### Tracking Chart – Special Occupancy TAC

<table>
<thead>
<tr>
<th>Model</th>
<th>Proposent</th>
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<tr>
<td>8038</td>
<td>Joseph Gamiy</td>
<td>4</td>
<td>455.27.3</td>
<td>New, innovative relocatables falling under Type V are not permitted via the pre-manufactured building program as SREF-compliant for classroom use. But incorporating fire sprinklers in a Type V relocatable provides greater life-safety than that of a non-sprinklered Type I, II, or IV relocatable.</td>
<td></td>
</tr>
</tbody>
</table>

#### Comment
- [ ] 1. Support comment. Comment sufficiently addresses the TAC’s concerns.
- [ ] 2. Do not support comment. Comment does not address the TAC’s concerns.
- [ ] 4. Straw Poll.

#### Commission Action
- [ ] 3/8 AM 1
- [ ] W NAS

- [ ] 0 Yes – 6 No
Now, innovative relocatable buildings falling under Type V are not permitted via the pre-manufactured building program as SREF-compliant for classroom use. But, incorporating fire sprinklers in a Type V relocatable provides greater life-safety than that of a non-sprinklered Type I, II or IV relocatable.

Rationale

Currently, combustible Type V construction is not allowed for relocatables for use in public educational facilities. However, there have been great advances in the design to Type V construction for relocatables including cost-effective, advanced designed Type V relocatables that are fully protected by a NFPA 13 Fire Sprinkler System.

These innovative relocatable buildings falling under Type V are not permitted via the pre-manufactured building program as SREF-compliant for classroom use. But, incorporating fire sprinklers in a Type V relocatable provides greater life-safety than that of a non-sprinklered Type I, II or IV relocatable. Automatic suppression systems limit fire impact in educational properties.

Fiscal Impact Statement

Impact to local entity relative to enforcement of code
None - Plan Review and Construction Inspections would be the responsibility of the manufacturer, as under the Florida modular building program. Local costs would be the same for inspection of installation and site plan review, as with currently allowed units under the current code language.

Impact to building and property owners relative to cost of compliance with code
Minimal - the costs for NFPA 25 required inspections per pre-manufactured unit could be as little as $300/year depending on the volume of units inspected at a time.

Impact to industry relative to the cost of compliance with code
None, in part due to the fact that the proposed change would not impact currently permitted relocatables. There will be no increased cost for Type I, II or IV relocatables, and the cost for Type V will be factored into the overall design and construction cost borne by the manufacturer.

Impact to small business relative to the cost of compliance with code
None, there is no change in the cost of compliance relative to the current code. Moreover, the change requested is specific to public educational facilities and not small businesses.

Requirements

Has a reasonable and substantial connection with the health, safety, and welfare of the general public
The purposed amendment allows Type V relocatables that are fully protected by a NFPA 13 Fire Sprinkler System provides equal, or greater, safety than what is currently required under the Florida Building Code, Section 453.27.3.

Strengthens or improves the code, and provides equivalent or better products, methods, or systems of construction
Having Type V relocatables that are fully protected by a NFPA 13 Fire Sprinkler System provides equal, or greater, safety than what is currently allowed under the Florida Building Code, Section 453.27.3. The amendment allows for better products, methods, and systems of construction.

Does not discriminate against materials, products, methods, or systems of construction of demonstrated capabilities
The proposed change expands the types of materials, products, methods, and systems of construction allowed under the Florida Building Code, Section 453.27.3 while ensuring safety by requiring Type V construction to be fully sprinklered when used as a relocatable in public educational facilities.

Does not degrade the effectiveness of the code
The current code allows structures that are not fully sprinklered. Having Type V relocatables that are fully protected by a NFPA 13 Fire Sprinkler System provides equal, or greater, safety than what is currently required under the Florida Building Code, Section 453.27.3.
Rationale
Currently, combustible Type V construction is not allowed for relocatables for use in public facilities. However, there have been
great advances in the designs of type V construction from relocatables including cost-effective, advanced designed Type V
relocatables that are fully protected by a NFPA 13 Fire Sprinklers System. These advances include structures with materials not
susceptible to decay or termite damage. These advances include having materials and construction methods in compliance with
all parts of the Florida Building Code regarding protection from decay and termites.

Fiscal Impact Statement
Impact to local entity relative to enforcement of code
None - Plan Review and Construction Inspections would be the responsibility of the manufacturer, as under the Florida
modular building program. Local costs would be the same for inspection of installation and site plan review, as with currently
allowed units under the current code language.

Impact to building and property owners relative to cost of compliance with code
Minimal - the costs for NFPA 25 required inspections per pre-manufactured unit could be as little as $300/year depending
on the volume of units inspected at a time.

Impact to industry relative to the cost of compliance with code
None, In part due to the fact that the proposed change would not Impact currently permitted relocatables. There will be no
increased cost for Type I, II or IV relocatables, and the cost for Type V will be factored into the overall design and
construction cost bore by the manufacturer.

Impact to Small Business relative to the cost of compliance with code
None, there is no change in the cost of compliance relative to the current code. Moreover, the change requested
is specific to public educational facilities and not small businesses.

Requirements
Has a reasonable and substantial connection with the health, safety, and welfare of the general public
The purposed amendment allows Type V relocatables that are fully protected by a NFPA 13 Fire Sprinkler System provides
equal, or greater; safety than what is currently required under the Florida Building Code, Section 453.27.3.

Strengthens or improves the code, and provides equivalent or better products, methods, or systems of construction
Having Type V relocatables that are fully protected by a NFPA 13 Fire Sprinkler System provides equal, or greater; safety
than what is currently allowed under the Florida Building Code, Section 453.27.3. The amendment allows for better
products, methods, and systems of construction.

Does not discriminate against materials, products, methods, or systems of construction of demonstrated capabilities
The proposed change expands the types of materials, products, methods, and systems of construction allow under the
Florida Building Code, Section 453.27.3 while ensuring safety by requiring Type V construction to be fully sprinklered when
used as a relocatable in public educational facilities.

Does not degrade the effectiveness of the code
The current code allows structures that are not fully sprinklered. Having Type V relocatables that are fully protected by a
NFPA 13 Fire Sprinkler System provides equal, or greater, safety than what is currently required under the Florida Building
Code, Section 453.27.3.

Is the proposed code modification part of a prior code version? No
453.27.3 Construction type. All new relocatables constructed, purchased or otherwise acquired by a board shall be noncombustible Type I, II, or IV construction, or Type V Construction if fully protected by a NFPA 13 Fire Sprinkler System and is (a) constructed of material not susceptible to decay and termite damage or (b) is fully compliant with all sections of Florida Building Code regarding protection against decay and termites related to material and construction methods used.
453.27.3 Construction type. All new relocatables constructed, purchased or otherwise acquired by a board shall be noncombustible Type I, II, or IV construction, or Type V Construction if fully protected by a NFPA 13 Fire Sprinkler System.
453.27.3 Construction type. All new relocatables constructed, purchased or otherwise acquired by a board shall be noncombustible Type I, II, or IV construction, or Type V Construction if fully protected by a NFPA 13 Fire Sprinkler System and is (a) constructed of material not susceptible to decay and termite damage or (b) is fully compliant with all sections of Florida Building Code regarding protection against decay and termites related to material and construction methods used.
As staff to the State Board of Education, I would not be able to recommend acceptance of Modification SP8038. This code modification seeks to allow Type V construction, which would allow lightweight wood construction in public educational facilities. Currently, the State Board of Education has not authorized lightweight wood construction. This change proposes to eliminate a Florida-specific requirement that was adopted to promote the public health and safety of the schools in Florida. The ICC model codes do not take into account the unique situations in Florida as shown by the following explanations:

Relocatables constructed in Florida are vulnerable to termite damage and other wood destroying organisms, such as powderpost beetles and carpenter bees. Because the destruction is hidden below the surface, pest control inspections can only minimize the danger, but not completely eliminate it. Because noncombustible construction is extremely durable, fire and termite resistant, and has a life expectancy of around 100 years, it is a popular building material in Florida. Because wood deteriorates more quickly with the high humidity in Florida, its life expectancy is about 25 years. Also, fire-retardant treated wood is expressly prohibited from being used in the construction of educational facilities by Rule 6A2.0010, of the Florida Administrative Code.

As an example of the potential hazard, allow me to share one school district's experience. Marion County School District was conducting an asbestos abatement of Anthony Elementary Cafetorium. During the asbestos abatement of the 9x9 floor tiles, one of the workers fell through the floor exposing the serious structural damage of the original wood floor framing system, which had been destroyed by powderpost beetles. Wood destroying organisms can cause structural failure without warning, and endanger the life safety of the occupants.

As staff to the State Board of Education, I urge the committee to not approve this code modification as submitted.