MIAMI-DADE COUNTY, FLORIDA
METRO-DADE FLAGLER BUILDING

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MEMO

TO: **All Building Officials in Miami-Dade County**

FROM: **Herminio F. González, P.E., Secretary**
Miami-Dade Board of Rules and Appeals

DATE: **February 24th, 2005**

SUBJECT: Interpretation of FBC Section 3401.8.3.(a)

At their meeting of February 17, 2005 the Board of Rules and Appeals rendered an interpretation regarding window replacement requirements. The Board clarified that window replacement must comply with Section 3401.8.3.2 of the Florida Building Code:

> *Structural repairs and alterations, the cost of which does not exceed 25 percent of the replacement value of the existing building or structure, shall comply with the requirements for new buildings or structures except that minor structural repairs and alterations may, with the approval of the building official, be constructed of the same materials and with the same degree of fire-resistivity as the original building or structure.*
>
> *(a) Window replacement is considered a major structural repair which shall meet the code requirements for new buildings. This means that existing windows shall be replaced with impact resistant windows or must be replaced with windows that are designed to resist the static pressure for an enclosed building and shall be protected with an impact resistant covering meeting the Miami-Dade TAS 201, TAS 202 and TAS 203. In addition the new windows must be anchored as per Chapter 17 of the code.*
>
> *(b) With regard to shutters as it relates to egress, existing windows which are used as emergency escape or rescue openings and at the same time protected with hurricane shutters shall be required to meet the code in effect at the time the building was permitted.*

> *OPENING PROTECTION EXCEPTION: For one-and two-family dwellings constructed under codes prior to September 1, 1994 the replacement of exterior doors with glazing, sliding glass doors, glass patio doors, skylights, and operable and inoperable windows within any 12 month period shall not be required to have opening protection provided the aggregate area of the glazing in the replaced components does not exceed 25 percent of the aggregate area of the glazed openings in the dwelling or dwelling unit.*

Additionally, the Board indicated that the maximum window sill height must comply with the code in effect at the time the building was constructed and not in compliance with the current code.

If you have any additional questions, please contact Mr. Eduardo Fernandez, Building Code Compliance Specialist (Building) at (305) 375-2901 on this matter.