**Fire Technical Advisory Committee – Comment**

**6th Edition (2017) Florida Building Code, Building**

F/SP – Comment #1

From: Skip Gregory [mailto:gregoryskip@gmail.com]

Sent: Thursday, February 16, 2017 11:30 AM

To: Madani, Mo

Subject: Comment on Section 908.7 6th edition of the FBC

Mo, Please find attached my comment and the attachments that go with the comment. Let me know if this will work. Thanks!

**Comment for Section 908.7 of the 6th edition of the Florida Building Code:**

This comment addresses a simple editorial correction to this section. The way this section is currently edited, the two Exceptions are located under sub-section *908.7.2 Combination Alarms.* This is not in keeping with the Florida Statue, Chapter 553.885 (see attached) because the exceptions in the statute were meant to apply to the entire section 908.7 and not just the subsection 908.7.2. This incorrect positioning of the exceptions has led to confusions as shown by the two opinions from the Building Officials Association of Florida that cite the location of the exception as being only under subsection 908.7.2.   
The fix is to simply relocate the exceptions to follow directly after section 908.7 as required by Florida Statute and as shown below with strike through and underline text.

908.7 Carbon monoxide protection. Every separate building or an addition to an existing building for which a permit for new construction is issued and having a fossil-fuel burning heater or appliance, a fireplace, an attached garage, or other feature, fixture, or element that emits carbon monoxide as a by product of combustion shall have an operational carbon monoxide alarm installed within 10 feet of each room used for sleeping purposes in the new building or addition, or at such other locations as required by this code.

Exceptions:

1. An approved operational carbon monoxide detector shall only be required to be installed inside or directly outside of each room or area where a fossil-fuel burning heater, engine, or appliance is located within a hospital, inpatient hospice facility or skilled nursing home facility licensed by the Agency for Health Care Administration, or a new state correctional institution. The carbon monoxide detector shall be connected to the fire-alarm system of the hospital, inpatient hospice facility, or nursing home facility as a supervisory signal.

2. This section shall not apply to existing buildings that are undergoing alterations or repairs unless the alteration is an addition as defined in Section 908.7.3.

908.7.1 Carbon monoxide alarm. The requirements of Section 908.7 shall be satisfied by

providing for one of the following alarm installations:

1. A hard-wired carbon monoxide alarm.

2. A battery-powered carbon monoxide alarm.

3. A hard-wired combination carbon monoxide and smoke alarm.

4. A battery-powered combination carbon monoxide and smoke alarm.

908.7.2 Combination alarms. Combination smoke/carbon monoxide alarms shall be listed

and labeled by a nationally recognized testing laboratory.

~~Exceptions:~~

~~1. An approved operational carbon monoxide detector shall be installed inside or directly~~

~~outside of each room or area within a hospital, inpatient hospice facility or nursing home~~

~~facility licensed by the Agency for Health Care Administration, or a new state correctional institution where a fossil-fuel burning heater, engine, or appliance is located. The carbon monoxide detector shall be connected to the fire-alarm system of the hospital, inpatient hospice facility, or nursing home facility as a supervisory signal.~~

~~2. This section shall not apply to existing buildings that are undergoing alterations or repair unless the alteration is an addition as defined in Section 908.7.3.~~

Fiscal Impact Statement

Impact to local entity relative to enforcement of code (553.73(9)(b),F.S.)

There is no fiscal impact on the local entity relative to enforcement.

Impact to building and property owners relative to cost of compliance with code (553.73(9) (b),F.S.)

There is no fiscal impact to building and property owners relative to cost of compliance

Impact to industry relative to the cost of compliance with code (553.73(9)(b),F.S.)

There is no fiscal impact to industry relative to the cost of compliance

Impact to small business relative to the cost of compliance with code (553.73(9)(b),F.S.)

There is no fiscal impact to small business relative to the cost of compliance

Requirements

Has a reasonable and substantial connection with the health, safety, and welfare of the general public (553.73(9) (a) 2,F.S.)

Yes.

Strengthens or improves the code, and provides equivalent or better products, methods, or

systems of construction (553.73(9) (a)3,F.S.)

Strengthens or improves the code by making the code requirements clearer to the user.

Does not discriminate against materials, products, methods, or systems of construction of

demonstrated capabilities (553.73 (9) (a) 4,F.S.)

Does not discriminate against materials, products, methods, or systems of construction

Does not degrade the effectiveness of the code (553.73(9)(a)5,F.S.)

Does not degrade the effectiveness of the code

**Support materials:**

**Attachment #1: 7572**

**Attachment #2: 7618**

**Attachment #3: 553.885 FS**

**TAC Recommendation:** Mr. Belcher entered a motion to approve the comment. Mr. Schiffer seconded the motion. The motion passed unanimously with a vote of 7 to 0

**Commission Action:**

**6th Edition (2017) Florida Building Code, Residential**

F – Comment #2

**Staff: Mo Madani**

**6th Edition (2017) Florida Building Code, Residential**

**Revise Section R314.6 for consistency with Section 553.883, Florida Statutes**

**SECTION R314 SMOKE ALARMS**   
  
**R314.1 General.**   
Smoke alarms shall comply with NFPA 72 and Section R314.   
  
**R314.1.1 Listings.**   
Smoke alarms shall be *listed* in accordance with UL 217. Combination smoke and carbon monoxide alarms shall be *listed* in accordance with UL 217 and UL 2034.   
  
**R314.2 Where required.**   
Smoke alarms shall be provided in accordance with this section.   
  
**R314.2.1 New construction.**   
Smoke alarms shall be provided in *dwelling units*.   
  
**R314.2.2 Alterations, repairs and additions.**   
Where *alterations*, *repairs* or *additions* requiring a permit occur, or where one or more sleeping rooms are added or created in existing *dwellings*, the individual *dwelling unit* shall be equipped with smoke alarms located as required for new *dwellings*.   
  
**Exceptions:**   
  
1. Work involving the exterior surfaces of *dwellings*, such as the replacement of roofing or siding, the *addition* or replacement of windows or doors, or the addition of a porch or deck, are exempt from the requirements of this section.   
  
2. Installation, alteration or repairs of plumbing or mechanical systems are exempt from the requirements of this section.   
  
**R314.3 Location.**   
Smoke alarms shall be installed in the following locations:   
  
1. In each sleeping room.   
  
2. Outside each separate sleeping area in the immediate vicinity of the bedrooms.   
  
3. On each additional *story* of the *dwelling*, including *basements* and *habitable attics* and not including crawl spaces and uninhabitable *attics*. In *dwellings* or *dwelling units* with split levels and without an intervening door between the adjacent levels, a smoke alarm installed on the upper level shall suffice for the adjacent lower level provided that the lower level is less than one full *story* below the upper level.   
  
4. Smoke alarms shall be installed not less than 3 feet (914 mm) horizontally from the door or opening of a bathroom that contains a bathtub or shower unless this would prevent placement of a smoke alarm required by Section R314.3.   
  
**R314.3.1 Installation near cooking appliances.**   
Smoke alarms shall not be installed in the following locations unless this would prevent placement of a smoke alarm in a location required by Section R314.3.   
  
1. Ionization smoke alarms shall not be installed less than 20 feet (6096 mm) horizontally from a permanently installed cooking *appliance*.   
  
2. Ionization smoke alarms with an alarm-silencing switch shall not be installed less than 10 feet (3048 mm) horizontally from a permanently installed cooking *appliance*.   
  
3. Photoelectric smoke alarms shall not be installed less than 6 feet (1828 mm) horizontally from a permanently installed cooking *appliance*.   
  
**R314.4 Interconnection.**   
Where more than one smoke alarm is required to be installed within an individual dwelling unit in accordance with Section R314.3, the alarm devices shall be interconnected in such a manner that the actuation of one alarm will activate all of the alarms in the individual *dwelling unit*. Physical interconnection of smoke alarms shall not be required where listed wireless alarms are installed and all alarms sound upon activation of one alarm.   
  
**Exception:** Interconnection of smoke alarms in existing areas shall not be required where *alterations* or repairs do not result in removal of interior wall or ceiling finishes exposing the structure, unless there is an *attic*, crawl space or *basement* available that could provide access for interconnection without the removal of interior finishes.   
  
**R314.5 Combination alarms.**   
Combination smoke and carbon monoxide alarms shall be permitted to be used in lieu of smoke alarms.   
  
**R314.6 Power source.**   
Smoke alarms shall receive their primary power from the building wiring where such wiring is served from a commercial source and, where primary power is interrupted, shall receive power from a battery. Wiring shall be permanent and without a disconnecting switch other than those required for overcurrent protection.   
  
**Exceptions:**   
  
1~~. Smoke alarms shall be permitted to be battery operated where installed in buildings without commercial power.   
  
2. Smoke alarms installed in accordance with Section R314.2.2 shall be permitted to be battery powered.~~

3. One-family and two-family dwellings and townhomes undergoing a repair, or a Level 1 alteration as defined in the *Florida Building Code,* may use smoke alarms powered by 10-year nonremovable, nonreplaceable batteries in lieu of retrofitting such dwelling with smoke alarms powered by the dwelling’s electrical system. A battery-powered smoke alarm that is newly installed or replaces an existing battery-powered smoke alarm as a result of a level 1alteration must be powered by a nonremovable, nonreplaceable battery that powers the alarm for at least 10 years. The battery requirements of this section do not apply to a fire alarm, smoke detector, smoke alarm, or ancillary component that is electronically connected as a part of a centrally monitored or supervised alarm system, that uses a low-power, radio frequency wireless communication signal; or that contains multiple sensors, such as a smoke alarm combined with a carbon monoxide alarm or other multi-sensor devices, and is approved and listed by a nationally recognized testing laboratory.

**R314.7 Fire alarm systems.**   
Fire alarm systems shall be permitted to be used in lieu of smoke alarms and shall comply with Sections R314.7.1 through R314.7.4.   
  
**R314.7.1 General.**   
Fire alarm systems shall comply with the provisions of this code and the household fire warning *equipment* provisions of NFPA 72. Smoke detectors shall be *listed* in accordance with UL 268.   
  
**R314.7.2 Location.**   
Smoke detectors shall be installed in the locations specified in Section R314.3.   
  
**R314.7.3 Permanent fixture.**   
Where a household fire alarm system is installed, it shall become a permanent fixture of the occupancy, owned by the homeowner.   
  
**R314.7.4 Combination detectors.**   
Combination smoke and carbon monoxide detectors shall be permitted to be installed in fire alarm systems in lieu of smoke detectors, provided that they are *listed* in accordance with UL 268 and UL 2075

**HB 535 - Section 24**

553.883 Smoke alarms in one-family and two-family dwellings and townhomes.—One-family and two-family dwellings and townhomes undergoing a repair, or a level 1 alteration as defined in the Florida Building Code, may use smoke alarms powered by 10-year nonremovable, nonreplaceable batteries in lieu of retrofitting such dwelling with smoke alarms powered by the dwelling's electrical system. ~~Effective January 1, 2015,~~ A battery-powered smoke alarm that is newly installed or replaces an existing battery-powered smoke alarm as a result of a level 1 alteration must be powered by a nonremovable, nonreplaceable battery that powers the alarm for at least 10 years. The battery requirements of this section do not apply to a fire alarm, smoke detector, smoke alarm, or ancillary component that is electronically connected as a part of a centrally monitored or supervised alarm system; that uses a low-power, radio frequency wireless communication signal; or that contains multiple sensors, such as a smoke alarm combined with a carbon monoxide alarm or other multi-sensor devices, and is approved and listed by a nationally recognized testing laboratory.

**TAC Recommendation:** Mr. Belcher entered a motion to approve the comment retaining exception 1 strike section 2 and re-number 3 to 2. Mr. Schiffer seconded the motion. The motion passed unanimously with a vote of 7 to 0.

**Commission Action:**