QUESTIONS/ANSWERS ABOUT NEW ROOF REPLACEMENT REGULATIONS AS REQUIRED BY FLORIDA EXISTING BUILDING CODE

On August 21, 2007, the Florida Building Commission (as directed by the Legislature through House Bill 7057) adopted significant changes to the way certain roofing will be regulated statewide. As required by law, effective October 1, 2007, all roof replacements on existing site built single family residential structures constructed prior to implementation of the Florida Building Code (March 1, 2002) must include a secondary water barrier as defined by the new regulations. Additionally, the existing roof decking must comply with section 708.7.1 of the Florida Existing Building Code or be re-nailed utilizing fasteners on a specified spacing (again as defined by the new regulations). Also, in wind borne debris areas, up to 15% of the cost of the roof replacement must be used to enhance the intersection of the roof framing with the wall below by adding metal connectors, clips, straps and fasteners such that the performance level equals or exceeds the uplift capacities as specified in the new regulations. The following questions were submitted to and constitute the combined response of the Building Officials Association.

1. When do the new roof replacement regulations become effective? The new regulations become effective October 1, 2007, therefore permits applied for after that date will be required to meet the new regulations. Revised regulations take effect February 18, 2008.

2. To what type of roof replacement projects does the new law apply? Existing site built single-family detached residential structures constructed prior to implementation of the Florida Building Code (March 1, 2002).

3. Which local jurisdictions in Florida have adopted the new roofing laws? Local governments did not adopt this law. It was adopted by the Florida Legislature through House Bill 7057, signed by the Governor and applies throughout Florida. Local governments are required to enforce this new unfunded statutory mandate.

4. Will the cost of roof replacement projects increase in order to comply with these new regulations? Yes, current estimates from roofing contractors indicate average increases of 30% above what they were prior to implementation of the new regulations.

5. When do I call for inspection under the new roofing requirements? In the City of Sebastian inspections are scheduled one day prior to the desired date of inspection.

6. Are there new inspection codes for requesting inspections through the automated inspection request line? The City of Sebastian will require a sheathing inspection on the re-nailing of the decking, a dry-in inspection of the secondary water barrier and underlayment, a shingle in progress during installation and a final inspection at job completion. Inspector in most cases will only be able to observe a portion of the sheathing re-nailing, therefore a re-nailing affidavit from the permit holder is required to be submitted to the Building Department prior to final.
7. What areas of Florida are considered wind-borne debris regions? **Regions within one mile of the coastal average high water line where basic wind speed is 110 mph or greater, OR anywhere that the basic wind speed is 120 mph or greater. Sebastian has a basic wind speed of 140 mph.**

8. When are improvements required for wall to roof connections? **When the home is located in a wind borne region and has a value of $300,000 or more. Value is determined from the insured value of the structure or from the just valuation of the structure for purposes of ad-valorem taxation.**

9. How much do I have to spend on improvements for wall to roof connections? **The new law requires you to spend a maximum of a 15% increase in the cost of the re-roofing project for improvements to the roof to wall connections.**

10. Are there any priorities for spending the 15% for improvements for wall to roof connections? **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. Priority shall be given to connecting the corners of roofs to walls below where the spans of the roofing members are greatest to stay within the 15% limit.**

11. Can a roofing contractor perform the gable end bracing and improvements for wall to roof connections? **The best information currently available from the State Construction Industry Licensing Board is that roofing contractors cannot perform this type activity. A residential, building, or general contractor is required to perform the gable end bracing and improvements to the roof to wall connections.**

12. What is a secondary water barrier? **The law defines it as: 1) all joints in roof decking shall be covered with a minimum 4 in. wide strip of self-adhering polymer modified bitumen tape applied directly to the sheathing or decking. The deck and self adhering polymer modified bitumen tape shall be covered with an approved underlayment system for the particular roof covering to be applied to the roof; OR 2) The entire roof deck shall be covered with an approved self-adhering polymer modified bitumen cap sheet. No additional underlayment shall be required on top of this cap sheet for new installations; OR 3) An asphalt impregnated 30# felt underlayment installed with nails and tin-tabs as required for the HVHZ; OR 4) An asphalt impregnated 30# felt underlayment or approved synthetic underlayment installed with plastic or metal cap nails spaced 6in on laps and 12in staggered in between laps. Slopes 2:12 to 4:12 shall have additional layer of felt installed in a shingle fashion with 19 in. laps and fastened as described above. Synthetic underlayment shall be installed per manufacturer’s specifications.**

13. What is a self-adhering polymer modified bitumen cap sheet? **The new roofing regulations do not define specifically what this product is; however, the Florida Building Code, Building, defines it as a leak barrier complying with ASTM D 1970. (commonly known as “peel and stick”)**
14. What are the new nailing requirements for the roof decking? The specific nailing requirements are contained in the following chart. However, generally speaking, in all areas of Florida if the existing roof decking is fastened with either staples or 6D nails, the entire roof deck will need to be re-nailed with 8D round head ring shank nails spaced no greater than 6 inches on center. Additionally, in all areas of Florida if the existing roof decking is fastened with 8D round head ring shank nails spaced no greater than 6 inches on center, no additional nailing will be required. In wind zones of 110mph or less, if the existing roof decking is fastened with 8D clipped head or round head nails, supplemental 8D round head ring shank nails will have to be added such that the maximum spacing between existing and supplemental fasteners is not greater than 6 inches on center. In wind zones greater than 110mph where the existing roof deck is fastened with 8D clipped head or round head fasteners, the entire roof deck must be re-nailed with 8D round head ring shank nails. OR Documentation must be provided to substantiate compliance with Section 507.2.2 of the Florida Existing Building Code. All supplemental fasteners must be 8D round head ring shank nails meeting the following specifications:

1. 0.113 inch nominal shank diameter
2. Ring diameter of 0.012 over shank diameter
3. Ring shank shall extend 1-1/2 inch from tip of the nail
4. 0.280 inch full round head diameter
5. 2-1/4 inch nail length

Supplement Fasteners at Panel Edges and Intermediate Framing

<table>
<thead>
<tr>
<th>Existing fasteners</th>
<th>Existing spacing</th>
<th>Wind speed 110 mph or less supplemental fastening shall be no greater than</th>
<th>Wind speed greater than 110 mph supplemental fastening shall be no greater than</th>
</tr>
</thead>
<tbody>
<tr>
<td>Staples or 6d</td>
<td>Any</td>
<td>6” o.c. (^b)</td>
<td>6” o.c. (^b)</td>
</tr>
<tr>
<td>8d clipped head, round head, or ring shank</td>
<td>6” o.c. or less</td>
<td>None necessary</td>
<td>None necessary</td>
</tr>
<tr>
<td>8d clipped head, round head, or ring shank</td>
<td>Greater than 6” o.c.</td>
<td>6” o.c. (^a)</td>
<td>6” o.c.</td>
</tr>
</tbody>
</table>

\(a\). Maximum spacing determined based on existing fasteners and supplemental fasteners.

\(b\). Maximum spacing determined based on supplemental fasteners only.
15. Do the enhanced roof requirements apply to new construction? **No.**

16. Do the roofing requirements apply to commercial or industrial structures? **No.**

17. Do the roofing requirements apply to multi-family structures or manufactured homes? **No.**

18. When is gable end bracing required? **As currently written, gable end bracing retrofits are not required. They are completely voluntary.**

19. Can a roofing contractor include the wall to roof improvements and/or gable end bracing in their contract with the owner and sub-contract this work to a properly licensed residential, building, or general contractor? **Yes, provided the majority (more than 50%) of the work performed under the contract is within the scope of the roofing contractors’ license.**

20. Can we continue re-roofing over existing roof coverings? **Yes, provided the existing roof covering is suitable as a base for the installation of the additional roofing as stipulated by section 708.3 of the Florida Existing Building Code.**

21. If the homeowner chooses to re-roof over the existing roof covering do they still have to comply with these new regulations? **No. Based on the definition of Roof Replacement as contained in the Florida Building Code, installation of a new roof covering over an existing roof covering without removing the existing roof covering does not constitute a roof replacement, which is the trigger that initiates the new roofing regulations.**