



Informal Interpretation Report Number 9503



Date March 04, 2026

Edition 2023

Section 3109.3.4 (6)

Question:

A proposed commercial building located in an X Zone (not AE or VE) but seaward of the CCCL, for "allowed use" enclosures below the 100 year design storm elevation per 3109.3.4 (6), do those enclosure walls need to be breakaway?

Answer

Submitted on behalf of FDEM Office of Floodplain Management:

The Florida Division of Emergency Management is designated as the NFIP State Coordinating Agency. In that capacity, the FDEM Office of Floodplain Management focuses on supporting communities as they administer and enforce local floodplain management regulations and the flood provisions of the Florida Building Code and responding to questions from the public. Regarding the Coastal Construction Control Line, they developed a chart to compare the requirements that apply in flood hazard areas to the CCCL requirements. Comparison of CCCL Sec. 3109 and Flood Requirements in FBC (12/2024) and other guidance on several matters of interest to communities are online: <https://www.floridadisaster.org/dem/mitigation/floodplain/community-resources/>

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.