1.7, and the gables are priority (or vice-versus) and can be improved with in budget of 15% of the re-roof cost, but all of the hip corners cannot be improved with in the same budget (15% of the re-roof cost) does all the hip corners still need to be improved?

Respectfully submitted,



Brad Weatherholtz
Director of Technical Services
FRSA