**Informal Interpretation Report**
**Number 8509**

**Date** February 25, 2021

**Edition** 2021

**Section** R908.7 Wind mitigation.

## Question:

For a one-story single-family dwelling with an asphalt shingle roof that was installed in December 2005 with a proper permit and in accordance with the 2004 Florida Building Code, Residential. Therefore, the underlayment is D226 Type I (15 ib. felt) fastened per code at 36 inches on center. The homeowner wants to tear off and replace the shingles. For existing properties, the 2020 FBC §R908.7 requires (1) enhanced deck attachment and (2) improved secondary water barrier. However, the exception reads (Exception: Structures permitted subject to the Florida Building Code are not required to comply with this section.) A publication from a municipality interprets this type of exception (i.e. permitted under the FBC) to mean that those work areas built by permit under earlier versions of the FBC need not upgrade. Therefore, can the homeowner use the exception and go back without renailing and with 15 in. felt at 36 on center as they had it? If not, what is the meaning of the exception?

## Answer

No, the exception in R908.7 does not apply in this instance. Existing Building Code ch 706: Materials and methods of application used for recovering or replacing an existing roof covering shall comply with the requirements of Chapter 15 of the Florida Building Code, Building, or Chapter 9 of the Florida Building Code, Residential. Roof repairs to existing roofs and roof coverings shall comply with the provisions of this code.

## Commentary:

None.

**Notice:**
The Building Officials Association of Florida, in cooperation with the Florida Building Commission, the Florida Department of Business & Professional Regulation, ICC, and industry and professional experts offer this interpretation of the Florida Building Code in the interest of consistency in their application statewide. This interpretation is informal, non-binding and subject to acceptance and approval by the local building official.