

December 30, 2019

Florida Building Commission
C/O Mr. Mo Madani, Florida Building Code, Technical Unit Manager
Department of Business and Professional Regulation (DBPR)
2601 Blair Stone Rd.
Tallahassee, FL 32399

Cc: Jeff Blair, Facilitator, FCRC Consensus Center at Florida State University
Thomas Campbell, Executive Director, DBPR
James R. Schock, P.E., C.B.O., Acting Chair of Florida Building Commission

Re: Comments Regarding the Draft 7th Edition (2020) of the Florida Building Code

Mr. Madani,

On behalf of the Floridians for Safe Communities Coalition, we have the following comments regarding the draft 7th edition of the Florida Building Code. The coalition focused its review on the Florida Building Code, Florida Residential Code and Florida Existing Building Code.

During our review, we found that 397 updates to the 2018 International Building Code (IBC) were excluded, 169 updates to the 2018 International Residential Code (IRC) were excluded and 153 updates to the International Existing Building Code (IEBC) were excluded.

Most of these International Code (I-Code) updates meet the criteria outlined in Florida §553.73 and Rule 61G20-2.002 for statewide amendments to the Florida Building Code and we urge the commission to reconsider these updates for inclusion into the 7th edition (2020) of the Florida Building Code.

The following is a detailed summary of each of the Florida supplemental codes:

FLORIDA BUILDING CODE

Chapter 1 – ADMINISTRATION (4)

The following I-Code Updates were not included:

ADM11-16	ADM71-16
ADM32-16	G223-15

Chapter 2 – DEFINITIONS (43)

The following new or revised definitions were not included:

ADDITION (ADM1-16 Part)
[F] AEROSOL PRODUCT (F363-16)

[F] AEROSOL CONTAINER (F363-16)
AMBULATORY CARE FACILITY (G124-15)
APPROVED AGENCY (ADM6-16)
ATTIC (G237-15)
BUILDING (ADM8-16 Part)
[F] CAPACITOR ENERGY STORAGE SYSTEM (New) (F112-16)
[F] CARBON MONOXIDE ALARM (New) (F3-16)
[F] CARBON MONOXIDE DETECTOR (New) (F3-16)
CONTINUOUS INSULATION (New) (FS162-15)
[F] EXPLOSIVE (F347-16)
[F] FIREWORKS (F347-16)
[F] FUEL CELL POWER SYSTEM STATIONARY (New) (F111-16)
GAMING (New) (E167-15)
GAMING AREA (New) (E167-15)
GAMING MACHING TYPE (New) (E167-15)
GAMING TABLE TYPE (New) (E167-15)
GREENHOUSE (New) (G13-15)
[F] HIGHER EDUCATION LABORATORY (New) (F340-16)
[A] HISTORIC BUILDINGS (ADM14-16 Part I)
[A] JURISDICTION (ADM15-16 Part I)
[F] LABORATORY SUITE (New) (F340-16)
OPENING PROTECTIVE (New) (G14-15)
PLASTIC GLAZING (G16-15)
[A] RELOCATABLE BUILDING (New) (G223-15)
[A]REPAIR (ADM26-16)
REPAIR GARAGE (G96-15)
[BS] ROOF ASSEMBLY (G14-16 Part I)
[BS] ROOF COATING (New) (S51-16)
ROOF REPAIR (ADM27-16 Part II)
BS] SKYLIGHTS AND SLOPED GLAZING (G10-16 Part I)
[F] SPRAY ROOM (New) (F283-15)
Deleted [BS] SUBSTANTIAL STRUCTURAL DAMAGE (G21-16)
[F] TENT (F298-16)
[BS] TSUNAMI DESIGN GEODATABASE (New) (S72-16)
[BS] TSUNAMI DESIGN ZONE (New) (S72-16)
[F] UMBRELLA STRUCTURE (New) (F298-16)
[BS] UNDERLAYMENT (G19-16 Part I)
VAPOR PERMEABLE MEMBRANE (G23-15)
VAPOR RETARDER CLASS (G21-15)
[BS] WIND-BORNE DEBRIS REGION (S56-16)
[BS] WIND SPEED, Vult (S56-16)
[BS] WIND SPEED, Vasd (S56-16)

Chapter 3 - USE AND OCCUPANCY CLASSIFICATION (15)

The following I-Code Updates were not included:

E5-15 Part II	F346-16	G36-15
G24-15	F347-16	G37-15
G27-15	F95-16	G40-15
G22-15*	F112-16	G44-15
F345-16	F340-16	G48-15

****G22-15 was a significant update as it reorganized chapters 3, 4, 5, 7, 9, 11, 12, 14, 15, 16, 17, 18, 21, 22, 23, 24, 25, 26 & 31 of the 2018 IBC which Florida did not adopt.***

CHAPTER 4 - SPECIAL DETAILED REQUIREMENTS (38)

The following I-Code Updates were not included:

G22-15*	G102-15	F356-16
FS46-15	G103-15	F352-16
FS74-15	G104-15	F293-16
G80-15	G105-15	F283-16
F14-16	G107-15	G120-15
G81-15	G109-15	G121-15**
G83-15	G111-15	G123-15**
G84-15	G112-15	F196-16
G94-15	G30-16	G124-15
G202-15	F340-16	EB68-15 Part II
E1-15	F354-16	G32-16
FS140-15	F356-16	G126-15
G97-15	F345-16	F258-16

****G22-15 was a significant update as it reorganized chapters 3, 4, 5, 7, 9, 11, 12, 14, 15, 16, 17, 18, 21, 22, 23, 24, 25, 26 & 31 of the 2018 IBC which Florida did not adopt.***

***** Significant change affecting multiple sections in Chapter 4.***

CHAPTER 5 - GENERAL BUILDING HEIGHTS AND AREAS (14)

The following I-Code Updates were not included:

G22-15*	G138-15	G149-15
G130-15	G139-15	G151-15
G24-15	G141-15	G160-15
G133-15	G146-15	G161-15
G137-15	G148-15	

****G22-15 was a significant update as it reorganized chapters 3, 4, 5, 7, 9, 11, 12, 14, 15, 16, 17, 18, 21, 22, 23, 24, 25, 26 & 31 of the 2018 IBC which Florida did not adopt.***

CHAPTER 6 - TYPES OF CONSTRUCTION (3)

The following I-Code Updates were not included:

G168-15	FS15-15	G185-15
---------	---------	---------

CHAPTER 7 - FIRE AND SMOKE PROTECTION FEATURES (45)

The following I-Code Updates were not included:

G22-15*	G202-15	FS91-15
FS7-15	G112-15	FS97-15
FS46-15	FS46-15	FS99-15
FS15-15	FS51-15	FS100-15
FS167-15	FS53-15	FS103-15
S294-16	FS70-15	FS104-15
G180-15	FS101-15**	FS107-15
FS17-15	FS90-15	FS108-15
FS21-15	FS78-15	FS117-15
G130-15	FS80-15	FS119-15
FS27-15	FS82-15	FS122-15
FS29-15	FS85-15	FS120-15
FS141-15	FS87-15	FS123-15
FS42-15**	FS88-15	

****G22-15 was a significant update as it reorganized chapters 3, 4, 5, 7, 9, 11, 12, 14, 15, 16, 17, 18, 21, 22, 23, 24, 25, 26 & 31 of the 2018 IBC which Florida did not adopt.***

*****Significant change affecting multiple sections in Chapter 7.***

CHAPTER 8 - INTERIOR FINISHES (8)

The following I-Code Updates were not included:

G22-15*	FS136-15	FS138-15
FS139-15	FS134-15	FS1-16
FS135-15	FS137-15	

****G22-15 was a significant update as it reorganized chapters 3, 4, 5, 7, 9, 11, 12, 14, 15, 16, 17, 18, 21, 22, 23, 24, 25, 26 & 31 of the 2018 IBC which Florida did not adopt.***

CHAPTER 9 - FIRE PROTECTION SYSTEMS (40)

The following I-Code Updates were not included:

F145-16	F176-16	F201-16
FS141-15	F174-16	F196-16**
F141-16	F175-16	F197-16**
G22-15*	F177-16	F363-16
F152-16	F179-16	F95-16
F153-16	F178-16	F203-16
F154-16	F176-16	F204-16
G124-15	F180-16	F14-16**
F157-16	F184-16	G202-15
F163-16	F185-16	F216-16
F12-16**	F187-16	F218-16
F340-16	F188-16	F221-16
F165-16	F183-16	F224-16
F170-16	F190-16	F228-16

****G22-15 was a significant update as it reorganized chapters 3, 4, 5, 7, 9, 11, 12, 14, 15, 16, 17, 18, 21, 22, 23, 24, 25, 26 & 31 of the 2018 IBC which Florida did not adopt.***

*****Significant change affecting multiple sections in Chapter 9.***

CHAPTER 10 - MEANS OF EGRESS (38)

The following I-Code Updates were not included:

G22-15*	E46-15	E106-15
E17-15	E61-15**	E113-15
G133-15	E64-15	E117-15
E22-15	E68-15	E118-15
E27-15	E69-15	E119-15
E28-15	E66-15	E123-15
E29-15	E70-15	E127-15
E32-15	E71-15	F153-16
E34-15 FL	E82-15	E137-15
E39-15 FL	E1-15	E141-15
E132-15 FL	E96-15	E145-15
E40-15	E23-15	E146-15
E41-15	G133-15	
E45-15	E23-15	

****G22-15 was a significant update as it reorganized chapters 3, 4, 5, 7, 9, 11, 12, 14, 15, 16, 17, 18, 21, 22, 23, 24, 25, 26 & 31 of the 2018 IBC which Florida did not adopt.***

****Significant change affecting multiple sections in Chapter 10.**

CHAPTER 11 - ACCESSIBILITY (11)

The following I-Code Updates were not included:

G22-15*	E159-15	E167-15
E150-15	E160-15	E168-15
E151-15	E163-15	E89-15
E154-15	E165-15	

***G22-15 was a significant update as it reorganized chapters 3, 4, 5, 7, 9, 11, 12, 14, 15, 16, 17, 18, 21, 22, 23, 24, 25, 26 & 31 of the 2018 IBC which Florida did not adopt.**

CHAPTER 12 - INTERIOR ENVIRONMENT (3)

The following I-Code Updates were not included:

G-22-15*	G186-15	G189-15
-----------------	---------	----------------

***G22-15 was a significant update as it reorganized chapters 3, 4, 5, 7, 9, 11, 12, 14, 15, 16, 17, 18, 21, 22, 23, 24, 25, 26 & 31 of the 2018 IBC which Florida did not adopt.**

CHAPTER 14 - EXTERIOR WALLS (16)

The following I-Code Updates were not included:

S1-16	FS162-15	FS15-15**
G22-15*	FS163-15	FS168-15
FS146-15	FS164-15	FS183-15
FS157-15	FS165-15	S294-16
FS158-15	FS166-15	
FS160-15	FS6-16	

***G22-15 was a significant update as it reorganized chapters 3, 4, 5, 7, 9, 11, 12, 14, 15, 16, 17, 18, 21, 22, 23, 24, 25, 26 & 31 of the 2018 IBC which Florida did not adopt.**

****Significant change affecting multiple sections in Chapter 14.**

CHAPTER 15 - ROOF ASSEMBLIES & ROOF STRUCTURES (30)

The following I-Code Updates were not included:

G22-15*	S4-15	S9-15
S1-15	S6-16	S11-16
S2-16	S7-15	S14-16
S3-15	S8-16 Part I	S18-16

S21-16	S30-16	S47-16
S27-16** (FL 7696	S31-16	S48-16
A1+A2+A3+Original +	S32-16	S49-16
Handout)/R7580/R8061	S39-16	S51-16 Part I
adopted instead)	S43-16 Part I	S56-16** (FL S7234
S28-16	S44-16	adopted instead)

***G22-15 was a significant update as it reorganized chapters 3, 4, 5, 7, 9, 11, 12, 14, 15, 16, 17, 18, 21, 22, 23, 24, 25, 26 & 31 of the 2018 IBC which Florida did not adopt.**

****Significant change affecting multiple sections in Chapter 15.**

CHAPTER 16 - STRUCTURAL DESIGN (19)

The following I-Code Updates were not included:

G22-15*	S66-16	S108-16 (FL #S7663
S56-18 (FL Amendment	S69-16	instead)
Instead)	S72-16	S114-16
S58-16	S75-16	S119-16
S63-16	S78-16	S124-16
S64-16	S89-16	S126-16
S65-16	S104-16	S242-16

***G22-15 was a significant update as it reorganized chapters 3, 4, 5, 7, 9, 11, 12, 14, 15, 16, 17, 18, 21, 22, 23, 24, 25, 26 & 31 of the 2018 IBC which Florida did not adopt.**

CHAPTER 17 - SPECIAL INSPECTIONS & TESTS (10)

The following I-Code Updates were not included:

G22-15*	S138-16	S149-16
S131-16	S145-16	S150-16
S133-16	S146-16	
S135-16	S147-16	

***G22-15 was a significant update as it reorganized chapters 3, 4, 5, 7, 9, 11, 12, 14, 15, 16, 17, 18, 21, 22, 23, 24, 25, 26 & 31 of the 2018 IBC which Florida did not adopt.**

CHAPTER 18 - SOILS & FOUNDATIONS (11)

The following I-Code Updates were not included:

G22-15*	S174-16	S205-16
S40-16	S185-16	S213-16
S166-16**	S186-16	S227-16

S233-16

S237-16

****G22-15 was a significant update as it reorganized chapters 3, 4, 5, 7, 9, 11, 12, 14, 15, 16, 17, 18, 21, 22, 23, 24, 25, 26 & 31 of the 2018 IBC which Florida did not adopt.***

*****Significant change affecting multiple sections in Chapter 18.***

CHAPTER 19 – CONCRETE (1)

The following I-Code Update was not included: S242-16

CHAPTER 21 – MASONRY (2)

The following I-Code Updates were not included:

G22-15* S246-16

****G22-15 was a significant update as it reorganized chapters 3, 4, 5, 7, 9, 11, 12, 14, 15, 16, 17, 18, 21, 22, 23, 24, 25, 26 & 31 of the 2018 IBC which Florida did not adopt.***

CHAPTER 22 – STEEL (1)

The following I-Code Update was not included: **G22-15***

****G22-15 was a significant update as it reorganized chapters 3, 4, 5, 7, 9, 11, 12, 14, 15, 16, 17, 18, 21, 22, 23, 24, 25, 26 & 31 of the 2018 IBC which Florida did not adopt.***

CHAPTER 23 – WOOD (12)

The following I-Code Updates were not included:

G22-15*	S270-16	S288-16
S56-16	S278-16	S289-16
S258-16	S285-16	S291-16
S266-16	S287-16	S292-16

****G22-15 was a significant update as it reorganized chapters 3, 4, 5, 7, 9, 11, 12, 14, 15, 16, 17, 18, 21, 22, 23, 24, 25, 26 & 31 of the 2018 IBC which Florida did not adopt.***

CHAPTER 24 - GLASS & GLAZING (3)

The following I-Code Updates were not included:

G22-16* S56-16 S96-16

****G22-15 was a significant update as it reorganized chapters 3, 4, 5, 7, 9, 11, 12, 14, 15, 16, 17, 18, 21, 22, 23, 24, 25, 26 & 31 of the 2018 IBC which Florida did not adopt.***

CHAPTER 25 - GYPSUM BOARD AND PLASTER (2)

The following I-Code Updates were not included:

G22-16* S299-16

**G22-15 was a significant update as it reorganized chapters 3, 4, 5, 7, 9, 11, 12, 14, 15, 16, 17, 18, 21, 22, 23, 24, 25, 26 & 31 of the 2018 IBC which Florida did not adopt.*

CHAPTER 26 – PLASTIC (8)

The following I-Code Updates were not included:

G22-16*	FS178-15	FS181-15
FS169-15	FS8-16	FS182-15**
FS175-15	FS180-15	

**G22-15 was a significant update as it reorganized chapters 3, 4, 5, 7, 9, 11, 12, 14, 15, 16, 17, 18, 21, 22, 23, 24, 25, 26 & 31 of the 2018 IBC which Florida did not adopt.*

***Significant change affecting multiple sections in Chapter 26.*

CHAPTER 27 – ELECTRICAL (3)

The following I-Code Updates were not included:

G125-15	F75-16	F340-16
---------	--------	---------

CHAPTER 28 - MECHANICAL SYSTEMS (1)

The following I-Code Update was not included: G192-15 Part II

CHAPTER 29 - PLUMBING SYSTEMS (8)

The following I-Code Updates were not included:

G192-15 Part II	P34-15	P44-15
P30-15	P36-15	P45-15
P33-15	P40-15	

CHAPTER 30 - ELEVATORS AND CONVEYING SYSTEMS (5)

The following I-Code Updates were not included:

G117-15	G195-15	G207-15
G194-15	G202-15	

CHAPTER 31 - SPECIAL CONSTRUCTION (7)

The following I-Code Updates were not included:

G22-16*	G212-15	G222-15
G211-15	G220-15	G223-15

F298-16

****G22-15 was a significant update as it reorganized chapters 3, 4, 5, 7, 9, 11, 12, 14, 15, 16, 17, 18, 21, 22, 23, 24, 25, 26 & 31 of the 2018 IBC which Florida did not adopt.***

CHAPTER 33 - SAFEGUARDS DURING CONSTRUCTION (4)

The following I-Code Updates were not included:

G40-16	F329-16
G229-15	F335-16

FLORIDA RESIDENTIAL CODE

Chapter 1 – SCOPE & ADMINISTRATION (4)

The following I-Code Updates were not included:

ADM36-16	ADM73-16
ADM72-16	ADM88-16, Part III

Chapter 2 – DEFINITIONS (25)

The following new or revised definitions were not included:

[RB] ADDITION (ADM1-16 Part IV)
[RB] APPROVED AGENCY (ADM6-16 Part IV)
APPROVED SOURCE (New) (ADM7-16 Part I)
[RB] ATTIC, HABITABLE (RB166-16)
[RB] BUILDING (ADM8-16 Part I)
[RB] BUILDING OFFICIAL (ADM 12-16 Part II)
CARBON MONOXIDE ALARM (New) (F3-16 Part II)
CARBON MONOXIDE DETECTORS (New) (F3-16 Part II)
COLLAPSIBLE SOILS (New) (RB172-16)
COMPRESSIBLE SOILS (New) (RB172-16)
CRAWL SPACE (New) (RB6-16)
EXPANSIVE SOILS (New) (RB172-16)
[RB] HISTORIC BUILDING (ADM14-16 Part II)
IMPACT PROTECTIVE SYSTEM (New) (RB259-16)
[RB] JURISDICTION (ADM15-16 Part I)
LOCKING-TYPE TAMPER-RESISTANCE CAP (New) (RB13-16)
MANUFACTURER’S APPROVED INSTALLATION INSTRUCTIONS (New) (S29-16)
[RB] PERMIT (ADM5-16 Part I)
[RB] REPAIR (ADM26-16 Part IV)
[RB] ROOF ASSEMBLY (G14-16 Part I)
ROOF COATING (New) (S51-16 Part I)

[RB] SKYLIGHT AND SLOPED GLAZING (G10-16 Part II)
 SOLAR ENERGY SYSTEM (New) (G17-16 Part II)
 SOLAR THERMAL COLLECTOR (New) (G17-16 Part II)
 SOLAR THERMAL SYSTEM (New) (G17-16 Part II)

CHAPTER 3 – PLANNING (24)

The following I-Code Updates were not included:

RB21-16	RB44-16	RB110-16
RB17-16	RB45-16	RB131-16
RB23-16	RB58-16	RB139-16
RB24-16	RB68-16	RB144-16
RB29-16	RB81-16	RB146-16
RB30-16	RB89-16	RB166-16
RB32-16	RB96-16	RB167-16
RB33-16	RB104-16	

CHAPTER 4 – FOUNDATIONS (5)

The following I-Code Updates were not included:

RB172-16	RB176-16	RB179-16
RB173-16	RB178-16	

CHAPTER 5 – FLOORS (14)

The following I-Code Updates were not included:

RB192-16	RB205-16	RB210-16
RB195-16*	RB206-16	RB212-16
RB200-16	RB207-16	RB213-16
RB202-16	RB208-16	RB214-16
RB203-16	RB209-16	

*The Florida Building Commission approved the deletion of Section R505 and now references AISI S230, Standard for Cold-Formed Steel Framing (see FL# S7856). ***All the prescriptive requirements for steel floor framing have now been deleted from the Florida Residential Code.***

CHAPTER 6 - WALL CONSTRUCTION (26)

The following I-Code Updates were not included:

RB218-16	RB226-16	RB230-16
RB219-16*	RB227-16	RB231-16
RB220-16	RB228-16	RB233-16
RB221-16	RB229-16	RB234-16

RB235-16	RB243-16	RB259-16
RB237-16	RB244-16	RB217-16
RB239-16	RB245-16	RB310-16
RB240-16	RB248-16**	
RB241-16	RB254-16	

*The Florida Building Commission elected to delete Sections R602.3.1 through R602.12.8 including all subsections, tables and figures. Now Section 602.3 states “Exterior walls of wood-frame construction shall be designed in accordance with Section R301.2.1.1 or ANSI AWC NDS.” ***All the prescriptive requirements for wood-framed walls have now been deleted from the Florida Residential Code.***

The Florida Building Commission elected to delete Section R603, Cold-Formed Steel Wall Framing in its entirety and now references AISI S230, Standard for Cold-Formed Steel Framing. *All the prescriptive requirements for steel-framed walls have now been deleted from the Florida Residential Code.***

CHAPTER 7 - WALL COVERING (12)

The following I-Code Updates were not included:

RB260-16	RB282-16	RB302-16
RB261-16	RB284-16	RB303-16
RB264-16	RB295-16	RB305-16
RB266-16	RB296-16	S300-16 Part II

CHAPTER 8 - ROOF-CEILING CONSTRUCTION (6)

The following I-Code Updates were not included:

RB172-16	RB310-16*	RB321-16
RB221-16	(see FL# S8150 w/A1,	RB324-16
RB314-16	S7972 & S7715)	

*The Florida Building Commission elected to delete Sections R802.3, R802.4, R802.5, R802.6, R802.8, R802.8.1, R802.9 AND R802.11 including all subsections, tables and figures. Now Section 802.3 states “Wood roof framing shall be in accordance with Section R301.2.1.1 or ANSI AWC NDS.”

All the prescriptive requirements for wood-framed roofs have now been deleted from the Florida Residential Code.

CHAPTER 9 - ROOF ASSEMBLIES (11)

The following I-Code Updates were not included:

S8-16 Part II	S28-16	S29-16 Part II
---------------	--------	----------------

S34-16 Part II	S43-16 Part II	<i>RB343-16 (See FL# R7694 w/A1/A2/handout/R7571 /R7665) RB351-16</i>
S41-16	S51-16 Part II	
S42-16 Part II	RB341-16	

CHAPTER 13 - GENERAL MECHANICAL SYSTEM REQUIREMENTS (2)

The following I-Code Updates were not included:

M15-15 Part II	RM1-15
----------------	--------

CHAPTER 14 - HEATING & COOLING EQUIPMENT & APPLICANCES (2)

The following I-Code Updates were not included:

RM3-15	RM5-15
--------	--------

CHAPTER 15 - EXHAUST SYSTEMS (9)

The following I-Code Updates were not included:

RM12-15	RM16-15	RM22-15
RM14-15	RM19-15	RM23-15
RM15-15	RM21-15	RM26-15

CHAPTER 16 - DUCT SYSTEMS (4)

The following I-Code Updates were not included:

RM31-15	RM36-15
RM34-15	RM37-15

CHAPTER 19 - SPECIAL APPLIANCES, EQUIPMENT & SYSTEMS (1)

The following I-Code Update was not included: RM19-15

CHAPTER 20 - BOILERS & WATER HEATERS (2)

The following I-Code Updates were not included:

RM52-15	M2006.3
---------	---------

CHAPTER 21 - HYDRONIC PIPING (9)

The following I-Code Updates were not included:

RM40-15	RM43-15	RM47-15
RM41-15	RM44-15	RM48-15
RM42-15	RM45-15	RM51-15

CHAPTER 23 - SOLAR THERMAL ENERGY SYSTEMS (1)

The following I-Code Update was not included: RM52-16

CHAPTER 24 - FUEL GAS (4)

The following I-Code Updates were not included:

FG2-15	FG20-15
FG17-15	FG34-15

CHAPTER 26 - GENERAL PLUMBING REQUIREMENTS (1)

The following I-Code Update was not included: P166-15 Part II

CHAPTER 29 - WATER SUPPLY & DISTRIBUTION (2)

The following I-Code Updates were not included:

RP8-15	RP15-15
--------	---------

CHAPTER 30 - SANITARY DRAINAGE (1)

The following I-Code Update was not included: P194-15 Part I

CHAPTER 31 – VENTS (1)

The following I-Code Update was not included: P226-15

APPENDIX S - STRAWBALE CONSTRUCTION (4)

The following I-Code Updates were not included:

RB366-16	RB368-16
RB367-16	RB369-16

APPENDIX U - SOLAR-READY PROVISIONS (2)

The following I-Code Updates were not included:

RE187-16	RB371-16
----------	----------

FLORIDA EXISTING BUILDING CODE

CHAPTER 1 – SCOPE & ADMINISTRATION (9)

The following I-Code Updates were not included:

EB3-16	ADM58-16	ADM77-16
ADM11-16 PART I	ADM70-16	ADM82-16
ADM31-16	ADM71-16	ADM87-16

CHAPTER 2 – DEFINITIONS (14)

The following I-Code Updates were not included:

[A] ALTERATION (ADM3-16)
[A] APPROVED (ADM4-16)
[A] BUILDING (New) (ADM8-16)
[BS] DISPROPORTIONATE EARTHQUAKE DAMAGE (New) (EB1-16)
[A] EXISTING STRUCTURE (New) (ADM13-16)
DELETED - LOAD-BEARING ELEMENT (ADM17-16 PART I)

[A] REGISTERED DESIGN PROFESSIONAL IN RESPONSIBLE CHARGE (ADM24-16)

DELETED - REHABILITATION, SEISMIC (EB3-16)

REPAIR (ADM26-16)

RISK CATEGORY (new) (EB50-16)

[BS] ROOF COATING (S51-16 PART I)

[BS] ROOF REPAIR (ADM27-16)

SEISMIC FORCES ... SEISMIC LOADING (EB4-16)

[BS] SUBSTANTIAL STRUCTURAL DAMAGE (G20-16, G21-16, G22-16)

CHAPTER 3 - PROVISIONS FOR ALL COMPLIANCE METHODS (27)

The following I-Code Updates were not included:

CCC1-15	EB11-15	EB33-16
EB1-16	EB11-16	EB39-15
EB2-16	EB12-16	EB40-15
EB4-16	EB13-15	EB41-15
EB8-15	EB13-16	EB42-16
EB8-16	EB14-15	EB45-15
EB9-16	EB14-16	EB47-15
EB10-15	EB16-15	EB48-15
EB10-16	EB30-15	EB49-15

CHAPTER 4 – REPAIRS (12)

The following I-Code Updates were not included:

EB1-16	EB12-16	EB33-16
EB2-16	EB14-15	EB42-16
EB3-16	EB15-15	EB43-16
EB4-16	EB19-15	EB52-15

CHAPTER 5 – PRESCRIPTIVE COMPLIANCE METHOD (28)

The following I-Code Updates were not included:

EB1-16	EB21-15	EB29-16
EB4-16	EB21-16	EB30-15
EB5-16	EB22-15	EB31-16
EB6-16	EB22-16	EB36-16
EB11-15	EB26-15	EB37-16
EB15-16	EB26-16	EB41-16
EB17-16	EB27-16	EB68-15 PART I
EB18-16	EB28-15	E147-15 PART II
EB19-15	EB28-16	
EB20-16	EB29-15	

CHAPTER 6 – CLASSIFICATION OF WORK (4)

The following I-Code Updates were not included:

EB14-15	EB26-15
EB15-15	EB33-16

CHAPTER 7 – ALTERATIONS – LEVEL 1 (8)

The following I-Code Updates were not included:

EB4-16	EB29-15	S51-16 PART I
EB18-16	EB33-15	E147-15 PART II
EB26-16	EB46-16	

CHAPTER 8 – ALTERATIONS – LEVEL 2 (12)

The following I-Code Updates were not included:

EB4-16	EB20-16	EB57-15
EB12-16	EB21-15	EB62-15
EB18-16	EB22-15	EB63-15
EB19-15	EB42-16	EB64-15

CHAPTER 9 – ALTERATIONS – LEVEL 3 (10)

The following I-Code Updates were not included:

EB4-16	EB26-16	EB48-16
EB7-16	EB27-16	EB49-16
EB8-16	EB29-16	
EB23-16	EB33-16	

CHAPTER 10 – CHANGE OF OCCUPANCY (6)

The following I-Code Updates were not included:

EB4-16	EB38-16	EB51-16
EB33-15	EB50-16	EB52-16

CHAPTER 11 – ADDITIONS (7)

The following I-Code Updates were not included:

EB4-16	EB21-15	EB68-15 PART 1
EB15-16	EB33-16	
EB17-16	EB53-16	

CHAPTER 12 – HISTORIC BUILDINGS (5)

The following I-Code Updates were not included:

EB33-16	EB54-16	EB70-15
EB41-16	EB69-15	

CHAPTER 13 – PERFORMANCE COMPLIANCE METHODS (7)

The following I-Code Updates were not included:

EB3-16	EB22-15	EB73-15
EB10-15	EB68-15 PART 1	
EB11-15	EB71-15	

CHAPTER 14 – RELOCATED OR MOVED BUIDINGS (2)

The following I-Code Updates were not included:

EB11-15	EB33-15
---------	---------

CHAPTER 15 – CONSTRUCTION SAFEGUARDS (2)

The following I-Code Updates were not included:

G229-15	F12-16
---------	--------

We feel by Including these International Code updates, Florida will maintain its eligibility for federal funding and discounts from the National Flood Insurance Program, the Federal Emergency Management Agency, and the United States Department of Housing and Urban Development.

The inclusion of these updates will reflect a Florida Building Code that is current, resilient and as stringent as the International Codes.

We respectfully request that these items be added to the agenda for the February 11th and April 7th, 2020 workshops so we can discuss any adjustments necessary to avoid any unintentional disconnects in the code, and to address the correlation with the I-Codes and within the proposed 2020 Florida code.

We also encourage that the affected Associations be allowed to pull any code modifications and address the Commission as to why the request is being made.

In addition to the two scheduled workshops planned for February and April 2020 it may be beneficial to schedule a separate workshop meeting to specifically review and make recommendations for the implementation of the subsequent code modification cycle (8th edition).

Thank you in advance for your consideration of our requests and we look forward to your response.

Respectfully submitted,



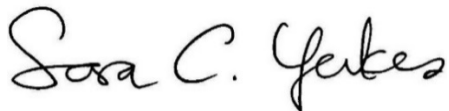
Clayton Parker
President
Building Officials Association of Florida



Natividad Soto, FAIA, LEED AP BD+C
President
American Institute of Architects Florida

Bryan P. Holland

Bryan P. Holland, MCP
Southern Region Field Representative
National Electrical Manufacturers Association



Sara C. Yerkes
Senior Vice President, Government Relations
International Code Council

J. Robby Dawson

James "Robby" Dawson, MBA, CFO
Southeast Regional Director
National Fire Protection Association



AIA
Florida

