Roofing Technical Advisory Committee – Comments

9th Edition (2026) Florida Building Code, Building/Residential

CHAPTER 15 ROOF ASSEMBLIES AND ROOFTOP STRUCTURES

Outside the scope of this comment cycle – Standard update

R- Ch. 15 -B Comment #1

From: Aaron R. Phillips <aphillips@asphaltroofing.org>
Sent: Monday, January 5, 2026 8:42 PM
To: Madani, Mo <Mo.Madani@myfloridalicense.com>
Subject: Comment Requesting Update to Standards

Hello Mo,

New editions of two asphalt roofing standards—ASTM D3462/D3462M-25 and ASTM D1970/D1970M-25—were released in December 2025. ARMA requests that revisions be considered to the Referenced Standards chapters for the FBC, Building (Chapter 35) and the FBC, Residential (Chapter 46) to recognize the latest editions of both D3462 and D1970.

ASTM D1970 is the Standard Specification for Self-Adhering Polymer Modified Bituminous Sheet Materials Used as Steep Slope Roof Underlayment for Ice Dam Protection. It is referenced in ten sections in Chapter 15 of the FBC, Building and in four sections in Chapter 9 of the FBC, Residential. Modifications to create the 2025 edition of ASTM D1970 are improvements to the test method for determining adhesion to plywood. The methodology modifications will improve consistency of results within and between laboratories, leading to more accurate outcomes.

ASTM D3462 is the Standard Specification for Asphalt Shingles Made from Glass Felt and Surfaced with Mineral Granules. It is referenced in two sections in Chapter 15 of the FBC, Building and in one section in Chapter 9 of the FBC, Residential. The 2025 edition directly recognizes that asphalt shingles are permitted to include recycled materials, provided the shingles meet or exceed all requirements of the standard. Referencing this edition of the standard in the Florida codes is important because asphalt shingles with recycled content are available. Updating to the latest edition will acknowledge these products.

Thanks for your assistance with this request.

Aaron

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TAC Recommendation:

Commission Action:

Editorial

R- Ch. 15 -B Comment #2

Hi Mo,

FBC 1523.6.5.2.17 sets forth physical property requirements for roof tile adhesive.

Nemo believes Section (7) is erroneously written:

1523.6.5.2.17.7
Tested in compliance with ASTM E96 for moisture vapor transmission for a maximum of 3.1 perms.

We believe the section should state:
"Tested in compliance with ASTM E96 for moisture vapor permeability for a maximum of 3.1 perm-inch"

Rationale:

- First off, "Water Vapor Transmission" does not have units of "perms". Units of "perms" are associated with "Water Vapor Permeance", which includes the pressure-differential component of the test.

- Secondly, roof tile adhesive, by its nature, is a field-applied product and does not have a fixed, codified thickness; the application thickness varies dependent on the method of application and the profile of the tile. Meanwhile, the ASTM E96 test method does not specify a fixed specimen thickness. That said, performance criteria inclusive of the as-tested thickness component of the test (aka, Permeability) would ensure consistency from test-event to the next.

- Thirdly, other codified standards for foamed-plastic which include a water-vapor performance criteria driven by ASTM E96 testing specify one of the following:

1. Permeance (perms) criteria <u>with a specified test specimen thickness requirement:</u>
   Example:
   - ASTM C1289: Factory-Produced Polyisocyanurate Thermal Insulation
   - While this standard has a **permeance** criteria (perms), it specifies that the test specimen is 1-inch thick.

2. Permeability (perm-inch) criteria:
   Example:
   - ASTM C1029: Field-Applied Sprayed Polyurethane Thermal Insulation
   - This standard has a **permeability** (perm-inch) requirement, and does not specify the test specimen thickness, so the thickness of the tested specimen forms part of the permeability (perm-inch) criteria.
   - Sidebar: The magnitude of the C1029 permeability criteria is max. 3.0 perm-inch, which coincides with the criteria of "max. 3.1" set forth in FBC 1523.6.5.2.17.7.

Best,

Robert Nieminen, P.E.
President

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Good morning Mo,

I think it is editorial to edit the section if it's changed to "water vapor permeability" instead of "moisture vapor permeability" to line up with the wording in the ASTM standard and correct to units of 'perm-inch'. The section would then read as follows:

"Tested in compliance with ASTM E96 for water vapor permeability for a maximum of 3.1 perm-inch"

It would be great if this can make it into the 9th Ed FBC.

Thank you.

Jaime D. Gascon, P.E.
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TAC Recommendation:

Commission Action:

Outside the scope of this comment cycle – Standard update

R- Ch. 15 -B Comment #3

From: Robert Zabcik <bob@ztech-consulting.com>
Sent: Wednesday, January 7, 2026 12:06 PM
To: Madani, Mo <Mo.Madani@myfloridalicense.com>
Subject: FBC Public Comment

Mr. Madani,

Happy New Year! I am the proponent for FBC proposals 12064 and 12070. Proposal 12064 adds a requirement for a new test, ANSI/MCA FTS-1, to Section 1504.3.1.1 and proposal 12070 adds a reference to that test method into Chapter 35. I was reviewing the supplements released for public comment last month and noticed that proposal 12070 does not appear to have carried over to the referenced standards mark-up. Also, please note that the standard was reaffirmed last November as well. I hope there is an errata for the supplement or some other way to correct this apparent oversight. I have attached a redlined version of the supplement appended with "_MCA" in the file name reflecting this. The marks are on page 39.

Please let me know if there is anything else I need to do.

ANSI/MCA FTS-1 2019 (R2025) Test Method for Wind Load Resistance of Flashings Used with Metal Roof Systems
1504.3.1.1

Thank you!

Robert A. Zabcik, P.E. (Texas), LEED AP
Technical Director

TAC Recommendation:

Commission Action:

Editorial

R- Ch. 15 -B Comment #4

Mr. Madani,

I believe there is a typographical error in Section 1506.5 (page 192) of the FBC Supplement currently out for public review. (Attached) I believe that the 300 foot limit introduced in this section is supposed to be 3,000 feet as marked in **bold red** below. This is supported by the fact that 914 meters is indeed 3,000 feet.

Bob

1506.5 Nails. Nails shall be corrosion-resistant nails conforming to ASTM F1667 or an equal corrosion resistance by coating, electro galvanization, mechanical galvanization, hot dipped galvanization, stainless steel, nonferrous metal and alloys or other suitable corrosion-resistant material, or corrosion resistance shall be demonstrated in accordance with TAS114, Appendix E. In areas within **3,000** feet (914 m) of a saltwater coastline, nails shall comply with Section 1711.

Robert A. Zabcik, P.E. (Texas), LEED AP
Technical Director

TAC Recommendation:

Commission Action:

Editorial

R- Chs 10/35 - B-Chs 9/46 - R - Comment #5

From: Aaron R. Phillips <aphillips@asphaltroofing.org>
Sent: Wednesday, January 7, 2026 2:18 PM
To: Madani, Mo <Mo.Madani@myfloridalicense.com>
Subject: Florida Supplements - Issues Requiring Attention

Hello Mo,

My review of the supplements identifies the following which require review and correction:

FBC, Building

- F11032
    - It appears that the language included in Section 1015.2 of the supplement is from the original ICC proposal (i.e., G106-21 Part II) instead of from Public Comment 1, which is what was approved in the IBC.

FBC, Residential

- R11576. The title of Table R905.6.8 contains a misspelling of the word “Accordacne”. This was misspelled in the original ICC proposal RB268-22.
- R11583. The number of the table in the table title is incorrect. It should be “R905.18.2” not “R905.182”.

FBC, Building – Referenced Standards

- R11849.
    - Should read “D4897/D4897M-16(2023)”. There should not be an “a” after “16.”
    - Should read “D6509/D6509M-16(2023)”. The “16” is missing.
    - Should read “F1667/F1667M-21a”. Missing “/F1667M”.
    - Should read “4470 (April 2022)”. The “2016” should be stricken.

FBC, Residential – Referenced Standards

- R11902.
    - Should read “C728-2017a(2022)”. The “A” should be lowercase.
    - Should read “D41/D41M-11(2023)”. The “11” is missing.
    - Should read “D226/D226M-17(2023)”. Remove “2017” and replace with “17”.
    - Should read “D312/D312M-16a(2023)”. Remove “2016” and replace with “16”.
    - Should read “D1863/D1863M-05(2024)”. Remove “2005” and replace with “05”.
    - Should read “D2824/D2824M-18(2024)”. Remove “2018” and replace with “18”.
    - Should read “D3019/D3019M-17(2024)”. Remove “2017” and replace with “17”.
    - Should read “D4479/D4479M-07(2024)”. The first “D4479” is missing. Also, remove “2007” and replace with “07”.
    - Should read “D4586/D4586M-07(2024)”. Remove “2007” and replace with “07”.
    - Should read “D4897/D4897M-16(2023)”. Remove “2016” and replace with “16”.
    - Should read “D6222/D6222M-16(2023)”. Remove “2016” and replace with “16”.
    - Should read “D6298/D6298M-16(2023)”. Remove “2016” and replace with “16”.
    - Should read “D6757/D6757M-18(2023)”. Remove “2018” and replace with “18”.
    - Should read “F1667/F1667M-21a”. Add “/F1667”.

Let me know if you have any questions or need anything else from me.

Take care,

Aaron

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TAC Recommendation:

Commission Action:

Outside the scope of this comment cycle – Standard update

R- Ch. 46 -R Comment #6

From: Robert Zabcik <bob@ztech-consulting.com>
Sent: Friday, January 9, 2026 2:44 PM
To: Madani, Mo <Mo.Madani@myfloridalicense.com>
Subject: RE: FBC Public Comment

Thank you, Mr. Madani. There is a likewise update to Chapter 46 of the Florida Residential Code on page 45 of the attachment. I have made the revision in red, as it is already underlined. The reason is that the standard has been reapproved since the original code change was submitted under 12077 last year.

ANSI/MCA FTS-1 2019(R2025) Test Method for Wind Load Resistance of Flashings Used with Metal Roof Systems

Thank you for your assistance with this.

Bob

Robert A. Zabcik, P.E. (Texas), LEED AP
Technical Director

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TAC Recommendation:

Commission Action:

Correlation

R- Ch. 9 - R - Comment #7

Mo,
Please note that the referenced modification below was submitted and approved for Building Chapter 15. Unfortunately, I missed submitting a correlative change for the Residential Subcode Chapter 9 which has identical language pre-modification. As you know we try to keep the Building and Residential roofing sections aligned to avoid confusion.
Modification 11797 as approved:
1507.3.9 Flashing.
At ~~the juncture of the roof~~ Interruptions, terminations and penetrations of the roof system ~~vertical surfaces~~,. fFlashing and/or counterflashing shall be ~~provided~~ installed in accordance with the manufacturer's installation instructions or the recommendations of the FRSA/TRI Florida High Wind Concrete and Clay Roof Tile Installation Manual, Seventh Edition where the basic wind speed, Vasd, is determined in accordance with Section 1609.3.1. was submitted for Building Chapter 15.
I respectfully ask that the same change as shown below be made in the Residential Subcode as a correlative change.
R905.3.8 Flashing.
At ~~the juncture of roof~~ Interruptions, terminations and penetrations of the roof system ~~vertical surfaces~~, ~~f~~Flashing and/or counterflashing shall be ~~provided~~ installed in accordance with the manufacturer's installation instructions, recommendations of the FRSA/TRI Florida High Wind Concrete and Clay Roof Tile Installation Manual, *Seventh Edition where the* V_{asd} *is determined in accordance with Section R301.2.1.3.*

My apologies.
Thanks,

Mike Silvers, CPRC
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TAC Recommendation:

Commission Action: