JDB CODE SERVICES, INC.

April 6, 2024

SUBJECT:Mod S9851

Dear Chairman Bourré, and the Florida Building Commission:

Please consider this a request from the Florida Home Builders Association (FHBA), the Vinyl Siding Institute (VSI), and the Aluminum Association of Florida (AAF) to accept alternate language to Mod S9851 as a glitch amendment to correct the unintended consequence of previously approved changes. The unintended consequence is the virtual elimination of aluminum fascia covers.

FHBA and AAF submitted alternate language to the Mod that was approved. Afterward, we learned the alternate language was not workable for construction, so a glitch amendment was submitted to the Structural TAC. After submission, we also learned the alternate language was not workable on the job site.

At the Structural TAC meeting, FHBA and AAF requested the TAC deem the change, not a glitch so that we could work with VSI to develop suitable language to present directly to the Commission. The language developed jointly by FHBA, AAF, and VSI is attached to this letter.

As stated, the language currently in the code is not workable and will result in the virtual elimination of the use of aluminum fascia cover. I will not go into a technical explanation of the reasons for this because we will have an expert builder who does this type of work daily at the meeting. His company has used the proposed aluminum fascia cover attachment method for 54 years and has not had a problem with failures during hurricanes.

I want to take a few moments of your time to discuss the process and my experience. In the past, I have asked the Commission to approve changes that were ruled not glitches but resulted in better code or corrected lousy code. In those instances, the Commission adopted the changes regardless of the rules because the change improved the code. The language we have approved currently is a harmful code for Florida because it is not usable in the construction field. This will result in the elimination of widely used materials that are better for the purpose. The aluminum fascia cover evolved because it is a less expensive and better material for protecting the sub-fascia while providing a maintenance-free and pleasing aesthetic. Approval of this change will be for the betterment of the code. I believe what we all want, and what the legislature wants at the end of the day, is a good code. A code that can be used for construction will result in a good product for the consumer. FHBA and AAF strongly urge the Commission to approve this change.

Sincerely.

Joseph D. Belcher

Joseph D. Belcher FHBA/AAF Code Consultant
JDB Code Services, Inc.

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FHBA/VSI FASCIA CHANGES FLORIDA BUILDING CODE – RESIDENTIAL

R704.3 Aluminum fascia. Aluminum fascia shall have a minimum thickness of 0.019 inches and be installed in accordance with the manufacturer's instructions and this code. Fasteners shall be aluminum or stainless steel. Aluminum fascia shall be attached in accordance with Section R704.3.1, R704.3.2 or R704.3.3. The drip edge shall comply with R905.2.8.5, and the thickness of the drip edge shall be in accordance with Table R903.2.1.

R704.3.1 Fascia installation where the design wind pressure is 30 psf or less. Where the design wind pressure is 30 pounds per square foot (1.44 kPA) or less, aluminum fascia shall be attached as follows:

1. Finish nails shall be provided in the return leg (1 1/4" * 0.057" * 0.177" head diameter) spaced a maximum of2. The fascia shall be inserted under the drip edge with not less than half the height of the drip edge or 1.0 inch (25 mm), whichever is greater, of the fascia material covered by the drip edge. One finish nail shall be centered in the face of the fascia from each end of the fascia material section located no more than 1 inch below the drip edge.

R704.3.2 Fascia installation where the design wind pressure exceeds 30 psf but is 60 psf or less. Where the design wind pressure is 60 pounds per square foot (2.88 kPA) or less, aluminum fascia shall be attached in accordance with Section R704.3.2.1 or Section R704.3.2.2.

R704.3.2.1. Where the height of the fascia from the top of the roof sheathing to the bottom of the subfascia plus any thickness of soffit material below the subfascia is less than or equal to 6.5 inches (165 mm) or less, aluminum fascia shall be attached as follows:

1. Finish nails shall be provided in the return leg (1¼" × 0.057" × 0.177" head diameter) spaced a maximum of 24 inches (610 mm) on center, and
2. The fascia shall be inserted under the drip edge with not less than half the height of the drip edge or 1 inch (25 mm), whichever is greater, of the fascia material covered by the drip edge. One finish nail shall be centered in the face of the fascia from each end of the fascia material section located no more than 1 inch (25 mm) below the drip edge.

R704.3.2.2. Where the height of the fascia from the top of the roof sheathing to the bottom of the sub-fascia plus any thickness of soffit material below the subfascia is greater than 6.5 inches (165 mm), the top edge of the fascia shall be secured using utility trim installed beneath the drip edge with snap locks punched into the fascia spaced no more than 6 inches (152 mm) on center.

R704.3.3 Fascia installation where the design wind pressure exceeds 60 psf. Where the design wind pressure is greater than 60 pounds per square foot (2.88 kPA), aluminum fascia shall be attached as follows in accordance with Section R704.3.3.1 or Section R704.3.3.2.

R704.3.3.1. Where the height of the fascia from the top

~~of the roof sheathing to the bottom of the subfascia plus~~

~~any thickness of soffit material below the subfascia isless than or equal to 4.5 inches (114 mm) or less, aluminum~~

~~fascia shall be attached as follows:~~

~~1. Finish nails shall be provided in the return leg~~

~~(1 1/4" × 0.057" × 0.177" head diameter) spaced a~~

~~maximum of 24 inches (610 mm) on center, and~~

~~2. The fascia shall be inserted under the drip edge~~

~~with not less than half the height of the drip edge~~

~~or 1.0 inch (25 mm), whichever is greater, of the~~

~~fascia material covered by the drip edge. One finish~~

~~nail shall be centered in the face of the fascia~~

~~from each end of the fascia material section~~

~~located no more than 1 inch (25 mm) below the~~

~~drip edge.~~

~~**R704.3.3.2** Where the height of the fascia from the top~~

~~of the roof sheathing to the bottom of the subfascia plus~~

~~any thickness of soffit material below the subfascia is~~

~~greater than 4.5 inches (114 mm), the top edge of the~~

~~fascia shall be secured using utility trim installed~~

~~beneath the drip edge with snap locks punched into the~~

~~fascia spaced no more than 6 inches (152 mm) on center.~~

R704.3 Aluminum fascia.

Aluminum fascia shall have a minimum thickness of 0.019 inches and be installed in accordance with the manufacturer's instructions and this code. Fasteners shall be aluminum or stainless steel. Aluminum fascia shall be attached in accordance with Section R704.3.1~~,~~or R704.3.2 ~~or an~~ and R704.4 or R704.5~~R704.3.3.~~ The drip edge shall comply with R905.2.8.5, and the thickness of the drip edge shall be in accordance with Table R903.2.1.

R704.3.1 Fascia installation where the design wind pressure is 30 psf or less.

Where the design wind pressure is 30 pounds per square foot (1.44 kPA) or less, aluminum fascia shall be attached as follows:

1. Finish nails shall be provided in the return leg ($1^1/_4$" × 0.057" × 0.177" head diameter) spaced a maximum of 24 inches (610 mm) on center, and

2. The fascia shall be inserted under the drip edge with not less than half the height of the drip edge or 1.0 inch (25 mm), whichever is greater, of the fascia material covered by the drip edge. One finish nail shall be centered in the face of the fascia from each end of the fascia material section located no more than 1 inch below the drip edge.

~~Where the design wind pressure is 60 pounds per square foot (2.88 kPA) or less, aluminum fascia shall be attached in accordance with Section R704.3.2.1 or Section R704.3.2.2.~~

R704.3.2 Fascia installation where the design wind pressure exceeds 30 psf.

Where the design wind pressure is greater than 30 pounds per square foot (1.44 kPa), aluminum fascia shall be attached with one a finish nail [$1^1/_4$ inches by 0.57 inch by 0.177 inch head diameter (32 mm × 14.5 mm × 4.5 mm)] in the return leg spaced a maximum of 16 inches (406 mm) on center. The fascia shall be inserted under the drip edge with not less than half the height of the drip edge or 1.0 inch (25 mm), whichever is greater, of the fascia material covered by the drip edge. And one of the following additional attachments:

1. One finish nail shall be centered in the face of the fascia from each end of the fascia material section located no more than 1 inch (25mm) below the drip edge.

2. Top edge of the fascia is secured using utility trim installed beneath the drip edge with snap locks punched into the fascia spaced not more than 6 inches (152 mm) on center, or

3. An approved adhesive applied to the inside of the fascia cover or onto the exterior face of the subfascia framing member.

R704.4 Corners on hip roofs.

Fascia shall be bent around corners and extend at least 12 inches (305 mm) beyond the corner. The next fascia material section shall overlap the extension a minimum of 3 inches (76 mm) and be fastened through the return leg at the overlap.

R704.5 Corners on gable roofs.

Fascia shall be wrapped (tabbed) around and extend at least 1 inch (25 mm) beyond the corner. The gable fascia material section shall overlap the tab and be fastened through the fascia cover and the tab at the end with two face nails ($1^1/_4$" × 0.057" × 0.177" head diameter) for a 2 × 4-inch subfascia and three face nails for 2 × 6- inch and greater sub fascia.

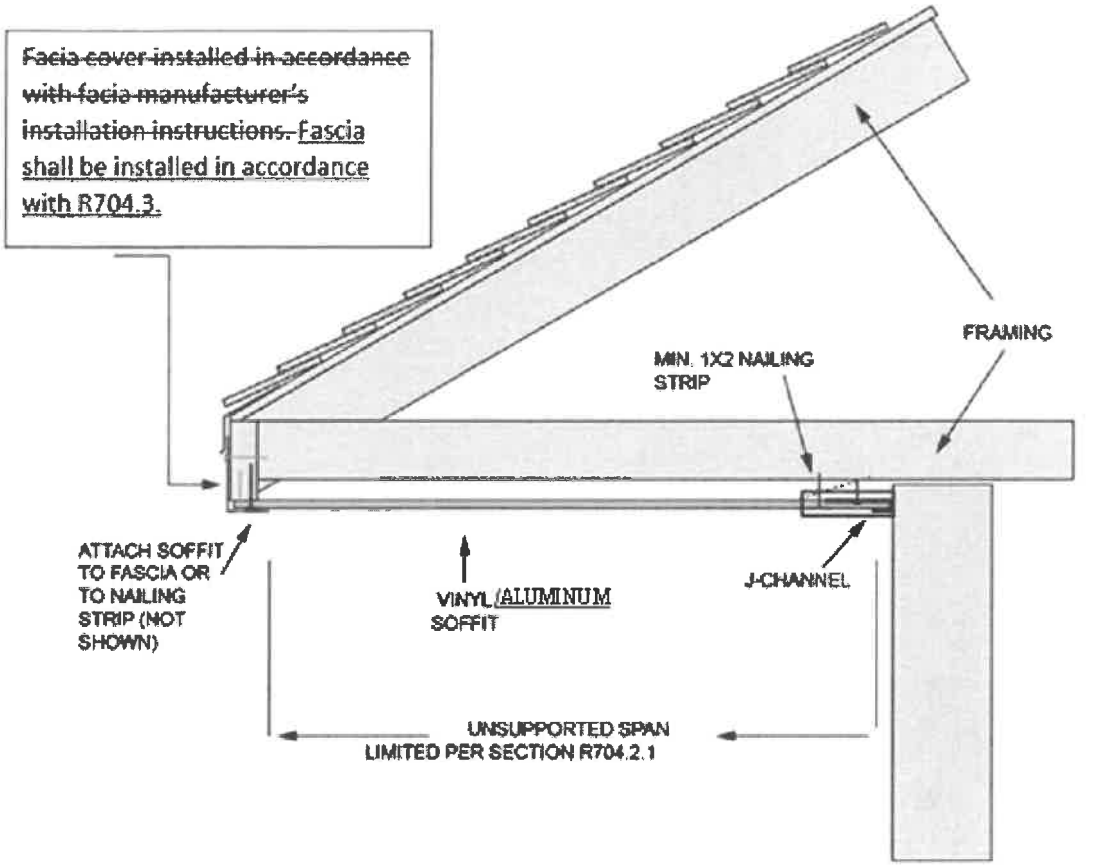


FIGURE 704.2.1(1) TYPICAL SINGLE-SPAN VINYL OR ALUMINUM SOFFIT PANEL SUPPORT

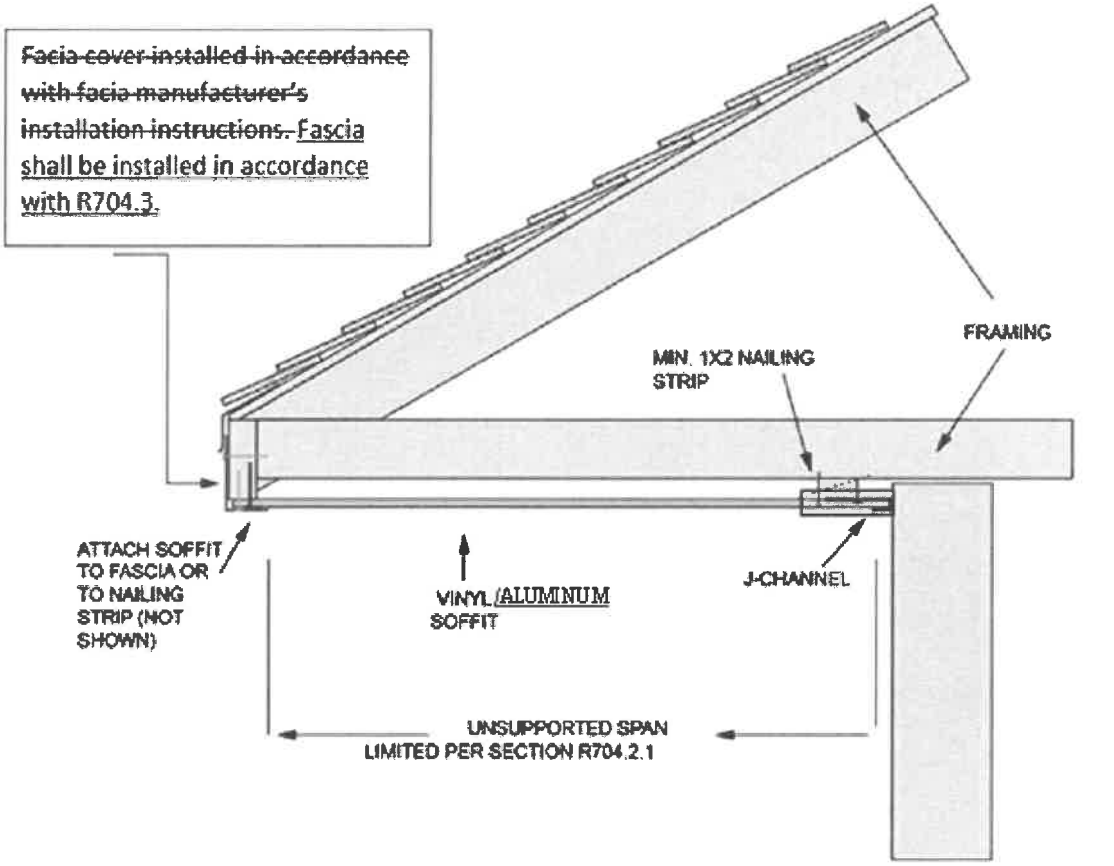


FIGURE 704.2.1(2) TYPICAL DOUBLE-SPAN VINYL OR ALUMINUM SOFFIT PANEL SUPPORT

FHBA/VSI FASCIA CHANGES FLORIDA BUILDING CODE – BUILDING

~~**1410.7.2 Fascia installation where the design wind pressure exceeds 30 psf.** Where the design wind pressure is greater than 30 pounds per square foot (1.44 kPa), aluminum fascia shall be attached with one a finish nail [$1^{1}/_{4}$ inches by 0.57 inch by 0.177 inch head diameter (32 mm × 14.5 mm × 4.5 mm)] in the return leg spaced a maximum of 16 inches (406 mm) on center. The fascia shall be inserted under the drip edge with not less than half the height of the drip edge or 1.0 inch (25 mm), whichever is greater, of the fascia material covered by the drip edge. And one of the following additional attachments:~~

~~4. One finish nail shall be centered in the face of the fascia from each end of the fascia material section located no more than 1 inch (25mm) below the drip edge.~~

~~5. Top edge of the fascia is secured using utility trim installed beneath the drip edge with snap locks punched into the fascia spaced not more than 6 inches (152 mm) on center, or~~

~~6. An approved adhesive applied to the inside of the fascia cover or onto the exterior face of the subfascia framing member. Where the design wind pressure is greater than 30 pounds per square foot(1.44kPA), aluminum fascia shall be installed using one aluminum nail with a minimum0.057-inch (1.5 mm) shank, 0.177-inch (4.5 mm) head, and 1 1/4" (32 mm) length finish nails, installed no more than 1-inch (25.5 mm) below the drip edge, and one finish nail at the return leg of the of the fascia within 3" (76 mm) of each end and a with a maximum spacing between fasteners of 24 inches (610 mm), and the fascia shall be inserted under the drip edge with at least 1-inch (26 mm) of fascia material covered by the drip edge. As an alternative, the top edge of the fascia is permitted to be secured using utility trim installed beneath the drip edge with snap locks punched into the fascia spaced no more than 6 inches on center.~~

1407.1Fascia installation where the design wind pressure is 30 psf or less. Where the design wind pressure is 30 pounds per square foot (1.44 kPA) or less, aluminum fascia shall be attached as follows:

1. Finish nails shall be provided in the return leg ($1^1/_4$" × 0.057" × 0.177" head diameter) spaced a maximum of 24 inches (610 mm) on center, and

2. The fascia shall be inserted under the drip edge with not less than half the height of the drip edge or 1.0 inch (25 mm), whichever is greater, of the fascia material covered by the drip edge. One finish nail shall be centered in the face of the fascia from each end of the fascia material section located no more than 1 inch below the drip edge.

~~Where the design wind pressure is 60 pounds per square foot (2.88 kPA) or less, aluminum fascia shall be attached in accordance with Section R704.3.2.1 or Section R704.3.2.2.~~

1407.2 Where the design wind pressure is greater than 30 pounds per square foot (1.44 kPa), aluminum fascia shall be attached with one a finish nail [$1^1/_4$ inches by 0.57 inch by 0.177 inch head diameter (32 mm × 14.5 mm × 4.5 mm)] in the return leg spaced a maximum of 16 inches (406 mm) on center. The fascia shall be inserted under the drip edge with not less than half the height of the drip edge or 1.0 inch (25 mm), whichever is greater, of the fascia material covered by the drip edge. And one of the following additional attachments:

1. One finish nail shall be centered in the face of the fascia from each end of the fascia material section located no more than 1 inch (25mm) below the drip edge.

2. Top edge of the fascia is secured using utility trim installed beneath the drip edge with snap locks punched into the fascia spaced not more than 6 inches (152 mm) on center, or

3. An approved adhesive applied to the inside of the fascia cover or onto the exterior face of the subfascia framing member.

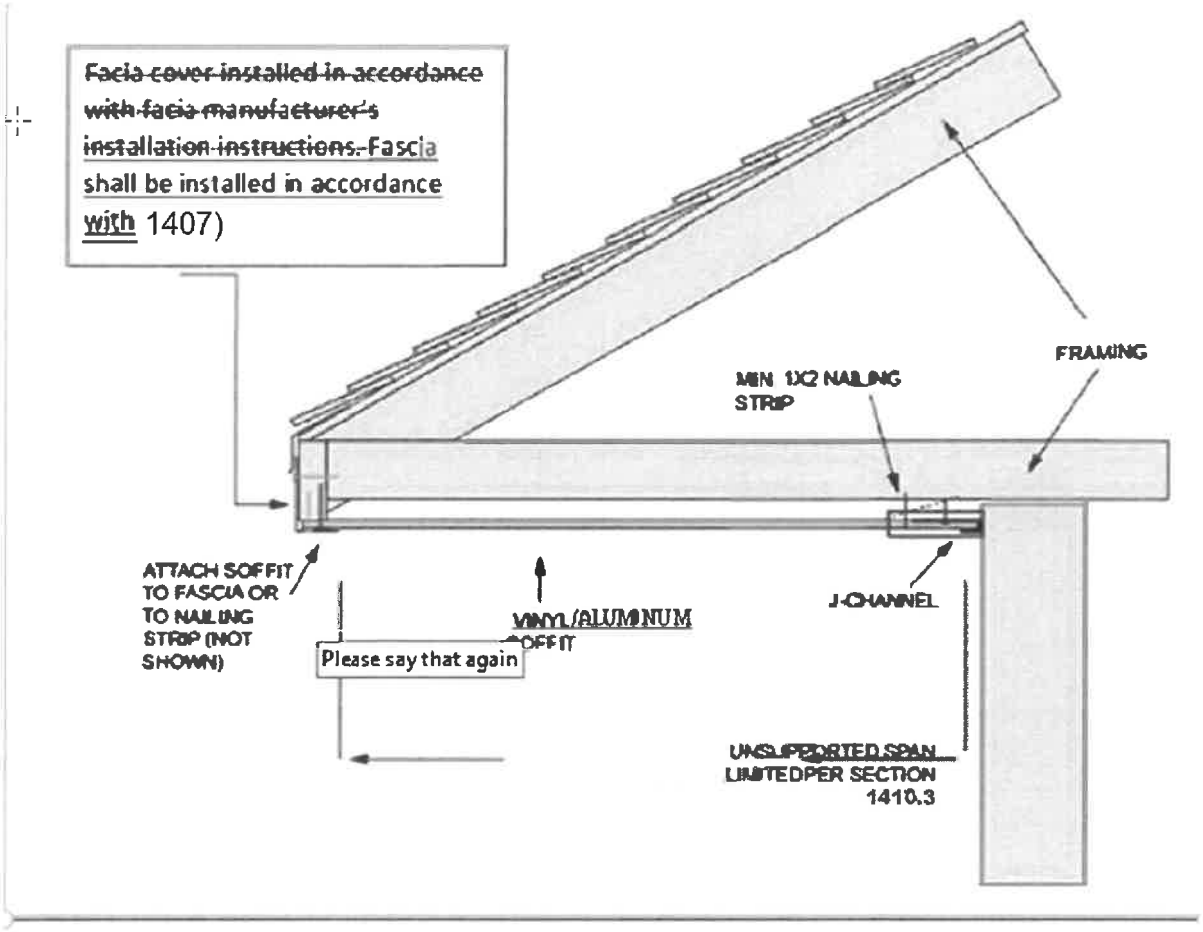
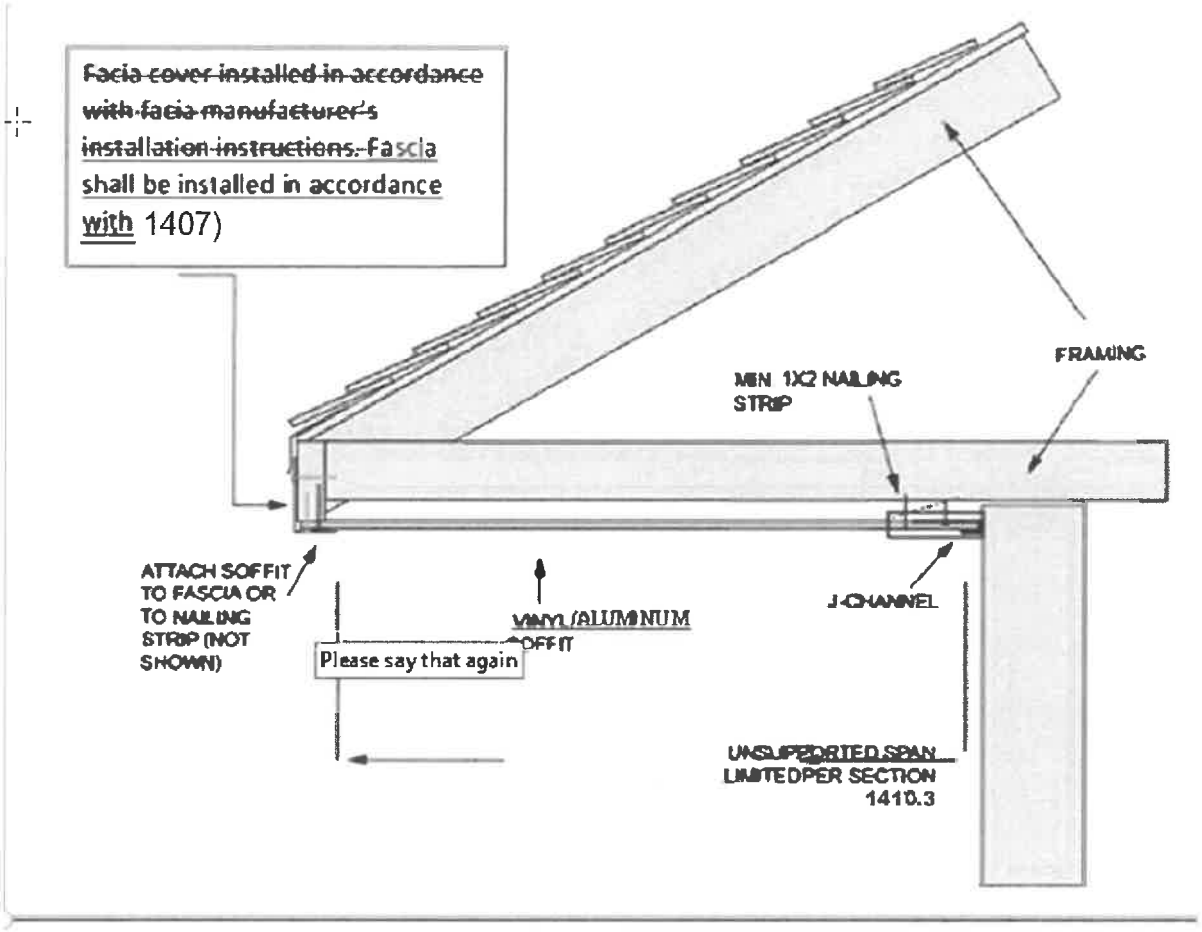


FIGURE 1410.2(1) TYPICAL SINGLE-SPAN VINYL OR ALUMINUM SOFFIT PANEL SUPPORT



FGURE 1410.3(1) TYPICAL DOUBLE-SPAN VINYL OR ALUMINUM SOFFIT PANEL SUPPORT