

April 8, 2008

*Amend - 4/9/08*  
*DCA 08 - DEC - 112*

The Florida Building Commission  
Florida Department of Community Affairs  
Building Codes and Standards Office  
2555 Shumard Oak Boulevard

Re: Request for Declaratory Statement

Dear Members of the Commission,

The purpose of this letter is to request your interpretation of the code in reference to the word "outside", when used concerning venting air to the "outside" in residential, single-family, vented attic construction. Furthermore, we would request a determination as to the nature of a "vented soffit", to determine whether or not this area DOES share the outside atmosphere (or outdoor air) or if it does NOT share this outdoor air.

We are a builder of single-family homes in the North East Florida area, primarily in St. Johns County. Our homes are typically slab on grade, wood frame structures, with synthetic finish over a conventional stucco system. Our soffit system is normally a ventilated vinyl product on the underside of the eaves with an aluminum wrapped fascia for ease of maintenance. Our attics ventilate through the soffit and normally through off-ridge vents located on the roof.

We are preparing to construct new homes using the same methods and materials as described above. One of the established methods that we are seeking to confirm has been a common practice in our area for the last 25 years or so, which is the practice of extending the flexible duct from the mechanical bathroom ventilators into the ventilated soffit area. We have always considered the air within these ventilated soffit as part of the "outdoor air", or as part of the "outside atmosphere".

Please find for your use, our effort to recap the different code references within the Residential Building Code that are causing some conflict in these established methods due to the wording, and therefore the request for this body to clarify the code intent. Later, you will find other terminology taken from the Mechanical Code, which I believe reflects the bigger picture of function, and may indicate how air performs, or the flow of air impacts the air within the ventilated soffit and attic areas.

The following Sections of the Residential Building Code are at issue:

R303.3 - "...ventilation air from the space shall be exhausted directly to the outside."

R303.4.2 - "Exhaust Openings. Outside exhaust shall be located so as not to create a nuisance. Exhaust air shall not be directed onto walkways.

R303.5 - "Outside opening protection. Air exhaust and intake openings that terminate outdoors shall be protected with corrosion-resistant screens, louvers or grills having a minimum opening

size of ¼ inch (6.4mm) and a maximum opening size of ½ inch (12.7mm) in any dimension. Openings shall be protected against local weather conditions. Outdoor air exhaust and intake openings shall meet the provisions for exterior wall opening protectives in accordance with this code.”

Upon examination of the Mechanical Code, we find that several terms are absent in the referenced Sections of the Residential Building Code. My belief is that had these terms been included within these sections of the Residential Code, it would result in conveying the correct intent within the code. These terms are “outside atmosphere” and “outdoor air”.

When discussing the air mass that surrounds a home and flows through a vented attic assembly, the nature of the discussion changes as we recognize that the outside air is not limited to the outside extents of the vented soffit area. The vented soffit itself is designed to promote a free-flow of outside air through the vented soffit, including through the vented attic, ultimately all the way through the roof vents. Therefore, any bathroom ventilation that exhausts within a properly vented soffit area will mix with the outside air existing within the soffit and disperse naturally into the atmosphere.

A “non-vented” attic, which presumably may be constructed using a vented or a non-vented soffit, may be the exception to mechanical bathroom ventilation terminating within the soffit area. The absolute need for terminating these vents outside the soffit area (or a roof area) might still be questioned because of the natural venting tendency of numerous vented soffit systems. In the case of these non-vented attics, further study should be undertaken to determine the type or quantity of soffit ventilation adequate for the approximate amount of humid air being removed from a residential bathroom.

We hope that this request will serve to correct what we believe wa a simple oversight that took place in prior years as portions of the mechanical code were used to create sections within the building code and the terms “outside atmosphere” and “outside air” were inadvertently overlooked. If it is deemed that non-vented attics should be held to a different standard, perhaps it is deserving of its own Code Section to properly address the different construction methods.

In conclusion, please answer the following questions:

- 1) When the Residential Building Code (R303.3) refers to “outside”, does it mean “outside of the conditioned space”?
- 2) Does the practice of “terminating a bathroom exhaust vent into a vented soffit area” comply with the intent of the Code?

I appreciate your response, as well as the service the members of the Commission provide.

Warmest Regards,



Lee Arsenault  
SR.VP of Operations  
The Vintage Group, Inc.