



No: 93-19 Criteria for Building Permits when Reroofing Dwellings

Code Section: ORSC Section R105.2(18)

Code Edition: 2011 Oregon Residential Specialty Code (ORSC)

Date: Reissued July 1, 2011

Subject: Criteria for Building Permits when Reroofing Dwellings

Question: Is a building permit required under Section R105.2(18) of the ORSC when removing a wood shingle or shake roof, installing plywood (or OSB) sheathing over the existing spaced sheathing and covering with new roofing?

Answer: No, the installation of solid sheathing on top of spaced sheathing would not trigger the requirement for a permit unless the 30 percent live load threshold is exceeded, and the structure is not in a wildfire hazard zone as stipulated in Section R324.

The 2011 ORSC has been modified to require a permit when more than 15 percent of the spaced sheathing is removed to facilitate the installation of new sheathing.

Analysis: The 1977 Legislature, through HB 2819 (codified in ORS 455.310), specifically exempted replacement and repair of roofing from permit requirements if it did not adversely affect the structural integrity of the dwelling.

In 1979 the Structural Code Advisory Board in conjunction with the Building Code Divisions Administrator ruled such work generally does not alter the basic existing structural integrity of the dwelling and therefore no building permit is required.

In 1993 the ruling was revisited, the board and the administrator concluded the ruling was still applicable.

The ORSC, Section R105.2, Exception 18, specifies the installation of new roofing material which does not exceed 30 percent of the live load design capacity is exempt from a permit. When this limit is exceeded, the structure is affected and permit is required. If more than 15 percent of existing spaced sheathing is removed prior to installation of new sheathing, or if rafters have to be replaced, repaired or if other structural repair is necessary then a structural

In accordance with OAR 918-008-0110, the information contained in this statewide code interpretation is legally binding on any party involved in activities regulated by applicable Oregon law, applicable Oregon regulations or the state building code. If the information contained in this statewide code interpretation is cited as a basis for a civil infraction, a representative of the jurisdiction must cite the interpretation number found in this document.



change has occurred and a building permit would be required.

Interpretive Ruling PPPI -4049 (original interp).

Interpretive Ruling 93-19 (last updated).

Question: Section R105.2(18) stipulates that new roofing material that exceeds 30 percent of the required live load design capacity triggers a structural permit. How is the 30 percent figured?

Answer: Section R301.6 states that roofs shall be designed for the live load as indicated in Table R301.6 or the snow load indicated in Table R301.2(1), whichever is greater. In most cases Table R301.2(1) will be greater.

Analysis: Table R301.2(1) uses 25 pounds per square feet (psf) below the elevation shown in the table.

The following is an example using an elevation of 400 ft. in Lane County:

$25 \text{ psf} \times .30 (30\%) = 7.5 \text{ psf}$. This is the maximum number of pounds per square feet that can be added to an existing roof before a permit is required. A number of websites can give weights of building materials. For the purpose of this example the Boise Cascade Technical Note GE-1 was used.

Asphalt shingles = 2 psf

7/16 OSB = 1.5 psf (typical)

15 lbs felt/paper = .2 psf

Total = 3.7 psf

Since the 3.7 psf is less than the 7.5 psf maximum allowed, a permit would not be required. Existing spaced sheathing is not considered when calculating the new load.

Question: Within the context and parameters established in Section R105.2 (18), are all of the code requirements associated with reroofing exempt from permit?

Answer: Yes.

Analysis: As noted previously, ORS 455.310 includes "...replacement and repair of roofing ..." (et al) in the list of items which are expressly exempt from permits and fees as otherwise required by the building code.

Examples of associated code requirements includes:

- Reroofing requirements in Section R907
- Ventilation requirements in Section R806
- Flashing requirements in Section R703.8
- Fastener requirements in Table R602.3(1)

Question: Does the ORSC intend that work which is exempt from permit comply with code requirements regardless?

Answer: Yes. Section R105.2 expressly states; "Exemption from permit requirements of this code shall not be deemed to grant authorization for any work to be done in any manner in violation of the provisions of this code or any other laws or

ordinances of this jurisdiction.”

Analysis: An exemption from permit is not an exemption from code requirements. As noted above, code requirements for reroofing, ventilation, flashing and fasteners are still applicable.

Contact: Richard S. Rogers
Structural Program Chief
Richard.Rogers@state.or.us
(503) 378-4472