Docusign Envelope ID: 9AC1DAED-A0AB-88E4-8280-97837FF9B15C

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Petition for Declaratory Statement Before the Florida Building Commission

Company: Jax Apex Technology, Inc.
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DS 2026-104

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Statute(s), Agency Rule(s), Agency Order(s), and/or Code Section(s) on which the Declaratory Statement is Sought:

9th Edition (2026) Florida Building Code, Residential

Portions of Chapters 3 and 8 (Section R301.2.1.1, Section R803.2.2 and Table R803.2.2)

Background:

Jax Apex Technology is a structural engineering company that services high volume home builders throughout Florida. We are currently updating our residential base plan designs to the 9th Edition (2026) Florida Building Code, which takes effect December 31, 2026.

The project that is the subject of this petition is a two-story residential dwelling consisting of a wood-framed second floor constructed over a masonry first floor. The roof system consists of a wood-framed roof with a wood structural panel roof deck. We engineer the structural building assembly to resist wind loads as determined using ASCE 7.

Due to the volume of homes that we assume responsible charge over, we are seeking clarity on the application of Sections R301.2.1.1 and R803.2.2 of the 9th Edition (2026) Florida Building Code, Residential. Specifically, it is not clear whether performance-based calculations using ASCE 7 or prescriptive Table R803.2.2 governs roof deck thickness for a dwelling of mixed construction, with a masonry first story and a wood-framed second story and roof.

In Declaratory Statement DS 2023-044 (filed March 19, 2024), the Commission concluded under the 8th Edition (2023) Florida Building Code, Residential, that performance-based design (i.e., ASCE 7) is an acceptable option for designing wood buildings and their roof deck thickness for wind load.

This petition requests confirmation of that interpretation under the 9th Edition (2026) code for the mixed masonry and wood-frame project described above.

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Section 301: Building Planning

R301.2.1.1 Wind design required.

In regions where the ultimate design wind speed, V_{ult}, from Figure R301.2(4) equals or exceeds 115 miles per hour (51 m/s), the design of concrete, masonry, wood and steel buildings for wind loads shall be in accordance with one or more of the following methods:

1. AWC *Wood Frame Construction Manual* (WFCM).
2. Concrete and masonry walls are permitted to be designed in accordance with ICC *Standard for Residential Construction in High-Wind Regions* (ICC 600).
3. ASCE *Minimum Design Loads for Buildings and Other Structures* (ASCE 7).
4. AISI *Standard for Cold-Formed Steel Framing—Prescriptive Method for One- and Two-Family Dwellings* (AISI S230).
5. *Florida Building Code, Building*; or
6. The MAF *Guide to Concrete Masonry Residential Construction in High Wind Areas* shall be permitted for applicable concrete masonry buildings for a basic wind speed of 130 mph (58 m/s) or less in Exposure B and 110 mph (49 m/s) or less in Exposure C in accordance with Figure R301.2(4) as converted in accordance with R301.2.1.3.

Exceptions:

1. Footings and foundations shall comply with Chapter 4.
2. Exterior windows and doors shall comply with Section R609.
3. For structural insulated panels, the provisions of this code apply in accordance with the limitations of Section R610.
4. Exterior wall coverings and soffits shall comply with Chapter 7.
5. Roof sheathing shall be attached in accordance with Section R803.
6. Roof coverings shall comply with Chapter 9.
7. For concrete construction, the provisions of this code apply in accordance with the limitations of Section R608.2.

The elements of design not addressed by the methods in Items 1 through 6 shall be in accordance with the provisions of this code.

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Section 803: Roof Sheathing

R803.2.2 Allowable spans.

The minimum thickness and span rating for wood structural panel roof sheathing shall not exceed the values set forth in Table R803.2.2.

TABLE R803.2.2
MINIMUM ROOF SHEATHING THICKNESS

Rafter/Truss Spacing 24 in. o.c.	WIND SPEED							
	115 mph	120 mph	130 mph	140 mph	150 mph	160 mph	170 mph	180 mph
Minimum Sheathing Thickness, Inches (Panel Span Rating) Exposure B	7/16 (24/16)	7/16 (24/16)	7/16 (24/16)	7/16 (24/16)	15/32 (32/16)	19/32 (40/20)	19/32 (40/20)	19/32 (40/20)
Minimum Sheathing Thickness, Inches (Panel Span Rating) Exposure C	7/16 (24/16)	7/16 (24/16)	15/32 (32/16)	19/32 (40/20)	19/32 (40/20)	19/32 (40/20)	19/32 (40/20)	23/32 (48/24)
Minimum Sheathing Thickness, Inches (Panel Span Rating) Exposure D	15/32 (32/16)	19/32 (40/20)	19/32 (40/20)	19/32 (40/20)	19/32 (40/20)	19/32 (40/20)	23/32 (48/24)	23/32 (48/24)

Performance-Based Design

Currently, Apex performs calculations to determine roof deck thickness by applying ASCE 7 wind loads using the properties of wood structural panels provided in APA Technical Bulletin Q225G. Except for Table R803.2.2, our calculated results meet or exceed the performance requirements of the 9th Edition (2026) Florida Building Code, Building and Residential. Results of our calculations for the project described above, a two-story residential dwelling with a wood-framed second floor over a masonry first floor and a wood-framed roof with wood structural panels installed with the long dimension perpendicular to roof framing, are exampled in Table 1 below:

Table 1: Apex Performance-Based Design of Roof Deck Thickness (MRH = 23 ft)

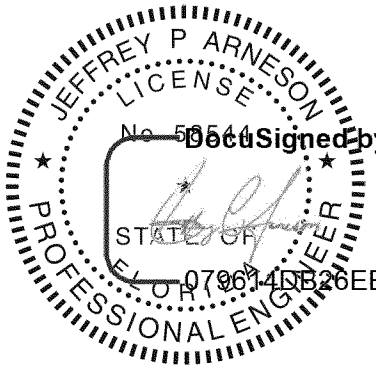
Wind Speed (mph)	Exposure Category	Roof Deck Thickness (inches)
140	C	7/16 (24/16)
150	C	7/16 (24/16)

Question:

As shown in Table 1, performance-based applied to project specific conditions can result in roof deck thicknesses that are less than those prescribed in Table R803.2.2.

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For a two-story residential dwelling consisting of a wood-framed second floor over a masonry first floor, with a wood-framed roof and wood structural panel roof deck, is Apex correct to interpret Section R301.2.1.1 of the 9th Edition (2026) Florida Building Code, Residential, as allowing performance-based design (ASCE 7) to determine roof deck thickness?



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