



Informal Interpretation Report Number 9013



Date February 28, 2025

Edition 2023

Section R322.2.1 Elevation Requirements / R322.2.5 / R322.3.3.1

Question:

Building and structures in designated flood areas (AE zones) need to be elevated to base flood +1 foot per this code section. Structure is defined as that which is built or constructed. Pools are defined in the residential code (chapter 45) as any structure contains water over 24 inches deep, etc....

I have a few questions below:

1. In AE zones would they subject the Base flood Plus 1' elevation requirements?
 2. In VE zones, would they subject to the lowest structural member requirements in R322.3.2?
- or
3. Because they are specifically defined separately as opposed to the definition of a structure, would they be subject only to the specific requirements in an AE zone per R322.2.5 (for AE zones), and for VE zones the specific requirements of R322.3.3.1?

Answer

Pools (as defined in the FBC-Residential) §4501.2, are considered as accessory structures of the primary structure and are dependent if they are connected or not to the main structure; also, section R4501.4.2.1 refers to the flood hazard areas to be in follow section R322.2.4.1, which is silent on this type of elevation. However, by reference in to the ASCE-24, section 9.5; In-ground pools and above ground polls are required to withstand all flood related load combinations; also, states that pools that are structurally connected to the main structure, shall be designed to function as a continuation of the main building or structure.

Further it also states that in Coastal High Hazard Areas (A Zones) pools shall be elevated so the lowest horizontal member is elevated as required in section 4.4, among other requirements.

Furthermore, section 4.4 sets the elevation requirements for the LHSM to be at or above the Design Flood Elevation (DFE), and as determined in table 4-1, where structure category established the minimum elevation. Finally, and based in the above information, and depending on the pool risk category, orientation to the wave approach and connection to the structure, such table establishes that the pool could range from DFE, BFE+1 or 2, or DFE (whichever is greater).

Commentary:

Additionally, the two R322 sections listed are silent about elevations (in V and CAZ, you get sent to ASCE 24). Be sure you're looking at all the FBC sections that apply to pools. See link below where you can download

FDEM's excerpts of the flood provisions of the FBC. Start with FBCB Sec 454. Then in FBCR, check out R322.1.6 (exception), R322.2.5, R322.3.3.1, and R326.1 which sends you to FBCR Chapter 45, and R4501.4.2.1. ASCE 24-14 is not available to view free online. Building Departments may have copies. In addition to the flood excerpts, at the link below you'll find several topics that FDEM has written up, and scroll down to Community Resources, then FBC Resources and Guidance, Ordinance Amendments, and Sample Forms. [fdem-ofm-guidance_swimming-pools_1-2024.pdf](#) ([floridadisaster.org](https://www.floridadisaster.org)). See especially <Swimming Pools, Spas, and Similar Water Features in SFHAs.> <https://www.floridadisaster.org/dem/mitigation/floodplain/>

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