

Florida Building Commission Draft Code Public Input Forums Report

**Convened by the
Florida Building Commission
www.dca.state.fl.us/fhcd/fbc**

**Florida
May 17 – June 29, 1999**

Forum Design and Facilitation by:



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**Florida Building Commission
Public Input Forums on the
Draft Code
May 17 – June 29, 1999**

Executive Summary

The Florida Building Commission is responsible for the development of a single statewide code to replace the many local and state codes currently in existence. The Commission has established a goal of including the public's input into the code development process at each phase of the process. The Commission has indicated that they want to include the public's comments and views in as informal and participatory way as possible. To that end, during the months of May and June, the Florida Building Commission convened ten public input forums/hearings for the purpose of soliciting the public's input and feedback on what they believe should be modified from the current draft version of the code to the second draft, which will be disseminated in September of 1999.

The first eight of the forums were modeled after the successful public forum that was held on January 15, 1999 in Orlando. The eight locations were: Fort Lauderdale on May 17, Melbourne on May 18, Jacksonville on May 19, Tallahassee on May 20, Orlando on May 24, Fort Myers on May 25, Tampa on May 26, and Pensacola on May 27. A ninth public hearing, following the traditional public hearing format of citizens speaking one at a time to Commission members seated at the front of the room, was held in Kendall on June 9th and a tenth forum was held on June 29 in Pensacola. At the completion of the ten forums/hearings over 1000 members of the public and elected officials had participated in the process by addressing their concerns and recommendations relative to the draft code. In addition, Department of Community Affairs (DCA) staff, Technical Advisory Committee and Task Group (TAC/TG) members, and Commissioners were in attendance to respond to public concerns and questions at each of the forums.

The process for the first eight forums/hearings began with a video on the history of the building codes reform efforts over the past five years and the 1998 legislation creating the Florida Building Commission and its mandate to draft a statewide building code (HB 4181), Steven Pfeiffer, the Commission's chair, explained that the current draft is a work in progress and in no way represents the final version of the proposed Florida Building Code. In fact, the current draft represents a series of recommendations from the TAC/TGs and does not necessarily reflect any attempt by the Commission to discuss, refine, and debate the more complex and controversial issues that are still unresolved. The Commission will begin the process of establishing their version of the code during the months of June, July, and August of 1999. In August the Commission will approve the second draft of the code, which in essence represents their first pass at refining specific issues which will represent the full Commission's evaluation and approval. The Chair concluded by reiterating that the public's comments were more viable now than ever since the Commission would have the benefit of their feedback during their deliberations on the second draft of the code.

Following the Chair's comments, a representative from the Florida Conflict Resolution Consortium described the forum format and the guidelines for participation in the process. It was explained that the Commission would review the public's comments and issue a report in July. The public was then invited to join one of the four tables that would be convened each hour in three separate one hour rounds. This format would allow participants to interact with all twelve TAC/TGs during the course of the evening.

At the forums the public was invited to provide verbal comments and engage in discussion with staff and TAC members. These conversations were captured on flip charts by the facilitators in the form of nearly 800 issues, concerns and suggestions. In addition, participants were encouraged to write their comments down on post-it notes as well as provide general comments or specific language for code modification suggestions on the public comment forms and proposed modification forms provided in the agenda packets. Participants were reminded that they have until July 2, 1999, to provide comment on the first draft of the Florida Building Code.

In Kendall, the public and public officials presented their concerns and comments in a traditional public hearing format. Commission members listened for over 4 hours as citizens and elected officials spoke of their concerns for preserving the integrity of the South Florida Building Code.

The 10th and final public hearing on Draft I took place in Pensacola. As a result of missing code materials, Chairman Pfeiffer promised the residents of West Florida that the Commission would return to the area with copies of Draft I. At this repeat forum the public was given an opportunity to make general comments and then to address their comments and questions on specific topical areas of the code and receive responses from the Commission, TAC members, and staff.

I. OVERVIEW

As a result of 1998 legislation, the Commission has established a goal of including the public's input into the code development process at each phase of the process. The Commission has indicated that they want to include the public's comments and views in as informal and participatory way as possible. To that end, during the month of May and June, the Florida Building Commission convened ten public input forums/hearings for the purpose of soliciting the public's input and feedback on what they believe should be modified from the current draft version of the code to the second draft, which will be disseminated in September of 1999. What follows is a report that describes the forum and captures that public input.

A. Background

In July of 1996, Governor Chiles established the Florida Building Codes Study Commission. This commission was established to study the efficacy of the existing building codes and the weaknesses that became apparent in the aftermath of Hurricane Andrew, and to make recommendations on how to improve the existing code requirements, as well as compliance and enforcement issues.

The commission concluded that Florida needed a single statewide building code system. Based on this recommendation, the Florida Legislature passed House Bill 4181, which directed the development of a single statewide code to replace the many local and state codes currently in existence. In order to research, design, and compile this new code the Florida Building Commission was formed. The Florida Building Commission selected the 1997 Edition of the Standard Building Code (SBC) to serve as the base code on which to develop the Florida Building Code.

The Commission is comprised of various professionals who oversee the process, as well as chair the nine Technical Advisory Committees (TACs) and the two Task Groups. The Commission will refine and finalize the base code into the statewide building code, which will be adopted by the 2000 Legislature and will go into effect on January 1, 2001, as the Florida Building Code.

The Florida Building Commission in October, 1998 selected the 1997 Standard Building Code as the base code (including the Standard Plumbing Code, Standard Mechanical Code, Standard Gas Code, the 1999 National Electrical Code (NFPA 70), and the 1996 National Fire Alarm Code (NFPA 72). In January of 1999, the Commission selected the 1999 National Electrical Code as the base Electrical Code, the National Alarm Code as the base Alarm Code, and the 1998 Florida Energy Efficiency Code for Building Construction. In February of 1999, the Commission replaced the 1997 Standard Mechanical Code with the 1998 International Mechanical Code as the base Mechanical Code and replaced the 1997 Standard Gas Code with the International Fuel Gas Code as the base Gas Code.

The Commission has adopted the following criteria for assigning proposals for modifying the base codes for inclusion in the Florida Building Code:

1. How does the proposal strengthen and improve the base code to enhance safety for all of Florida's citizens?
2. How does the proposal make the code easier to understand or otherwise contribute to a user-friendly code?
3. What is the proposal's technical merit and how is it supported by a scientific basis?
4. How will the proposal be enforceable or otherwise contribute to an enforceable code?
5. Is the proposal cost effective?
6. Does the proposal account for Florida's diverse conditions including climate, geology, and population?

B. Forum Organization

For the first eight forums/hearings the public participants were invited to provide input in the following twelve general areas: Accessibility TAC; Administration/Code Enforcement TAC; Joint Commission and State Fire Marshal Building/Fire Coordination TAC; Commission's and State Fire Marshal's Education TGs; Building/Structural TAC; Electrical/Alarms TAC; Energy TAC; Mechanical/Elevator TAC; Plumbing/Gas TAC; Product Approval TG; Specialty Codes/Special Occupancy TAC; and State Fire Marshal's Prevention Code TAC. The facilitated meeting format consisted of three one-hour rounds with four topic tables. The sessions were designed to solicit public input as well as to facilitate discussion between the public and the Commission and Technical Advisory Committee (TAC) members and DCA staff on issues and concerns relative to the first draft of the Florida Building Code. At each table a DCA staff person, at least one TAC or Commission member, and a facilitator from the Florida Conflict Resolution Consortium helped to facilitate the input.

The public was invited to provide verbal comments and engage in discussion with staff and TAC members. These conversations were captured on flip charts by the facilitators in the form of nearly 800 issues, concerns and suggestions. In addition, participants were encouraged to write their comments down on post-it notes as well as provide general comments or specific language for code modification suggestions on the public comment forms and proposed modification forms provided in the agenda packets. Participants were reminded that they have until July 2, 1999, to provide comment on the first draft of the Florida Building Code.

The forums/hearings held in Kendall followed the traditional hearing process in which participants were provided with an opportunity to address their concerns one at a time to the Commission members who were seated at a table at the front of the room. This format elicited approximately 250 comments from citizens and elected officials from the South Florida area. The Commission listened to the concerns of the public for over 4 hours and received their written comments and recommendations.

At the second public forum in Pensacola, a modified format was used. This format allowed the public to first address their general concerns and recommendations to the Commission using the traditional public hearing format of speaking one at a time to Commissioner and staff with no response from them.

This was followed by a question, comment, and answer phase which provided the public with an opportunity to ask questions and provide comments to specific code topical areas. The sequence of the topical areas was accessibility, energy and mechanical, electrical and plumbing, special occupancy, product approval, code enforcement, building structural, and concluded with building fire. In this process the public was invited to ask questions and make comments that would be specific to each of these eight areas. Commission, TAC members, and staff were available to answer questions and respond to specific areas of concern by members of the public.

II. PUBLIC FORUM INPUT RESULTS

Captured below are the various forms of input received at the Forums for each of the twelve table discussions. The table discussions were recorded and posted on flip chart paper. The participants were also given post-it notes for additional suggestions or concerns. Finally each table had comment forms where participants could offer specific input or code modification language on any of the topical areas.

A. Accessibility TAC Comments

- Hotel existing - proliferation of litigation - what can we do to change litigation positive - this is really a FBC law forum
- Chapter 11 -Accessibility will be in Building Code
- In Order to change accessibility code it will need to be done legislatively changed
- Questions w/regard to size of water closet - seems excessively large, but if sink put elsewhere than on same wall it can be made smaller.
- Florida refutations are more restrictive (water closets) than Federal - makes the room to large
- In bathrooms , at least one lav. Must be accessible outside the stall
- Accessibility items should not be in more than one section of the code- causes confusion/ declination. Plumbers wanted the duplication so they only had to buy one book
- Clear concise rules needed for vertical accessibility
- Why are Churches exempted ??
- (Separation church /state due to civil rights law)
- Why is ADA Fair Housing not combined into one document?
- Could Fair Housing (state statute 760)
- If it could be changed, then adopt not only new ANSI but also Fair Housing
- Draft code does not make it clear which types of lav. You are allowed to build.
- Construction of Barrier issue w/ regard to lav accessibility .
- Children's Standards for Daycare- not adopted only a guideline.
- Barrier Removal 553.508- why not being enforced by local govt. (not building officials)

- Parking - is 316 being adopted into this code? –only those parking requirements already contained in Florida access code will be included in the Draft code
- Needs to be explicit about who is responsible for enforcing parking
- Is 316 enforced by zoning or Building Dept
- Lots of questions about when parking issues must be addressed
- When a Building required to come up to code would that also trigger accessibility ? 50% rule
- Florida schools “kiddie code” is reflected in single code.
- On new construction, school districts don’t have a problem-on renovations there will be a problem.
- Current code allows districts a few outs on renovations - are these included in new code.?
- Cross referencing is useful
- If a handicapped standards classes are on the ground floor, do you have to make whole building accessible ? (Yes)
- Is there a threshold ? Does a certain amount of renovation trigger ADA requirements?
- Currently DOE provides guidance on ADA compliance . If municipalities enforce, we may have to tear down schools because we can’t bring them up to ADA
- Can other codes (previous or existing) be changed this process? (Yes)
- Keep drawings in code!
- What is enforcement responsibility for public access telephones – PSC ? local ?
- Public phones should be exempt from building code requirements
- What is effect of 553.504(11) relative to enforcement
- Establish a section w/in Florida building code addressing areas of enforcement delegated to agency other than building official eg hotels and restarants, septic tanks, elevators.
- Figure 28 – clarify interpretation of need for side access.
- The provision state statue 720 on fair housing enforcement needs the Federal law
- There may be a conflict between Florida accessibility code, ADA and fair housing, e.g. grab bars.

- May not be a conflict - dealt with housing type: single and multiple family and condos.
- Cross reference accessibility , plumbing , electrical alarms and elevators.
- Changing fair housing format; it was just copied from Federal register. Need chapter reference to site someone.
- Part A & B is not like any other part. Number differently.
- Need to site Florida's certification for FACBC.
- Prefix table of contents with Chapter 11
- Contractor formatted changes in consistently.
- "Adaptable" is not defined (time frame) Can we add this ?
- Does it create a consumer expectation of performance (liability) - need note - Make it clear responsibility of person moving interpretation.
- Relocate 9B-7 to before the waiver application and provide explanation. Provide caption the highlights the waiver process.
- Florida special rooms - can't change the code there is confusion about bar size.
- Unisex bathrooms must comply with associability code. (in plumbing code)
- Are accessibility provisions in the most user friendly locations?
- Text and figures need to correlate in accessibility section of plumbing code.
- End goal to have accessibility code not in conflict with rest of code? Yes
- Has work been done on distinction between accessible stalls and accessible bathrooms.
- Any progress in bringing accessibility into multi family construction? Falls under Fair housing Chapter 760.
- Any additional requirements of single family residences .? NO -just bathroom door issues.
- What was the result on stair rise and tread run?.
- Vertical accessibility- 2 story commercial, less than 3,000 square feet/ floor?
- What will be minimum threshold for vertical accessibility.

- Parking - Existing conditions waiver not new construction
- Include accessibility for juveniles with in a part “D” for draft 2
- Looks into substituting kiddy potties for standard fixtures- - Make waiver process easier (may need statute change 553 FS
- Provide commentary on B,C and D so people know if they can seek a waiver etc. - Be available as a separate document
- Define “ adaptable” better explanation
- Size would take Federal action . This is for grab bars etc
- Figure 30E (11.4.17) Does not cover rooms (11.4.22) -It would be helpful to have a drawing, at least as a reference or link text and illustrations.

B. Administrative / Code Enforcement TAC Comments

- The current draft of the FBC will reduce the current SFBC standards for wind and enforcement.
- What can Broward and Dade do to avoid local amendments?
- Why did the TAC vote down Appendix J? The Commission should adopt Appendix J as part of the FBC.
- Adopt Appendix J as an option for coastal areas in the state.
- The term “coastal areas” is hard to define. Should use wind speed as the base for implementation of Appendix J.
- What would be the process to change the code after implementation?
- Who is going to benefit from the unified Code? Is it the insurance industries or building owners?
- The Draft code as written will reduce the inspection standards currently required under the SFBC.
- Why develop a FBC when the International Code is going to be available in 2 years.
- Appendix J should be included as a new Chapter in the proposed code for implementation in the coastal areas only.
- The FBC should address licencing of building officials.
- Why did the law exempt Walt Disney and not Dade and Broward from compliance with the FBC?

- The FBC is a minimum code and local governments which have more stringent standards should be able to administer them locally.
- The FBC should address only technical subjects and should not address administrative subjects.
- The FBC Should simplify the permit process.
- Do not like the format of the workshop.
- The FBC should require more code enforcement and provide for penalties against local governments that do not enforce the Code.
- Is the FBC serving lobbyists or homeowners?
- Change the FBC administrative chapter to suite local areas.
- We are not one Florida. South Florida environment is different than those of central and North Florida.
- The FBC should address uniform enforcement.
- The state is diverse and the FBC should reflect this diversity.
- The FBC should address existing buildings.
- Address the insurance industries reaction to reduced building standards in South Florida.
- Why is the code enforcement function is at the City level and not at the county level or regional level?
- The FBC should address state enforcement as it relates to maintenance inspection of restaurants and motels.
- The insurance rates in Dade and Broward are based on higher building standards. Reducing the standards will force insurance companies to charge higher rates.
- The state is going back to good-old-boy standards by not promoting better building code education and enforcement.
- Fines for not complying with the Code should be placed on properties and not individuals.
- Have FEMA been consulted regarding this code?
- Do you know how field test of roofing is going to be handled? Does the B.O. has the authority to require field test on state approved products?.

- The State should have the same wind load requirements. Who is going to be responsible for the cost of damage from hurricane?
- Who is going to be liable for a weak code?
- Should keep Chapter 1,2,3,23,34 of SFBC as part of the Florida Building Code.
- The draft code calls for only four inspections. This is not enough. Who is going to be responsible for the other inspections currently required by the SFBC?.
- The Commission should adopt Chapter 34 of the Broward SFBC.
- Need to include more code officials from South Florida on the TACs.
- South Florida is not equally represented on the TACs.
- The Commission should conduct a comparison study between the SFBC and FBC. Especially, for Chapter 1,2,3 of SFBC.
- Is the FBC going to address Journeyman issues?
- Why can insurance determine zones and not the ASCE 7 wind map?
- Should address variations / conflicts in code interpretations between building officials..
- Affidavit in places of inspection should not be allowed under the Code.
- Building inspectors should be experienced and state certified.
- Inspectors under the SBC do inspect for more than what is required by the code. In fact, they inspect for the same requirements that under SFBC.
- Additional cost to construction should be addressed.
- Most of the losses during hurricane Andrew were due to lack of enforcement.
- The current administration section of the code is too discretionary (i.e., contractors inspect their own work). The Admin. section needs to be redrafted from scratch.
- The draft code as written now will reduce inspections and quality of plans examination. This area of the Code needs to be improved.
- Local officials feel that the SBC provides for sufficient inspection and structural requirements.
- The Code should provide minimum qualifications for inspectors.
- In order to have uniform enforcement, the state should provide for state inspectors.

- Providing sufficient number of inspectors to inspect for the code would be a burden on a smaller communities.
- Establish a definition for the term “cost-effective”. The cost analysis should be based on actual codes and the selected base code.
- The Code should provide for means to assure similar code interpretation cross the state.
- Allowing local amendments will defeat the idea of having a unified code.
- How will the new code impact in-plant inspections for modular homes?
- Interpretation of the Code by building officials is a problem. This issue needs to be fixed.
- Did the Commission consider the economic impact on jurisdictions which are currently under an outdated code?
- How will the new code impact the state inspection programs for hotels and restaurants, and elevators.
- Inspection of elevators and hotels and restaurants should stay with the state.
- Can building inspections be done by contractors?
- Does the code allow design by non-professional?
- How does the code deal with unlicensed contractors?
- Should require that all drawings for structural components be sealed by PE or Architect.
- Should require that all mandatory inspections be done by building officials; unless there is a special circumstances permitted under the code.
- The draft code is deficient and too discretionary..
- Should builders be allowed to inspect their own work?
- The Code should provide for more (multiple) inspection requirements.
- The Code should provide for more inspections regarding roofing.
- Code enforcement provisions should be written based on the life safety of Floridian.
- In Section 104.1 of the draft code, just reference as required by Florida statutes. This is because the statutes could change in the future.
- Data element of application in section 104.1 should be simplified.

- Sheathing inspection is not needed every where in the state. Currently, it is not required by the SBC. Additional inspection should be implemented at the local level.
- Should simplify the local amendment process. Local amendments are needed to control materials and requirements not mentioned in the code.
- The Administrative Chapter of the FBC is sufficient. It provides for sufficient number of inspections.
- Is the termite requirements going to be addressed through Chapter One of the Code?
- The Code should address safety/inspection on the job site as per Chapter 33 of SFBC . OSHA is not always their to inspect for safety. The Building Official should enforce safety on the job site.
- The Code should address enforcement of portable job-site toilets and provide for uniform requirements based on ANSI Z 4.3 standards.
- Define how the Building Official should handle unsafe structure standards.
- Is the code going to expand the inspection criteria as per SFBC code and as per HB 4181.
- The Code should expand the inspection criteria as per SFBC and as per HB 4181. The Code should define inspections and permit requirements to provide for the number and types of inspections and clarify how long inspections should last.
- The sheathing inspection requirement is not practical and this is because it rains frequently in Florida. Providing for inspection could take 4-5 days. The Code should require that sheathing inspection be done very quickly and should provide for specific time for frame sheathing inspection and spot checking if covered because of the rain.
- The state should provide the local governments with the necessary funds to cover the costs of additional inspection / administrations associated with the FBC.
- Cost to local government due to the additional inspections required by the FBC should be covered through permit fees.
- Is permit fees going to be addressed by the code or is it going to be left to local jurisdictions?
- How is the state going to oversee the enforcement of the code?
- The Code should not allow sheathing to be covered without proper inspection. Also, the Code should require inspection of sheathing to be made within 24 hours of installation and should provide program to make sure it happen.
- How does the FBC's administrative provisions apply to schools? Does the School Board have liability like a building owner?

- The Code should not set time frame regarding code inspection.
- Explain section 105.3 service inspection?
- Recommend that module buildings inspection and administration continue to function as is.
- The contractor shall not be allowed to inspect buildings?
- The code is too discretionary with regard to inspection.
- Is the Commission going to provide documentation explaining amendments and interpretation processes?
- The Code allows anybody to do inspection without meeting the minimum qualification of the state.
- DCA should oversee the qualifications of the building official and the certification and qualification should be in the code. Also qualification of the contractor should be in the code. All should be under one umbrella.
- The commission task is to improve inspection and provides for the qualification of the building department personnel.
- If you remove qualifications of the building official from the code you should also remove the power of the building official.
- Are the manufacturers facilities exempt from spot inspection?
- The code should specify the number of years for keeping records.
- How is the coordination between DPR and DCA is going to take place with regard to code enforcement?
- How is DCA going to enforce the code?
- Who will inspect for mobile home tie downs?
- Septic tank inspection should remain with Department of Health.
- Minor repair that is structural in nature need to be permitted.
- How do you look at work already concealed?
- Provide for additional duties and responsibilities regarding the Building Officials.
- How will enforcement obligations under Ch. 4 be handled by the B.O.?
- Affidavit should not be allowed for inspection.

- The owner should not be allowed to inspect his own work.
- An engineer should be allowed to inspect his own buildings.
- A building owner should not be allowed to inspect his own buildings.
- The Building official should be licensed to build what they inspect.
- Any body with financial interest should not be allowed to provide for affidavit. The public sector should perform the inspection.
- The Building Department should perform inspection within one day.
- How is DCA going to enforce the 24 hrs inspection requirements?
- Are you going to have commentary available for the code?
- Should require inspection be performed the next day of business.
- The inspector should inspect for roofing such as sheathing, nailing and so on.
- Require that the nailing pattern and fasteners should be inspected according to plans and not for the code minimum by the building department.
- The roof should not be covered until it is inspected.
- Contractor should not be allowed to change the design specifications of the plans without approval of the engineer.
- Structural change should be approved by an engineer, however, non structural provisions may be done without an engineer approval.
- Any changes to the plans should be rejected until reviewed by the plans examiner.
- Change to the design could be done by a letter.
- Make mandatory that engineer/architect of record should be responsible for the complete product.
- Define the term non structural.
- Who will be responsible for the cost of uncovering concealed work?
- Local modification process is too cumbersome and need to be simplified.

- The amendments processes is too cumbersome because: (1) it does not allow new subjects to be addressed; (2) the local jurisdiction must inter into a local agreements with other local jurisdiction to adopt local amendments, (3) allows the use of non code / flimsy materials, (4) temporary in nature, and (5) the appeal process is too long.
- Local amendments need to be clarified. There is a lot of misunderstanding regarding the local amendments process. DCA should establish rules to clarify this subject.
- The need for inter local agreement regarding local amendment is a very good idea. This is needed to create code uniformity at the local level.
- Should make the amendments process and the appeal process less time consuming.
- The FBC reduced number of inspections required by the SFBC from 8 to 3 .

C. Building /Fire Coordination TAC Comments

- What edition of NFPA 1 will be used as a minimum standard for the state?
- The Code should address egress and number of people/exit capacity for outside seating on sidewalks.
- The Code should address the state requirements for education facilities that are more stringent than the state fire requirements.
- The Code should address the statutes's requirements that schools must be designed as shelters.
- The Code should address Mean of egress requirements for residential and should adopt NFPA 101 verbatim.
- The Code should grandfather designs permitted prior to code adoption.
- What was the intent of removing fire lines from the plumbing code definition. (See. P. 2.5 Plumbing Code)
- The Code should address the issue that adopting the 1997 Life Safety Code (later than 1985 edition) will require exiting buildings to meet new standards.
- Elevator recall provision requirements is currently superceded by elevator rule 4A-47. This conflict between the rule, NFPA 101 and FBC should be resolved.
- The Code should clarify that if the a building does not meet current codes, fire wall standards should be met.
- Chapter 34 should address life safety of exiting facilities.

- Resolve conflicts between the fire code and the building code regarding the requirements for 13 or 13R systems as they relates to three stories buildings. The SBC requires 13 system and the fire code requires 13 R.
- Should incorporate in the Code (Chapter 9) statutes regarding sprinklers.
- The Code should clarify issues relative to state facilities (e.g., schools, restaurants, etc.)
- Does NFPA 101 apply to single family dwelling?
- The code should clarify accessory usage in building such as office and restaurant.
- The conflicts regarding the Fire dampers in 1 hour wall requirements at the local and in state buildings need to be addressed.
- Should adopt NFPA 1 and LSC 101 without amendments.
- Does the statute provide for specific editions of the NFPA 1 and LSC 101 for adoption? .
- Need to leave exiting building requirements out of the fire code to eliminate a lot of conflicts.
- Should leave existing building provisions in the code in order to provide a mean for inspection.
- How are the variations in definitions and terminologies going to be addressed by the TACs?.
- Who will enforce job-site -safety ? The fire inspector or the building inspector. It should be the responsibility of the official who inspect the job site. The contractor should assume the responsibilities of job site safety. Builders should be responsible for life safety.
- Should modify SBC to defer to NFPA or read the same.
- Does the code address access for emergency vehicles?
- Need to clarify who would do fire inspection and who will do building inspection.
- The inspection for fire and building code should be done under one department or put the building department under the fire department.
- Interpretation should be provided for at the state level. There should be a single source for interpretation.
- The fire Marshall should be involved in the building code.
- Need one code and make it simple.

- Chapter 10 should be replaced by the NFPA 101.
- There is a difference between the NFPA 101 and Ch. 10 especially in the term designation of mean of egress. The Code should use the word designation in similar meaning to the NFPA.
- Fire alarm, and audible appliances - will the appendix of NFPA 72 be part of the code or will the code define the ambient level for spaces based on the table in the appendix..
- Define an engineered system - as stated in Chapter 19 life safety.
- Connecting means to be located in the exterior of the building. Why is this not allowed inside the building.
- Do not require sprinkler in one and two family dwelling.
- Need to address shutter impact on mean of egress and life safety.
- Address new facilities vs. existing.
- Need to address existing code such as standard for existing buildings and property maintenance code.

D. Building/Fire Education TG Comments

- Who will pay for fire college?
- Who will pay?
- Will they be “grandfathered” in?
- Don’t agree that fire inspectors must be or have been firefighters and take a 200 hour class and pass exam.
- Fire Code TAC has done a good job!
- Support – fire inspectors must be or have been firefighters.
- 99-53 may be difficult to interpret and enforce.
- Battery operated smoke alarms should be readdressed.
- Set up basic procedure for establishing fire lanes.
- 99-169 Sprinkler systems – pounds of pressure should be clarified for design engineers. (10% below the curve)

- Consistency between codes.
- Definitions should be consistent to include roles and responsibilities.
- Building and Fire Code officials overlap in enforcement should be defined.
- 99-301 – Three references might be unreasonable.
- Egress issues need to be resolved.
- Performance based codes need to be considered.
- Building and Fire Code(s) revisions should be implemented and changed consistently.
- Code references should be updated.
- Should be fire service requirement prior to certification as an inspector to have 5 years of related experience.
- 99-301 is good.
- 99-302 – recommend funds be made available.
- 99-304 – have addresses in rear (alleys). Size and type of numbers on addresses – coordinate with DCA.
- 99-53 – why fire/police department on signs? Too hard to read.
- 99-178 language not consistent with 99-53.
- 99-53 – Should match traffic code.
- 99-22 – Inspectors should not have to be or have been firefighters.
- Does enforcement leave out special inspectors – what about the 169,408 inspections that were performed in the last 10 months. 66,500 violations – It shouldn't!!!
- Gated communities should be uniform for emergency access.
- 99-301 – need to look at licensing
- Need courses for inspectors OJT-field training after school/certification (suggest to Florida Fire College) – also advanced training or field internship
- Good web site! Good work!
- Inspectors should not have to be or have been a state certified firefighters.
- Disagree with 99-22 should not have to be a firefighter.

- Fire codes should be in a single-bound book.
- NFPA 92 conflict with Standard Building Code?!?!?
- Log 99-13 is excellent!
- Log 99-15: firefighters or certified inspectors.
- Need clarification building/fire inspector's roles. (especially with dual certification)
- What about school districts?
- What about 4A Rules?
- Inspectors should not have to be or have been firefighters but need to be experienced.
- If no paid departments then the county or jurisdiction can appoint. What about jurisdictions without paid departments? What about rural jurisdictions?
- 99-22 Could greatly reduce the pool of qualified inspectors.
- Roles, responsibilities and limitations of authority should be clear – in the code and related documents.
- 99-178 Some issues should be handled by local governments.
- 99-299 Duct detectors – Good!
- 99-51 Not applicable in all jurisdictions.

E. Education TG Comments

- Include the elements of the National Flood Insurance Programs in the core training.
- Reciprocity for out of state courses should be considered by the Boards.
- Use University of South Florida (USF) testing model for the equivalency exams (food managers certification of private vendor ASI)
- Need cross training for inspectors.
- DBPR's cross training – should be available ASAP long before the code is out.
- Inspectors need training in using discretion in administering the code – limited to standardized range.

- Training in liability issues.
- Self-study programs should be available.
- The code should be available on the web in updated formats..
- The state should fund the mandated training.
- Core requirements for contractors currently is OK. The core training should be available to other entities (existing programs).
- The code should be available with the CORE training program..
- Will the Fire Code training be available statewide? Need local training certified by Fire College.
- What if inspectors, etc. fail the Core or equivalency exam?
- Will fire core and building core training be accepted for continuing education credit on both sides (reciprocity)?
- Include irrigation and well systems in advanced specialized training. **(Fire)**
- The training should be affordable.
- Use the radon fund to pay for training.
- The 4-hour core for 118,000 licensed professionals in construction – may not be enough time!
- Four hours is not enough time – if the application of the code is to be relevant.
- Forty hours or more may be adequate for building officials or other professions – however – may be more than enough for other professions (e.g., interior designers or landscape architects).
- Education = Enforcement, four hours is not enough.
- A percent of all permit fees could pay for Building Code Training Program.
- Consumer Guide should include licensing requirements and who should be on the job site.

- Web and CD-ROM training is a good idea.

F. Building/Structural TAC Comments

- A reduced construction standard is not acceptable to South Florida. Should develop a Code that the legislature could adopt.
- Based on the intent of the FBC and what required to be enforced, the SFBC does not add costs to construction if compared with the SBC.
- Why use the 75% consensus, use 50% instead.
- Should use ASCE 7 98 for all buildings.
- Should add more members to the TACs from South Florida..
- The TACs representation process is flawed. It does not represent the right people.
- Board of Engineers /Miami Chapter recommends the adoption of ASCE 7-98 for all buildings.
- Determine maximum loads without allowing the wind tunnel test as an option.
- Why smoke detectors is in Section 4 of the Code instead of the Mechanical Code?
- The FBC should address attachment of mechanical equipment to structures.
- Chapter 15 should address metal accessories and metal edge conditions.
- Chapter 15, is very weak. It should be replaced with Chapter 34 of SFBC. Metal roofing over wood decks is not class A roof.
- Testing standards should not allow shutter to be penetrated.
- What is the wind design speed for the prescriptive requirements of the FBC? Should review the prescriptive requirements for wind that is currently in the exiting draft.
- Section 1606.1 of the FBC is not consistent with Section 1606.2.
- The FBC should include wind impact standards .
- The FBC's wind map should show only the State of Florida.
- The FBC should address balcony enclosures, especially when removing doors which cause internal pressure.
- The Code should be driven by life safety.
- Both the process and the draft code are flawed.

- Should adopt the SFBC which is based on real data.
- The Code should address existing buildings.
- The draft code deletes certain life safety criteria such as tie beam that need to be in the Code.
- According to Broward county, the new life safety requirements of SFBC impact construction cost by 3% only.
- The FBC should address installation of shutters.
- Remove the prescriptive requirements from the FBC. They are not applicable to the state and are not being used.
- Should conduct a study to show value of human life.
- All roofing requirements should be in one Chapter or sub code.
- Should address the economic impact on the state and manufacturers for not requiring shutters.
- Section 3107.7 of the FBC refers to ASCE 7-88. This should be corrected.
- Revise s. 1608.2.3 to consider Dade county guardrail requirements.
- Safe rooms should be addressed by Code.
- None of the studies which were done after hurricane Andrews recommended reducing the stringency of the SFBC.
- Should use the SFBC which was developed based on experience from Hurricane Andrews.
- The draft FBC should address diversity of the state. One code fit all will leave south Florida unprotected.
- Adopting the FBC will cause insurance rates to increase and safety to be reduced.
- Should adopt the SFBC as the base code.
- Are shelters required to have shutters?
- The Code should address butt glass windows.
- When were the low rise provisions of the SBC last modified by the SBCCI? and what are their bases?

- Threshold buildings with sheet metal roof should pass the wind impact penetration test developed by UF.
- Should consider additional costs to construction taking in consideration safety and risk.
- The code should address the relationship between building heights and the requirements for shutters.
- The cost for additional safety and protection as addressed by the SFBC is less than 10%.
- Affordability must be addressed by the code.
- Let the free market drives the need for higher building standards.
- Should the wind speed map be used to modify structural requirements?
- The unified code should be based on a worst case calculation.
- Clarify the wind load criteria required to be shown on the plans.
- Adopt ASCE 7-98 for low rise building.
- Should not adopt the ASTM E - 1996.
- What was the base for the 60 feet criteria of Section 1606?
- Should develop an education program for the code. Education is one of the biggest problem.
- The Code is very adequate as is.
- The entire draft code and the process are inadequate.
- The code development process is fair.
- Should not include appendices or chapter 34 of SFBC in the FBC.
- Roofing chapter 15 is not adequate and should be replaced.
- Standard building code is adequate. The problem is specific to workmanship and application and is not the code it self.
- The code should be based on uniformity.
- Allowing amendments will defeat the purpose of having a unified code.
- The Code should be simple to limit the need for code interpretation.

- The Code should be a minimum code and should not for example require window protection.
- Use a consumer rating system as a mean to promote higher standards.
- One system or one uniform code is not the ideal thing. Amendments to the Code should be allowed.
- Providing for a rating system as a mean to promote higher standards is a good idea. Let the market drives higher standards.
- Should modify the local amendment process to allow for ease of amending the code.
- If the code is reduced what will happen to insurance rates.
- Affordability should include insurance.
- Hurricane premium is based on hurricane models for specific areas.
- The Commission should support a development of rating system. This is a good marketing tool for builders.
- What will affordability do to the people in South Florida? Will that displace homeowners form ownerships?
- Some insurance companies reduce premiums based on increased standards.
- Impact resistant standards do work.
- Educate people that the FBC is a minimum code and structures will only be protected to a minimum standards.
- Minimum standards means performance standards.
- The prescriptive requirements in the code are not applicable to the state.
- Chapter 23 of the code is only applicable to non-coastal areas.
- People did not have sufficient time to review the code and provide comments.
- All buildings that are located in the high wind areas should be protected and that protection should not be penetrated.
ASCE 7-98 should be the base for high wind areas.
- ASTM E 1996 should not be considered for wind impact test because it allows for penetration.
- Should use South Florida wind impact standard.

- The Commission should review frequency reports on hurricane submitted by Dade county.
- The FBC should consider re-certification of older buildings for structure, electrical, and fire.
- The Commission needs to assess available options regarding the wind load issues.
- Use chapter 34 of SFBC for roofing.
- The proposed termite provisions fall short. Recommend establishing a committee to rework certain issues.
- Labeling regarding termite treatment should be consumer friendly. Labeling should be more informative.
- The code should address the geographical differences of the state.
- The termite provisions should address alternate technologies and methods for treatment.
- Non glassed products should be differentiated from glass products because they perform differently.
- Adoption of ASCE 7- 98 will limit the need for local amendments because buildings will be designed to the appropriate code.
- The draft as written is weaker than what the insurance companies would like to see and the code should provide for wind load requirements similar to those of the SFBC.
- ISO currently rates both the SFBC and SBC the same.
- Should address the relationship between the costs of codes and standards and the cost of insurance and its availability.
- The FBC Should reference the Wood Guide for high wind areas as one of the alternative wind design methods.
- Insurance companies would like to see SFBC adopted as the base code for FBC.
- The damage from hurricane Andrew was due to lax code enforcement and not a weak code.
- The purpose of the commission is the establish a minimum standard building code.
- A lot of the damage in hurricane Andrew was due to poor materials and inspections. This draft code reduces level of inspections which will impact SFBC.

- Grand Jury report pointed out that damage from Hurricane Andrew were due to weak wind load standard and weak products.
- At some point we need to accept the fact that mother nature is going to bring wind load levels that exceed the required wind design load.
- Should allow the code to reflect the geographical differences in the state.
- We should use the energy code as a model to resolve the wind issue.
- Should adopt the ASCE 7 98 for all buildings.
- Should adopt the IBC.
- Section 1606 of the base code should be based on ASCE 7-98 in addition to the impact provisions.
- The impact requirements should be limited to areas where evacuation is needed.
- Can you include in the code specific sections from the referenced documents such as ASTM standards?
- Town house wall separation should be designed as an exterior wall.
- The pressure numbers / tables in 1606.2 are based on exposure A &B. This is not applicable to Dade because Dade is exposure C. Should use exposure C. Need to adopt ASCE 7-98.
- Life safety and shelters requirements should be addressed in the Code.
- Need to provide for exception allowing residential designer to design homes if adopted ASCE 7-98. The IRC allows for this option.
- The commission needs to develop cost analysis to address the cost of human life.
- Homes should be designed by an engineer.
- The base code does not provide the proper requirements for structural review plans. The Code should require structural review plan at the building official level.
- The prescriptive requirements of the code provide for under design. The gage level of measurement should be substituted with the actual measurement in thickness.
- The draft code does not provide for safe homes.

G. Electrical/Alarm TAC Comments

- Journeyman licensing for electricians
- Want more electrical contractor's on TAC
- Put Nat'l install Standard NEIS, included in code (see attachment)
- Licensing should be on a statewide level so you can practice your trade anywhere in the state
- Journeymen's level licence
- Statewide /supervisors on jobs should be required to have a minimum of a journeymen licence
- If someone works unsupervised they should have a journeymen license
- Item 4 , No 4 - what does identify ground rod- what does this mean ? Needs certification.
- Need to clarify and conform between 11 and 6 (modification language) item # 4 , Section 27.03
- Item #5 - Equipment grounding conducting - wants this to be copper
- Item # 9 - make sure this stays in there “ low voltage wetness fixtures”
- Item # 3 - NEC does not reorganize a shunt trip as a service disconnect - why not make the service disconnect. -why not make the service disconnect accessible?
- The issue of where a shunt trip can be located is in contention (i.e., many participants felt it should not be located on outside of buildings)
- One solution might be to locate key for a shunt trip to building (for fire dept) in a “knox box”
- Item # 6 - “where req'd “ should be deleted to be in accordance w/ proposed language (base code tracking issue 8)
- Educational facilities: and 1999 NEC - there will be original) many inconsistencies therefore these two need to be correlated.
- In a hazardous condition who has the authority to shunt the electric power off?-- Reinstated base code tracking #26 (original submittal) 305.4K2
- Put Base tracking original mod #031 language back in document (refrig/freezer)- see a language (original) of #31
- How are educational facilities requirements addressed?

- How will new code affect certification requirements and training for personal performing NFPA 72 maintenance?
- RE: TAC's sense that any important exceptions to national code need to be addressed through NFPA change process- there are changes that make sense for Florida, and should be made here, not through there NFPA process.
- There are changes that makes sense for Florida (are geographically specific) and should be make here not through NFPA process.
- Need to correlate educational facility requirements with work of this TAC.
- Any discussion of 70's. Should be adopted in a way that applies to all occupancies.
- Educational facilities, Chapter 5 , Fire Alarm suppression system- does not speak to need for system to be monitored? Where do you go (supervised) to find requirements?
- Alarm or fire protection systems need to be monitored off premises? speciality pertaining to educational /agency of Health Care Admin.
- Are proposed modifications applicable to Florida only?
- Will proposed modifications be submitted to national electrical code board?
- Sub section 1) Section 2703 modification to NFPA 70
- Sub section2) Change reference to 230-70 to 90-70
- Sub section 3) 230-70D add to the top of the right hand side of the page
- Sub section 4) Table 25064 change table 25066
- Sub section 9) Delete - not approved by TAC in second reading
- What % of commission members and TAC members from Broward -Dade?
- What about NFPA's number 780, etc, recognized? (referenced but not included)
- CFR's adopted?
- Not adopting may create problems- legal, perception they are excluded.
- Use of armor clad cables addressed?
- Requirement to use non- corrosive materials in certain cases is a better approach

- If main disconnect located at point that is not accessible.... Violates NEC requirement to be readily accessible, cannot/ (must not) use short -trip instead.. Main disconnect must be accessible
- Remove all 9 changes
- Addition to 230.7 Listing of all electrical equipment ...not just service equipment. Isn't this redundant - Fix wording
- Re: 250.118 Why reference this when these change every 3 years - reference sections or wording (quote)
- Re Addition to 250.64 Minimum grounding conductor.... NEC allows exception Ground rod rated number #6 Maybe # 4 for compile system- otherwise don't need to oversize , Clarify thinking behind this
- Re: 280-3"Where required " contradict "all" Change to surge protectors shall be installed"
- Should focus on changes specific to Florida needs
- Re 210-26 Table, Done for load calculation purposes only., What do ceiling fans, exhaust fans, heads fall under? There seem to be a lot little problems. with this.
- 2701.2 This code shall govern- look at conflicts
- Re change # -If you delete 2nd paragraph you don't need GFI
- What is "no-nicho" light fixture? Include as alternate
- Product approval should be addressed in the electrical code
- All electrical equipment materials, devices and apparatus shall be listed and labeled
- Need to identify who is recognized , e.g. UL, state approved. Coordinate with product approval TAC are all current nationally recognized going to be grand fathered in to Florida approval process
- Some products are recognized not listed or labeled . A- recognized or considered "listed" change to include " listed, labeled or recognized"
- Need to adopt more NFPA volumes by reference, e.g. if not referenced in NFPA 70
- Don't include table 210-26 in Chapter 27. Table is more stringent than national code and could increase building construction costs.
- We need a VA requirement for residential only. Need a way to limit the number of outlets on a # 14 wire of undetermined length.
- This should be caught engineered by plans reviewer not inspector.

- Engineer needs a code limit to work from
- We need a defined volt/amp per receptacle or a table with clear definition
- Require service disconnect or shunt trip button. I am opposed to modification #3 because of added cost and allow unauthorized shunt off of power and loss or liability
- Need exceptions for fire control stations, command centers in larger buildings.
- If it is on the outside of the building it needs to be keyed on commercial buildings.
- Consider cost of shunt trip and its security
- This doesn't address generators and others power sources.
- May not want to shunt down all electricity
- Shunt should be dead front for residential.
- Item 5 - All raceways should have electrical equipment grounding conductor, not just buried or below grade.
- Item 5 need exception for service entrance raceways
- Item 6 - Requiring surge arresters is good- They should be secondary surge arresters that are listed and labeled
- Listing and labeled on # 6 is enough " Approved lab" is redundant.
- If we adopt the National Code that is fine.
- Now adjacent counties have different requirements . I want a standard code with no amendments. To avoid inconsistent interpretations.
- The problem is enforcement .
- Have smoke detectors return side only.

H. Energy TAC Comments

- Concern with ventless dryers installed in multifamily occupancies. DCA response not favorable. Believe heat entering home. DCA prevents water heaters in return plenum. Can't understand response. Most of country is dryer. Anything that puts moisture in a residence is bad.
- Wall air conditioners don't have latent load input in sizing calculation. Manufacturers don't provide the information.
- Why not prevent installation of water heaters in closets. Energy Code did prevent them in closets at one time.
- Prohibiting AHU from being installed in attics is in direct contradiction to FL law. Can you implement a complete prohibition? Commentator builds a variety of homes. Regulation is extremely cumbersome, costly, not cost effective.
Count: 3
- Prohibiting installation of air handlers from attics restricts their application. Suggest that TAC look at it as option. If spend \$400-500 on closet, wouldn't it be better to spend on heat recovery unit. There are some buildings where it is not practical to put them anywhere else. You haven't prohibited ahu from installation on roofs.
Count: 9
- Why not prohibit ducts from being installed in attics?
- Why not require insulation on air handling units? You did before.
- Equipment sizing. Some jurisdictions make you meet or exceed size of calculation.
- There is widely divergent enforcement on equipment sizing requirements. Undersizing is a concern. There is a requirement that equipment be to nearest unit size. 120% came up because of availability of equipment. Why not make residential & commercial sizing criteria the same?
- It's not clear whether an existing house with previous a/c has to comply with energy code.
- Gas air conditioning should get credit.
- Agree with the change to a 120°F water setting. Thought the 110°F was just for commercial anti-scald applications..
- There are other requirements to prevent scalding.

- Kitchen exhaust hoods. Called in to find why a/c not sufficient. Contractor made hood out of sheet metal. Make up air provided by supply grill in ceiling. Restaurant sucking 25 tons out. 100 cfm/sq.ft. 250 c.f. = 1 ton . Recommend changing code to prevent homemade hoods.
- HVAC equipment should be rated with dew point applicable in Florida
- Are equipment efficiencies going up?
- Get rid of “sealing” to 100 percent closure. Put duct sealing criteria in one place so can enforce without going back to other books.
- Please explain the revision deleting the term “shading coefficient” and changing “U-value” to “U-factor”.
- What do manufacturers think of use of SHGC? Sizing programs use the shading coefficient.
- Concerning the 1998 International Energy Conservation Code (IECC) requirement for a .4 SHGC, how can it be achieved?
- Is there anything that limits how many windows & what conditions?
- The International Residential Code is trying to be prescriptive. Can the Florida Building Code have a performance base to it? Commentator heard Lovens say Florida and Texas codes were the worst in nation.
- Heavier gauge wire conducts electricity better and provides continual savings. Recommend requiring #10 wire. Save money from utility bill.
- Insulation put on inside of mass doesn't make sense. Concrete block homes with reflective insulation are inefficient. Florida should require more insulation in walls.
- Regarding the white tile roof credit approved by the TAC, is there any data to back up the prohibition against taking credit for both white roofs and radiant barriers?
- Who is going to inspect for energy code issues? Adequate enforcement of the code is a key issue.
- HVAC units are often stolen. Can the building inspector sign off without unit on site?

I. Mechanical/Elevator TAC Comments

- Code enforcement people have been instrumental in code development process. Not a lot of net changes in IMC. Present code pretty adequate.
- Should use SMC as base code, not IMC. IMC is composite of national codes. Many glitches.
- Smoke/fire. Is it covered in mechanical code? Smoke control belongs in mechanical code, not chap. 4 of building code. Cross referencing might be adequate. Needs to be enforced by mechanical.
- Sec 507.2.2 (p.5.6). Does this mean that if you put a domestic range in a commercial occupancy, you can put in a Type 1 hood?
- Regarding Mech 003, TAC voted to require smoke detectors in both the supply and return air ducts. 1) This is more expensive. 2) Smoke detectors in supply cause false alarms; concern with fresh air intakes and maintenance. 3) Smoke detectors should be consistent with NFPA 90A. State review enforces strictly fire codes. Smoke detectors are a life safety issue, not a mechanical issue. 4) Only practical place to put it is in return. Have talked to fire inspectors. To put 2 in home is ludicrous; many large homes. 5) No complaints until word “fire stat” was removed. I require a smoke detector in the return, life safety requires in supply (wired into alarm system). Over 2000 cfm.
- Is anyone doing anything about fire rating of air handlers in garages? Fire protection in ceiling? Fire dampers? See S FL Bldg Code treatment. Need to consider covering them. Air handlers should not be in the attic or the garage for safety reasons.
Count: 2
- Mech 01. Why require 4" minimum pipe below concrete slab?
- Mech 039. Does IMC allow use of pvc underground?
- Mech055. French drains. Why?
- Ch. 11, 5 unenforceable items. Inspectors are licensed to enforce codes. Must be able to do so.
- MECH026. Not enforceable. Bldg dept won't check undercuts on doors.
- Why require a 110 V outlet in attic? Not required in electrical code.
- Should exclude use of ductboard like AHU.
- Are fire sprinklers under fire code? Does not belong in mechanical code.
- Generators should be in mechanical code or cross referenced.

- Commentator would like to see the code enforced consistently.
- Issue of mastic of boots. Only inspected in Jacksonville. Sealing boots is a waste of time and money. Boots are so insignificant when compared to air handlers in attics. No common sense here.
- Should not have air handlers in attics. Should be prohibited in mechanical code.
- What is the story with elevators? Building departments don't have personnel qualified to inspect elevators! There should be elevator inspectors. Also, who can install fire sprinklers in an elevator shaft? Plumbing or fire sprinkler contractor? If pre-engineered system, up to 5 heads can be installed by plumbing contractor.
- Life safety code for existing buildings is 1985. Sec. 19 Life Safety Code: has to conform with section 7.45. Requires that you have elevator recall for new buildings. Subsequent codes say old buildings too. Many apartment buildings need to be upgraded for recall. Cost \$25,000 for 2 elevators. Old people. Can't afford to upgrade. They have to go down steps anyway. HB4181 would require it. Allow to pressurize elevator shafts for smoke control.
- There is a conflict with elevators. Fire sprinklers reqd. at top of elevators. Conflicts between fire & bldg need to be resolved.
- Code needs to cover residential elevators.
- What does it take to get a S FL Bldg code rep on TAC? Have approached Peggy Harris to get on committee. Problem is would have to pay own expenses in not a voting member. Two code officials from Orlando area on committee. Can't get issues through of interest to S FL. Had stack of literature and central FL guys had minds made up.
- Regarding the proposed mod to section 616 to address unbalanced air flow in buildings, believe this is a comfort issue which doesn't belong in the mechanical code. Recommend exempting residential or limit to single units 2000 cfm & above.

J. Plumbing/Gas TAC Comments

- How will putting 64E-6 in code affect the septic tank industry? The Health Dept. presently enforces this rule. There is concern that untrained local inspectors would have to do septic tank inspections, which would be a large step back for this industry. FL is a leader in the nation in education and standards for septic tanks. The issue is who regulates it. Would like to be involved in code development to keep on top of issue. If Rule 64E-6 is changed, it needs to be changed in plumbing code. Put statement in text to refer to latest rule & that appendix is not enforce by bldg dept.

Count: 5

- HRS inspects it's own construction. Recommendation to change code Terrible code.
- Inform septic tank industry leadership when this issue is raised.
- Does the code cover installation of ground water heat pumps?
- In the matter of water wells, support decision of plumbing TAC to draw line at point of connection to potable water. Problem with cutting off at well system, 4 different kinds of pump are installed at different locations, public vs private wells. Should define public and private wells (see DEP definitions).

Count: 6

- Perception is that well drillers would have to become plumbing contractors because the plumbing code covers wells. They would like the code to say that well drillers are allowed to do this work. They are concerned with losing their relationship with DEP & the Water Management Districts.
- The Florida Ground Water Association would like to see a continuing education program in Florida which they would develop themselves. They would like to have responsibility for installation of well equipment up to the pressure valve. Alternately, they would like a specialty licence to install well equipment. All the equipment well drillers use is certified by the manufacturer. FGWA would like to see guidelines for equipment and they would like to develop them (currently working on a draft derived from the Wisconsin code for pumps and tanks). Building department personnel also need training on how to inspect wells if they are responsible for inspecting them.
- There is a problem where the homeowner wants the pressure tank located in the garage. It is possible to have 100 ft of piping with no inspection. Could have piping under a slab. Can see areas of problems without inspection. Marion County inspects well hookup, piping, insulation.
- Are water softeners covered? What kind of licensing would be required to install water softeners?
- Irrigation wells should have permits and inspections.
- FU value for water closets should stay same as '94 plumbing code.
- Should require shower pans. Without the pan, water wicks up the wall.
- The draft code appears to allow dishwasher discharge through a grease trap. Is this correct? Why are grease interceptor capacities dictated? There appears to be no engineering support for equation. Huge cost increase.
- Sections 413.3 and 1003.3.2 Would this require a grease interceptor? Typically sent to sanitary. Nothing here says you have to use an interceptor.

- Why is plumbing code moving to require sizing of grease traps (1003.5.1)? It would increase the size of grease trap required.. There is no engineering basis for this requirement. Would require significant expense.
- The potty parity law should apply to assembly occupancies, not all buildings. Table 403.1 vs 403.2(4) Mercantile bathroom ratio 1:500. If mall is providing bathrooms, at what point does store not have to? Potty parity needs to move from 403 to 403.1. Rule need to be included in the code. P. 4.2, #4. Plumbing fixture Table 403.1: service sink not deleted for business & mercantile. Also, would like to see a footnote under table to reference to potty parity section.
- Diagram of accessibility stall. Because of figure, question of whether need front & side transfer in single toilet rooms. Fig. 404.3.2 (ADAG 28).
- The Plumbing code does not address sidewalk seating outside restaurants. Strongly recommend plumbing code include outside seating.
- If code addresses accessibility, why put grab bars in plumbing code?
- Installation of fixtures is an accessibility issue. Reference to 404.
- Should put reference to high low drinking fountains in plumbing code in section 404.2.
- Plumbing, sec. 802.1 could be construed to mean a sink; don't think that was the intent of the code.
- Section 411.1 delete word "cold" from water connection for emergency showers.
- Has anyone defined what a recreational facility is? Which category requires an additional unisex bathroom?
- Swimming pool definition in the plumbing code does not match the definition in the swimming pool code. Suggest delete definition from plumbing code; reference it.
- How will standards be updated? Commentator proposed updating standards (PLUMB028); it was denied. If standard is not up to date, products are not tested to the standard referenced by the code.
- Reclaimed water. Chance of cross flow connections. Can use reclaimed water & eliminate water demand. Shadetree mechanics making mistakes. People don't know what purple pipe means. Need public awareness campaign. Pvc pipe under ground with holes could absorb from sprinkler. Any kid can go up to any sprinkler and get a drink.
- Rumor regarding sanitary cross in vertical position with back to back toilets. Should be an exception for water closet without pumping action.

- Purple primer runs all over the pipe. Rumor has it that only purple primer allowed. Some contractors declare they will go out of business if purple is required.
- Does the code address who can install backflow preventers? Too much left open for interpretation.
- Why did the TAC go with the International Fuel Gas Code instead of NFPA 54?
- Need more tables in IFGC. Will comment later.
- Medical gas licensure is required by the Legislature. Will that be in code?
- Should require CO detector for any house with fuel burning equipment. Will submit form.
- Will there be a mandatory statewide education requirement?
- Need to use consistent language: “plumbing official” vs. “chief plumbing inspector” vs. “building official”.
- Will there be a mandatory statewide education requirement?
- Are appendices in unified plumbing code adopted? Understood that a community could or not adopt.
- Will the new code have a commentary?
- Concerned with not enough time to review the draft code. Did not receive it until Friday.
- How get consistent interpretation? Contractors do things to avoid a fight. Don’t want to make people do it in error.
- During the first year code is in effect, there should be an opportunity for changes.
- Can local enforcement enforce their own code requirements?
- Can building official waive requirements like Std codes?

K. Product Approval TG Comments

- Products should be evaluated according to code on a regional basis. Whatever the code requirements is in a particular area, the product should be able to demonstrate that it meets that standard.
- Rational analysis should not be used.
- Can local entities restrict products in their jurisdiction?

- Any company should be allowed to manufacture approved products with the same standards production process - already approved.
- Minor alterations should be allowed using rational analysis on products already approved.
- Everything that is approved nationally should be included in the list of approved products grandfathered in - e.g., SBCCI, BOCA, ICBO, etc.
- How is product approval related to wind-load? Shouldn't we base product approval on the highest wind-load standards in the state?
- Should be minimum/maximum wind speed attached to product approval.
- Wind speed should be based on a national standards (Building/Structural TAC)
- What impact on insurance rates would occur if this code is approved?
- Products that meet the 97 edition of the SBC should not have to go through the costly evaluation process again - grandfathering?
- Product Approval needs to recognize differences in hurricane and non-hurricane prone areas. Process should be the South Florida Product Approval process. This process is an international standard.
- Modular Buildings should be addressed - by whom? - DCA?
- Will inspection time increase?
- Will additional funding be available?
- Criteria for water penetration should be reconsidered.
- Wind speed should be based on a national standards.
- ASCE 7-98 may reduce wind load standards.
- Will inspection time increase? Will additional funding be available?
- SBCCI standards? New state system - quality assurance
- Product Approval should be addressed ecological issues and conditions.
- Product should be tested in its environment.
- Third party approval should continue.
- Already have a system in South Florida - use it! Lessons learned from Andrew.

- Better representation in TACs and different venue for public hearings.
- Do not use manufactured homes model.
- Miami/Dade Product Approval should be the state approval system.
- Need penalties process for bad workmanship.
- Need strong Product Approval enforcement plan/process.
- Should not be a rubber stamp - rather should review every product.
- Rational analysis should not be used.
- Remove exceptions to stringent standards/streamline the process.
- The state should not use the manufactured buildings' model for product approval. The state should not "rubber stamp" manufacturers' review.
- Conceptual design report is a work in progress.
- Product Approval system should not be a rubber stamping entity, and if it is, should not exist.
- The Task Group has recommended specific criteria for product approval for products to be used statewide.
- SBCCI fee schedule should be used for approval and evaluation.
- Recommend fee schedule at the end of the process.
- The current Product Approval draft is representative of national models.
- Miami/Dade County Product Approval should become the state process.
- Public life-safety issues should be foremost in the process.
- Committee make-up should be representative of all parties to include citizens.
- The draft conceptual design reflects the statutory requirements.
- Need scientifically based approach.
- Should not create a bureaucracy in DCA. 7) Intent of Legislation should be followed - there's no need to recreate the wheel.
- Existing draft of conceptual design reflects national programs.
- Product Approval system should be based on the code.

- Should not be a "rubber stamping" entity and extra level of bureaucracy.
- Do not use manufactured buildings DCA model.
- Current conceptual design is based on pre-Andrew and not adequate.
- Need a life-safety product approval system to protect citizens.
- Product Approval needs to recognize differences in hurricane and non-hurricane prone areas. Process should be the South Florida Product Approval process. This process is an international standard.
- SBCCI and others entities currently do scientific testing - opposed to a statewide system (bureaucracy).
- Miami/Dade uses scientific methods and should be used as the state's model.
- Hurricanes don't just hit coastal areas: requirements should be as strict as South Florida's throughout the state. ("As a homeowner, I am not opposed to the Commission imposing the stricter South Florida standards on me. Make me build to those standards."-- private citizen from Frankin County.
- NWWDA standards and AAMA standards should be considered.
- Miami/Dade codes are more stringent for windows and shutters (water and air testing sequence is different).
- Central Florida does not need Dade County standards.
- ASCE 7-98 may reduce wind load standards.
- A distinction should be made between hurricane and non-hurricane prone areas.
- Product approval system should reflect geographic differences in Florida.
- Grandfathering should be strictly enforced - based on product performance and compliance with the code and timely.
- List of frequently asked questions.
- Any company should be allowed to manufacture approved products with the same standards production process - already approved.
- Dade County has a process in place through the association participation program.
- The Product Approval Program should meet or exceed Miami Dade's Product Approval -ARC 4496 DCA - guideline compliance summary.
- Engineer should be responsible for asking for additional testing.

- Product Approval should be based on geographic areas.
- Scientific testing should be required. The proposed system is not new - it is similar to the system used in Miami/Dade and was in effect at the time of Andrew swept through South Florida - Andrew proved that the system failed.
- The products and/or process may have failed.
- Grand jury report (Miami/Dade) materials and process failed.
- There should be a period for submission prior to the date the code is effective.
- Use existing testing protocols - such as Miami/Dade Product Approval Process.
- Don't create a bureaucracy for product approval. Establish funding limits or cost analysis.
- Product approval and evaluation should be delegated to an entity or system like Miami/Dade.
- Minor alterations should be allowed using rational analysis on products already approved.
- Local jurisdictions should do their own reviews rather than product evaluation entities. As part of House Bill 4181, it allows the approval of product, methods or systems of construction by the local building official has long as certain criteria have been met.
- Penetration due to flying objects should be re-evaluated/considered.
- Local jurisdictions can approve products for local use - Process should be expedient.
- Product approval process should allow for creativity for meeting the code without going through an expensive process of approval - If I can build a better mouse trap without going to costly engineering firm to confirm my method, how would I be able to obtain approval? alternative methods of construction and materials.
- Grandfathering of existing approved products will be built into the State Product Approval Process.
- List of approved products should be available online and kept current. A flyer or bulletin sent out to contractors, manufacturers, etc. listing the products.
- National standards for testing should be a model for the state system. Those that are accepted or evaluated by the model codes.
- National standards criteria should be used in state system.
- Rational analysis should not be used.

- Implementation and enforcement should be uniform - Statewide date.
- Long-term product approval needs to be addressed.
- Does grandfathering apply to products not covered by state laws?
- Grandfathering of existing approved products will be built into the State Product Approval Process.
- National standards criteria should be used in state system.
- Where does National Evaluation Service fit in?
- NWWDA standards and AAMA standards should be considered.
- What impact on insurance rates would occur if this code is approved?
- Don't create a bureaucracy for product approval. Establish funding limits or cost analysis.
- Testing product should be monitored by a quality assurance agent - State program may be flawed.
- Need an approval system that includes standardized testing.
- Should be a generic product label and not duplicate tests on same products. Waste of money.
- Adequate safe guards with specific criteria for quality assurance programs, testing labs and product approval entities.
- In-house lab testing should be witnessed by quality assurance entity - not self-testing by producers.
- Need a total system:
testing facilities
quality assurance on items tested are the same when they are the applied as those that have been approved.
- No in-house testing - i.e., manufacturers test their own products.
- Need non-subjective testing with quality assurance (strict) measures.
- Conflicts in the law regarding local amendments as to product testing should be addressed.

- The code dictates what products can be approved - If a local jurisdiction adopts a more stringent standard that requires a window to withstand 120 mph winds, then a state approved window that can only stand a to 80 mph winds will not be allowed in the area.
(This issue is within the code — the code dictates what products can be approved — If a local jurisdiction adopts a more stringent standard that requires a window to withstand 120 mph winds, then a state approved window that can only stand a to 80 mph winds will not be allowed in the area!!! (per Kari Hebrank))
- There should be a period for submission prior to the date the code is effective. I
D) Will the State University System be involved?
- Should products be labeled permanently or removable?
- Composite panels for interior walls, roofing, etc. - how will this be handled? (e.g. Elite panels)
- Product Evaluation should be determined based on the **total** facility - for life safety issues.
- Will product approval be timely? Should be done in 90 days. The following are recommendations the Task Group has made to the Commission on the time frame for an application:
- Need definition of panel walls.
- All products should be tested and meet the code. Uniformity should be maintained by requiring all products to be tested no matter how they have been approved. In the Product Approval conceptual design report the Task Group recommended that all products that require approval for statewide use comply with the Code. Testing criteria has not been
- Longevity of approval should be addressed.

L. Specialty Codes/Special Occupancy TAC Comments

- Where do grease interceptors for restaurants go in the code?
- What is the new rule on mobile home tie downs? Was there any alterations in language?
- Many codes used are more restrictive than SF Bldg Code (particularly fire & safety)
- School Board Safety Mgr.
- Provisions of 161 F.S. conflict between that and 44 CFR (FEMA) (DEP & FEMA)
 - ongoing conflict – needs resolution
 - Question is, has DCA resolved the issue.

- Take public and private wells out of the construction standards of the FBC
- Would existing exceptions for inspections on colleges & other schools still apply for plan review.
- In existing historic buildings is there a requirement to make current owners comply with the code? This concern is because as underlying property value increases owners tend to neglect the building itself i.e discourage “demolition by neglect”
- Rest/hotels outside seating now a facility that can accommodate “x” number of people is accommodation more than anticipated Does code extend to occupancy of private property public property (this under sidewalk seating)
- This issue (outside seating) also needs to be looked at in terms of accessibility.
- Who decides the number of outside seating to the number or required restrooms.?
- Could higher standards desired by Dade be put in an appendix?
- What are the effects of higher standards on afford ability of houses?.
- Are wind load provisions in new code different?
- Why the difference in firewall requirement for condos and fee simple (1hr vs 2 hrs)?
- Does the FBC address requirements to provide storm shelter capacity in schools ?
- Schools Community colleges should remain under state requirements for Educational facilities.?
- Discontinue state requirements for educational facilities code –use statewide code.
- Who will be responsible for testing interfaces (eg fire alarm and sprinkler system)
- Law must address everything that is construction related.
- Environmental issues do they belong in the FBC.?
- Exclude process or administrative issues can be addressed in one place. Also contractor contract issues, and operational regulations.
- Coastal construction line should be in Chapter 31.
- Need to reference the National Flood Insurance program.

- Commercial public pools: Don't use ANSI /NSPI-1 1991 performance standard. Pool and Spa assoc opposes it. Does not provide adequate protection Has used Health Dept. 10D5 Code renamed 64E5 . It would have engineering and planning people who would not understand the existing FI Code.
- May be an oversight leaving it -need to delete 36-304.1 Standard ref. for public pools.
- Put pools (public and private) in same chapter or cross reference.
- Wells should be excluded from code. Wells is an environmental issue regulated by DEP, WMD, DOH.
- Need a statutory basis issuing permits.
- Some districts permit all wells some only 4" or larger.
- If the sunset 373 in Jan. 2001 of WMD well construction programs might create a problem.
- Want all regulations for well drillers and contractors in one place .
- How do we deal with DEP or WMD rule changes.
- Type of well varies by size and agency responsible.
- Can we do a matrix of type , size and agency for wells.
- Well contractors are licensed by DEP who will be responsible for enforcement. This may remain the same or change
- Specify who responsibility goes to of 373 part FS , sunsets
- You can ref it in the code as long as DEP continue to regulate and propagate rules.
- Why is this not in plumbing, it has nothing to do with SO. Possibly elsewhere than Chapter 4
- Contractors did to format changes the same consistently in the code.
- Reorganize State agency regulations int the proper occupancy group or special construction chapter
- Need to look at how codes are put together and how engineers and contractors and inspectors use them, e.g. plumbing, energy and ADA.
- Why not use standard building code?
- Why not use standard
- Florida Code should cover everything

- What changes to existing schools?
- Who will do school inspections?
- Chapter 373 part 3 Water wells-Well the new code sunset this - it has taken since 1971 to get this New code should reference this
- Keep Section 441 intact as it is now . This is specialized construction that needs specialists local inspectors may not have.
- For community colleges with k-12 1) Allow us as building code administrators 2) Allow inspectors to be grand fathered in until their license expire
- Authorize contract with public or private entity for plan review and in inspection.
- Allow self repair of \$200,000 (public construction) or less to be done without a permit (Other comments in writing)
- Address discrepancies (on detectors) between elevator code and fire Marshall's office (2 groups are meeting to resolve these)
- Wells is environmental and should be deleted or put in an appendix. Authority should remain with DEP, WMD and DOH (see Orlando notes)
- Swimming pool code exceptions? A -eliminated wading pools can have manual locking device at 54" plus for doors between house and pool
- If wells are shifted to building dept would they staff up with professional geologists? Considers unsettling of 373FS
- Concern about kiddy potty in Daycare centers not address FACBC 97 different local agencies have door sizes that may not be consistent with the code.
- Radon does not belong in the code
- There is a lot in SREF that should not be in the code
- Are all portable buildings . to be inspected by a 3rd party representative - Continue as is see 4181 9B-3 DCA
- Can we continue to have plan review by in-house arch. and engr. This should be allowed .
- Any pool needs to have access control if over 24" deep This should also cover storm water retention ponds.
- Address confusion between DMV and DCA over mobile home tie downs, esp. for business uses. (different standards and DMV title requirements) Clarify jurisdiction and permitting process.

- There is some constituent complaint about radon requirements in this area that has little radon
- Juvenile Justice Standards are good. There have been problems between DJJ and DOE standards applied in the some facility
- Wind standards should be consistent for coastal construction- May want to show on a map.
- Well issue: Underground storage well injection construction system (comments to be included in writing). Wants DEP to continue enforcement on these issues.

III. Commission's Key Remaining Tasks for The Code Development Process

MAY, 1999 - FEBRUARY, 2000

TASK	DATE
Draft I of the Florida Building Code printed	May, 1999
Ten public input forums on the draft code	May 17 - June 29, 1999
Public comment period-Draft I 1999	May 1 - July 2,
TAC/TGs recommend and draft responses for Commission review	July 12 - 13, 1999
Commission finalizes Draft II 1999	August 9 - 10,
Draft II printed 1999	September 1,
Commission convenes public hearings on Draft II	September & October, 1999
Commission finalizes Rule Notice Draft (III)	November 8 - 9, 1999
Commission approves final draft and rule notice	December 6 - 7, 1999
Final hearing on Building Code Rule and approve filing the rule	January 10 - 11, 2000
Rule adopted or faces the rule challenge process 2000	February 11,
Approve report to Legislature on law and code 2000	February 14 -15,

Appendix A

Florida Building Commission Public Forum Attendance

City	Date	Number of Registered Attendees
Fort Lauderdale	5/17/99	177
Melbourne	5/18/99	65
Jacksonville	5/19/99	57
Tallahassee	5/20/99	74
Orlando	5/24/99	65
Naples	5/25/99	64
Tampa	5/26/99	110
Pensacola	5/27/99	55
Miami	6/9/99	250
Pensacola	6/29/99	57

Appendix B

**Public Input Forum
Agenda Packet**

Appendix C

INTRODUCING THE CONSORTIUM



The Consortium’s mission is to bring people together to facilitate consensus solutions to Florida’s public problems. This statewide, publicly supported program, with its neutral home in the state university system, provides dispute resolution and consensus-building services, technical assistance and professional dispute resolution training and education services to a wide range of citizens, elected and appointed leaders, professionals and agency staff. Moreover, the Consortium supports dispute resolution teaching within the university system and sponsors research to evaluate and establish the value of collaborative approaches to problem-solving and dispute resolution.

It is the intent of the Legislature to reduce the public and private costs of litigation, resolve public disputes...more quickly and effectively, and improve inter-governmental communications, cooperation, and consensus-building. The Legislature hereby formally establishes the Florida Conflict Resolution Consortium... to serve as a neutral resource to assist citizens, public and private interests in Florida to seek cost-effective solutions to public disputes and problems through the use of alternative dispute resolution and consensus-building.” —Florida Statutes, §240.709