

Madani, Mo

From: Reed Hitchcock <rhitchcock@asphaltroofing.org>
Sent: Tuesday, September 29, 2026 10:53 AM
To: Madani, Mo
Cc: Reed Hitchcock; Mike Silvers
Subject: 105.2 Single-family dwelling work valued at less than \$7500

Mr. Madani –

I am writing on behalf of the Asphalt Roofing Manufacturers Association (ARMA) in support of the comments previously sent to you by FRSA on section 105.2. FRSA has requested that the language shown below in bold red type and underscored be added to the language in staff's comment on 105.2.3 as shown and presented here for consideration during the second 45-day comment period.

CA-FBC-B - Ch. 1 – Glitch #1 – Staff

105.2 Work exempt from permit.

Revise section 105.2.3 to read as follows:

105.2.3 ~~Public service agencies. Reserved.~~ Single family dwelling work valued at less than \$7,500.

1. A local government that issues building permits shall exempt an owner of a single-family dwelling or the owner's contractor from the requirement to obtain a building permit to perform any work valued at less than \$7,500 on the owner's property.
2. The exemption under subparagraph 1. does not apply to any of the following:
 - a. Work on a property that is partially or entirely located in a flood hazard area as defined by the Florida Building Code.
 - b. Any electrical, plumbing, structural, mechanical, or gas work performed on property containing a single-family dwelling. A construction project may not be divided into more than one project for the purpose of evading the requirements of this paragraph. **Roofing shall be considered structural as it applies to the exemption in 105.2.3 Part 2.**
3. To qualify for the exemption under subparagraph 1., the owner or the owner's contractor must submit a written request for exemption to the local enforcement agency with a copy of the contract or other documentation demonstrating the nature and the value of the work to be performed.
4. A local government has no legal duty to the owner, contractor, or successors or assigns thereof for exempted work performed under this paragraph.

The requested additional clarifying language is meant to reflect the intent of the legislature during floor debate just before the bill was passed. During final discussion on HB 803 with an amendment under consideration, Representative Alex Andrade asks Representative Toby Overdorf, the amendment sponsor, the following question: "Based on this amendment is it your understanding that roofing work and roofing repairs would be deemed as structural as defined or understood under the bill?" Representative Overdorf responded: "Roofing would be structural, yes." Another unrelated question was discussed and then the amendment and the bill were passed unanimously. (<https://thefloridachannel.org/videos/3-12-26-house-session/> marker 3:28:36).

Based on the discussion on the House floor and the unanimous vote afterwards, it is very clear that the intent of the legislature was to not allow roofing to be exempt from permitting and inspections.

Florida's roofing industry has been a primary advocate for strengthening the roofing-related portions of the code. The positive results of doing so are widely recognized as extremely effective in reducing storm damage, thereby reducing insurance losses and rates, and most importantly, keeping Floridians in their homes and businesses post-storm. Allowing the installation of roof coverings to be performed without a permit and inspections (or at least the fear of being called out for non-compliance) would be incredibly counterproductive. This is too important to be left to shifting and conflicting interpretations and should be clearly stated in the code.

ARMA agrees completely with these comments from FRSA. Please do not hesitate to contact me if you have any questions or need any clarification from our organization's perspective. Thank you for your consideration.

-Reed Hitchcock



Reed B. Hitchcock | Executive Vice President

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