

Petition



Florida Building Codes
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OFFICE OF THE SECRETARY

Petition #	318
Do you have a Local Board of Appeals	No
If Yes, have they rendered a decision on this issue	No
County	Escambia
Jurisdiction	Escambia County Building Services
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Building Official	Tim Tolbert
Address/Phone/Email	3363 West Park Place Pensacola, FL 32505 (850) 595-3550 JTTOLBERT@myescambia.com
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Petitioner Name	Jared Blount
Address/Phone/Email	142 Daybreak Trl Fairhope, AL (251) 725-3925 jblount@atslab.com
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Petitioner Representative's Name	
Address/Phone/Email	
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Building Code Version	2023
Sub Code	Building
Chapter & Topic	Chapter 1 - Scope and Administration
Section	110.8.1
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If permitted, date of permit application	
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Enter explanation of how the Petitioner's substantial interests are being affected by the local interpretation of the Florida Building Code

The Petitioner is a Florida-licensed Professional Engineer employed by Applied Technical Services and is directly involved in providing engineering services related to the subject project. The local building official's interpretation that the proposed scope of work requires Special Inspection under the Florida Building Code affects the Petitioner's professional obligations and scope of services.



Enter statement of the interpretation given to provisions of the Florida Building Code by the local building official and the manner in which the interpretation was rendered
 (If information is entered, it must be exactly as it appears in the hardcopy)

The local building official indicated that replacement of windows within the subject building requires Special Inspection under Florida Building Code Section 110.8.1. The interpretation was communicated verbally during discussions between the building official and the project contractor and was subsequently confirmed through written correspondence.

The building official stated that language added to Section 110.8.1 addressing repair and restoration projects resulted in window and door replacement projects being included within the scope of threshold inspection requirements.

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Date	Attached File
12/17/2025	Pet ID 318 BGD Interp. Correspondence with Escambia County.pdf

Enter statement of the interpretation that the petitioner contends should be given to the provisions of the Florida Building Code and a statement supporting the petitioner's interpretation

Florida Building Code Section 110.8 requires Special Inspection for threshold buildings only where the permitted scope of work includes structural alterations or structural repairs that may affect the structural integrity of the building.

The subject project involves a reinforced concrete structural frame with non-load-bearing metal stud infill walls. Wall assemblies within the scope of work consist of stucco and window replacement within these non-structural infill walls. The scope does not include alteration or repair of structural concrete part of the main wind force resisting system. Window openings are not being enlarged, relocated, or reconfigured.

Windows and doors are not classified as structural members under the Florida Building Code, and replacement of windows within non-load-bearing infill wall assemblies, absent any modification to structural members, does not constitute work that affects the structural integrity of the building. Accordingly, this scope of work does not require Special Inspection under Florida Building Code Sections 110.8.1.

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Enter local building official response by providing a statement admitting or denying the statements contained in the petition and a statement of the interpretation of the provisions of the Florida Building Code which the local jurisdiction or the local building official contends is correct, including the basis for the interpretation

My opinion, the original intent of the requirement did not include windows and doors at all. Language was added to 110.8.1 a few years ago including repair and restoration projects. As a result, door and window replacement projects, a structural system that's part of an enclosed building design, are included in threshold plans. This and discussions at Florida Building Commission meetings about the subject sparked those requirements. Be advised that I do not consider stucco work part of a threshold requirements at this time.

In my view someone should submit for a Declaratory Statement from the Florida Building Commission to clear this up. I cannot submit for that because I currently sit on the Commission.

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Date	Attached File
12/23/2025	Pet ID 318 Response Correspondence with Escambia County.pdf

History

Date Paid	12/17/2025
Date Pending Building Official Response	12/10/2025 10:05 AM
Date Building Official Response	12/23/2025
Date Submitted to BOAF	12/23/2025
Date Accepted	01/07/2026

Time Waiver Granted

Date Extended To

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